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November 21, 2001

BY HAND DELIVERY

Blanca Bayó
Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399

   Re: Docket No. 960786-B-TL

Dear Ms. Bayó:

   Enclosed for filing on behalf of WorldCom, Inc. and its operating subsidiaries are the original and 15 copies of the Affidavit of Sherry Lichtenberg (together with two exhibits) relating to BellSouth's OSS. As stated in the Affidavit, this filing omits Attachment 4 to Exhibit 1. Attachment 4 consists of KPMG Observations and Exceptions in the Florida Third Party Test and BellSouth's responses thereto. These materials are already on file with the Commission in this docket.

   By copy of this letter, this filing has been furnished to the parties on the attached service list. Due to their voluminous nature, Attachments 1 to 28 of Exhibit 1 are not being served on any of the parties except BellSouth. A copy of these attachments will be supplied to any other party on request.

   If you have any questions regarding this filing, please give me a call at 425-2313.

       Very truly yours,

       Richard D. Melson

RDM/mee
Enclosures

DOCUMENT NUMBER-DATE

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FPSC-COMMISSION CLERK

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was furnished by U.S. Mail, or hand delivery (*) to the following parties this 21st day of November, 2001.

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BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION

DOCKET NO. 960786B-TL

AFFIDAVIT OF
SHERRY LICHTENBERG

ON BEHALF OF WORLDCOM, INC.

November 20, 2001

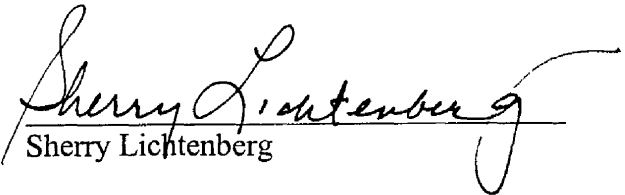The undersigned, first being duly sworn, states that:

1.   My name is Sherry Lichtenberg. My business address is 701 S. 12th St., Arlington, Virginia 22202. I am employed by WorldCom, Inc. in the Mass Markets local services team as a Senior Manager. I will refer to the division of the company that offers local residential service as "MCI." My duties include designing, managing, and implementing MCI's local telecommunications services to residential customers on a mass market basis nationwide, including Operations Support Systems ("OSS") testing. I have twenty years experience in the telecommunications market, five years with MCI and fifteen years with AT&T. Prior to joining MCI, I was Pricing and Proposals Director for AT&T Government Markets, Executive Assistant to the President, and Staff Director for AT&T Government Markets and had a number of positions in Product and Project Management.

2.   On October 22, 2001, Rene Desrosiers, Karen Kinard, Richard Cabe and I filed a Declaration with the FCC in *In re: Application by BellSouth Corporation, BellSouth Telecommunications, Inc., and BellSouth Long Distance, Inc. for Provision of In-Region, InterLATA Services in Georgia and Louisiana*, CC Docket No. 01-277 ("Georgia/Louisiana 271 Docket"). That Declaration outlines in detail problems MCI has experienced with BellSouth's OSS since we launched our residential service there on May 15, 2001. A copy of the Declaration (with Attachment 4 concerning Florida third party test observations and exceptions omitted due to its volume) is attached hereto as Exhibit 1.
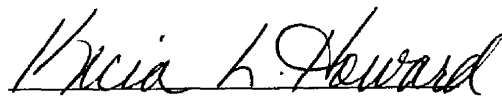
3.   On November 13, 2001, Rene Desrosiers, Karen Kinard, Richard Cabe and I filed a Reply Declaration with the FCC in the Georgia/Louisiana 271 Docket. That Reply Declaration updates the initial Declaration and describes changes in BellSouth's OSS during the previous

month. We noted that some of the problems we described in the initial Declaration had grown even worse during that time. A copy of the Reply Declaration is attached as Exhibit 2.

4.   On November 16, 2001, MCI began offering, on a limited basis, local residential service in Florida. Based on our Florida launch, I should be in a position in the near future to begin reporting MCI's experience in Florida and how that experience replicates, or differs from, our experience in Georgia. I will file additional information concerning our Florida experience when sufficient information becomes available.

Sherry Lichtenberg

Sworn to and subscribed before me
this _20th_ day of November, 2001.

Notary Public

My Commission expires: 8/31/03

3

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)	
)	
Application by BellSouth Corporation,)	
BellSouth Telecommunications, Inc., and)	
BellSouth Long Distance, Inc., for)	
Provision of In-Region, InterLATA)	CC Docket No. 01-277
Services in Georgia and Louisiana)	
———————————————————)	

DECLARATION OF SHERRY LICHTENBERG, RENE DESROSIERS, KAREN KINARD & RICHARD CABE

1.   My name is Sherry Lichtenberg. I have twenty years of experience in the telecommunications market. Prior to joining WorldCom, Inc., I was Pricing and Proposals Director for AT&T Government Markets, Executive Assistant to the President, and Staff Director for AT&T Government Markets. I also held a number of positions in Product and Project Management. I have been with WorldCom, Inc. for five years. I am currently employed by WorldCom, Inc. as a Senior Manager in the Mass Markets local services team. We will refer to the division of WorldCom, Inc. that offers local residential service as "MCI." My duties include designing, managing, and implementing MCI's local telecommunications services to residential customers on a mass market basis nationwide, including Operations Support Systems ("OSS") testing in BellSouth and elsewhere. I have been involved in OSS proceedings throughout the country including all of those in the BellSouth region.

2.   My name is Rene H. Desrosiers. I am an Information Technology Director in WorldCom's Network Planning & Engineering organization. I am responsible for

EXHIBIT 1

planning, developing, and supporting WorldCom's Trading Partner Provisioning Systems. These systems service both the facilities-based and network platform product suites and the specific applications include collocation data management, network interconnect planning, access-interconnect optimization, pre-order interface management, and external order interface management for Unbundled Network Element-Platform (UNE-P), Unbundled Loops (UBL), Access Services, Digital Subscriber Line (DSL), Local Number Portability (LNP), E911, Directory Services, and Operator Services. In particular, since 1998, I have managed the development of UNE-P pre-ordering and ordering interfaces that communicate with Verizon, SBC and Bell South. In addition to application development, I am also responsible for representing WorldCom at various industry forums and standards bodies. The primary forums are the Alliance for Telecommunications Industry Solutions (ATIS) and the Telecommunications Industry Forum (TCIF). My committee involvement includes the Ordering & Billing Forum (OBF), Industry Numbering Committee (INC), Carrier Liaison Committee (CLC), T1M1, Electronic Communications Implementation Committee (ECIC), and Electronic Data Interchange (EDI) Committee. Prior to becoming Information Technology Director, I had held various positions since joining WorldCom's (then MCI's) Information Technology organization in January 1988 including seven years in technical and management roles supporting WorldCom's access provisioning application.

3.   My name is Karen A. Kinard. I am a Senior Staff Member in WorldCom's National Carrier Management and Initiatives organization. I am responsible for performance measurement development for WorldCom, and I was a key developer of the Local Competition Users' Group's version 7 Service Quality Measurement document. I have also been WorldCom's lead representative in carrier-to-carrier performance measurement and remedy discussions and/or testified in Louisiana, North Carolina, Tennessee, South Carolina, Kentucky, Florida, as well as the Verizon states of New York, New Jersey, Pennsylvania and Virginia, and other states including Illinois, Michigan, Ohio, Indiana, and Arizona. I am currently participating in the Georgia six month review. I have held various positions since joining WorldCom's (then MCI's)

Local Initiatives group in June 1996, including leading a team that provided subject matter
expertise during the first round of interconnection agreement negotiations. Before joining
WorldCom, I was an Editor for 11 years at Telecommunications Reports ("TR"), and joined
Phillips Business International's Communications Today daily electronic newsletter in 1995 as
its chief FCC correspondent. I received my Masters of Science degree in Telecommunications
Policy and Management from George Washington University in 1984

    4.   My name is Richard Cabe. I am an economist in private practice, specializing in
economic analysis of regulatory matters in the telecommunications industry. I have presented
testimony in matters concerning competition in the telecommunications industry to the public
utility commissions of Alabama, Arizona, Colorado, Florida, Georgia, Iowa, Kentucky,
Louisiana, Mississippi, Nevada, New Mexico, North Carolina, Oregon, South Carolina,
Tennessee, Texas, Utah and Washington. I have also assisted in preparation of comments filed
before the FCC. Until May of 1999, I was employed as Associate Professor of Economics and
International Business at New Mexico State University. In that position, I taught graduate and
undergraduate economics courses and arranged the telecommunications curriculum for
conferences sponsored by the Center for Public Utilities. Over my last several years at the
university, I offered graduate courses in Industrial Organization, Microeconomic Theory,
Antitrust and Monopoly Power, Game Theory, Public Utilities Regulation, and Managerial
Economics for MBA students. My experience with telecommunications regulation began in
January of 1985 when I was employed by the Washington Utilities and Transportation
Commission. During my employment at the Washington Commission, I served as a staff
member to the Federal - State Joint Board in CC Docket No. 86-297. When I left the
Washington Commission staff to complete my doctoral degree, my title was
Telecommunications Regulatory Flexibility Manager. My consulting clients since I left the
Washington Commission have included aspiring new entrants into the local telecommunications
market, state commissions, and consumer advocates.

    5.   The purpose of our declaration is to describe the deficiencies we have found in

BellSouth's OSS since MCI launched local telephone service to residential customers in Georgia in May, 2001 using combinations of unbundled elements (UNE-P), and to discuss relevant evidence arising from BellSouth's performance measurement and incentive plans. MCI began service in Georgia based on plans that had been in place for more than six months. Through the end of September 2001, MCI has turned up more than 60,000 local residential lines in Georgia. MCI hopes to continue to expand service in Georgia and to serve other states in the BellSouth region. MCI is concerned, however, that the OSS problems MCI is already experiencing will expand dramatically if it significantly increases the volume of orders it is transmitting in the BellSouth region. While MCI is committed to the Georgia market, the scope and viability of our entry in the long term in Georgia and other BellSouth states remains very much in question if current levels of OSS problems continue, let alone if they grow with increased volumes of orders.

6.   This Commission has three times rejected BellSouth's section 271 applications based largely on its failure to offer acceptable OSS. Although BellSouth has made some progress, many of the problems identified in those prior orders remain today and additional ones have arisen. BellSouth does not offer truly integratable pre-ordering and ordering interfaces, its reject rate remains far too high, it manually processes too many orders leading, in conjunction with other issues, to erroneous rejects, loss of dial tone for customers, and failure to return FOCs, rejects and completion notices on many orders, and it transmits inaccurate or incomplete line loss reports, wholesale bills and daily usage feeds. Underlying all of these problems is the fundamental difficulty of obtaining help from BellSouth. BellSouth has contracted out much of its OSS to third party vendors which makes it far more difficult to obtain help in resolving problems with the OSS. Moreover, BellSouth's flawed change management process precludes CLECs from obtaining needed changes with the OSS and allows BellSouth to make changes to its OSS systems (including billing systems) without notifying CLECs.

7.   Both the Louisiana Commission and the Georgia Commission have recognized a number of important flaws with BellSouth's OSS and have ordered BellSouth to implement

systems changes to resolve these problems. Hopefully, BellSouth will do so. But BellSouth should have made these changes before, not after, applying for section 271 authorization. Moreover, BellSouth should have fixed other significant flaws in its OSS, and BellSouth should have made it far easier for CLECs to resolve problems and obtain needed changes in BellSouth's OSS. Fixing individual issues based on commission orders does nothing to ensure that CLECs will be able to resolve additional problems as they arise. Indeed, it sets the stage for ongoing litigation as CLECs find that the only way that they can get BellSouth to make needed changes or correct deficiencies is via commission order.

8.   The KPMG test in Georgia does not show that BellSouth's OSS is acceptable. That test in fact revealed important defects in BellSouth's OSS that mirror the defects that WorldCom has found in production. The Florida test, which is more thorough and more recent than the Georgia test, has revealed even more problems. Indeed, almost all of the problems that WorldCom has experienced in production are also apparent in the Florida test.

9.   BellSouth's performance, as measured by currently reported metrics, also does not support the claim that BellSouth provides nondiscriminatory access to OSS, nor do existing enforcement mechanisms, which rely on BellSouth's calculations of metrics, provide adequate incentives to ensure improvements in BellSouth's present inadequate service, or to ensure that any improvements would be maintained if this Commission were to grant the section 271 authorization sought through this application.

10.   Finally, it is important to note that even if BellSouth's OSS were ready in Georgia, there is little reason to believe it is ready in Louisiana. BellSouth has little commercial experience in Louisiana; there has been no third party test in Louisiana, and there are enough differences between BellSouth's OSS in Georgia and Louisiana, that BellSouth cannot rely solely on its Georgia experience to show Louisiana OSS is ready.

BellSouth Does Not Provide Fully Integratable Pre-ordering and Ordering Interfaces

11.   One of the primary reasons that this Commission rejected BellSouth's prior section

271 applications was that BellSouth failed to provide integratable pre-ordering/ordering interfaces. (South Carolina Order ¶ 155-66; Louisiana I Order ¶¶ 49-55; Louisiana II Order ¶¶ 96-103.) In response to each of those applications, MCI explained the importance of parsed Customer Service Records ("CSRs") in achieving integration and also enabling CLECs to import important information into their own systems. Each time BellSouth responded that it provided alternative means for CLECs to integrate pre-ordering and ordering interfaces. But the Commission properly found these means to be wanting.

12. BellSouth now again applies for section 271 approval. It still does not offer parsed CSRs, however. It again claims that CLECs are now able to integrate pre-order and order interfaces without parsed CSRs. But parsed CSRs are by far the most effective means of achieving pre-order/order integration. If the information on a CSR is fully parsed, CLECs can take that information and import it directly into their own back-end systems and also place the information directly into the requisite fields on an order.

13. Thus, for example, in the Verizon region, where MCI has access to parsed CSRs, MCI creates records for its own systems that include the customer's service address, billing address, directory listing address, the customer's name, existing features, and whether the customer is a residential or business customer without the need for any re-typing. In contrast, in Georgia, MCI types all of this information into its own systems (with the exception of the service address that we will discuss further below). Typing the information takes significant time and leads to typing errors.

14. Although CLECs have emphasized the need for parsed CSRs from at least 1997 onward, BellSouth has continually delayed implementation of parsed CSRs. The Georgia Commission has now ordered BellSouth to provide parsed CSRs in January 2002. There is no way to know whether BellSouth will meet that date without waiting to see. Even more important, it appears unlikely that BellSouth will provide parsed CSRs that meet the needs of CLECs. One of the excuses that BellSouth long provided for its failure to provide parsed CSRs quickly was the need to develop requirements in conjunction with CLECs. And BellSouth

eventually worked with CLECs to do so. But when BellSouth finally released draft user requirements on September 7, 2001, they were far different than those agreed upon in November 2000. BellSouth does not plan to provide Type of Service information on the parsed CSR, for example, information that indicates whether a line is a business, residential or coin line. This information is required on every order. Prior to September 2000, BellSouth never indicated to CLECs its intention to deviate from the November 2000 requirements. We have provided an MCI description of what is missing from the September 7, 2001 requirements as Attachment 1.

15. In the absence of parsed CSRs, CLECs cannot take the information on the CSR and use it directly to prepopulate an order. One alternative they have is to attempt to parse the information on the CSR themselves. This is quite difficult in general and is particularly difficult with respect to a customer's address, which contains many components that are not easily distinguished from each other.

16. Verizon early on recognized this difficulty and, in addition to offering parsed CSRs to CLECs, also enabled CLECs to place migration orders without submitting a service address. CLECs could place the order based on the customer's telephone number. Similarly, when CLECs suggested during the Texas section 271 process that migration by telephone number would be of significant assistance, SBC implemented this change relatively quickly. MCI has found this enhancement to be helpful in reducing its reject rate.

17. Years after Verizon and SWBT implemented ordering by telephone number, BellSouth continued to refuse to do so. The Georgia Commission has now ordered BellSouth to implement migration by telephone number, and BellSouth has now announced that it will do so, as ordered, on November 3, 2001.[1] But BellSouth released documentation for this change only on Friday, October 19, 2001, making it difficult for CLECs to do the proper coding of their

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[1] BellSouth asserts that migration by telephone number is a misnomer because CLECs must still submit the address but the BOC will then ignore the address. Stacy Aff. ¶ 264. (When we refer to the Stacy Aff., we are referring to the affidavit of William Stacy for Georgia.) In fact, migration by telephone number can be implemented without the need for CLECs to send an address.

interface to take advantage of this important change. Indeed, WorldCom's initial review of this documentation finds it to be unclear whether BellSouth will simply ignore the address that CLECs send (as does SWBT) or whether CLECs will be required to rewrite their interface to stop sending this data. In any case, it is unknown whether BellSouth will meet this date, whether BellSouth's enhancement will work properly as released, or whether this change will actually add to the manual handling of orders, given the unclear documentation.

18. If MCI has to remove the address from its LSRs, it will need documented business rules to prepare that coding and to determine if the address field should be blank or contain default characters, etc. Moreover, MCI will need to test its own implementation of these changes in the BellSouth CAVE environment to ensure that this change does not create new problems with the BellSouth OSS. Even with the documentation on October 19, BellSouth has not provided CLECs with adequate specificity. And BellSouth's CAVE environment is scheduled to be down until December.

19. In any event, even after BellSouth implements migration by telephone number, CLECs will need to be able to obtain parsed information from the CSR. BellSouth contends that it "provides CLECs with all the specifications necessary for integrating BellSouth's interfaces" and that CLECs therefore do not need parsed CSRs. Stacy Aff. ¶ 36; see also id. ¶ 220. BellSouth suggests that although it is unable to know for certain, it believes a number of CLECs including MCI have successfully integrated pre-ordering and ordering interfaces. Stacy Aff. ¶ 37. But BellSouth does not show that any CLECs have been able to integrate pre-ordering and ordering interfaces and achieve a reasonable reject percentage.

20. As for MCI's ostensible ability to integrate pre-ordering and ordering, to date MCI is submitting a very high proportion of UNE-P migration orders, not new installations. On these orders, MCI is able to obtain the service address through BellSouth's address validation function that dips into the Regional Street Address Guide ("RSAG") database. This address is provided in parsed format. The customer's name, however, is not provided in parsed format. MCI representatives therefore look at the customer's name on the CSR and, because it is not parsed,

type the name onto the orders. This forces MCI representatives to use two pre-order functions – address validation and CSR – when they should only have to use one. And if they make any errors in typing the name, the orders will be rejected. Of the 1,316 manually processed rejects that MCI received in September, 119 were for incorrect name and another 357 may have been for incorrect name. (The information on these rejects either did not distinguish between incorrect name and address or indicated that both were incorrect.)

21.   Moreover, as noted above, MCI must type substantial additional information into its own systems such as the customer's directory listing and billing address because it does not have a parsed CSR. Much of this information is used on orders even if it is not always needed on initial UNE-P migration orders. The directory listing address, for example, is used on directory listing orders. It would be far easier for MCI to import this information into its systems and then make the changes the customer wants rather than starting fresh and risking typing errors. Other information, such as whether the customer is a residential or business customer, is required even on initial orders.

22.   Finally, although BellSouth ostensibly provides a parsed service address with use of the address validation process, MCI continues to receive far too many address rejects as we discuss further below. Indeed, in Georgia, 21% of the rejects MCI has received on migration orders have been for incorrect name or address. (In September, for all order types MCI submitted, 16% of the automated rejects and 51% of the manually processed rejects MCI received were for invalid name or address (of which, 840 were for invalid address, 357 were for invalid address and/or name, and 119 were for invalid name). (Att. 2 (breakdown of September automated and manually processed rejects).) MCI should not be receiving address rejects if BellSouth is properly parsing the information in RSAG and then editing the orders MCI transmits against RSAG.[2] But BellSouth may not always be editing orders exclusively against

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[2]   MCI does make one change for some addresses when it takes the addresses from RSAG and populates an order. If an address includes an asterisk in the middle of the address, MCI's systems reject the order internally and MCI then manually removes the asterisk and submits the order. This is because MCI uses an asterisk as a delimiter in EDI and it would cause many systems problems to include it in the middle of an address. Moreover, MCI coded to

RSAG, however. One hundred of the 421 manual address rejects MCI received the week ending

September 21 stated that the "LSR address does not match the CSR address." (emphasis added).

(Att. 3 (example of such a reject)). Similarly, MCI looked at the August rejects in PMAP and

found that 140 of these rejects involved a mismatch between the address and the CSR. This

suggests that to avoid rejects MCI should be pulling the address from the CSR, not from RSAG,

even though BellSouth had repeatedly told MCI that all address edits are made against RSAG,

not the CSR. It also makes it difficult for MCI representatives correcting the reject to know

whether to check the CSR or RSAG address. In any event, MCI would not have received any of

these address rejects if BellSouth did not require addresses to be placed on migration orders.

23.   There is no excuse for BellSouth's failure to offer parsed CSRs and migration by

telephone number years after other BOCs have done so -- and three years after this Commission

emphasized to BellSouth the importance of integratable interfaces.

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examples in BellSouth's EDI documentation which show that the asterisk is supposed to be used as a delimiter. Nonetheless, BellSouth has suggested that some of MCI's address rejects result from its removal of the asterisk. It has said that the asterisk is necessary to separate small and capital letters in a name such as Mc*Donalds. However, all of the rejects that MCI has received based on the asterisk issue have been manually processed. BellSouth's systems do not appear to require the asterisk. In fact, when MCI re-submitted several orders to evaluate the issue but did not add the asterisk, the orders were accepted by BellSouth's systems. MCI provided these examples to BellSouth which has not yet explained why this is so. Thus, BellSouth appears to be blaming rejects on MCI when the real issue is its own EDI documentation coupled with mistakes made by its representatives in processing the orders.

With some other address rejects, the cause of the rejects may be that MCI is typing in the address rather than pulling it from RSAG. When MCI service representatives are unable to access BellSouth's pre-order systems because either the front-end interface or the back-end systems are down, they sometimes type in the address with the risk that typing errors will lead to rejects. The problem here is that BellSouth's systems are unavailable too much of the time. In Florida, KPMG found that between March 13 and August 21, 2001, 9% of the pre-order queries it submitted into the same systems used in Georgia received the response that BellSouth was unable to process the transaction as a result of resource limitations. (Att. 4, Florida Exception 87). KPMG explained that, "KPMG Consulting's professional opinion is that the percentage of back-end resource limitation errors experienced during the time frame reference above is unacceptably high and could cause significant delays in processing of orders." Id. Although BellSouth may claim its performance metrics show adequate availability and response times, KPMG nonetheless found defective performance -- and MCI has similarly found it is often unable to access the address information it needs. Moreover, BellSouth acknowledges a flaw in its measure of pre-order response times (Stacy Aff. ¶¶ 552-53), and BellSouth's measure of interface availability (OSS-2) excludes degraded service, defined as "slow response time, loss of non-critical functionality, etc."

BellSouth Rejects Too Many Orders [3]

24.   BellSouth rejects far too many MCI orders, far more than are rejected by other

BOCs. MCI's data show that BellSouth rejected 24.0% of MCI's transactions for simple UNE-P

migrations in May, 24.9% in June, 28.3% in July and 26.2% in August.[4] In contrast, the reject

rate on migration orders in the other states MCI has entered is far lower. The reject rate on

MCI's UNE-P migration orders in Michigan from January through August 2001 was 10.6%,

11.6% in Illinois, 11.9% in Pennsylvania, 14.6% in Texas, and 17.9% in New York (where a

systems problem temporarily increased the reject rate for three months significantly above

normal levels).[5]

25.   The rejection of orders significantly delays completion of these orders. It also

causes CLECs to expend significant effort working to correct and re-transmit rejected orders. Of

course, if the order is rejected a second time, completion of the order is delayed even further.

26.   BellSouth contends that its reject rate is acceptable. It suggests that the rate is lower

than MCI indicates and that the high reject rate is the fault of CLECs. But whatever explains the

discrepancy between BellSouth's data and MCI's data,[6] MCI's data comparing its reject rate in

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[3]   MCI uses the term reject to encompass all orders returned to CLECs – whether so-called fatal rejects that cannot be corrected or so-called "clarifications" that can be corrected and re-submitted to BellSouth.

[4]   Because almost all of the orders MCI has submitted to date in Georgia have been migration orders, the overall reject rate MCI has experienced in Georgia is almost identical to that for migration orders: 24.0% in May, 24.9% in June, 27.2% in July, and 26.0% in August.

[5]   BellSouth also returns rejects belatedly on UNE-P orders. BellSouth acknowledged that in Georgia in July it returned only 74% of rejects for UNE-P orders within one hour. Stacy Aff. ¶ 475. In contrast, in Louisiana, where BellSouth processes far fewer UNE-P orders, BellSouth's returned 96% of UNE-P rejects within one hour. Moreover, in Florida, KPMG found that BellSouth does not properly construct the data used to measure FOC and reject timeliness. (Att. 4, Florida Exception 36.) KPMG found similar problems in Georgia. (MTP O&P 7-1-3, 7-2-3, 7-3-3).

[6]   BellSouth claims that its overall reject rate on UNE-P orders for CLECs was 13.3% in July. (PM Ex. 4 (0-7)). It states that the overall reject rate for CLECs submitting the largest volume of orders between May and July had reject rates ranging from 3% to 17%. Stacy Aff. ¶ 110. BellSouth's PMAP data for MCI specifically also appear to shows reject levels significantly below MCI's own data. BellSouth's August data, for example, show MCI's reject rate on UNE-P orders as 19.29%, with 7,650 out of 39,652 transactions rejected. This is both a significantly smaller number of rejects than WorldCom's data show and a somewhat higher number of transactions. It may be that part of the reason for the discrepancy is that BellSouth excludes fatal rejects from its count of rejects (and from its count of LSRs submitted). BellSouth's PMAP data show that MCI had 6,709 fatal rejects in August. If these are added

different states is based on a consistent methodology in those different states.[7] Thus, there is no

doubt that MCI's reject rate on UNE-P migration orders in Georgia is almost twice that in the

other states it has entered even though MCI is using the same processes to transmit orders in each

of these states. Thus, BellSouth is the cause of the high reject rate by its systems and

representatives.[8]

27.   Several aspects of BellSouth's OSS contribute to the high reject rate. As explained

above, other BOCs do not require addresses to be submitted on UNE-P migration orders and may

also provide parsed CSRs. BellSouth does neither. As a result, MCI receives a high number of

rejects for incorrect addresses on migration orders in Georgia but not in other states. Indeed, as

explained above, 21% of the total rejects on migration orders have been for incorrect name or

address and the rejection rate for addresses is even higher on new installations. (Att. 5 (reject

breakdown for migrations and all orders for June, July, August and September).)

28.   In addition to rejects caused by BellSouth systems requirements with respect to

addresses, BellSouth rejected many orders as a result of a particular policy it has had with respect

to rejected orders. Until October 6, BellSouth cancelled rejected orders in ten days if they were

not corrected and re-transmitted in that time. We will discuss that policy further below. But the

reason this policy caused rejects is that CLECs that attempted to correct and re-transmit a

rejected order were often unaware exactly when the ten day clock would run out -- or the re-

transmitted order would take some period of time to reach BellSouth (as a result of BellSouth's

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into BellSouth's count of LSRs and of rejects, this would increase the reject rate up to 30.97% – close to, but
somewhat higher than the rate shown by MCI's own data. However, we doubt that fatal rejects are the real
explanation for the data discrepancy because the rejects MCI is receiving do not appear to be fatal rejects. Of
course, this leaves open the question of why PMAP shows 6,709 fatal rejects.

[7]   KPMG's evaluation of BellSouth's data on percent rejects was incomplete as a result of discrepancies KPMG
found in time stamps that it evaluated. Georgia MTP O&P 7-1-3.

[8]   BellSouth contends it will offer CLECs an action plan to reduce their rejects. Stacy Aff. ¶ 111. But MCI has
been asking since it first launched for BellSouth to provide an explanation of the reasons its orders were being
manually processed and/or rejected. It was only in September that BellSouth provided explanations based on a
sample of 89 orders. As we discuss below, the explanation generally was BellSouth errors or system design.

use of a Value Added Network ("VAN") that we will also discuss further below). About 7% of

MCI's rejects in September (8% of the rejects on migration orders) were because the order had

"aged off" in BellSouth's systems. (The figure was 8% in June, 18% in July and 5% in August.

(Att 5.)) Thus, BellSouth's policy of canceling rejected orders in ten days itself caused a

significant number of rejects. Hopefully, BellSouth's new policy – which was ordered by the

Georgia Commission – will reduce MCI's reject rate. But BellSouth should have implemented

this change before applying for section 271 authorization and waited to see the effects of the

change.

29.   BellSouth also continues to reject some orders for reasons that are simply

erroneous. For example, BellSouth continues to reject a number of orders because the end user

name on the order does not match the directory listing name in BellSouth's database even though

it is acceptable for the listed name to be different from the service name and MCI has specified

that the directory listing should remain "as is." Instead, BellSouth representatives manually

reject the order, because apparently they have decided that MCI made an error on the LSR. In

MCI's analysis of 771 manually processed rejects it received in the week of September 21, 11

orders were rejected with the statement "ERL is invalid," which indicates the listed name does

not match the service name on the LSR. Six additional orders were rejected because the orders

had already been completed despite BellSouth's earlier transmission of rejects to MCI. In

September as a whole, 1.9% of the rejects MCI received (5% of the manually processed rejects)

were invalid rejects for reasons such as these. (Atts. 3, 5.) Another 11% of the manually

processed rejects needed further research because WorldCom could not determine the cause of

the reject.

30.   Like MCI, KPMG experienced problems with erroneous rejects during its Georgia

test. Georgia MTP O&P 1-4-2, 2-4-2, Georgia STP PO&P 11-4-4, Stacy Aff. ¶¶ 497-505.

Eighteen percent of the manually processed rejects it received during re-test activities were

erroneous and others did not contain clear error descriptions. Georgia MTP O&P 1-4-2. KPMG

did not perform an additional re-test to determine whether this problem had been fixed.

31. Finally, BellSouth rejects some orders with the designation "assignable order." In September, 1% of the rejects MCI received on migration orders (and 15% of the rejects on the relatively few new installation orders MCI submitted) were for "assignable order." When MCI asked BellSouth what "assignable order" meant, BellSouth responded that this is a "message sent by BellSouth's electronic system acknowledging that a service order has been issued and is in a hold status for manual review." (Att. 6, Letter from Pamela Reynolds to Amanda Hill, October 1, 2001.) If this is the case, BellSouth should not then send a reject message to the CLEC in which the CLEC is expected to clarify its order and re-transmit it.

32. As was true for CLECs in 1997 and 1998, BellSouth's high reject level causes significant problems for MCI and its customers and substantially increases our costs. BellSouth must adopt the systems fixes that will enable it to reduce this rate substantially.

BellSouth Should Use Interactive Agent

33. BellSouth is the only BOC that processes MCI's platform EDI orders through a VAN. A VAN essentially creates a stopping point between the CLECs and BellSouth. Because BellSouth uses a VAN, MCI must use its own third-party VAN provider to link to BellSouth's VAN provider, a company called Peregrine. Thus, orders transmitted from the CLECs to BellSouth and acknowledgments, firm order confirmations and other notifiers from BellSouth to the CLECs must pass through the VAN. Orders and notifiers are often delayed significantly in the VAN and may even be lost altogether. In fact, one cause of the missing notifier problem that we discuss below is that notifiers are being lost in the VAN; BellSouth believes it has transmitted the notifiers but they never reach MCI.

34. Delays caused by BellSouth's use of a VAN are not captured by BellSouth's performance measures. BellSouth measures the timeliness of its notifiers based on when they leave "EDI Central," before they reach the VAN. (Att. 7, Deposition of William Stacy, September 28, 2001 ("Stacy Dep.") at 227-28.)[9] If the notifier leaves BellSouth on time, it

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[9] Indeed, BellSouth is currently time stamping some notifiers in its LEO system, before they even reach EDI Central.

counts as on time in BellSouth's performance measures even if it sits in the VAN for days before reaching the CLEC. BellSouth's measures based on completeness of notifications provided to CLECs also will be satisfied even if notifiers remain "stuck" in the VAN.

35. Moreover, the very possibility that orders or notifiers can become lost in the VAN creates difficulties for CLECs. If MCI is missing a notifier and asks BellSouth to trace the notifier, BellSouth must look not only in its own systems but must also determine whether the notifier is stuck in the VAN. Because transactions are sent through the VAN in batches, entire batches must be searched rather than simply looking for individual notifiers. And the VAN does not have a log file; after seven days the record of transactions in the VAN disappears.

36. BellSouth's OSS witness Mr. Stacy has acknowledged that "a VAN was set up primarily for occasional or intermittent or low-volume connection requirements." (Stacy Dep. at 163-64.) Because of the inherent difficulties with use of a VAN, it is not a desirable means of connection for CLECs such as MCI that are transmitting thousands of orders per week.

37. In his September 28 deposition, Mr. Stacy has suggested that instead of using a VAN, larger CLECs should use BellSouth's "Connect Direct." (Stacy Dep. at 163-64). But BellSouth has never before suggested this to MCI and none of its documentation indicates that high volume CLECs should use Connect Direct. Moreover, Connect Direct is a proprietary interface, created by a third-party vendor, that is not the method chosen by the industry for transmission of high volumes of EDI transactions. Like transmission through a VAN, Connect Direct is a batch process, and there is no reason to believe it would work any better than the VAN.

38. The industry has chosen EDI TCP/IP/SSL3 – Interactive Agent as the method for submitting high volumes of orders in a competitive production environment. With other BOCs, MCI submits its orders using Interactive Agent directly to the BOC and receives acknowledgments, firm order confirmations and other notices directly back from the BOC. Interactive Agent allows CLEC to send orders individually, rather than in batches, and has a log

file that allows parties rapidly to search for missing orders or notifiers. Indeed, because of the advantages of Interactive Agent, Verizon sponsored seminars introducing it to CLECs and encouraging them to move to this ordering method.

39.   BellSouth acknowledges that MCI submitted change request CR0186 to the change control process ("CCP") on September 26, 2000 requesting Interactive Agent but states that development is currently on hold because CLECs prioritized that request 21st out of 36 change requests at the April 25, 2001 meeting. However, BellSouth neglects to state that between September 2000 and April 2001 it failed even to put the change request before CLECs to prioritize at all. This is evidence of a flaw in the change management process that will be discussed further below. Moreover, the fact that CLECs ranked CR0186 21st on the priority list in April 2001 does not indicate that it is not important, only that those CLECs that do not use EDI for ordering – or place small volumes of orders – do not need Interactive Agent. For high volume CLECs such as MCI, Interactive Agent is extremely important. And if BellSouth implemented even six CLEC requests per quarter, a change request ranked 21st would be implemented.

40.   In any event, BellSouth should not be able to avoid responsibility for implementing Interactive Agent simply by pointing to change management – especially since BellSouth makes few changes and even delays implementation of change requests CLECs have ranked at the top of the priority lists.

Loss of Dial Tone

41.   Through September 23, 2001, 1,988 MCI customers in Georgia reported a loss of dial tone (or in some cases the inability to receive calls) on their lines – 3% of MCI's customers. Five hundred thirty six of these customers lost dial tone within 10 days of migration, and 1,214 lost dial tone within 30 days of migration. (Att. 8 (lost dial tone list).) In each case, the customer who lost dial tone had working phone service before being migrated to MCI and then lost dial tone after migration. It is highly unlikely that this many customers would have lost dial tone shortly after migration if BellSouth's migration process were working as it should be. Other

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CLECs, including AT&T, IDS, NewSouth, Birch and Network Telecom also have complained about loss of dial tone, including during UNE-P user group meetings beginning in May 2001.

42.   This problem appears to be getting worse as our daily sales volumes increase. In May, there were 11 trouble tickets closed for loss of dial tone (or the inability to receive calls); in June, there were 150; in July, there were 419; in August, there were 639, and in September (for customers who had called in by September 23), there were 771 (four tickets remained open as of the time of reporting). The impact of lost dial tone on customer convenience and safety is obvious. Moreover, of the customers who have lost dial tone, 8% have left MCI according to the line loss reports we receive – many shortly after losing dial tone. Indeed, in some instances, the notes from the BellSouth technicians on the trouble tickets MCI submitted states that the customers left MCI before the technician even had the chance to investigate the trouble. (As an aside, it is worth noting that in approximately 1/3 of the cases in which the technician made such a note, MCI never received a loss notification suggesting that the percentage of customers with lost dial tone that have left MCI may be significantly higher than 8%.) (Att. 8.)

43.   Flaws in BellSouth's migration process are almost certainly responsible for much of the lost dial tone. Ordinarily, a very small percentage of customers lose dial tone – far fewer than the 3% that have lost dial tone since MCI entered the Georgia market in May.[10] A UNE-P migration should never cause a loss of dial tone as there is no need to disconnect the customer.

44.   BellSouth has acknowledged that one reason MCI customers are losing dial tone is the two-service-order process it uses to process migrations. BellSouth's process uses a "D" order to disconnect the customer's old service and an "N" order to establish new service with the CLEC. Stacy Aff. ¶ 263. If those orders are not related and properly sequenced through the entry of specific codes by the BellSouth systems – or, for manually processed orders, by the BellSouth service representative – the customer may lose dial tone.

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[10]   MCI has asked BellSouth how many of its retail customers lose dial tone in a given period of time. BellSouth initially told MCI that this information was in PMAP but, when MCI could not find the information, later told MCI it would not provide the information.

45. Indeed, as BellSouth witness Ronald Pate acknowledged, the N and D order must be correctly sequenced when they (1) reach the Loop Facility Assignment Control System ("LFACs"); (2) reach the switch; (3) reach the Service Order Control System ("SOCS"), and (4) reach the Customer Record Information system ("CRIS"). Pate Alabama Testimony at 939-45. At any of these stages, if the orders are not properly sequenced, "the potential exists for them to lose dial tone." Pate Alabama Testimony at 945. See also Pate Alabama Testimony at 933-34. The sequencing of the N and D orders can be incorrect if they don't include the proper "RRSO FID," the code used to relate the orders. Pate Alabama Testimony at 935-940. The possibility that the RRSO FID will not be placed on the N and D orders is particularly high when an LSR falls out for manual intervention. In that case, the RRSO FID must be placed on the N and D orders manually and humans inevitably make mistakes. As BellSouth's witness explained, "as long as you have someone touch it, there is always the potential for human error." Pate Alabama Testimony at 36; see also id. at 46-47.

46. BellSouth has confirmed that 10 out of a sample of 140 loss of dial tone cases it reviewed resulted from the two order process. Nonetheless, BellSouth has attempted to minimize the problem by stating that in 70 of the cases, BellSouth tested the line and found no trouble, found an end user problem, or found the problem was caused by the customer's inside wiring. In 60 other cases, BellSouth claims the problem was unrelated to the customer's migration to MCI and would have happened in any event. An analysis of BellSouth disposition codes on trouble tickets MCI has submitted shows similar results. BellSouth generally claims the loss of dial tone did not exist when BellSouth tested the line or that the trouble was caused by defective wire pairs or other problems. (Att. 8.) But the fact that in some cases the customer's dial tone was restored by the time BellSouth tested the line does not mean that the customer never lost dial tone; indeed, it is very unlikely that the customer called MCI to report a non-existent problem. It is much more likely that the lost dial tone caused by processing of the D order was later restored by processing of the N order. Indeed, in one case (404-767-2774), the BellSouth closure report stated "tested OK, came clear" even though the Account Team later told

us that this customer lost dial tone as a result of the BellSouth two-order process. As for

BellSouth's claim that many of these customers would have lost dial tone in any event as a result

of inside wiring or other problems, it strains credulity to believe that so many customers would

suddenly experience problems with their inside wiring or cable pairs shortly after migrating to

MCI. If the two service-order process is not the cause, it is likely that some other aspect of

BellSouth's migration process is.

47.   The significant problem MCI is experiencing with lost dial tone does not appear to

be captured in BellSouth's performance measures. BellSouth measures "the first trouble report

from a service order after completion." Ex. PM-1 (P-9). If the N order has not completed,

however, and the D order disconnects the customer, the CLEC trouble report will not actually

occur "after completion" and thus may not appear at all in BellSouth's performance reports. Or

worse – it may appear in BellSouth's retail trouble reports because BellSouth believes the

customer is still its customer – and thus skew the parity standard. This is the LMOS problem

that held up the SBC Missouri application.

48.   Moreover, even if BellSouth associated the trouble report with the CLEC that

submitted it, BellSouth often would exclude the report from its measure. BellSouth excludes

from its measurement troubles it classifies as caused by customer premises equipment – without

any way for the CLECs to know that BellSouth had concluded that a particular instance of dial

tone loss was caused by customer premise equipment, or to verify that BellSouth's assessment is

accurate. Ex. PM-1 (P-9). Unlike Verizon or SWBT, BellSouth has refused even to report on

the number of troubles it excludes in this category, so that CLECs can ask for the raw data if the

numbers seem unusually high. Nor does BellSouth report data that would allow calculation of

the comparable number of reports of dial tone loss among retail users that are attributed to

customer premises equipment, or which are otherwise resolved without any repair. Finally, it is

important to note that KPMG opened Exceptions 86.1 and 89.9 in Georgia (Georgia STP

(PMR4-13-1, 5-11-2)) and Exception 27 in Florida (Att. 4) regarding the accuracy of BellSouth's

measure of provisioning troubles within 30 days, and these issues have not been retested. (Stacy

Aff. ¶¶ 561-63). In Florida, KPMG concluded that "KPMG Consulting's inability to replicate report values signifies that the accuracy of BellSouth's calculations for the SQM may be in question. Without accurate SQMs, CLECs might not be able to assess the quality of service received or plan for future business activities reliably." (Att. 4, Florida Exception 27.)

49. BellSouth must reduce the significant number of customers losing dial tone after UNE-P migrations. There is no reason that so many customers should be losing dial tone after such migrations. The solution may be to eliminate the two order process. Indeed, in 1998 BellSouth had a two service order process for resale that, like its present UNE-P process, used both an N and a D order. That process caused a loss of dial tone for customers, which MCI found in testing. After MCI filed a complaint with the Georgia Commission, BellSouth moved to a single order process for resale because "disconnects were a necessary albeit unfortunate side effect of BST's old customer migration system." (Att. 10, Georgia Commission Order in Docket No. 6865-U, December 28, 1998, pp. 19-21.)

50. BellSouth should have moved to a single order process for UNE-P as well but chose not to do so. Both the Louisiana and Georgia Commissions have now ordered BellSouth to move to a single order process. Indeed, the Georgia Commission has ordered BellSouth to move to a single order process by January 5, 2002. There is no way ahead of time to assess whether BellSouth will succeed in making this change, and BellSouth is already claiming that it cannot implement the change by January. Moreover, it may be that even after the change, too many CLEC customers will continue to lose dial tone. Until BellSouth manages to reduce the lost dial tone, its systems cannot be found adequate.

BellSouth Relies On Too Much Manual Processing

51. BellSouth processes too many orders manually in Georgia and Louisiana. Manual processing of orders inevitably results in delays and errors. Indeed, BellSouth has attributed much of its deficient performance to manual mistakes. For example, BellSouth has attributed loss of dial tone to manual errors in placing the RRSO code on N and D orders. It has attributed unclear error messages on rejects, as well as erroneous rejects, to manual errors. Thus, in

explaining erroneous rejection of three hundred of MCI's initial orders, BellSouth witness Ainsworth said that "this issue was a simple case of what happens when humans are involved. They make mistakes." (Att. 11, Ainsworth Alabama Rebuttal Testimony at 23). MCI's own analysis shows that 5% of the manually processed rejects it received in September were erroneous and another 11% required further research because the cause of the rejection was unclear.

52.   As BellSouth acknowledges, KPMG, in its Georgia test, found 10 not satisfied observations for manually processed (partially-mechanized) orders related to accuracy and timeliness. Stacy Aff. ¶¶ 480, 573. For example, as noted above, manual errors led to return of inaccurate and belated FOCs and rejects and also led to failure to return completion notices altogether. Georgia MTP O&P 1-4-2 (erroneous rejects), 2-4-2 (erroneous rejects); Georgia MTP O&P 1-2-1 (failure to return completion notices), 2-2-1 (failure to return completion notices); Georgia STP PO&P 11-3-3B (belated return of rejects), 11-4-3 (inaccurate and incomplete FOCs) and 11-4-4 (inaccurate error messages). It also led to inaccurately provisioned orders. Georgia MTP 5-2-1. Contrary to BellSouth's suggestion, Stacy Aff. ¶¶ 445, 515, inaccurate provisioning of a customer's long distance carrier significantly harms both the customer and the long distance carrier that was supposed to receive the customer's business. BellSouth's own analysis of the completion notices that KPMG failed to receive during the Georgia test further demonstrates the errors caused by manual processing. Stacy Aff. ¶¶ 490-94.

53.   The FCC has found a "direct correlation between the evidence of order flow-through and the BOC's ability to provide competing carriers with nondiscriminatory access to the BOC's OSS functions." Louisiana II Order ¶ 107. Although the Commission has approved section 271 applications in other states with less than perfect flow through, it has done so because significant commercial experience in those states (or in other states in the same region) showed that the BOC was capable of handling increasing order volumes with existing levels of manual processing. BellSouth cannot make such a showing in Georgia where manual processing is leading to significant problems. Nor can it make such a showing in Louisiana where it has

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almost no experience in provisioning UNE-P to residential customers -- especially given the evidence from Georgia that BellSouth's manual processes continue to lead to significant errors.

54.   To begin with, we note that BellSouth manually processes far too many of the orders that it ultimately rejects. In June, BellSouth rejected 10,895 mechanized UNE-P orders according to its own data of which it processed 6,388 rejects manually. Ex. PM-3 (O-8). In July, BellSouth rejected 10,891 mechanized UNE-P orders of which it processed 5,711 manually. Ex. PM-4 (O-8). Thus, far too many of BellSouth's edits are based on manual evaluation by service representatives. This is important. The performance benchmark for timeliness of manually processed rejects is far more lenient than for automated rejects. BellSouth must return 97% of mechanized rejects in an hour or less but must return only 85% of manually processed rejects within 10 hours. (O-8). Moreover, with manually processed rejects, unlike mechanized rejects, non-business hours – including weekends – do not count in the measurement.[11] Even more important, as noted above, manual processing of orders often leads to erroneous rejection of orders and to descriptions of reject causes that are difficult for the CLEC to interpret. All of the September rejects that MCI received that it knows to be erroneous – and all of the rejects that MCI has had difficulty discerning – were manually processed.

55.   In addition, BellSouth manually processes far too many of the UNE-P orders it ultimately accepts and provisions – all of which should flow through. BellSouth acknowledges that in May through July 2001, only 47 to 56% of its UNE orders flowed through. Stacy Aff. ¶ 299. (It does not provide specific data for UNE-P.) In June, the achieved flow through rate was 57.41% on UNE orders; in July, the achieved flow through rate was 64.34% on UNE orders.[12] PM Exs. 3, 4. BellSouth's flow through rate should be particularly high because

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[11]   The benchmark for FOCs for partially mechanized orders is equally low – 85% must be returned in 10 business hours. In states in which the FCC has approved section 271 applications there has been no difference in the FOC benchmark for mechanized and partially mechanized orders.

[12]   Achieved flow through in the BellSouth region does not mean the same thing as in the Verizon region. BellSouth defines achieved flow-through to measure all orders that fall out – except for orders returned to CLECs for clarification, orders containing CLEC errors, supplemental orders when an order is pending or orders that are rejected (either electronically or after falling to manual) and orders that are the subject of supplements during

MCI's UNE-P orders constitute a relatively high percentage of BellSouth's UNE orders

Moreover, unlike in other states, MCI is submitting almost no new installation orders, which

generally flow through at a lower rate than migration orders.[13]

56. KPMG has also found issues with BellSouth's flow-through. In Florida. KPMG

opened Exception 86 on August 15, 2001, Exception 99 on August 28, 2001 and Exception 107

on August 29, 2001 because BellSouth was manually processing orders designed to flow through

before returning a FOC or a reject. (Att. 4, Florida Exceptions 86, 99, 107). Exception 86 lists

126 orders that should have flowed through but did not. Moreover, KPMG found that it could

not replicate BellSouth's values for ordering percent flow through requests. (Att. 4, Fl.

Observation 68.)

57. Indeed, BellSouth should not be able to rely on any of its flow through numbers as a

basis for claiming its flow through performance is adequate. BellSouth's flow-through numbers

are completely untrustworthy. BellSouth recently revised MCI's flow through percentages for

June and July by re-categorizing many LSRs that it originally categorized as designed fall out as

CLEC-caused error. Thus, these LSRs no longer are considered LSRs that did not flow through.

We have no reason to trust BellSouth's revisions and indeed do not trust BellSouth's flow

through data generally. Moreover, BellSouth's revisions (and its flow through data generally)

rely on the following premise: if an order falls out because of a BellSouth system error but the

BellSouth representative then finds what he or she believes is some other error on the order, such

as an address error, then BellSouth categorizes the order as CLEC-caused fallout. Thus, for

example, if an MCI order falls out because the BellSouth retail customer had call forwarding – a

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processing. Unlike its flow-through measure, BellSouth's achieved flow-through measure includes the fraction of orders that fail to flow through because BellSouth's systems are not designed to mechanically process the order, so fallout is "planned manual."

[13] In fact, BellSouth's systems do not presently flow through any new installation orders where there was no prior service at the address. (Stacy Aff. ¶ 324.) Interestingly, BellSouth has now told MCI to put a FID on new installation orders to state whether there is service already there but BellSouth's documentation suggests the FID is actually prohibited.

problem we will discuss below – but the representative then finds an address error on the order, the order is not counted against BellSouth's flow through performance. And this is so even if the address "error" would not in fact have caused the order to drop out of BellSouth's systems.

58.   We recently discovered what appears to be an even more important flaw in BellSouth's flow through numbers. As we discuss below, BellSouth recently analyzed MCI orders that had been manually processed and provided an explanation of why those orders had been manually processed. (Att. 12 (spreadsheet of orders).) We took three of those orders that clearly fell out as a result of BellSouth-caused errors and looked them up in PMAP.[14] What we found is that each of these orders was considered to flow through in BellSouth's metrics even though BellSouth acknowledged manually processing these orders! BellSouth's Flowthrough Logic (Att. 21) in PMAP states that an order is counted as flowing through if PMAP does not have codes showing the order to be a fatal reject, an auto clarification, or a planned manual order, and if it contains the codes "FOC STAGED FOR LSR" or "FOC AND CN STAGED FOR LSR" and "ORDER NUM" or "INFO ORDER" or "CANCELLED." Each of the three orders met these conditions. (Att. 22 (PMAP data on three orders).)

59.   Although we are unsure why BellSouth considered these orders to flow through, what we presume is that these orders fell out for manual processing after BellSouth had already issued a FOC on these orders. The errors that caused these orders to fall out involved failures in LESOG. In two instances LESOG issued orders for "Ringmaster" service and these orders failed; in another instance LESOG incorrectly issued duplicate orders. If orders that do not flow through for basic systems errors such as these are counted as flow through, BellSouth's flow-through numbers are largely worthless.

60.   Another reason that we do not trust BellSouth's flow through data and believe far more orders actually fall out is that we know that important order types do not flow through. The exclusions in BellSouth's flow-through measure (O-3 (in Ex. PM-1)) specify certain orders that

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14   Many of the orders that BellSouth analyzed were from September and thus the data is not yet available for these orders in PMAP. We chose 3 of the earliest orders from August that were clearly BellSouth system errors.

are not designed to flow-through. These include complex orders (including hunting MLH), special pricing plans, pending order review required, CSR inaccuracies such as invalid or missing CSR data in CRIS, some partial migrations, transfer of calls option to the CLEC end user, new telephone numbers not posted to BOCRIS, and LSRs in "Z status" (LSRs that receive a supplemental LSR submission prior to final disposition of the original LSR). The importance of some of these order types – partial migrations and supplemental orders – has long been apparent. Others also cause a substantial amount of manual processing. In addition, there are important orders types designed to fall out that are not included on BellSouth's list.

61.   As we discussed above, MCI asked BellSouth to undertake the examination of 100 manually processed orders in early June, shortly after launch, to determine why these orders fell out. BellSouth did not even begin this review until September. In September, BellSouth finally did analyze 89 randomly selected MCI UNE-P orders to determine why they fell out. (Att. 12 (spreadsheet from BellSouth meeting.)) Of these orders, there were 18 that fell out as a result of address errors. BellSouth would categorize these errors as MCI errors and thus would exclude them from its flow-through analysis – even though it is BellSouth's systems requirements that force MCI to transmit addresses. Even setting aside the address issue, however, more than 50 of 89 orders fell out as a result of BellSouth issues. Fourteen orders fell out because BellSouth was unable to recognize requests for second lines and instead believed these requests might be duplicate orders, nine fell out because the customer had voice mail or call forwarding, six fell out because the customer had an installation costs installment plan, eight fell out as a result of various BellSouth systems issues, eight fell out because of "planned fallout – Sup on RRSO" (BellSouth is researching this issue to see where this is described in BellSouth's documents as planned fallout); six fell out because the service orders were not posting correctly, which BellSouth said is planned manual; one order fell out because the BellSouth representative copied an incorrect zip code from the CSR; one fell out because of a BellSouth promotion; one fell out because there was a pending winback order from BellSouth even though MCI has not received a loss notification on that line. (In and of itself, this is a significant problem because BellSouth

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should not be winning back customers before it has even processed the CLEC's order. In late July. 2001, the Georgia commission, in a temporary order, prohibited BellSouth from contacting the customer for seven days following a change in service providers. Proceedings concerning this problem are continuing.) Thus, 54 of the 89 orders that fell out for manual processing did so as a result of BellSouth errors or planned fallout on simple orders. (Att. 12.)

62.   This list emphasizes that even very basic UNE-P orders are often considered designed fall out by BellSouth – whether or not they fall within the categories that BellSouth previously has indicated are considered designed fallout. The six orders that fell out because the retail customer had an installation pricing plan, in which the customer had purchased retail service from BellSouth and agreed to pay installation costs by installment, as well as the order that fell out because of a BellSouth promotion, likely fall into BellSouth's category of special pricing plans. The eight orders that fell out because of "planned fallout - Sup on RRSO" are considered planned fallout, even though they are not specifically listed as planned fallout in the exclusions on the flow-through metric. The six orders that fell out because the service orders were not posting correctly are also considered planned fall out by BellSouth – they may fall within the category of pending order review required. The order that fell out because of a pending BellSouth winback order is also considered planned manual. Thus, much of the fall out in BellSouth's systems is attributable to planned fall out of basic UNE-P orders.

63.   It is clear that all of these basic UNE-P orders should flow through. It is unacceptable for basic UNE-P migration orders to fall out for manual processing because the BellSouth retail customer had call forwarding or voice mail, for example – two very common types of features. Worse, in his recent deposition, Mr. Stacy indicated that if a BellSouth retail customer has enhanced voice mail, or has DSL, a CLEC cannot even order service for that customer – the order will drop out and be rejected and there is no way to fix the problem unless the customer first calls BellSouth and removes enhanced voice mail or DSL from his line. (Att. 7, Stacy Dep. at 199-201.)

64.   Moreover, MCI did not even learn that orders with voice mail or call forwarding

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would drop out until late August, when BellSouth's Account Team told MCI that some of our LSRs are falling out because the customer has call forwarding or voice mail on his or her retail account, and therefore a specific field identifier (FID) must be added to the disconnect order to remove those features.[15] None of BellSouth's prior documentation on orders designed to fall out had indicated that orders for customers with call forwarding or voice mail would fall out. See, e.g., OSS Ex. 61 (listing reasons for manual fall out but not including call forwarding). This suggests the potential existence of many types of orders that have been designed to fall out for manual processing but that BellSouth has not revealed to CLECs.

65. Finally, the letter BellSouth transmitted on October 1 (Att. 6) that discussed two orders that fell out because they had voice mail and/or call forwarding demonstrates some of the problems manual processing can cause. (BellSouth later transmitted an e-mail discussing a third order that involved similar problems. (Att. 13.) After both LSRs (actually the D and the N orders generated from the LSRs) fell out for manual processing, the service representatives then checked the service orders to determine whether there were errors on the orders. In both cases, the service representatives rejected the orders because the customer's name did not exactly match the directory listing name listed on the CSR. For the second LSR, for example, the order was for "Phil" but the CSR said the directory listing was for "Phillip"). This, however, is an invalid reason to reject an order because there is no reason to expect the directory listing to match the name on the order. And MCI ordered the directory listing "as is" in the first place.

66. In addition to rejecting the orders incorrectly, the representatives compounded their errors by making a second mistake. Apparently, when an LSR falls out for manual processing, the representatives must cancel the original N and D orders if they reject the LSR. The

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[15] It remained somewhat unclear after this whether orders with call forwarding did actually fall out. BellSouth's affiant here, William Stacy, denied in a September 28 deposition that call forwarding would cause an order to drop out for manual processing. (Att. 7, Stacy Dep. at 194-96.) But just days later, on October 1, a BellSouth letter responding to MCI queries regarding two specific orders made clear that orders for retail customers with call forwarding will fall out for manual processing. (Att. 6, Letter from Pamela Reynolds to Amanda Hill, October 1, 2001).

representatives did not do so for the two LSRs in question. Thus, even though the

representatives transmitted reject messages to MCI, the N and D orders completed. BellSouth

did not then transmit completion notices, however, because some of BellSouth's systems still

viewed the orders as having been rejected. MCI therefore continued to believe the orders had

been rejected and that it needed to determine why the orders had been rejected and to clarify the

orders.

67. BellSouth must ensure that almost all basic UNE-P orders flow through before it

obtains section 271 authorization. Its current high level of manual processing is causing too

many delays and errors.

68. Provisions of the enforcement mechanism will not induce BellSouth to improve its

flow-through performance in at least one dimension that is crucial to a CLEC's ability to

compete. While BellSouth's Percent Flow Through measure (0-4) receives Tier I treatment, the

Percent Flow Through measure excludes from consideration orders which do not flow through

because BellSouth has planned for these orders to be handled manually. BellSouth's Percent

Achieved Flow Through measure comes closer to capturing the CLEC's immediate experience of

BellSouth's ordering OSS; it calculates the percentage of accurately placed orders that can be

expected to flow through – excluding CLEC errors but not excluding orders BellSouth plans to

handle manually. But there are no penalties associated with this measure. BellSouth's current

planned manual handling of such a large fraction of orders imposes a substantial cost on

competitors, and is not addressed by incentives created by the Self-Executing Enforcement

Mechanism ("SEEM").[16]

Missing Notifiers

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[16] This is in sharp contrast to the Verizon New York Performance Assurance Plan (PAP), which levies a large
remedy payment of $2.5 million per quarter if neither an 80% Flow-Through Total (similar to BellSouth's Achieved
Flow Through Calculation with no standard) or 95% for Percent Flow Through (Similar to BellSouth's Percent
Flow Through Metric in that Orders not designed to flow through are excluded). BellSouth's standards for the latter
metric only match the 95% standard for resale, but no other disaggregated product. When an ILEC is only
measuring what it represents to CLECs should flow through, even 95% standard is generous.

69.   As was the case in New York and Pennsylvania, MCI has a significant problem in Georgia with missing notifiers -- FOCs, rejects, and completion notices that BellSouth simply fails to return. In New York and Pennsylvania, Verizon worked to minimize the problem and eventually succeeded. In Georgia, however, BellSouth has yet to take the steps needed to resolve the problem. Thus, MCI is extremely concerned that the problem will escalate significantly as ordering volumes increase. Missing notifiers are already causing substantial difficulties for MCI and its customers.

70.   The problem with missing notifiers developed soon after MCI launched service in Georgia in May and it increased subsequently. As of October 4, MCI was missing 733 notifiers in Georgia. It was missing 311 confirmations/rejects – 123 of which have been missing since July. It was also missing 422 completions – 274 of which have been missing since July.[17]

71.   The number of missing notifiers decreased on October 5 after BellSouth finally re-flowed many of the notifiers that had previously been missing. The number of missing notifiers then began to increase again, however. As of October 16, MCI was missing 184 FOCs/rejects and 346 completion notices. The number of missing notifiers will certainly continue to increase for some time because BellSouth has refused to re-flow missing notifiers except in conjunction with a scheduled EDI release! Until October 19, MCI was not certain what BellSouth considered to be the next scheduled release with which it would re-flow missing notifiers. On October 19, BellSouth called and indicated that it would re-flow on November 3 the 260 notifiers still missing as a result of the LEO problem. And it may only be the fortuity of the newly scheduled release for migration by telephone number that has persuaded BellSouth to re-flow the notifiers even then.

72.   KPMG identified similar problems during third-party testing. In Florida, KPMG opened Exception 105 on September 21, 2001 because "KPMG has not received responses to

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[17]   Neither SBC nor Verizon have anywhere close to this number of missing notifiers even though order volumes in those regions are far higher. In Pennsylvania and New York combined, for example, 114 notifiers were missing as of October 16.

several Local Service Requests (LSRs) using the Electronic Data Interchange (EDI) interface."
(Att. 4, Florida Exception 105.) Indeed, Florida Exception 105 lists 68 LSRs for which KPMG
did not receive a FOC or reject[18] and 13 LSRs for which KPMG did not receive an
acknowledgment. Florida Exception 99 also indicates BellSouth's failure to return responses to
LSRs. (Att 4, Florida Exception 99.) Similarly during re-testing in Georgia test, KPMG found
that BellSouth did not return completion notices on 14% of EDI orders for which KPMG
expected a completion notice and 16% of TAG orders. Stacy Aff. ¶ 489; Georgia MTP O&P 1-
2-1, 2-2-1. Despite this enormously high failure rate, KPMG closed the Exception it opened on
this issue for the sole reason that "no subsequent re-testing activities are planned." Georgia MTP
O&P 1-2-1, 2-2-1.

73.   The missing notifier problem is likely to grow significantly worse if BellSouth does
not identify the root causes and eliminate them. At present, ordering volumes in Georgia remain
relatively low compared to other states and Georgia is the only BellSouth state in which
BellSouth is processing any substantial volume of UNE-P orders. If order volumes grow
substantially, the number of missing notifiers is likely to grow substantially as well.

74.   As the Commission knows, the impact of delayed and missing notifiers on CLECs
is severe. The NYPSC found that Verizon's missing notifiers significantly delayed customers'
ability to move their service to competitive local exchange companies. If CLECs do not receive
a reject, for example, they do not know that they must clarify an order and re-transmit it.
Similarly, if CLECs do not receive a completion notice, they must assume that BellSouth has not
yet completed the order. If this assumption is correct, as it has proven to be in some instances,
the customer is not receiving service from the carrier of his or her choice and that carrier is not
receiving revenue from the customer. If the assumption is incorrect, BellSouth has completed
the order but the CLEC does not know this. Thus, the CLEC does not know that it should begin

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[18]   KPMG also opened Exceptions 51, 54, 85 and 100 in Florida concerning BellSouth's failure to return
mechanized rejects and FOCs in a timely fashion. (Att. 4, Florida Exceptions 51, 54, 85, 100.) It opened
observation 100 concerning BellSouth's failure to return timely completion notices.

billing the customer and also does not know that it is responsible for maintenance and repair for

that customer. For those customers that have been missing notifiers since July, for example,

MCI has been unable to bill the customers for months.

75. BellSouth has not responded adequately to the problem of missing notifiers; nor has

it even succeeded in re-flowing missing notifiers that MCI has identified. In early June, MCI

began asking to have routine meetings with BellSouth to discuss missing notifiers with

appropriate subject matter experts. BellSouth did not agree to begin such meetings until mid-

August, however, and even then, not all of the necessary experts were present and the "experts"

who were present did not have extensive knowledge of EDI or of BellSouth's systems. Even

though almost all of BellSouth's OSS development and management has been contracted out to

outside vendors (Att. 7, Stacy Dep. at 143-46, 153-57), and even though BellSouth's VAN is

also run by a third-party vendor, no representatives from the outside vendors were on the calls.

Eventually, after MCI repeatedly pressed BellSouth on this subject, BellSouth added a

representative from Peregrine, which runs the VAN, but BellSouth still has not added

representatives from the vendors managing its OSS.

76. This does explain, however, why the BellSouth representatives on the calls have

such limited knowledge of EDI and BellSouth's systems. Whenever MCI asks a question,

BellSouth's response is always that it will have to get back to MCI in 7 days – and the 7 days

often becomes weeks. Often BellSouth will explain that the individual responsible for the

BellSouth system involved – LEO, for example, is not on the call. Indeed, the BellSouth

representatives on the call seem to change every week. In some instances, it appears that the

single BellSouth employee with the knowledge to answer many of MCI's questions – Kathy

Ragsdale – is simply overwhelmed with too much work.

77. Because BellSouth has not had appropriate experts on the calls, it has had difficulty

identifying the root cause of the missing notifier problem. Although MCI has been explaining

the missing notifier problem to BellSouth since June, BellSouth long denied there was a problem

– suggesting that it had sent the notifiers but that MCI had lost them. MCI had to explain to

BellSouth how to audit its systems to search for the missing notifiers and that it also needed to look for the notifiers in the VAN. BellSouth initially was unable to provide the ISA numbers that identify the EDI envelopes in which notifiers are sent and that are important in searching for the missing notifiers. BellSouth eventually acknowledged that it was losing notifiers and in September finally suggested that one primary root cause was two difficulties with its LEO system – LEO was failing to transmit some notifiers and then overwriting those notifiers. The basic mismatch in data between LEO and downstream systems should have been quickly identified by BellSouth, and indeed, should have been picked up by internal audits without any need for MCI to point to specific notifiers that were missing, but it took BellSouth several months to identify the problems despite constant prodding by MCI.

78.   BellSouth claims to have fixed the LEO problems on September 29 and to have re-flowed the missing notifiers caused by the LEO problems on October 5. There is not yet any way to judge whether BellSouth's assessment of the LEO problems properly identified one cause of missing notifiers or whether BellSouth's "fix" has helped resolve the problems. It certainly has not eliminated missing notifiers since, after BellSouth re-flowed many old notifiers on October 5, the list of MCI's missing notifiers again began to grow. Many of the missing notifiers as of October 16 are for orders that were due in October – and thus should not have been missing if the September 29 fix eliminated the problem. Moreover, BellSouth has acknowledged that some of the notifiers that are missing have gotten lost in the VAN, and this problem has not yet been fixed.

79.   In addition to BellSouth's difficulty in identifying a root cause of missing notifiers, BellSouth has had great difficulty in returning the particular notifiers that MCI has identified as missing. It often takes BellSouth months to re-flow missing notifiers. BellSouth often takes a long period of time even to begin working a particular trouble ticket. Thus, after BellSouth re-flowed notifiers on October 5 that ostensibly missing as a result of the LEO problems, it subsequently discovered that it had not re-flowed all of the notifiers that were missing as a result of this problem. According to BellSouth, this was because MCI had submitted a missing notifier

trouble ticket on September 13 and <u>BellSouth had not yet begun to work this ticket</u> by the time it

re-flowed notifiers on October 5 because it was still working on the four oldest tickets.

BellSouth later asked MCI to prioritize which trouble tickets that MCI wanted BellSouth to work

– incredibly implying that MCI had to decide which trouble tickets for missing notifiers it

wanted BellSouth to work. Unfortunately, this is not unusual. Since launch, BellSouth has

continually asked MCI to prioritize its problems with BellSouth's OSS systems and manual

processes, since apparently not enough staff is available to work all customer-impacting issues.

80.   After BellSouth begins working a trouble ticket, it often takes BellSouth weeks or

even months to find the missing notifiers in its systems. BellSouth has had difficulty

determining whether notifiers are lost in the VAN, for example, because a week after notifiers

reach the VAN, any record of these notifiers in the VAN disappears. Unlike Interactive Agent, a

VAN does not have a log file that enables notifiers to be easily traced. Moreover, even when

notifiers were missing in BellSouth's own systems, and not the VAN, it often took weeks to

determine that they were in fact missing.

81.   Finally, BellSouth has great difficulty in re-flowing the notifiers after it determines

that they were missing. Initially, BellSouth, unlike other ILECs, was unable to return individual

missing notifiers at all. It could only return the entire EDI envelope in which a missing notifier

was contained. The envelope would also contain hundreds of notifiers that had <u>already</u> been

returned to MCI and MCI would then have to sort through the notifiers to retrieve the ones that

had been missing. Although BellSouth now is able to return EDI batches limited to missing

notifiers, as noted above, BellSouth claims that it is only able to do so in conjunction with an

EDI release. There is simply no reason for this. All other ILECs have been able to return

missing notifiers without this constraint. Indeed, after the missing notifier problem arose in New

York, the consent decree this Commission worked out on the missing notifier issue required that

trouble tickets concerning missing status notices opened at Verizon help desks be resolved in

<u>three days</u>. <u>In re Bell Atlantic-New York Authorization Under Section 271 of the</u>

<u>Communications Act to Provide In-Region, InterLATA Service in the State of New York</u>, Order

And Consent Decree, 15 F.C.C.R. 5413 (2000). In contrast, BellSouth often fails to re-flow notifiers for weeks or even months.

82. The problem with missing notifiers is compounded by the inadequacy of BellSouth's metrics related to notifiers.[19] BellSouth has no measure that tracks whether it returns completion notices on all orders. BellSouth does measure the completeness of its FOC and reject responses but states that this metric is not yet reliable. (Ex. PM-1 (O-11); Stacy Ga. Aff. ¶ 357.) It is no wonder that BellSouth does not want to rely on this metric because it appears to confirm that there are significant problems. In July, BellSouth returned FOCs and rejects on only 85.6% of UNE orders, far below the 95% benchmark (which itself is far too generous). (Ex. PM-4, 0-11). (In June, the data does not appear accurate as only 1,194 CLEC UNE-P orders are reported. Ex. PM-3 (0-11).)

83. BellSouth does not even provide billing completion notices. Indeed, although MCI proposed in change management that BellSouth provide billing completion notices (CR0443 issued June 29, 2001), BellSouth has refused to do so, stating first that billing is not covered by change management and then stating that they will add a billing completion notice only when the OBF determines that this is a required notifier. And while BellSouth does have a metric to measure whether its provisioning completion notices (which it calls simply completion notices) are late, this measure does not capture whether completion notices are missing. In any event, BellSouth failed to meet the average completion notice interval for UNE-P orders in May, June, or July. (Exs. PM 2, 3, 4 (Item B.2.21).)

84. Just as BellSouth does not measure the number of missing notifiers, it also does not measure its timeliness in re-flowing notifiers once it has learned from CLECs that they are missing. Indeed, BellSouth has refused to adopt a measure of help desk responsiveness more

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[19] BellSouth's measures of average time to transmit notifiers do not capture missing notifiers. In any event, KPMG found discrepancies in time stamps related to these measures. Georgia MTP O&P 7-2-3, 7-3-3. In response, BellSouth rewrote its business rules to describe the measures as using time stamps from LEO. Stacy Aff. ¶ 549. Thus, if a notifier is delayed after reaching LEO, it is not captured in the measures.

generally. In New York, the FCC consent decree required Verizon to adopt a measure of help desk responsiveness related to missing notifiers.[20] BellSouth should adopt a similar measure.

85.   BellSouth's problem with missing notifiers is disturbing. That problem is already causing MCI to devote significant resources to tracking these notifiers and attempting to obtain them from BellSouth. Even more problematic is BellSouth's inability to respond effectively to these missing notifiers. The result is that MCI is unable to work rejects, unable to bill customers for long periods of time, and unable to process maintenance requests for its customers.

Line Loss Reports

86.   This Commission recently explained the need for a BOC to provide CLECs with accurate line loss reports. Pennsylvania Order ¶ 52. Without such reports, a CLEC will continue to bill an end user even after the end user has discontinued service with the carrier.

87.   BellSouth is failing to submit line loss reports for a significant number of customers. MCI periodically evaluates all of its customer information for a randomly selected list of customers. MCI audited 250 customers in June, July and August. Each time, it found a number of customers who were not listed as MCI customers in the CSR even though MCI had not received line loss reports from BellSouth to indicate that the customers had left MCI for another carrier. MCI found 11 such customers in June, five in July and four in August. (Att. 14, line loss spreadsheet.) Either BellSouth failed to transmit line loss reports for the customers or BellSouth failed to update the CSR when the customer migrated to MCI in the first place. Thus, we do not even know if these customers are ours.

88.   Assuming the problem is with line loss reports and not with updates to the CSR, the number of customers for whom MCI did not receive line loss reports is quite significant. If 25 of the 250 customers MCI audited each month had left MCI that month (and this would be a very

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[20]   BellSouth does measure average answer time on calls to repair centers (PM Ex-1 (M&R6).) But answer time is far less important than the length of time BellSouth takes to respond to a problem after it has answered. Moreover, even the average answer time measure for calls to repair centers is itself flawed. The business rule makes clear that abandoned calls are not included in this measure, but this eliminates all of the calls in which callers become frustrated by lengthy delays and drop off the line.

high number), then the fact that MCI failed to receive line loss notifications on an average of six

customers for each audit would suggest that BellSouth is failing to return almost 25% of the line

loss reports.

89.   Another indication of the extent of the line loss problem is apparent from the MCI's

list of customers that have lost dial tone. (Att. 8.) That list shows 34 trouble tickets on which

the BellSouth technician commented that he or she was unable to work the trouble ticket because

the customer had already left MCI. Yet MCI has not received line loss notifications for 12 of

these customers – more than 1/3 of the customers for which MCI clearly should have received

such notifications. MCI must extrapolate from such limited data because it has no other way of

determining the level of inaccuracy of the reports. BellSouth has no metric to measure

inaccuracies in its line loss reports and presents no data suggesting those reports are accurate.

90.   The impact of missing line loss reports is severe. Without a line loss report, MCI

does not know to stop billing the customer. The customer is therefore billed by both MCI and

the customers' new carrier. Indeed, several of the customers that MCI discovered in its audits

subsequently called MCI to complain about double billing. Other customers have called to

complain about double billing as well. For example, customers with account numbers

4IN80095, 4GB46466, 4IN80095, and 4GB46466 all recently called to state they switched back

to BellSouth in mid-August but had continued to be billed by MCI for months. MCI did not

receive line loss notifications for these customers. When the customers called, our

representatives had no way even to tell that the customers had migrated.

91.   On August 13, MCI provided BellSouth a list of 10 customers who were not listed

as MCI customers in the CSR. BellSouth agreed to research the issue. For one of the customers,

it subsequently determined the customer was a MCI customer and updated the CSR. For nine

others, BellSouth stated that the customers had left MCI. Remarkably, however, more than two

months after starting to research the issue, BellSouth still had not determined why it failed to

transmit line loss reports. Nor had it managed to transmit line loss reports for these customers.

Each week it has told MCI that it was still researching the issue, as well as the general issue of

problems with line loss notifications.

92.   On October 17, 2001, BellSouth finally transmitted a letter purporting to explain why it had not transmitted line loss reports for the 10 customers. (Att. 23.) For five of the customers, BellSouth explained that when it had processed customer orders to migrate away from MCI, service representatives had made manual errors in creating the service orders which prevented the telephone numbers from reaching the line loss report. This is another instance of the impact of manual processing. For an additional three orders, BellSouth's explanation was even more astonishing – "[a]ccounts disconnected due to claims of unauthorized change of service are not listed on the NDM loss report." But regardless of why the customer left MCI, MCI must know that the customer has left or it will continue to bill the customer. Moreover, BellSouth never communicated to MCI that it believed customers were being migrated in error (i.e., slammed), and we seriously doubt that these three particular customers fall into this category. Two of the three customers called MCI to report problems of double billing and in the process explained why they had switched back to BellSouth – neither said they had been erroneously switched to MCI in the first place. Finally, BellSouth reports that MCI cancelled one of the orders before it was completed – thus, the customer was never switched to MCI. But MCI received completion notices on all of these orders.

93.   In its response, BellSouth also asserts that although it did not provide line loss information for eight of these customers in the report it transmits to MCI via Network Data Remover ("NDM"), it did post this information on BellSouth's web site, where it remained available for seven days. BellSouth states that the information on the web site is different – more complete – than the information transmitted via NDM. But BellSouth had never stated this before and had agreed to provide line loss reports to MCI via NDM – a far more effective method than requiring CLECs to look on the web for line loss information.

Delays in Posting to Billing

94.   BellSouth does not appear to be updating its billing systems properly and rapidly. As we just discussed, we have identified customers whose CSR still lists them as BellSouth

customers despite the fact that we have received completion notices and BellSouth's CSOTS web site shows that these customers have migrated to MCI. These customers are therefore receiving bills from MCI – and almost certainly are also receiving bills from BellSouth.

95. When, on August 13, MCI provided BellSouth with a list of orders for which we received completion notices but for which the post migration CSRs retrieved through LENS still showed BellSouth as the owner, BellSouth responded that some of the customers were caught in a "hold file error," due to discrepancies between the customer's CSR and the customer's billing record. In other words, because the customer's existing CSR did not match the customer's billing records, BellSouth held the order and did not update either the CSR or the billing records to reflect that MCI was now the carrier. After further research, BellSouth determined that one of the ten orders MCI provided was in a hold file. (On the others, as we discussed before, BellSouth had updated the CSR but then failed to transmit line loss notifications when the customers left MCI.) We have also seen at least one other example where this appears to have occurred. It is very difficult for MCI to quantify the extent of this problem, but BellSouth's initial description of the hold file when it was researching the ten orders MCI provided suggested that it was relatively routine that orders fall into the hold file. And BellSouth explained that customers can remain in a hold file for up to thirty days as a result of discrepancies between the CSR and billing systems.[21]

96. BellSouth also may take substantial time to update its billing systems for a second reason that has nothing to do with the hold file. The week before last in Florida collaboratives, BellSouth explained for the first time that if the N order that BellSouth creates from every UNE-P LSR reaches the BellSouth billing systems before the D order, then the billing systems will not be able to determine why a new order is being transmitted on an existing account. They will

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[21] While KPMG did not specifically find problems in updating the billing systems, it has found problems in updating the CSR. On October 1, 2001, KPMG opened Exception 112 in Florida because "BellSouth had updated 54% of the analyzed CSRs accurately," when it should have updated at least 95% accurately. (Att. 4.) KPMG found that BellSouth made errors in updating directory listings and features and services, for example, and that, as a result, the customer would not receive what the customer had ordered.

therefore hold the order in a pending file waiting for the D order to complete, and the billing systems will not be updated unless BellSouth subsequently realizes the problem and fixes it.

97.   If either the hold file problem or the N and D problem delay updates to the billing systems, the CLEC will not receive any daily usage information on the customer since BellSouth's systems still view the account as belonging to BellSouth. This means that CLECs cannot bill customers for usage. The CLECs will, however, bill the customers the flat-rated fees for the accounts. But the customers also will receive bills from BellSouth which still views the customers as its customers. The customers are double billed and will often blame their new carrier for the double billing. In addition, subsequent orders for customers whose orders have not yet completed through billing (for example, to add or change a feature), will be rejected either because another order is pending in the BellSouth systems or because the systems do not yet recognize the customer as having migrated to MCI.

98.   The problem with discrepancies between the information in its billing systems and information in its other systems is very similar to problems MCI has experienced elsewhere. In the SWBT region, the significant LMOS problem that arose recently was caused by the failure of service orders to properly update SWBT's maintenance and repair systems after a CLEC order had been provisioned. Similarly, one of the problems with BellSouth is that service orders are not properly updating BellSouth's billing systems after a CLEC order has been provisioned. This is exactly what happened in New York. When the missing notifier problem arose in New York, one of the issues was that orders that had been provisioned were not "posting" to Verizon's billing systems and updating those systems to show that a CLEC now owned the customer. As a result, Verizon was not transmitting billing completion notices on time to inform the CLEC that the billing systems had been properly updated. In BellSouth the problem is even worse – BellSouth does not even transmit billing completion notices. Thus, the CLEC has no easy way of knowing whether BellSouth has properly updated its billing systems. The only way to find this information would be to check each and every customer CSR through the BellSouth systems to determine which ones have not been updated to reflect MCI as the billing

party. This is a practical impossibility.

99. MCI requested in change management that BellSouth provide billing completion notices to alert CLECs to orders that do not make it through the billing change process. BellSouth's change control team refused to agree to MCI's request, stating that billing issues are not covered by change management and later that it would not issue BCNs unless they were adopted by industry standard bodies.

100. Without BCNs, there is no mechanism in place to assess BellSouth's performance in updating its billing systems or to motivate improvements if performance is inadequate. BellSouth does not measure the timeliness or completeness of updates to its billing systems.

BellSouth's Billing Processes Are Inadequate.

101. In its recent Pennsylvania Order, ¶ 13, this Commission properly explained that BOCs must provide CLECs with complete accurate and timely wholesale bills and with complete, accurate and timely reports on the service usage of CLECs' customers. BellSouth does neither.

102. MCI has had significant problems with auditing its wholesale bills due to formatting and other errors. These bills appear to have incorrectly co-mingled UNE-P and resale usage, have billed usage against the wrong Billing Account Numbers (BANs), and have failed to transmit the Billing Telephone Numbers (BTNs) for many customers altogether. Without correctly formatted bills, MCI cannot audit the information that BellSouth provides to determine whether charges are being correctly assessed. MCI cannot simply "assume" that charges are correct but – like any business – must be able to ensure that the bill matches the circuits and features provided to our end user customers.

103. MCI's audit of the August UNE-P bills it received showed that 6.5% of the lines for which MCI was billed did not include a BTN. (The bills included only the area codes instead of the complete BTNs for these numbers.) Without a BTN, MCI sees a charge or credit but does not know the account to which the charge or credit is supposed to relate. It therefore cannot even determine whether the charge or credit relates to a bill for a legitimate MCI customer, much less

compare the charge or credit against the amount MCI expects to receive for a particular customer. MCI called BellSouth several months ago to protest the missing BTNs on the bill. BellSouth did not look into the issue. Instead, BellSouth informed MCI that if we did not pay our bills as a result of this issue, BellSouth would cut off MCI's service. MCI has therefore paid the bulk of the bills.

104. BellSouth's bills also are billing usage against the wrong BAN. MCI has two UNE-P BANs in Georgia – one for the 770 area code and a 678 BAN for the rest of the state. BellSouth is billing customers from the 770 area code on the incorrect BAN. In fact, 14,210 of 14,397 of the BTNs billed on the 678 BAN in September belonged on the 770 BAN. This makes it more difficult to maintain records and track disputes.

105. In May, BellSouth sent a letter to MCI informing it that it would be "transferring" resale billing to MCI's UNE-P BANs. Presumably BellSouth has done so. But BellSouth should not have done so as WorldCom has no way to separate out any resale billing from UNE-P billing. And MCI has no idea what ostensible resale charges have been transferred.

106. BellSouth's difficulties in transmitting correct wholesale bills are apparent from one final example. BellSouth is transmitting MCI bills for Florida UNE-P service. MCI does not offer UNE-P in Florida.

107. KPMG has opened a number of exceptions regarding inaccuracies in BellSouth's wholesale bills during its Florida test, although it has not found identical problems to those MCI has found, it has opened Exception 44 (incorrect quantities of unbundled switching and transport usage); Exception 60 (failure to cease billing on disconnected auxiliary lines); Exception 62 (incorrect rate for service order mechanized charge), and Exception 96 (incorrect usage charges on resale bills). (Att. 4.) BellSouth must fix its many wholesale billing problems.

108. Calls to the BellSouth billing help desks have not elicited any help; indeed, the representatives have stated that they have not been trained in UNE-P and have referred MCI back to its own account team (which referred MCI to the Help Desk in the first place). On August 21, BellSouth finally sent MCI a note clarifying "the role that Yvette Scott holds as the point of

contact for you. She will be available to take questions about disputes and either direct you to the correct group or person or give you a written status of the disputes in question. Yvette has just recently accepted this assignment and she is in the process of learning UNE-P. She will therefore not be able to answer your questions or give you a status without investigation of the [stet] each one." (Att. 15) On October 9, BellSouth sent another note to inform MCI that two of its service representatives had completed UNE-P training. "As with anything new, we will be slow at first, but as experience is gained will complete your disputes in a timely manner." (Att. 16.) It is astounding that almost 5 months after MCI launched service in Georgia with UNE-P, BellSouth is finally providing representatives who have been trained in UNE-P and even now admits resolution of issues will continue to be slow. KPMG also opened an exception related to the difficulties in dealing with BellSouth's billing work center during its Florida test – Exception 37 (lack of a formal process for identifying and planning for variations in level of staff required to support work load). (Att. 4, Florida Exception 37.)

109. In addition to difficulties with BellSouth's wholesale bills, MCI has experienced two specific systems problems with BellSouth's daily usage feed ("DUF"). But the bigger issue is that there is no readily available means of ensuring that BellSouth fixes the problem – the same issue MCI has had with wholesale bills.

110. The first specific problem that MCI has experienced is that BellSouth is improperly routing some intraLATA toll calls through its local switches rather than through the switches of the intraLATA carrier. BellSouth is then sending usage on these calls to MCI on the DUF – 7,280 records in the last 90 days. But the usage is not local usage. MCI should not have to pay for it. Moreover, the intraLATA toll carrier (which is often MCI) is not receiving the revenue for these calls.

111. The second difficulty that MCI has faced is that, prior to July 31, BellSouth was sending records that were formatted incorrectly (they incorrectly said there were "modules" attached to the records). There were 60,000 records with this problem. MCI has been unable to process these records and thus still does not have accurate usage for these records. On a going-

forward basis, BellSouth appears to have fixed this problem on records transmitted after July 31.
Once again, however, BellSouth did not proactively announce this problem to CLECs or
announce its resolution because in BellSouth's view the change was not CLEC-interface
impacting.

112. The scope of these particular problems with the DUF is limited to date – although
MCI fears that the intraLATA toll issue could become substantial. The bigger issue is that there
is no effective means to communicate such problems to BellSouth. BellSouth provides a form
on which a CLEC can transmit information regarding problems with an individual usage record –
but this form cannot be used to submit issues that pertain to thousands of records. Moreover,
information submitted on this form would not enable BellSouth to view the actual records to
evaluate the problem.

113. There is not even an easy way to communicate problems with the DUF via phone
call. When MCI initially called the Billing Dispute Center at the LCSC regarding the DUF
formatting issues, the LCSC provided a different number to call. After making several more
phone calls and speaking to seven different people, MCI never was connected to a person who
could respond to its questions. MCI eventually began working through its account team, but it
took until the end of September for the Account Team to add a billing expert to the calls.

114. One key request we made to the BellSouth account team was that BellSouth
establish an "outcollect process." With such a process, MCI would return incorrect records to
BellSouth which would then have all of the records and could more easily research the
underlying problems. Other BOCs such as Verizon and SWBT have established such a process.
To date, however, BellSouth has refused to do so.

115. Thus, BellSouth has been completely unresponsive to MCI's concerns with the
DUF, as it has with MCI's wholesale billing problems. BellSouth's attitude is further apparent
from the process it has put in place to respond to CLEC billing disputes. At a collaborative in
Florida the week of October 5, BellSouth described to CLECs a previously undocumented
process in which it screened CLEC billing disputes and only loaded them into BellSouth systems

if the screener determined they were legitimate. If the screener did not accept the disputes,

CLECs could not contest them and BellSouth would threaten the CLECs to cut off their service

if they did not pay their bills.

116. BellSouth's remedy plan's $1 per occurrence remedy amount certainly does not

provide any meaningful incentive for improving billing accuracy for either invoices or usage.

And none of BellSouth's billing metrics capture how quickly BellSouth adjusts bills in response

to undisputed let alone disputed billing adjustment requests.[22]

BellSouth Has Not Shown Its Performance In Louisiana Is Adequate

117. Even if the Commission were to conclude that BellSouth's OSS performance in

Georgia is acceptable, there is no basis for it to reach a similar conclusion with respect to

Louisiana. BellSouth has almost no experience in Louisiana processing UNE-P orders – the only

viable means of providing ubiquitous residential competition. BellSouth therefore must rely on

its Georgia experience to show the readiness of its systems in Louisiana.

118. In its Kansas/Oklahoma Order, the FCC relied on evidence from Texas to ·

conclude that SWBT's OSS was ready in Kansas and Oklahoma. It found that SWBT had

provided specific evidence that its systems were the same throughout its region. It relied in part

on SWBT's explanation "that it is the only 'Baby Bell' to survive intact as a regional BOC and,

as such, has maintained a single region-wide set of OSS, including its back office systems for its

own retail use long before divestiture in 1984. Kansas/Oklahoma Order ¶ 112 n.312. See also

id. ¶ 118 n. 320 ("[A]s MCI itself recognizes, however, 'it is quite likely that the OSS [in Kansas,

Oklahoma and Texas' is more similar between these three states than between other states in the

country' because 'a single legacy company – SWBT – historically provided local telephone

service for all three states.'"). BellSouth, on the other hand, grew out of a merger of Southern

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[22] The Florida PSC recently ordered a Billing Errors Corrected in X Days proposed by CLECs for both DUF and
Invoice errors, but only made it diagnostic. This metric, with benchmarks and attention-getting remedies, is needed
to provide an incentive for BellSouth to correct the numerous errors CLECs are able to find (despite the difficulties
in auditing its poorly formatted bills).

Bell and South Central Bell. Georgia is a former Southern Bell state (as is Florida). Louisiana is a former South Central Bell state. As a result, there are likely important differences in BellSouth's legacy systems.

119. Although we have no visibility into BellSouth's systems, BellSouth has acknowledged one significant difference in order processing in its systems. In the Southern Bell states, including Georgia, BellSouth has relied for many years on the DOE system as part of its ordering process. In the South Central Bell states, including Louisiana, BellSouth relied on the SONGs system to perform equivalent functions. BellSouth also used these systems during manual processing of CLEC orders. BellSouth relies on a Price Waterhouse Report to conclude these systems are equivalent. But an evaluation by Price Waterhouse without any input from CLECs, is not a substitute for a truly independent third-party test, much less for commercial experience. There is not sufficient basis to conclude that DOE and SONGs will perform equivalently – or that the difference in these systems is the only difference in the back-end systems. See Att. 28, Letter of April 30, 2001 from Kentucky Public Service Commission Staff· to BellSouth (the "type of information" in Price Waterhouse audit will not substitute for "end-to-end testing and analysis" of orders "to ascertain how the SONGS software actually performs").

120. There are almost certainly also important differences in BellSouth's manual processes for provisioning and maintenance. There are different centers for maintenance and provisioning in different states. Although these centers ultimately report to a common authority several layers up the organizational hierarchy, the managers frequently exercise their discretion and may do so differently. Indeed, BellSouth has previously acknowledged comparing the performance of different centers and using the practices of the best performing center as a basis for suggesting possible improvements for other centers. For there to be best practices, however, there necessarily must be different practices. Further, by way of example, in discussing transmissions of requests for loop makeup to BellSouth by fax or e-mail in Louisiana PSC hearings, BellSouth witness William H. B. Greer emphasized that "BellSouth has the flexibility within different turfs, different districts, to do things differently." (Att. 27, Transcript of

Louisiana PSC Administrative Hearing, Docket No. U-24714-A, April 24, 2001, Vol. II at 150-51.)

121. Thus, although there are undoubtedly important similarities in BellSouth's OSS throughout its region, there also are differences. Without significant commercial experience in Louisiana, there is no way to know how significant these differences are and no way to conclude that BellSouth's Georgia experience is adequate to show readiness in Louisiana. In any event, BellSouth's Georgia experience does not even show BellSouth's OSS is ready in Georgia. And, as we explain below, additional problems, which are region-wide, further demonstrate BellSouth's OSS failings.

BellSouth's Implementation of a Change Management Process Is Inadequate

122. As a result of the continuous evolution of the telecommunications industry, the interfaces and processes by which CLECs interact with BellSouth must change as well. Change management is the process by which CLECs and BellSouth determine which changes are needed, and then implement those changes in such a manner that they do not have significant negative impacts on CLECs and customers. For example, a good change management process will ensure that CLECs have sufficient notification of changes to an interface that they are able to adapt to any such change.

123. BellSouth's change management rules and its implementation of those rules must improve in a number of important ways before CLECs in the BellSouth region will have an adequate opportunity to compete.

124. To begin with, although BellSouth's change control plan in theory allows CLECs to prioritize change requests, in practice BellSouth often delays implementation of CLEC-initiated requests. Thus, vital CLEC requests, such as provision of fully parsed Customer Service Records ("CSRs") often take years to implement. In approving Bell Atlantic's New York section 271 application, the FCC emphasized that Bell Atlantic's process "prioritize[d] changes based on merit, rather than the sponsor of the change," New York Order ¶ 106, and noted "we would be concerned about the impact of a BOC disregarding input from competing carriers on change

management issues." Id. ¶ 124. BellSouth disregards just such input.

125. BellSouth's change management plan includes processes for both BellSouth and CLECs to propose changes. BellSouth-initiated changes are called Type 4 changes; CLEC-initiated changes are called Type 5 changes. Under the Change Management Plan, Type 4 and Type 5 changes are supposed to be treated identically. First, a change request must be reviewed for acceptance by BellSouth within 10 days (BellSouth had 20 days until recently). Stacy Aff. at OSS Ex. 39 at 28. Obviously, for BellSouth requests, such acceptance is a given. Before BellSouth accepts the change request, the request is called a new request. After BellSouth has accepted the request, the request is considered a pending request. The next step is that BellSouth has 5-7 days to prepare for a change review meeting, and it must then conduct such a meeting. At the meeting, CLECs prioritize change requests, including both Type 4 and Type 5 Change Requests, with one vote per CLEC. BellSouth then schedules those requests based on the priority order in upcoming releases and implements them.

126. But there is nothing in the change management plan that requires BellSouth to schedule and implement CLEC change requests. BellSouth can refuse to accept CLEC change requests, can accept them and not schedule them, or can schedule them and then change the schedule. This is so even if the CLEC's request is entirely reasonable and is a top priority of the CLECs. BellSouth has abused its control in order to deviate from the change management schedule or simply to delay implementation of CLEC-initiated change requests because nothing in the plan precludes it from doing so.

127. Analysis of CLEC-initiated change requests shows that BellSouth delays implementation of these requests at each stage of the process. As of September 5, 2001, there were 34 "new" Type 4 or 5 change requests on BellSouth's Change Control Log. Of these, 26 have been in new status for more than the 20 days the change management plan allots for BellSouth to accept or reject a request (the plan now allots only 10 days). Each of these was a Type V (CLEC-initiated) request. Most of these 26 requests have been in new status for many months. Counting from September 5, 2001, one of the "new" change requests was submitted

more than 16 months ago, one was submitted more than 12 months ago, one was submitted 11 months ago, two were submitted nine months ago, two were submitted 8 months ago, one was submitted six months ago, four were submitted 5 months ago, one was submitted 4 months ago, three were submitted 3 months ago, four were submitted 2 months ago, and six were submitted 1 month ago. Thus, BellSouth has caused delays even in the earliest stage of the change control process.

128. Such delays often occur because BellSouth does not respond and neither accepts nor rejects a CLEC request for a significant period of time. For example, BellSouth failed to respond to change requests 325 and 334 for 3 months. More frequently, however, BellSouth responds to the change request but refuses to accept requests in its initial response even though BellSouth has no good reason for refusing to allow the request to be prioritized in the change management process. For example, MCI recently requested that BellSouth extend the length of time for which LENS and TAFI passwords remain valid from 60 days to 1 year (CR0421). BellSouth responded that this was not its policy, without providing an acceptable reason why the policy could not be changed. Thus, several months after the request was initially made, the parties were still discussing the request, rather than moving closer to implementation of the request. On October 17, BellSouth finally turned down the request based on the purported advice of its security personnel.

129. Even after BellSouth accepts a request, it often takes a long time before that request is placed on the ballot for CLECs to prioritize. As of August 30, 2001 (the day on which BellSouth's Change Control Log had most recently been updated when we evaluated the status of requests), there were 21 "pending" change requests. See Stacy Aff. ¶ 185. Ten of these were CLEC-initiated requests, seven were BellSouth-initiated requests and four fell into other categories. Six of the 17 Type 4 and Type 5 pending change requests had been pending since 1999 or 2000. All were CLEC initiated (Type 5) change requests (CR133, 151, 177, 184, 246, 371). Even though BellSouth has had two change control meetings since the beginning of 2001 to prioritize requests, none of these six change requests was on either list to be prioritized.

130. Once a CLEC request is prioritized, it still must be scheduled for implementation. This also frequently takes many months. During its Georgia test, KPMG noted the "backlog of [CLEC] change requests that, at the time of this report, were prioritized but unscheduled for implementation into a release." Georgia MTP CM-1-1-3. That backlog continues today. Of the 65 change requests that have been prioritized in the four change control prioritization meetings since June 28, 2000, only 15 have been implemented and only two additional requests are even scheduled to be implemented. Only six have been implemented in 2001 and none are scheduled to be implemented during the rest of 2001. BellSouth has implemented far more change requests that CLECs did not prioritize than those that CLECs have prioritized.

131. BellSouth's status log shows that 25 Type 5 change requests (and 17 Type 4 change requests) were in the status "candidate request," which means that they have been prioritized by the CLECs at a change control meeting but have not yet been scheduled for implementation. See also Stacy Aff. ¶ 185. In contrast, BellSouth currently has scheduled only two CLEC change requests for implementation in upcoming releases – both for 2002. Of the 42 "candidate requests" that BellSouth has not scheduled for implementation, 23 were initiated more than one year ago, including five that were initiated in 1999. Nineteen of the 23 were CLEC-initiated requests, including all five 1999 requests.[23]

132. Some of the "candidate requests" that have not yet been scheduled for implementation were ranked very high by CLECs. CR135, for example, which was submitted by AT&T on August 9, 2000, was prioritized fourth by the CLEC community on the pre-ordering/ordering priority list at the January 31, 2001 meeting.[24] It was re-prioritized at the April 25, 2001 meeting because BellSouth failed to schedule it for implementation prior to that

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[23] CR 364 (form of directory listing that drops from 411/DA), CR 365 (allow 1 LSR to change main account number on a listings only account), CR 366 (handling of remaining service on partial migrations), CR 367 (LEAN/LEATN fields) and CR 368 (provide CFA on pre-order).

[24] Change requests by one CLEC often benefit other CLECs. The prioritization process is designed to ensure that changes that benefit CLECs the most as a group are implemented first.

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meeting, and it was again prioritized fourth. (CR135 is designed to enable a CLEC to electronically order a migration of a customer's line to the CLEC and have that line added to an existing account the customer has with the CLEC.) CR0040 was requested by AT&T on May 11, 2000 but was not even placed by BellSouth on the list of change requests to be prioritized until the April 25, 2001 meeting. At that meeting, it was prioritized first, yet it still has not been scheduled. (CR0040 is designed to enable CLECs to obtain real-time status information electronically.) CR0020, a TriVergent Communications request to enable CLECs to view multiple CSRs simultaneously, was submitted on May 2, 2000, was prioritized fourth among pre-ordering requests at the June 28, 2000 meeting, but was not scheduled to be implemented, and indeed has still not been scheduled, despite being re-prioritized seventh at the April 25, 2001 meeting.

133. A final example of BellSouth's delay in scheduling implementation of candidate requests is MCI's change request 0186. On September 26, 2000, MCI submitted this change request for use of the Interactive Agent protocol which would allow orders to be transmitted in real time, rather than being transmitted through a VAN. BellSouth initially responded that it would implement Interactive Agent with the scheduled release of CR0101 which had already been prioritized. In December 2000, BellSouth stated that CR0186 could not be worked with CR0101, but then reversed itself again on February 14, 2001, stating that the requests would be worked together. MCI escalated the issue on April 4, 2001. The change request was finally subject to prioritization at the April 25, 2001 meeting. It still has not been implemented or even scheduled for implementation.

134. BellSouth's delay implementing CLEC-initiated change requests is further evident from the two requests that BellSouth has scheduled to implement. Both of the Type 5 change requests that BellSouth presently has scheduled to implement in upcoming releases are longstanding requests: CR53 (BBR-LO Improvements, requested May 22, 2000) and CR369 (formerlyTAG0812990003, parsed CSRs, requested Aug. 12, 1999). Based on the order of the Georgia Commission, parsed CSRs will now ostensibly be implemented in January 2002.

(Technically, therefore, parsed CSRs have become a regulatory change request, rather than a CLEC-initiated change request.) None of the other CLEC-initiated change requests are yet scheduled for implementation in upcoming releases.

135. An analysis of the changes that actually have been implemented by BellSouth also reveals that BellSouth implements BellSouth-initiated changes far more rapidly than CLEC-initiated changes. CLECs have initiated 96 change control requests between 1999 and 2001 of which only 27 have been implemented, while BellSouth has implemented almost half of its requests during the same time period.[25] Thus, BellSouth has implemented a far higher percentage of BellSouth-initiated than CLEC-initiated change requests. Moreover, even when BellSouth implements CLEC-initiated change requests, it takes nearly three times as long to do so on average as it does with BellSouth-initiated change requests. Of the 27 CLEC-initiated change requests that have been implemented, BellSouth has implemented the requests in an average of 142 days.[26] By contrast, it has implemented 28 BellSouth-initiated change requests in an average of just 55 days.[27]

136. This is further evident by comparing the number of changes that have been prioritized in the BellSouth region since October 2000 with those that have been implemented in the Verizon region. (Att. 25.) In BellSouth, a total of 58 prioritized change requests were implemented over this period. In contrast, Verizon implemented 170 prioritized changes over

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[25] The number of CLEC-initiated change requests and BellSouth-initiated change requests was derived by adding up all of the Type 5 and Type 4 change requests on BellSouth's change logs (other than the cancelled requests). The number of requests that have been implemented was based on the requests listed as implemented on BellSouth's archived change control log.

[26] The averages were obtained by printing out the change control log archive on BellSouth's web site and averaging the days between the open/validate date and the release implementation actual date for Type 4 and Type 5 changes. The open/validate date and the date the CCP received the change request are generally very similar. In the few instances in which the open/validate date was not available, the date the CCP received the change request was used in the calculation instead.

[27] For example, CR 0216, NPORD Data for FOC (Issue 7 – LNP for Ordering impact) was submitted by BellSouth on November 13, 2000 and implemented on December 10, 2000. CR 0219, standard interval changes for loop (LNP for ordering impact) was submitted by BellSouth on November 13, 2000 and implemented on December 10, 2000, and CR 0247, reduce due date interval from 5 to 4 days for SL1 in TAG (system and documentation impact for LENS and TAG within the pre-order and order interfaces) was submitted on December 15, 2000 and implemented on January 27, 2001.

the same time period. Moreover, in Verizon almost all of the requested changes were prioritized. As of October, 2001, only one requested change remained to be prioritized. In BellSouth, however, as we have seen, a multitude of change requests have not even been prioritized, much less implemented.

137. BellSouth's delay in implementing prioritized changes often has significant negative impacts on CLECs. This is evident from examining change requests related to integration of pre-ordering and ordering.

138. CLECs have submitted three change requests related to integration and all have met with extensive delays. On August 12, 1999, AT&T submitted change request 0369 requesting fielded, parsed CSRs. (Of course, CLECs had been requesting parsed CSRs for far longer outside of the newly-formed change management process, as MCI repeatedly explained during BellSouth's prior section 271 applications.) In response to CR0369, BellSouth initially stated that it would develop a project plan for implementing parsed CSRs during the Y2K window at the end of 1999 and beginning of 2000. But it was not until September 2000 that BellSouth even began addressing the change request with CLECs. It was only at the September 27, 2000 meeting that parsed CSRs were submitted to change control for prioritization (at the time, the request had a different number, TAG0812990003). CLECs prioritized parsed CSRs first among pre-ordering requests at the September 27, 2000 meeting. But BellSouth still did not schedule implementation of parsed CSRs.

139. In October 2000, BellSouth finally met with CLECs to discuss requirements for parsed CSRs. CLECs provided their requirements to BellSouth immediately based on the industry standard requirements in LSOG 4 and these were finalized in a meeting with BellSouth in November 2000. BellSouth agreed that it would evaluate the requirements and respond to CLECs if the requirements were unacceptable. BellSouth never did so. Instead, in a series of letters and meetings, BellSouth continuously changed the date in which it said it would implement parsed CSRs. In February 2000, BellSouth said it would implement them in the May time frame, this later slipped to September, then moved back to the summer, and finally

BellSouth provided an implementation date of January 2001, a date that has been set based on the order of the Georgia Commission, close to two-and-a-half years after the request was first made.

140. BellSouth asserts that delays in implementation of parsed CSRs were necessitated by the complexity of the task and the need to work with CLECs in formulating requirements. Stacy Aff. ¶ 223. But Verizon was able to implement parsed CSRs quickly years ago. Indeed, in concluding that Bell Atlantic's change management process in New York was adequate, the FCC specifically noted that "when MCI WorldCom expressed a preference regarding how customer service record addresses be made available to competing carriers, Bell Atlantic agreed to add this functionality within the remaining weeks before the related change release. At the same time, Bell Atlantic devised a special software approach to defer implementation of this functionality for AT&T, the sole competing carrier that objected to this change." NY Order ¶ 124 (emphasis added). BellSouth has not been remotely as responsive to the request for parsed CSRs in its region. In fact, although BellSouth claims it needed to work with CLECs to develop requirements, almost a year after CLECs presented requirements to BellSouth and BellSouth promised to respond if it found parts of these requirements unacceptable, BellSouth released draft user requirements on September 7, 2000 that do not include much of what was agreed upon and do not meet the needs of CLECs.

141. In addition to requesting parsed CSRs, on August 9, 2000, MCI submitted a second change request (0133) that would have significantly contributed to integration of pre-order and order interfaces. MCI requested that BellSouth enable CLECs to submit migration orders with the customer's telephone number (and name) but without a service address. When MCI submitted CR0133, it indicated that the request had a high priority. Nonetheless, BellSouth originally resisted the change, suggesting that a similar change was being considered by industry bodies. It later accepted the change request and seemed to combine its consideration with a similar AT&T request, EDI1121599001, which had been pending since December 1999. That request was prioritized sixth by the CLECs on the ordering list at the September 27, 2000

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meeting.

142. Neither AT&T nor MCI's request was scheduled for implementation, however, nor were they placed on the list to be re-prioritized at the January 31, 2001 meeting. On March 15, 2001, BellSouth announced that the request would be re-prioritized at the March 28, 2001 meeting. But BellSouth then unilaterally withdrew the request from consideration for re-prioritization, claiming that the change was inconsistent with new requirements to place address fields on certain orders. Then, for some reason, BellSouth subsequently informed MCI (in May 2001) that migration by telephone number was in testing but later again indicated the change could not be made. Implementation of the change request was finally scheduled based on the order of the Georgia Commission. Even then, however, BellSouth did not follow the change control process, as it did not announce the date for the change until October 15, 2001 and BellSouth has yet to provide requirements for the change.

143. AT&T long ago submitted a third change request that is important for integration of pre-ordering and ordering and that has only recently been scheduled. On March 1, 2000, AT&T submitted CR2 to correct business rule discrepancies between pre-ordering and ordering. The length of some pre-order fields exceeded that of corresponding order fields so that if the pre-order information was submitted on an order the information would be truncated. The FCC has emphasized that when a BOC "becomes aware of any inconsistencies in field names or formats that would impede a carrier's ability to integrate pre-ordering and ordering functions, we expect that [the BOC] promptly will design and deploy a software correction or provide the necessary technical assistance to competing carriers in the interface integration." NY Order ¶ 139. Nevertheless, after AT&T submitted CR2, BellSouth failed to submit that request to CLECs for prioritization. Instead, more than a year after AT&T submitted the request, BellSouth finally responded by scheduling and implementing the change in the July 28, 2001 release.

144. In addition to requests related to integration of pre-ordering and ordering, BellSouth has also substantially delayed implementation of other important changes. For example, MCI requested BellSouth change its policy of cancelling rejected orders if CLECs did not clarify those

orders and re-transmit them in 10 business days. This was insufficient time. While we have a

business interest in correcting rejects as quickly as possible, we cannot always do so in 10 days.

This is so for a number of reasons: (1) rejects are sometimes lost in BellSouth's VAN (or in

BellSouth's own systems) and it often takes long periods of time to track down the reject; (2) the

reject messages BellSouth transmits are often unclear and must be researched with BellSouth (as

noted above, 11% of the manually processed rejects that MCI received in September required

further research for MCI to understand the meaning of the reject message and its cause); (3)

sometimes transmission of a corrected order will require a system change on the CLEC's side of

the interface that cannot be accomplished in 10 days.

145. Soon after MCI launched service in Georgia, it learned of BellSouth's policy

regarding cancellation of orders when a reject was not corrected in 10 days. It also saw the

impact this was having on its business. Between May and August, 2001, 6,000 MCI orders

"aged off" as a result of BellSouth's policy. In addition, many supplemental orders that MCI

sent to correct rejects were themselves rejected because the 10 day window had passed. On June

22, 2001, MCI therefore submitted change request 436 requesting that BellSouth extend the

window to 30 days. BellSouth, however, first told MCI that it was impossible for it to do this,

later told MCI it was contrary to its policy to do this, and finally, told MCI that this change

would exceed the capacity of its systems. Yet after the Georgia Commission ordered BellSouth

to implement this simple and extremely important change, BellSouth was able to do so within

days. BellSouth should not have resisted this simple change in the first place. Other BOCs, such

as Verizon and SWBT, long have provided CLECs with 30 days to correct the order and

implemented this 30 day policy immediately after CLECs requested it.

146. Even after BellSouth was ordered to implement the change, it did so without

following the change management process. BellSouth made the change for a subset of LSRs

(fully mechanized LSRs) on October 6. But BellSouth did not notify CLECs of the change until

October 12. (Att. 18, Carrier Notification Letter, Oct. 12, 2001.) BellSouth should have

recognized the importance of this change when MCI first requested it, agreed to implement the

change, and provided proper notification to CLECs before implementing the change.

147. BellSouth's delay in implementing change requests that are needed to ensure integratable interfaces and its delay in implementing the change request related to its 10 day clarification policy on rejects underscores its more general failure to respond effectively to CLEC-initiated change requests. This failure is exacerbated by BellSouth's failure to consider important aspects of OSS subject to change control at all. In response to MCI requests for changes related to billing, BellSouth has informed MCI that billing falls outside the change control process altogether. There is nothing in the change control plan that imposes such a limitation. And such a limitation precludes CLECs not only from obtaining important changes, but also from being notified of such changes.[28] BellSouth must begin responding more effectively to CLEC requests before obtaining Section 271 authorization.

148. But this is not BellSouth's only failure with respect to change management. BellSouth's contention that billing falls outside the change management process allows it to avcid including CLECs in discussion of billing changes. BellSouth currently has plans to launch a new "Tapestry" billing system as early as November. Yet BellSouth never discussed this change during the change control process. Instead, after CLECs discovered BellSouth's plan, they demanded that BellSouth explain why this new billing system was not being discussed in change control meetings. BellSouth responded that billing falls outside change management and that, in any event, the change was not CLEC-impacting and thus did not have to go through change management. BellSouth did eventually hold a meeting to discuss the billing changes it had unilaterally decided to implement but did not announce the meeting to the CLEC community as a whole. At that meeting, it repeated its explanations as to why the changes had not gone through change management. (Att. 19.) BellSouth's unilateral determination that a significant

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28 In addition, although BellSouth does consider EDI subject to change control, it appears to reserve the right to make changes to EDI outside of the change control process. BellSouth's "EDI Specification Guide" prominently displays the following disclaimer: "This documentation is for general information purposes only and does not obligate BellSouth to provide services in the manner described herein. BellSouth reserves the right as its sole option to modify or revise the information contained in this documentation at any time without prior notice."

change to its billing process is not CLEC-impacting is problematic to say the least. As the

questions asked at the October 11 meeting indicate, there are numerous aspects of the billing

change that directly affect CLECs. This is true of most systems changes that BellSouth

unilaterally decides to exclude from the change management process because it determines they

do not impact CLECs.

149. An additional problem with BellSouth's change management process is that

BellSouth fails to implement Type 6 changes quickly enough. A Type 6 change "is any non-type

1 change that corrects problems discovered in production versions of an application interface"

either because the interface is not working in accordance with published requirements or because

agreed-upon requirements result in inoperable functionality. BellSouth OSS Ex. 39 at 42.

BellSouth separates Type 6 changes into High Impact (impairs critical functions and no

electronic workaround exists); medium impact (impairs critical system functions, though a

workaround solution does exist), and low impact (causes inconvenience or annoyance). Id. The

change control process calls for BellSouth to internally determine solutions for high impact

defects in 10 days with best effort used to achieve the earlier number, medium impact defects in

90 days with best effort used to achieve the earlier number and low impact defects using best

effort. (Additional time is required for other steps in the resolution process.) BellSouth has

rejected the CLECs' proposal in which it would be required to complete the internal resolution

process for medium impact defects in 4-10 business days with best effort used to achieve the

earlier number, and low impact defects within a 4-20 business day range with best effort used to

achieve the earlier number.

150. A medium impact defect affects critical functionality, even if a manual workaround

exists. Given MCI's order volume, MCI cannot fall into a manual mode for up to 90 days. This

would be extremely costly to MCI and will also result in extensive delays. Further, low impact

defects which cause inconvenience should also be resolved rapidly, not simply left to a "best

efforts" standard.

151. In addition, BellSouth should provide a more complete release schedule. Until

recently, BellSouth, unlike other BOCs such as Verizon, has not had any fixed release schedule based on which new interface versions will be released on specific days of the month or specific months of the year, so that CLECs can plan well in advance when to expect a release. BellSouth now provides such a schedule but does not include in that schedule the expected content of future releases. The schedule will provide the days on which releases will occur but not what functionality will be included in those releases. Thus, CLECs still cannot plan in advance as to when specific changes can be expected. Moreover, CLECs have no means to assess whether BellSouth is appropriately implementing CLEC change requests until the releases are almost upon them.

152. By contrast, other BOCs provide such a schedule. Verizon and SWBT have long had schedules in which releases occur on particular days and provide well in advance a list of the planned functionality that will be incorporated in each release. BellSouth should do the same.

153. The BellSouth change management process therefore has a number of important flaws, the most fundamental of which is BellSouth's failure to implement enough CLEC-initiated change requests. The Georgia OSS test does not demonstrate that BellSouth's change management process is adequate. KPMG did not specifically address some of the problems described here, such as the lengthy time frame for implementation of Type 6 changes. KPMG appears to concur that other problems exist, despite its conclusion that BellSouth's performance was satisfactory. For example, as noted above, KPMG describes the "backlog of [CLEC] change requests that, at the time of this report, were prioritized but unscheduled for implementation into a release." Georgia MTP CM-1-1-3. KPMG also describes the balloting of proposals designed to help alleviate the backlog and noted that its "change management evaluation concluded prior to CLEC-BLS voting on these balloted items." Id. KPMG nonetheless found BellSouth's change control process satisfactory without explaining why.

154. In Florida, KPMG has several open exceptions and observations regarding BellSouth's identical change management process. On June 29, 2001, KPMG opened Observation 86 because the BellSouth change management team "does not provide all prioritized

Change Requests to the BellSouth IT Team for development and implementation." (Att. 4,

Florida Observation 86.) As a result of this observation, CLECs for the first time became aware

that BellSouth's IT organization was not even given all prioritized changes to consider for

implementation.

155. On July 25, 2001, KPMG opened Exception 88 because the "BellSouth Change

Control Prioritization process does not allow CLECs to be involved in prioritization of all CLEC

impacting change requests." (Att. 4, Florida Exception 88.) KPMG explained that BellSouth

uses an internal prioritization list based on changes that it believes are not CLEC-affecting. This

means that CLECs have no warning of these changes – which may in fact turn out to be CLEC

affecting. We have described a number of examples of such changes. This also means that

requests CLECs have not prioritized crowd out those they have prioritized. As KPMG

explained, "[t]his policy inhibits one of the primary objectives of the Change Control Plan

(CCP) 'to allow for mutual impact assessment and resource planning to manage and schedule

changes.'" BellSouth is assessing its response.

156. On August 29, 2001, KPMG also opened Exception 106 because "[t]he BellSouth

IT Team does not have criteria to develop the scope of a Release Package." (Att. 4.) KPMG

added that "[t]he lack of established and documented development criteria may result in the

BellSouth IT team overlooking and/or ignoring important change requests. Important change

requests that remain unimplemented prevent CLECs from receiving requested order and pre-

order functionality that may allow CLECs to compete more effectively in the local exchange

carrier market." Id. As we have explained at length, that is exactly what has happened.

157. BellSouth's change control process and BellSouth's implementation of that process

must undergo a number of improvements before that process can be deemed satisfactory.[29]

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[29]   BellSouth's performance metrics do not include any measures that would capture the defects with
BellSouth's change management process discussed here. BellSouth's Change Control Metrics do measure the
timeliness of change notifications and documentation, but even these measures have extremely lax standards.
BellSouth's change management plan used to allow it to release documentation shortly before a release. While
BellSouth recently has committed to longer intervals for various types of notices for business rules and technical

BellSouth's Test Environment for CLECs Is Inadequate.

158. BellSouth has only recently implemented a CLEC Test Environment that ostensibly is separate from the production environment. Indeed, after MCI launched service in Georgia in April 2001, we could not do additional testing unless we were willing to do so in the production environment, at a risk to our customers, which we were not.

159. BellSouth recently put in place its CLEC Application Verification Environment ("CAVE") testing environment. BellSouth claims that CAVE is a separate testing environment, but the truth is that this is not so. BellSouth, unlike Verizon or SBC in any of its regions, requires CLECs to use different codes when testing in CAVE than they do in production. For testing, BellSouth provides CLECs with fictitious Company Codes, Customer Carrier Name Abbreviations, Carrier Identification Codes, and Billing Account Numbers. Because WorldCom was suspicious that these fictitious codes were used to separate test orders from production orders in BellSouth's production systems, it asked at a September 7, 2001 kickoff meeting for MCI's use of CAVE – a meeting that included BellSouth's personnel responsible for CAVE – why it needed to use these fictitious numbers. BellSouth responded CAVE is a front-end ordering process that interfaces BellSouth's back-end <u>production</u> systems and that, just as MCI suspected, the fictitious numbers are used to separate out test orders from production orders. Thus, CAVE is not actually a separate test environment as BellSouth has claimed.[30]

160. This was confirmed several weeks later. On October 1, BellSouth re-flowed 1521 production notifiers into MCI's test environment in an effort to transmit to MCI notifiers that had previously been missing. These notifiers contained the correct Purchase Order Number ("PON") values that were missing but were sent to MCI with test Trading Partner IDs thus causing the responses to end up in MCI's test environment. Thus, BellSouth's production and testing systems

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documentation, it can meet its performance plan without meeting these new intervals, as the new intervals have not been imported into the plan.

[30] After this meeting, BellSouth sent MCI meeting minutes that did not include this explanation of CAVE. MCI corrected the minutes and returned them to BellSouth. (Att. 20). BellSouth never responded that MCI's understanding was incorrect.

order reaches SOCS (when BellSouth transmits the FOC). Thus, if a CLEC submits an order, it takes two weeks for that order to reach SOCS, and one additional day to complete, the average completion interval in BellSouth's measures would be one day. Since many orders are delayed or even lost before reaching SOCS, BellSouth's erroneous definition of average completion interval likely significantly understates that interval.

169. BellSouth claims that it does not need to measure the time to receive a FOC as part of the Order Completion Interval because it is measured separately. All the other ILECs that measure Average Order Completion interval from receipt of an error-free (i.e. non-rejected) order also measure FOC intervals as well. This is not an excuse for not measuring the interval to capture the full customer experience. Combining two averages together does not tell the whole story because of how FOC intervals for different products are averaged together in the remedy plan.

BellSouth's Self-Executing Enforcement Mechanism ("SEEM") Parameter Delta

170. Even if BellSouth's performance were acceptable today, its performance plans in Georgia and Louisiana are insufficient to prevent backsliding. While the other remedy plans included in section 271 applications filed by BOCs to date have set a specific critical value to determine whether a specific difference in performance between the BOC's retail and wholesale customers is discriminatory, BellSouth has proposed an added buffer of allowed discrimination which is supposedly "nonmaterial or non-competitively significant." Under BellSouth's remedy plan, BellSouth attempts to equalize the risk of making Type I errors (finding discrimination when it does not exist) and Type II errors (finding no discrimination when it does exist). But use of this method requires reliance on a parameter – delta – that is a measure, in units of the ILEC standard deviation, of the extent to which the ILEC mean exceeds the CLEC mean, or the reverse. The selected delta will determine how many standard deviations from equal performance is considered competitively significant.

171. BellSouth's 1 delta for Tier I remedies and 0.5 delta for Tier II remedies adopted by Louisiana, and even its 0.5 and 0.35 delta for Georgia, make detection of discrimination for

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larger sample sizes very difficult. As the attached MCI paper by Professor John Jackson of Auburn University discusses, this one-size-fits-all delta approach can allow real discrimination to escape remedies for large sample sizes. (Att. 24) Moreover, the deltas in Georgia and Louisiana were not chosen by industry experts for each type of metric to determine what is competitively significant.

172. The Florida PSC understood these issues when it adopted Z-Tel's alternative to a lower 0.25 delta proposed by CLECs or the BellSouth proposed 1 delta.

> In our opinion, [Z-Tel] witness Ford advances the correct principle, namely that balancing should be done in a reasonable fashion in order to minimize the deviation from a true test of parity. We recognize that BellSouth witness Mulrow's position that balancing should be done in the same fashion (i.e., fixed delta) across all sample sizes is probably rooted in the idea that since balancing assists ALECs at small sample sizes, it is only fair the balancing disadvantage ALECs at larger sample sizes. We do not find this rationale compelling. We are persuaded by the principle advanced by witness Ford that we should adhere as closely as possible to a strict test of parity, since BellSouth is required to provide non-discriminatory service under the Telecommunications Act of 1996.

Although the Louisiana and Georgia Commissions reached a different conclusion, the Louisiana Commission adopted its staff report that gave a less than ringing endorsement of BellSouth's proposed 1 delta for CLEC-specific and 2 delta for CLEC aggregate reports:

> Staff believes that the Commission should accept BellSouth's proposed delta value of 1 for individual CLEC tests and .50 for CLEC aggregate tests for an interim period review period. Staff did not have sufficient evidence to conclude that a delta value of 1 produces reasonable results when examining actual performance data and resulting pass fail statistics. Staff concludes that additional analyses and data should be examined before drawing a final conclusion concerning the delta value. BellSouth should be ordered to use delta values of 1 and .50 for an interim period of seven and one-half months (45 days to put its statistics and remedy plan into full production mode and six months of reporting); provide Staff with the amount of remedies produced using these values; and to present the metric results as aggregated under its remedy plan, Z-scores, Type I and Type II error probabilities and balancing critical values that produced the amount of remedies. This information should be made available to Staff so that it can further evaluate the reasonableness of BellSouth's proposed parameter delta value of 1 and .50.

Order Adopting Final Staff Recommendation, In re: BellSouth Telecommunications, Inc.,

Service Quality Performance Measurements, Docket No. 22252 Subdocket C (May 14, 2001).
Although the staff recommendation was voted on in February, the order was not released until
May, so the 7 and one-half month trial proposed by staff is only in its second month. In
accepting this remedy plan as is, the FCC would free BellSouth from paying remedies for
performance that would clearly trigger remedies in the New York, Massachusetts and
Connecticut plans, as well as the three Southwestern Bell plans it previously approved.

173. BellSouth's SEEM also suffers the same infirmities as other per occurrence plans.
Because with low ordering volumes the occurrences of discrimination will be small even if
BellSouth discriminates on every measure, the plan does not provide BellSouth a sufficient
incentive to resolve discriminatory performance. To the contrary, by continuing to perform
badly, BellSouth can keep order volumes low and thus also keep remedies low. This is made
even worse when the amounts per occurrence are remarkably low. For example, in August
BellSouth failed the Billing Invoice Timeliness submetric on four occasions for WorldCom in
Georgia where the remedy is only one dollar per miss, so the remedy payable to WorldCom is $4
– clearly not a large deterrent to a multi-billion dollar company.

BellSouth Is Unresponsive to CLEC Issues

174. One issue that lies at the bottom of all of MCI's specific concerns is BellSouth's
failure to respond adequately to CLEC problems. As we have already explained, it is extremely
difficult to obtain answers from BellSouth on even relatively simple questions – even if
BellSouth seems to be trying to be helpful. BellSouth's failure to respond adequately to MCI's
problems with missing notifiers, billing issues, and line loss problems merely exemplify this
concern.[32] Indeed, more than 40% of MCI's IT resources for local are spent on BellSouth even
though less than 10% of MCI's monthly transaction volume is in the BellSouth region.

175. Much of the difficulty appears to relate to the fact that BellSouth's entire IT

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[32] We have attached a series of e-mails related to MCI's attempt to open a trouble ticket on FOCs it had received
that had a different due date than it requested or that were completed on a different day than it requested. They
provide one example of some of the difficulties MCI has encountered. (Att. 17.)

department was outsourced between 1996 and 1997. (Att. 7, Stacy Dep. at 143-46, 153-57).

Thus, OSS development is contracted out to outside vendors. But BellSouth requires CLECs to

work through BellSouth to obtain answers to EDI questions. Generally we must work through

our account team which has very little knowledge of EDI and must itself bring in BellSouth

employees with more knowledge, and they then may have to obtain answers from the outside

vendors. And it is not the same outside vendor for all parts of BellSouth's OSS. We are aware

that Accenture developed and manages parts of the OSS and Telcordia developed and manages

some other parts. This creates substantial difficulties for CLECs.

176. CLEC difficulties are increased by BellSouth's failure to provide CLECs a walk

through of their OSS systems as Verizon and other BOCs have done. Although BellSouth

provided an overview of its systems at a UNE-P Users Group meeting, this overview was

extremely high level and did not address the questions that CLECs asked. Without a detailed

walk through, CLECs do not know how orders are processed and cannot help BellSouth

determine whether problems are theirs or BellSouth's. We learn everything we know about

BellSouth's systems from depositions and testimony. This is not a business relationship.

177. BellSouth's unwillingness to facilitate CLEC competition is also evident from the

web site it has developed for CLECs to access performance reports. CLECs must pull the

performance reports from the web. This is an extremely cumbersome process in the BellSouth

region. CLECs must download the data one submetric at a time. This often takes up to two

minutes per submetric for each of the hundreds of submetrics. Further, the reports do not clearly

show what standard (benchmark or parity) against which performance is being measured, as do

the reports BellSouth has provided to the FCC with its section 271 application. CLECs need to

be able to quickly download a report in the format provided to the FCC, rather than spending

hours pulling one report at a time. The problem is further encumbered by the frequent error

messages and down times for the system. Moreover, if CLECs wish to print the data, they must

reformat the data. And the website is unavailable on the weekends.

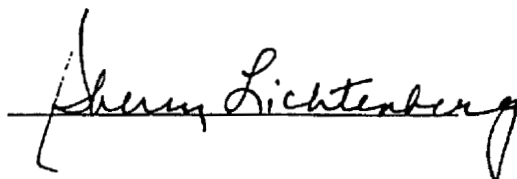178. BellSouth's inability or unwillingness to help facilitate local competition is further

evident from its approach to change management, as we discuss below.

Conclusion

179. This concludes our declaration on behalf of WorldCom, Inc.

I declare under penalty of perjury that the foregoing is true and correct.
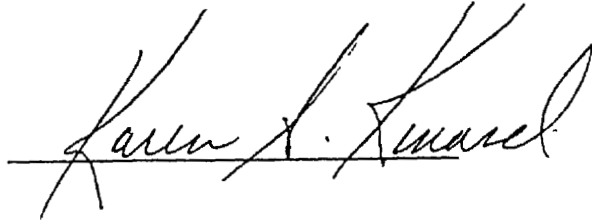
Executed on October __17__, 2001.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on October __19__, 2001.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on October __19__, 2001.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on October **16**, 2001.

Before the
Federal Communications Commission
Washington. D.C. 20554

In the Matter of	)
	)
Application by BellSouth Corporation.	)
BellSouth Telecommunications. Inc.. and	)
BellSouth Long Distance. Inc.. for	)
Provision of In-Region. InterLATA	) CC Docket No. 01-277
Services in Georgia and Louisiana	)
	)

**DECLARATION OF SHERRY LICHTENBERG,
RENE DESROSIERS. KAREN KINARD & RICHARD CABE**

ATTACHMENTS

ATTACHMENTS TO EXHIBIT 1

ATTACHMENT 1

1. What are BST plans for providing this functionality via industry EDI and CORBA interface guidelines?
2. What are plans for upgrade to LSOG 5? Or will this version be a hybrid LSOG 4/5?
3. Are field characteristics, i.e., alpha, numeric, alpha/numeric, and special between pre order identical to ordering requirements?
4. Requirements document does not identify field usage, i.e., required, conditional, optional, prohibited, etc.
5. Requirements document does not identify field lengths.
6. Are field names for Pre Order identical to Order when definition our general usage are the same?
7. In many instances the requirements document does not identify valid values applicable for specific fields, e.g., SATH, CITY, STATE, LASD, LATH, LASS, LALOC, etc. Are pre order values received in these fields to be populated exactly as received (i.e., with case sensitivity applied) to order as received in pre order CSR transaction?
8. Are field values contained in Pre Order CSR response transaction identical to order initiation requirements?
9. If the end user's listed and service address is identical, will both be parsed out in response transaction? What if they are not identical, will both sets of fields be populated? If account is classified as non listed, will all listed addresses be left blank?
10. If the end users directory delivery address is identical to either the service or listed address, will all be parsed out in response transaction? What if they are not identical?

The following fields were identified by the CLEC community (11/16/00 requirements review session) as valid fields to be utilized by BST for the CSR Inquiry and/or Response transactions (parsed). However, these field requirements are not contained in the BST 9/11 User Requirements document:
1. CC – Company Code.
2. AGAUTH – Agency Authorization
3. TOS – Type of Service
4. NAME – End User Name (not for directory delivery)
5. NC – Network Channel Code
6. NCI – Network Channel Interface Code
7. SECNCI – Secondary Network Channel Interface Code
8. FEATDES – Feature Description
9. LST – Local Service Termination
10. DGOUT – DID Digits Out
11. HNTYP – Hunting Type
12. HTSEQ – Hunting Sequence
13. SGNL – Signaling
14. DDADLO – Delivery Address Descriptive Location
15. STYC – Style Code
16. TOA – Type of Account
17. LNPL – Listed Name Placement
18. LTXNUM – Line of Text Reference Number
19. BRO – Business/Residence Placement Override

The following issues/clarification requests relate to individual requirement numbers (UR6776.xxxx):
2. how will user select/designate parsed versus unparsed type request?
2A. Need additional clarification on what last paragraph means, for BST owned accounts.
3B. Does block of data mean that within one transaction both parsed and non-parsed data will be returned?
3C. How does this limitation equate to lines of text or access lines? What will be returned if this limitation is hit? What alternative does CLEC have if this limitation occurs?
4. What are inquiry requirements? CCNA was recommended to be prohibited for response transaction.
10. What are inquiry requirements?
20. Do both options provide parsed only results, or what? The CLEC community requested that TXTYP be required on response transaction.
30 & 31. Date and time sent value on response transaction should not be ECHO but exact time of BST transmission.

40, 45, & 46. If user inputs WTN value in WTN field, are all associated TNs returned? If user inputs WTN in ATN field and WTN=BTN are all details returned?

80. Why is Class of service being returned as unfielded data. CS data should be returned as a 5 A/N field as per OBF guidelines. Identifies the type of service relationship for ordering. CLECs identified CS is a required response transaction field.

180. Is APT, SUIT, UNIT, LOT, and SLIP an inclusive list of valid values for Room?

190 Is WNG and PIER an inclusive list of valid values for Building, shouldn't BLDG also be included? In example used by BST, where would Atrium be located?

200. Will Floor only contain a numeric value? What is inclusive list of valid values for Floor?

240. Will BST only provide a 5 digit zip code value?

420 What are valid values?

440 What are valid values?

450 What are valid values?

460 What are valid values? Or are community names spelled in full?

461 What are valid values?

470 What are valid values?

500 What are valid values?

510 What are valid values?

650 What are valid values?

670 What are valid values?

680 What are valid values?

700 What are valid values?

720 What are valid values?

ATTACHMENT 2

BST - AUTOMATED REJECTS

TOP ISSUES	ALL REJECTS			INITIAL			SUPPLEMENTAL		
	REJECT VOLUME	% OF REJECTS	% OF ORDERS	REJECT VOLUME	% OF REJECTS	% OF ORDERS	REJECT VOLUME	% OF REJECTS	% OF ORDERS
1 MULTIPLE BTN	2079	22%	N/A	1357	14.7%	N/A	722	7.8%	N/A
2 NAME/ADDRESS	1436	16%	N/A	913	9.9%	N/A	523	5.7%	N/A
3 PON/VERSION REJECTS	1104	12%	N/A	22	0.2%	N/A	1082	11.7%	N/A
4 PON AGED OFF	761	8%	N/A	4	0.0%	N/A	757	8.2%	N/A
5 INVALID TN	707	8%	N/A	578	6.3%	N/A	129	1.4%	N/A
6 LCON	699	8%	N/A	686	7.4%	N/A	13	0.1%	N/A
7 LISTING REJECTS	534	6%	N/A	473	5.1%	N/A	61	0.7%	N/A
8 BST REJECTS	398	4%	N/A	264	2.9%	N/A	134	1.4%	N/A
9 MIGRATION DECLINED	312	3%	N/A	304	3.3%	N/A	8	0.1%	N/A
10 DISCONNECTION DETAILS	274	3%	N/A	272	2.9%	N/A	2	0.0%	N/A

TOP 5 OF INITIAL VERSIONS	REJECT VOLUME	% OF REJECTS	% OF ORDERS
MULTIPLE BTN	1357	15%	N/A
NAME/ADDRESS	913	10%	N/A
LCON	686	7%	N/A
INVALID TN	578	6%	N/A
LISTING REJECTS	473	5%	N/A

TOP 5 OF SUPPLEMENTAL VERSIONS	REJECT VOLUME	% OF REJECTS	% OF ORDERS
PON/VERSION REJECTS	1082	12%	N/A
PON AGED OFF	757	8%	N/A
MULTIPLE BTN	722	8%	N/A
NAME/ADDRESS	523	6%	N/A
BST REJECTS	134	1%	N/A

TOP REJECT CODES

G9496 - TNS=7704753071 ON LNUM=00002 NOT FOUND ON EATN=7704753071 FOR ACT=	21%	2025
R1030 - VER MUST BE GREATER THAN PREVIOUS VERSION	11%	1036
G7905 - RSAG - INCORRECT COMMUNITY, INCORRECT ZIP CODE OR INVALID ADDRESS FORMAT	9%	879
R1645 - LSR/PON AGED OFF	8%	761
E2120 - LCON-NAME MUST BE UP TO 15 ALPHANUMERICS WITH EMBEDDED BLANKS AT MAIN LOCATION	7%	688
D4045 - DLNUM=&DLNM LTN=<N ASSOCIATED LACT COMBINATION I OR O MISSING	4%	354
D4065 - DLNUM=&DLNM LTN=<N ASSOCIATED LACT COMBINATION I AND O IS MISSING	4%	354
AO ASSIGNABLE ORDER	4%	337
G7400 - CLEC DOES NOT OWN THIS ACCOUNT.	3%	309
G7250 - LSR HOUSENUMBER INCORRECT	3%	307
G9626 - CLASS OF SERVICE LNPRL NOT ELIGIBLE FOR CONVERSION TO PORT/LOOP SERVICE	3%	301
G9627 - ALL CUSTOMER RECORDS ARE FINAL FOR THIS NUMBER	3%	243
G9442 - DLNUM=0001 LTN=7709961213 ALI MUST BE UNIQUE	2%	170
G9860 - UNABLE TO HANDLE REQUEST; ENDUSER ACCOUNT FROZEN	2%	159
G7055 - NUM=7703939880 TELNO=7703939880 ACCOUNT IS FINAL	1%	130
G8209 - USOC COMBINATION IS INVALID. FORMAT SAE 587 I1 ESXDC /TN 770 532-2155	1%	101
G8830 - CLEC ALREADY OWNS THIS ACCOUNT	1%	94
G9685 - DUE DATE COULD NOT BE CALCULATED	1%	93
G7860 - RSAG - NO EXACT MATCH ON STREET NAME	1%	92
S3410 - LNA MUST BE X OR G IF OTN IS POPULATED	1%	92

MIGRATION	ALL VERSIONS		INITIAL		SUPPLEMENT		VERSION 2		VERSION 3+	
MULTIPLE BTN	33.8%	2078	22.1%	1356	11.7%	722	9.2%	563	2.6%	159
PON/VERSION REJECTS	13.6%	835	0.1%	8	13.5%	827	10.4%	639	3.1%	188
NAME/ADDRESS	11.7%	721	7.3%	449	4.4%	272	2.8%	171	1.6%	101
LCON	10.9%	673	10.7%	660	0.2%	13	0.1%	8	0.1%	5
PON AGED OFF	9.7%	598	0.1%	4	9.7%	594	9.2%	568	0.4%	26
MIGRATION DECLINED	5.0%	307	4.9%	301	0.1%	6	0.0%	3	0.0%	3
INVALID TN	2.6%	161	1.5%	93	1.1%	68	0.7%	45	0.4%	23
LOCAL FREEZE	2.6%	159	2.5%	156	0.0%	3	0.0%	3	0.0%	0
FEATURES/USOCS	2.3%	143	1.4%	89	0.9%	54	0.6%	39	0.2%	15
BST REJECTS	1.5%	94	1.3%	81	0.2%	13	0.1%	8	0.1%	5
DUPLICATE INSTALL/MIGRATE	1.5%	94	0.4%	26	1.1%	68	0.8%	52	0.3%	16
DUE DATE	1.4%	88	1.1%	69	0.3%	19	0.3%	16	0.0%	3
CLASS OF SERVICE (CID)	1.0%	62	0.8%	48	0.2%	14	0.2%	12	0.0%	2
PENDING ORDER	0.7%	43	0.6%	34	0.1%	9	0.1%	5	0.1%	4
INVALID LEC REJECTS	0.6%	34	0.4%	27	0.1%	7	0.1%	4	0.0%	3
LISTING REJECTS	0.5%	31	0.4%	22	0.1%	9	0.1%	5	0.1%	4
INVALID/MISSING DATA	0.4%	26	0.3%	19	0.1%	7	0.1%	5	0.0%	2
DISCONNECTION DETAILS	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
PON ACTIVITY/LINE ACTIVITY	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
DEACTIVATION DETAIL	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
SUSPEND/RESTORE ACTIVITY	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
REJECTS NEEDING RESEARC	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
NEW LINE	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
PIC REJECTS	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
BILLING ACCOUNT NUMBER	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
BTN ASSIGNMENT	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
	100.0%	6147	55.0%	3442	44.0%	2705	34.9%	2146	9.1%	559

TOP REJECTS FOR MIGRATION

G9496 - TNS=7704753071 ON LNUM=00002 NOT FOUND ON EATN=7704753071 FOR ACT=	33%	2024
R1030 - VER MUST BE GREATER THAN PREVIOUS VERSION	13%	793
E2120 - LCON-NAME MUST BE UP TO 15 ALPHANUMERICS WITH EMBEDDED BLANKS AT MAIN LOCATION	11%	662
R1645 - LSR/PON AGED OFF	10%	598
G7250 - LSR HOUSENUMBER INCORRECT	5%	307
G9626 - CLASS OF SERVICE LNPRL NOT ELIGIBLE FOR CONVERSION TO PORT/LOOP SERVICE	5%	301
G7905 - RSAG - INCORRECT COMMUNITY, INCORRECT ZIP CODE OR INVALID ADDRESS FORMAT	4%	256
G9860 - UNABLE TO HANDLE REQUEST; ENDUSER ACCOUNT FROZEN	3%	159
G8209 - USOC COMBINATION IS INVALID, FORMAT SAE 587 I1 ESXDC /TN 770 532-2155	2%	96
G8830 - CLEC ALREADY OWNS THIS ACCOUNT	2%	94
G9685 - DUE DATE COULD NOT BE CALCULATED	1%	81
G7055 - NUM=7703939880 TELNO=7703939880 ACCOUNT IS FINAL	1%	73
G9627 - ALL CUSTOMER RECORDS ARE FINAL FOR THIS NUMBER	1%	66
AO ASSIGNABLE ORDER	1%	63
G8945 - LINECLSSVC AND TOS DO NOT MATCH	1%	62
G9475 - ACT= ALLOWED ONLY ON SAME LOCNUM SERVICE ADDRESS	1%	61
G9488 - DISPOSITION OF ALL LINES REQUIRED ON ACT V	1%	54
PD PENDING ORDER	1%	43
G8195 - CALL FORWARDING USOC MUST NOT APPEAR, FORMAT SAE 540 I1 GCJ /TN 770 227-1838 /CFND <	1%	40
E2085 - LOCNUM=000 FLOOR-EU MUST NOT BE POPULATED WITH FLR IN ANY POSITION AT THIS LOCATION	1%	39

NEW INSTALL	ALL VERSIONS		INITIAL		SUPPLEMENT		VERSION 2		VERSION 3+	
NAME/ADDRESS	56.0%	705	36.1%	455	19.8%	250	15.1%	190	4.8%	60
BST REJECTS	21.6%	272	12.3%	155	9.3%	117	6.0%	76	3.3%	41
PON/VERSION REJECTS	13.7%	172	0.0%	0	13.7%	172	8.7%	110	4.9%	62
PON AGED OFF	5.4%	68	0.0%	0	5.4%	68	3.8%	48	1.6%	20
LCON	1.9%	24	1.9%	24	0.0%	0	0.0%	0	0.0%	0
PENDING ORDER	0.8%	10	0.3%	4	0.5%	6	0.3%	4	0.2%	2
DUE DATE	0.6%	8	0.1%	1	0.6%	7	0.4%	5	0.2%	2
LISTING REJECTS	0.1%	1	0.1%	1	0.0%	0	0.0%	0	0.0%	0
MULTIPLE BTN	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
MIGRATION DECLINED	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
INVALID TN	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
LOCAL FREEZE	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
FEATURES/USOCS	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
DUPLICATE INSTALL/MIGRATE	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
CLASS OF SERVICE (CID)	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
INVALID LEC REJECTS	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
INVALID/MISSING DATA	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
DISCONNECTION DETAILS	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
PON ACTIVITY/LINE ACTIVITY	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
DEACTIVATION DETAIL	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
SUSPEND/RESTORE ACTIVITY	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
REJECTS NEEDING RESEARC	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
NEW LINE	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
PIC REJECTS	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
BILLING ACCOUNT NUMBER	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
BTN ASSIGNMENT	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
	100.0%	1260	50.8%	840	49.2%	620	34.4%	433	14.8%	187

TOP REJECTS FOR NEW INSTALL:

G7905 - RSAG - INCORRECT COMMUNITY, INCORRECT ZIP CODE OR INVALID ADDRESS FORMAT	49%	618
AO ASSIGNABLE ORDER	21%	260
R1030 - VER MUST BE GREATER THAN PREVIOUS VERSION	14%	172
G7860 - RSAG - NO EXACT MATCH ON STREET NAME	6%	76
R1645 - LSR/PON AGED OFF	5%	68
E2120 - LCON-NAME MUST BE UP TO 15 ALPHANUMERICS WITH EMBEDDED BLANKS AT MAIN LOCATION	2%	24
G8825 - ORDER ERR:	1%	11
G9641 - REQUESTED ACTIVITY ALREADY PENDING	1%	9
R1131 - DDD IS LESS THAN CALC DATE ON PRIOR VERSION LSR OR SERVICE ORDER DUE DATE	0%	6
G7935 - RSAG-SIMILAR STREET FOUND IN DIFFERENT COMMUNITY AND/OR ZIP	0%	5
G7900 - RSAG - NO MATCH ON STREET NAME	0%	2
G9685 - DUE DATE COULD NOT BE CALCULATED	0%	2
PD PENDING ORDER	0%	1
D4310 - DLNUM=0001 LTN=9127485928 LANO PROHIBITED WITHOUT LASN	0%	1
E2040 - LOCNUM=000 SANO PROHIBITED WHEN SASN IS NOT POPULATED AT THIS LOCATION	0%	1
E2060 - LOCNUM=000 SASN REQUIRED WITH THIS REQTYP/ACT TYP COMBINATION AT THIS LOCATION	0%	1
E2080 - LOCNUM=000 SADLO REQUIRED WHEN SANO IS NOT POPULATED AT THIS LOCATION	0%	1
G7718 - UNABLE TO RETRIEVE PSO TO PROCESS SUP	0%	1
G7930 - RSAG-STREET FOUND IN DIFFERENT COMMUNITY AND/OR ZIP	0%	1
CA CANCELLED ORDER	0%	0

CHANGE	ALL VERSIONS		INITIAL		SUPPLEMENT		VERSION 2		VERSION 3+	
LISTING REJECTS	36.4%	475	32.6%	425	3.8%	50	1.7%	22	2.1%	28
DISCONNECTION DETAILS	17.0%	222	17.0%	222	0.0%	0	0.0%	0	0.0%	0
INVALID TN	15.8%	206	12.5%	163	3.3%	43	2.1%	28	1.2%	15
FEATURES/USOCS	7.3%	95	4.2%	55	3.1%	40	1.9%	25	1.2%	15
PON ACTIVITY/LINE ACTIVITY	7.3%	95	7.3%	95	0.0%	0	0.0%	0	0.0%	0
PON AGED OFF	6.7%	87	0.0%	0	6.7%	87	5.8%	75	0.9%	12
PON/VERSION REJECTS	5.6%	73	0.9%	12	4.7%	61	3.5%	46	1.2%	15
BST REJECTS	1.8%	23	1.5%	20	0.2%	3	0.2%	3	0.0%	0
PENDING ORDER	1.3%	17	1.1%	14	0.2%	3	0.1%	1	0.2%	2
NAME/ADDRESS	0.4%	5	0.3%	4	0.1%	1	0.0%	0	0.1%	1
MIGRATION DECLINED	0.2%	3	0.2%	2	0.1%	1	0.1%	1	0.0%	0
INVALID LEC REJECTS	0.2%	2	0.1%	1	0.1%	1	0.0%	0	0.1%	1
MULTIPLE BTN	0.1%	1	0.1%	1	0.0%	0	0.0%	0	0.0%	0
LCON	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
DUE DATE	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
LOCAL FREEZE	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
DUPLICATE INSTALL/MIGRATE	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
CLASS OF SERVICE (CID)	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
INVALID/MISSING DATA	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
DEACTIVATION DETAIL	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
SUSPEND/RESTORE ACTIVITY	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
REJECTS NEEDING RESEARC	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
NEW LINE	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
PIC REJECTS	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
BILLING ACCOUNT NUMBER	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
BTN ASSIGNMENT	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
	100.0%	1304	77.8%	1014	22.2%	290	15.4%	201	6.8%	89

TOP REJECTS FOR CHANGE:

D4045 - DLNUM=&DLNM LTN=<N ASSOCIATED LACT COMBINATION I OR O MISSING	20%	330
D4065 - DLNUM=&DLNM LTN=<N ASSOCIATED LACT COMBINATION I AND O IS MISSING	20%	330
G9442 - DLNUM=0001 LTN=7709961213 ALI MUST BE UNIQUE	9%	143
G7400 - CLEC DOES NOT OWN THIS ACCOUNT.	7%	107
S3410 - LNA MUST BE X OR G IF OTN IS POPULATED	6%	92
T8140 - LNUM=00001 TC OPT PROHIBITED IF TC FR IS NOT POPULATED ON REQTYP E, F OR M FOR LNA C, (	6%	92
T8255 - LNUM=00001 TC FR IS REQUIRED IF LNUM TC OPT IS POPULATED AND LNA IS C G N OR V AND REQ	6%	92
R1645 - LSR/PON AGED OFF	5%	87
G9627 - ALL CUSTOMER RECORDS ARE FINAL FOR THIS NUMBER	3%	50
R1030 - VER MUST BE GREATER THAN PREVIOUS VERSION	3%	49
G7055 - NUM=7703939880 TELNO=7703939880 ACCOUNT IS FINAL	3%	47
G9481 - LNUM=00001 FEATURE DOES NOT EXIST ON ACCOUNT TO DISCONNECT	3%	45
T8180 - LNUM=00001 TC TO PRIMARY NUMBER MUST BE DIFFERENT FROM NUMBER BEING REFERRED	2%	38
G9602 - USOC ALREADY EXISTS ON CUSTOMER RECORD	2%	25
PD PENDING ORDER	1%	17
G8825 - ORDER ERR:	1%	15
G8970 - FID RCU WITH TWC FOUND ON SAME LINE AS 3-WAY CALLING USOC	1%	12
R1015 - PON DUPLICATE ON INITIAL LSR	1%	12
R1215 - SUP PROHIBITED WHEN FIRST CHARACTER OF REQTYP CHANGES	1%	9
AO ASSIGNABLE ORDER	0%	8

MOVE	ALL VERSIONS		INITIAL		SUPPLEMENT		VERSION 2		VERSION 3+	
DISCONNECTION DETAILS	59.8%	52	57.5%	50	2.3%	2	0.0%	0	2.3%	2
PON/VERSION REJECTS	13.8%	12	0.0%	0	13.8%	12	8.0%	7	5.7%	5
PON AGED OFF	9.2%	8	0.0%	0	9.2%	8	4.6%	4	4.6%	4
DUE DATE	9.2%	8	5.7%	5	3.4%	3	0.0%	0	3.4%	3
BST REJECTS	5.7%	5	5.7%	5	0.0%	0	0.0%	0	0.0%	0
PENDING ORDER	2.3%	2	2.3%	2	0.0%	0	0.0%	0	0.0%	0
LISTING REJECTS	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
INVALID TN	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
FEATURES/USOCS	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
PON ACTIVITY/LINE ACTIVITY	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
NAME/ADDRESS	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
MIGRATION DECLINED	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
INVALID LEC REJECTS	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
MULTIPLE BTN	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
LCON	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
LOCAL FREEZE	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
DUPLICATE INSTALL/MIGRATE	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
CLASS OF SERVICE (CID)	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
INVALID/MISSING DATA	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
DEACTIVATION DETAIL	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
SUSPEND/RESTORE ACTIVITY	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
REJECTS NEEDING RESEARC	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
NEW LINE	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
PIC REJECTS	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
BILLING ACCOUNT NUMBER	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
BTN ASSIGNMENT	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
	100.0%	87	71.3%	62	28.7%	25	12.6%	11	16.1%	14

TOP REJECTS FOR MOVE:

T8180 - LNUM=00001 TC TO PRIMARY NUMBER MUST BE DIFFERENT FROM NUMBER BEING REFERRED	60%	52
R1030 - VER MUST BE GREATER THAN PREVIOUS VERSION	14%	12
R1145 - INTERVAL BETWEEN DDD AND DDDO MUST BE 30 CALENDAR DAYS OR LESS	9%	8
R1645 - LSR/PON AGED OFF	9%	8
AO ASSIGNABLE ORDER	6%	5
PD PENDING ORDER	2%	2
CA CANCELLED ORDER	0%	0
CP COMPLETED ORDER	0%	0
D4045 - DLNUM=&DLNM LTN=<N ASSOCIATED LACT COMBINATION I OR O MISSING	0%	0
D4055 - DLNUM=&DLNM LTN=<N ALI MUST BE UNIQUE	0%	0
D4065 - DLNUM=&DLNM LTN=<N ASSOCIATED LACT COMBINATION I AND O IS MISSING	0%	0
D4310 - DLNUM=0001 LTN=9127485928 LANO PROHIBITED WITHOUT LASN	0%	0
E2040 - LOCNUM=000 SANO PROHIBITED WHEN SASN IS NOT POPULATED AT THIS LOCATION	0%	0
E2060 - LOCNUM=000 SASN REQUIRED WITH THIS REQTYP/ACT TYP COMBINATION AT THIS LOCATION	0%	0
E2080 - LOCNUM=000 SADLO REQUIRED WHEN SANO IS NOT POPULATED AT THIS LOCATION	0%	0
E2085 - LOCNUM=000 FLOOR-EU MUST NOT BE POPULATED WITH FLR IN ANY POSITION AT THIS LOCATION	0%	0
E2115 - LOCNUM=000 ZIP CODE-EU MUST BE 5 OR 9 NUMERICS AT THIS LOCATION	0%	0
E2120 - LCON-NAME MUST BE UP TO 15 ALPHANUMERICS WITH EMBEDDED BLANKS AT MAIN LOCATION	0%	0
E2130 - LOCNUM=000 TEL NO-LCON MUST BE 10 NUMERICS AT THIS LOCATION	0%	0
G7020 - NUM= TELNO= TN NOT FOUND IN CRIS	0%	0

RECORD	ALL VERSIONS		INITIAL		SUPPLEMENT		VERSION 2		VERSION 3	
LISTING REJECTS	67.5%	27	62.5%	25	5.0%	2	5.0%	2	0.0%	0
INVALID TN	15.0%	6	12.5%	5	2.5%	1	2.5%	1	0.0%	0
BST REJECTS	7.5%	3	7.5%	3	0.0%	0	0.0%	0	0.0%	0
MIGRATION DECLINED	5.0%	2	2.5%	1	2.5%	1	2.5%	1	0.0%	0
LCON	5.0%	2	5.0%	2	0.0%	0	0.0%	0	0.0%	0
DISCONNECTION DETAILS	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
PON/VERSION REJECTS	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
PON AGED OFF	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
DUE DATE	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
PENDING ORDER	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
FEATURES/USOCS	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
PON ACTIVITY/LINE ACTIVITY	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
NAME/ADDRESS	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
INVALID LEC REJECTS	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
MULTIPLE BTN	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
LOCAL FREEZE	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
DUPLICATE INSTALL/MIGRATE	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
CLASS OF SERVICE (CID)	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
INVALID/MISSING DATA	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
DEACTIVATION DETAIL	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
SUSPEND/RESTORE ACTIVITY	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
REJECTS NEEDING RESEARCH	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
NEW LINE	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
PIC REJECTS	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
BILLING ACCOUNT NUMBER	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
BTN ASSIGNMENT	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
	100.0%	40	90.0%	36	10.0%	4	10.0%	4	0.0%	0

TOP REJECTS FOR RECORD:

G9442 - DLNUM=0001 LTN=7709961213 ALI MUST BE UNIQUE	68%	27
G8825 - ORDER ERR:	8%	3
E2120 - LCON-NAME MUST BE UP TO 15 ALPHANUMERICS WITH EMBEDDED BLANKS AT MAIN LOCATION	5%	2
G7055 - NUM=7703939880 TELNO=7703939880 ACCOUNT IS FINAL	5%	2
G7400 - CLEC DOES NOT OWN THIS ACCOUNT.	5%	2
G9155 - UNE - PORTED OUT NUMBER	5%	2
G9627 - ALL CUSTOMER RECORDS ARE FINAL FOR THIS NUMBER	5%	2
AO ASSIGNABLE ORDER	0%	0
CA CANCELLED ORDER	0%	0
CP COMPLETED ORDER	0%	0
PD PENDING ORDER	0%	0
D4045 - DLNUM=&DLNM LTN=<N ASSOCIATED LACT COMBINATION I OR O MISSING	0%	0
D4055 - DLNUM=&DLNM LTN=<N ALI MUST BE UNIQUE	0%	0
D4065 - DLNUM=&DLNM LTN=<N ASSOCIATED LACT COMBINATION I AND O IS MISSING	0%	0
D4310 - DLNUM=0001 LTN=9127485928 LANO PROHIBITED WITHOUT LASN	0%	0
E2040 - LOCNUM=000 SANO PROHIBITED WHEN SASN IS NOT POPULATED AT THIS LOCATION	0%	0
E2060 - LOCNUM=000 SASN REQUIRED WITH THIS REQTYP/ACT TYP COMBINATION AT THIS LOCATION	0%	0
E2080 - LOCNUM=000 SADLO REQUIRED WHEN SANO IS NOT POPULATED AT THIS LOCATION	0%	0
E2085 - LOCNUM=000 FLOOR-EU MUST NOT BE POPULATED WITH FLR IN ANY POSITION AT THIS LOCATION	0%	0
E2115 - LOCNUM=000 ZIP CODE-EU MUST BE 5 OR 9 NUMERICS AT THIS LOCATION	0%	0

SUSPEND/RESTORE	ALL VERSIONS		INITIAL		SUPPLEMENT		VERSION 2		VERSION 3	
INVALID TN	91.0%	132	91.0%	132	0.0%	0	0.0%	0	0.0%	0
DUE DATE	3.4%	5	3.4%	5	0.0%	0	0.0%	0	0.0%	0
SUSPEND/RESTORE ACTIVITY	3.4%	5	3.4%	5	0.0%	0	0.0%	0	0.0%	0
NAME/ADDRESS	2.1%	3	2.1%	3	0.0%	0	0.0%	0	0.0%	0
LISTING REJECTS	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
BST REJECTS	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
MIGRATION DECLINED	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
LCON	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
DISCONNECTION DETAILS	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
PON/VERSION REJECTS	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
PON AGED OFF	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
PENDING ORDER	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
FEATURES/USOCS	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
PON ACTIVITY/LINE ACTIVITY	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
INVALID LEC REJECTS	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
MULTIPLE BTN	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
LOCAL FREEZE	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
DUPLICATE INSTALL/MIGRATE	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
CLASS OF SERVICE (CID)	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
INVALID/MISSING DATA	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
DEACTIVATION DETAIL	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
REJECTS NEEDING RESEARCH	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
NEW LINE	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
PIC REJECTS	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
BILLING ACCOUNT NUMBER	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
BTN ASSIGNMENT	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
	100.0%	145	100.0%	145	0.0%	0	0.0%	0	0.0%	0

TOP REJECTS FOR SUSPEND AND RESTORE:

G7400 - CLEC DOES NOT OWN THIS ACCOUNT.	72%	105
G9627 - ALL CUSTOMER RECORDS ARE FINAL FOR THIS NUMBER	18%	26
G9529 - CANNOT RESTORE A LINE WHICH IS NOT SUSPENDED/DENIED	3%	5
G9685 - DUE DATE COULD NOT BE CALCULATED	3%	5
G7645 - MATCH IN CSR SA AND LSR HOUSENUM NOT FOUND	2%	3
G7055 - NUM=7703939880 TELNO=7703939880 ACCOUNT IS FINAL	1%	1
AO ASSIGNABLE ORDER	0%	0
CA CANCELLED ORDER	0%	0
CP COMPLETED ORDER	0%	0
PD PENDING ORDER	0%	0
D4045 - DLNUM=&DLNM LTN=<N ASSOCIATED LACT COMBINATION I OR O MISSING	0%	0
D4055 - DLNUM=&DLNM LTN=<N ALI MUST BE UNIQUE	0%	0
D4065 - DLNUM=&DLNM LTN=<N ASSOCIATED LACT COMBINATION I AND O IS MISSING	0%	0
D4310 - DLNUM=0001 LTN=9127485928 LANO PROHIBITED WITHOUT LASN	0%	0
E2040 - LOCNUM=000 SANO PROHIBITED WHEN SASN IS NOT POPULATED AT THIS LOCATION	0%	0
E2060 - LOCNUM=000 SASN REQUIRED WITH THIS REQTYP/ACT TYP COMBINATION AT THIS LOCATION	0%	0
E2080 - LOCNUM=000 SADLO REQUIRED WHEN SANO IS NOT POPULATED AT THIS LOCATION	0%	0
E2085 - LOCNUM=000 FLOOR-EU MUST NOT BE POPULATED WITH FLR IN ANY POSITION AT THIS LOCATION	0%	0
E2115 - LOCNUM=000 ZIP CODE-EU MUST BE 5 OR 9 NUMERICS AT THIS LOCATION	0%	0
E2120 - LCON-NAME MUST BE UP TO 15 ALPHANUMERICS WITH EMBEDDED BLANKS AT MAIN LOCATION	0%	0

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DEACTIVATION	ALL VERSIONS		INITIAL		SUPPLEMENT		VERSION 2		VERSION 3	
INVALID TN	76.2%	202	89.8%	185	6.4%	17	4.9%	13	1.5%	4
PENDING ORDER	14.0%	37	14.0%	37	0.0%	0	0.0%	0	0.0%	0
PON/VERSION REJECTS	4.5%	12	0.8%	2	3.8%	10	2.6%	7	1.1%	3
DEACTIVATION DETAIL	2.3%	6	2.3%	6	0.0%	0	0.0%	0	0.0%	0
DUE DATE	1.9%	5	1.9%	5	0.0%	0	0.0%	0	0.0%	0
NAME/ADDRESS	0.8%	2	0.8%	2	0.0%	0	0.0%	0	0.0%	0
BST REJECTS	0.4%	1	0.0%	0	0.4%	1	0.4%	1	0.0%	0
SUSPEND/RESTORE ACTIVITY	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
LISTING REJECTS	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
MIGRATION DECLINED	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
LCON	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
DISCONNECTION DETAILS	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
PON AGED OFF	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
FEATURES/USOCS	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
PON ACTIVITY/LINE ACTIVITY	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
INVALID LEC REJECTS	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
MULTIPLE BTN	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
LOCAL FREEZE	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
DUPLICATE INSTALL/MIGRATE	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
CLASS OF SERVICE (CID)	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
INVALID/MISSING DATA	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
REJECTS NEEDING RESEARCH	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
NEW LINE	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
PIC REJECTS	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
BILLING ACCOUNT NUMBER	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
BTN ASSIGNMENT	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
	100.0%	285	89.4%	237	10.6%	28	7.9%	21	2.6%	7

TOP REJECTS FOR DEACTIVATION:

G9627 - ALL CUSTOMER RECORDS ARE FINAL FOR THIS NUMBER	37%	99
G7400 - CLEC DOES NOT OWN THIS ACCOUNT.	36%	95
G9641 - REQUESTED ACTIVITY ALREADY PENDING	14%	37
R1030 - VER MUST BE GREATER THAN PREVIOUS VERSION	4%	10
G7055 - NUM=7703939880 TELNO=7703939880 ACCOUNT IS FINAL	3%	7
T8040 - LOCNUM= DISCNBR=&DISCNM DNUM=&DNUM TC TO PRIMARY CANNOT BE THE SAME AS THE NUM	2%	6
G9685 - DUE DATE COULD NOT BE CALCULATED	2%	5
G7645 - MATCH IN CSR SA AND LSR HOUSENUM NOT FOUND	1%	2
R1015 - PON DUPLICATE ON INITIAL LSR	1%	2
AO ASSIGNABLE ORDER	0%	1
G7020 - NUM= TELNO= TN NOT FOUND IN CRIS	0%	1
CA CANCELLED ORDER	0%	0
CP COMPLETED ORDER	0%	0
PD PENDING ORDER	0%	0
D4045 - DLNUM=&DLNM LTN=<N ASSOCIATED LACT COMBINATION I OR O MISSING	0%	0
D4055 - DLNUM=&DLNM LTN=<N ALI MUST BE UNIQUE	0%	0
D4065 - DLNUM=&DLNM LTN=<N ASSOCIATED LACT COMBINATION I AND O IS MISSING	0%	0
D4310 - DLNUM=0001 LTN=9127485928 LANO PROHIBITED WITHOUT LASN	0%	0
E2040 - LOCNUM=000 SANO PROHIBITED WHEN SASN IS NOT POPULATED AT THIS LOCATION	0%	0
E2060 - LOCNUM=000 SASN REQUIRED WITH THIS REQTYP/ACT TYP COMBINATION AT THIS LOCATION	0%	0

BST - MANUAL REJECTS

TOP ISSUES	ALL REJECTS			INITIAL			SUPPLEMENTAL		
	REJECT VOLUME	% OF REJECTS	% OF ORDERS	REJECT VOLUME	% OF REJECTS	% OF ORDERS	REJECT VOLUME	% OF REJECTS	% OF ORDERS
1 NAME/ADDRESS	1316	51%	N/A	933	36.0%	N/A	383	14.8%	N/A
2 REJECTS NEEDING RESEARCH	293	11%	N/A	164	6.3%	N/A	129	5.0%	N/A
3 FEATURES/USOCS	211	8%	N/A	133	5.1%	N/A	78	3.0%	N/A
4 PENDING ORDER	159	6%	N/A	127	4.9%	N/A	32	1.2%	N/A
5 INVALID LEC REJECTS	130	5%	N/A	71	2.7%	N/A	59	2.3%	N/A
6 INVALID TN	112	4%	N/A	76	2.9%	N/A	36	1.4%	N/A
7 CLASS OF SERVICE (CID)	72	3%	N/A	51	2.0%	N/A	21	0.8%	N/A
8 PON/VERSION REJECTS	68	3%	N/A	41	1.6%	N/A	27	1.0%	N/A
9 DUE DATE	54	2%	N/A	24	0.9%	N/A	30	1.2%	N/A
10 NEW LINE	53	2%	N/A	16	0.6%	N/A	37	1.4%	N/A

TOP 5 OF INITIAL VERSIONS	REJECT VOLUME	% OF REJECTS	% OF ORDERS
NAME/ADDRESS	933	36%	N/A
REJECTS NEEDING RESEARCH	164	6%	N/A
FEATURES/USOCS	133	5%	N/A
PENDING ORDER	127	5%	N/A
INVALID TN	76	3%	N/A

TOP 5 OF SUPPLEMENTAL VERSIONS	REJECT VOLUME	% OF REJECTS	% OF ORDERS
NAME/ADDRESS	383	15%	N/A
REJECTS NEEDING RESEARCH	129	5%	N/A
FEATURES/USOCS	78	3%	N/A
INVALID LEC REJECTS	59	2%	N/A
NEW LINE	37	1%	N/A

TOP REJECT CODES

MCI CODE [Z23] name/address	51%	1316
ALL REMAINING UNKNOWNS	11%	293
MCI CODE [Z12] pending order	6%	159
MCI CODE [Z28] feature detail conflicts	5%	135
MCI CODE [Z10] invalid or insufficient reject detail	5%	130
MCI CODE [Z33] conflict with order activity	3%	72
MCI CODE [Z16] invalid TN	3%	71
MCI CODE [Z29] feature combination invalid	2%	60
MCI CODE [Z13] duplicate PON / version	2%	56
MCI CODE [Z22] due date	2%	54
MCI CODE [Z36] WSOP / new line	2%	53
MCI CODE [Z34] customer has migrated away from MCI	2%	41
MCI CODE [Z25] ali code / listing activity	1%	32
MCI CODE [Z21] business, DSL, special line	1%	30
MCI CODE [Z15] multiple BTN	1%	18
MCI CODE [Z30] invalid PIC	1%	18
MCI CODE [Z37] billing account number	1%	17
MCI CODE [Z26] invalid feature	1%	16
MCI CODE [Z14] supplement invalid	0%	12
MCI CODE [Z20] duplicate install/migration	0%	8

MIGRATION	ALL VERSIONS		INITIAL		SUPPLEMENT		VERSION 2		VERSION 3+	
NAME/ADDRESS	53.8%	916	42.0%	716	11.7%	200	9.0%	154	2.7%	46
REJECTS NEEDING RESEARC	10.3%	175	5.9%	100	4.4%	75	3.4%	58	1.0%	17
FEATURES/USOCS	9.1%	155	6.0%	102	3.1%	53	2.1%	36	1.0%	17
INVALID LEC REJECTS	7.0%	119	3.9%	67	3.1%	52	2.0%	34	1.1%	18
PENDING ORDER	6.3%	108	4.8%	81	1.6%	27	1.2%	20	0.4%	7
DUE DATE	2.6%	44	1.1%	18	1.5%	26	1.0%	17	0.5%	9
INVALID TN	2.2%	37	1.2%	21	0.9%	16	0.6%	10	0.4%	6
MIGRATION DECLINED	1.7%	29	1.6%	28	0.2%	3	0.2%	3	0.0%	0
CLASS OF SERVICE (CID)	1.6%	28	1.3%	23	0.3%	5	0.3%	5	0.0%	0
PON/VERSION REJECTS	1.6%	26	0.4%	7	1.1%	19	0.9%	16	0.2%	3
LISTING REJECTS	1.5%	26	1.3%	22	0.2%	4	0.2%	4	0.0%	0
MULTIPLE BTN	0.0%	16	0.8%	13	0.2%	3	0.2%	3	0.0%	0
BILLING ACCOUNT NUMBER	0.8%	14	0.6%	11	0.2%	3	0.2%	3	0.0%	0
PIC REJECTS	0.2%	4	0.2%	3	0.1%	1	0.0%	0	0.1%	1
DUPLICATE INSTALL/MIGRATE	0.2%	4	0.1%	1	0.2%	3	0.1%	1	0.1%	2
NEW LINE	0.1%	2	0.1%	2	0.0%	0	0.0%	0	0.0%	0
LOCAL FREEZE	0.1%	1	0.1%	1	0.0%	0	0.0%	0	0.0%	0
PON AGED OFF	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
LCON	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
BST REJECTS	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
DISCONNECTION DETAILS	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
PON ACTIVITY/LINE ACTIVITY	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
INVALID/MISSING DATA	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
DEACTIVATION DETAIL	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
SUSPEND/RESTORE ACTIVITY	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
BTN ASSIGNMENT	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
	100.0%	1704	71.2%	1214	28.8%	490	21.4%	364	7.4%	126

TOP REJECTS FOR MIGRATION:

MCI CODE [Z23] name/address	54%	916
ALL REMAINING UNKNOWNS	10%	175
MCI CODE [Z10] invalid or insufficient reject detail	7%	119
MCI CODE [Z12] pending order	6%	108
MCI CODE [Z28] feature detail conflicts	5%	93
MCI CODE [Z29] feature combination invalid	3%	52
MCI CODE [Z22] due date	3%	44
MCI CODE [Z16] invalid TN	2%	31
MCI CODE [Z21] business, DSL, special line	2%	29
MCI CODE [Z33] conflict with order activity	2%	28
MCI CODE [Z25] ali code / listing activity	2%	26
MCI CODE [Z13] duplicate PON / version	1%	17
MCI CODE [Z15] multiple BTN	1%	16
MCI CODE [Z37] billing account number	1%	14
MCI CODE [Z26] invalid feature	1%	10
MCI CODE [Z14] supplement invalid	1%	9
MCI CODE [Z34] customer has migrated away from MCI	0%	6
MCI CODE [Z20] duplicate install/migration	0%	4
MCI CODE [Z30] invalid PIC	0%	4
MCI CODE [Z36] WSOP / new line	0%	2

NEW INSTALL	ALL VERSIONS		INITIAL		SUPPLEMENT		VERSION 2		VERSION 3+	
NAME/ADDRESS	66.4%	291	32.0%	140	34.5%	151	18.7%	82	18.8%	69
NEW LINE	10.3%	45	2.7%	12	7.5%	33	2.1%	9	6.5%	24
REJECTS NEEDING RESEARC	10.0%	44	3.0%	13	7.1%	31	2.3%	10	4.8%	21
FEATURES/USOCS	2.6%	11	1.1%	5	1.4%	6	0.5%	2	0.0%	4
CLASS OF SERVICE (CID)	2.5%	11	0.9%	4	1.6%	7	0.7%	3	0.0%	4
PON/VERSION REJECTS	2.1%	9	1.4%	6	0.7%	3	0.7%	3	0.0%	0
INVALID LEC REJECTS	1.4%	6	0.5%	2	0.9%	4	0.7%	3	0.2%	1
PENDING ORDER	1.4%	6	0.5%	2	0.9%	4	0.5%	2	0.5%	2
DUPLICATE INSTALL/MIGRATE	0.9%	4	0.7%	3	0.2%	1	0.2%	1	0.0%	0
DUE DATE	0.7%	3	0.0%	0	0.7%	3	0.0%	0	0.5%	2
INVALID TN	0.7%	3	0.5%	2	0.2%	1	0.2%	1	0.0%	0
BILLING ACCOUNT NUMBER	0.5%	2	0.0%	0	0.5%	2	0.2%	1	0.2%	1
MIGRATION DECLINED	0.2%	1	0.0%	0	0.2%	1	0.2%	1	0.0%	0
MULTIPLE BTN	0.2%	1	0.0%	0	0.2%	1	0.2%	1	0.0%	0
PIC REJECTS	0.2%	1	0.0%	0	0.2%	1	0.2%	1	0.0%	0
LISTING REJECTS	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
LOCAL FREEZE	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
PON AGED OFF	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
LCON	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
BST REJECTS	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
DISCONNECTION DETAILS	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
PON ACTIVITY/LINE ACTIVITY	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
INVALID/MISSING DATA	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
DEACTIVATION DETAIL	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
SUSPEND/RESTORE ACTIVITY	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
BTN ASSIGNMENT	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
	100.0%	438	43.2%	189	56.8%	249	27.6%	121	29.2%	128

TOP REJECTS FOR NEW INSTALL:

MCI CODE [Z23] name/address	66%	291
MCI CODE [Z36] WSOP / new line	10%	45
ALL REMAINING UNKNOWNS	10%	44
MCI CODE [Z33] conflict with order activity	3%	11
MCI CODE [Z28] feature detail conflicts	2%	10
MCI CODE [Z13] duplicate PON / version	2%	7
MCI CODE [Z10] invalid or insufficient reject detail	1%	6
MCI CODE [Z12] pending order	1%	6
MCI CODE [Z20] duplicate install/migration	1%	4
MCI CODE [Z22] due date	1%	3
MCI CODE [Z14] supplement invalid	0%	2
MCI CODE [Z34] customer has migrated away from MCI	0%	2
MCI CODE [Z37] billing account number	0%	2
MCI CODE [Z15] multiple BTN	0%	1
MCI CODE [Z16] invalid TN	0%	1
MCI CODE [Z21] business, DSL, special line	0%	1
MCI CODE [Z29] feature combination invalid	0%	1
MCI CODE [Z30] invalid PIC	0%	1
AO ASSIGNABLE ORDER	0%	0
CA CANCELLED ORDER	0%	0

CHANGE	ALL VERSIONS		INITIAL		SUPPLEMENT		VERSION 2		VERSION 3+	
REJECTS NEEDING RESEARCH	17.4%	45	12.0%	31	5.4%	14	4.6%	12	0.8%	2
FEATURES/USOCS	17.4%	45	10.0%	26	7.3%	19	5.0%	13	2.3%	6
INVALID TN	14.7%	38	9.7%	25	5.0%	13	3.9%	10	1.2%	3
PENDING ORDER	13.5%	35	13.6%	35	0.0%	0	0.0%	0	0.0%	0
CLASS OF SERVICE (CID)	12.4%	32	8.9%	23	3.5%	9	1.9%	5	1.5%	4
PON/VERSION REJECTS	11.6%	30	9.7%	25	1.9%	5	1.2%	3	0.8%	2
PIC REJECTS	5.0%	13	1.9%	5	3.1%	8	1.2%	3	1.9%	5
NAME/ADDRESS	4.6%	12	3.9%	10	0.6%	2	0.0%	0	0.8%	2
DUE DATE	2.3%	6	2.3%	6	0.0%	0	0.0%	0	0.0%	0
INVALID LEC REJECTS	1.2%	3	0.4%	1	0.8%	2	0.8%	2	0.0%	0
NEW LINE	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
DUPLICATE INSTALL/MIGRATE	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
BILLING ACCOUNT NUMBER	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
MIGRATION DECLINED	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
MULTIPLE BTN	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
LISTING REJECTS	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
LOCAL FREEZE	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
PON AGED OFF	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
LCON	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
BST REJECTS	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
DISCONNECTION DETAILS	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
PON ACTIVITY/LINE ACTIVITY	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
INVALID/MISSING DATA	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
DEACTIVATION DETAIL	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
SUSPEND/RESTORE ACTIVITY	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
BTN ASSIGNMENT	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
	100.0%	259	72.2%	187	27.8%	72	18.5%	48	9.3%	24

TOP REJECTS FOR CHANGE:

ALL REMAINING UNKNOWNS	17%	45
MCI CODE [Z12] pending order	14%	35
MCI CODE [Z28] feature detail conflicts	12%	32
MCI CODE [Z33] conflict with order activity	12%	32
MCI CODE [Z13] duplicate PON / version	12%	30
MCI CODE [Z34] customer has migrated away from MCI	10%	27
MCI CODE [Z30] invalid PIC	5%	13
MCI CODE [Z23] name/address	5%	12
MCI CODE [Z16] invalid TN	4%	11
MCI CODE [Z29] feature combination invalid	3%	7
MCI CODE [Z22] due date	2%	6
MCI CODE [Z26] invalid feature	2%	6
MCI CODE [Z10] invalid or insufficient reject detail	1%	3
AO ASSIGNABLE ORDER	0%	0
CA CANCELLED ORDER	0%	0
CP COMPLETED ORDER	0%	0
PD PENDING ORDER	0%	0
D4045 - DLNUM=&DLNM LTN=<N ASSOCIATED LACT COMBINATION I OR O MISSING	0%	0
D4055 - DLNUM=&DLNM LTN=<N ALI MUST BE UNIQUE	0%	0
D4065 - DLNUM=&DLNM LTN=<N ASSOCIATED LACT COMBINATION I AND O IS MISSING	0%	0

MOVE	ALL VERSIONS		INITIAL		SUPPLEMENT		VERSION 2		VERSION 3+	
NAME/ADDRESS	55.9%	62	28.8%	32	27.0%	30	17.1%	19	9.9%	11
REJECTS NEEDING RESEARCH	18.0%	20	10.8%	12	7.2%	8	4.5%	5	2.7%	3
INVALID TN	12.6%	14	7.2%	8	5.4%	6	2.7%	3	2.7%	3
NEW LINE	5.4%	6	1.8%	2	3.6%	4	2.7%	3	0.9%	1
PENDING ORDER	3.6%	4	2.7%	3	0.9%	1	0.9%	1	0.0%	0
CLASS OF SERVICE (CID)	0.9%	1	0.9%	1	0.0%	0	0.0%	0	0.0%	0
PON/VERSION REJECTS	0.9%	1	0.9%	1	0.0%	0	0.0%	0	0.0%	0
DUE DATE	0.9%	1	0.0%	0	0.9%	1	0.0%	0	0.9%	1
BILLING ACCOUNT NUMBER	0.9%	1	0.0%	0	0.0%	0	0.9%	1	0.0%	0
MULTIPLE BTN	0.9%	1	0.9%	1	0.0%	0	0.0%	0	0.0%	0
FEATURES/USOCS	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
PIC REJECTS	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
INVALID LEC REJECTS	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
DUPLICATE INSTALL/MIGRATE	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
MIGRATION DECLINED	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
LISTING REJECTS	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
LOCAL FREEZE	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
PON AGED OFF	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
LCON	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
BST REJECTS	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
DISCONNECTION DETAILS	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
PON ACTIVITY/LINE ACTIVITY	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
INVALID/MISSING DATA	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
DEACTIVATION DETAIL	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
SUSPEND/RESTORE ACTIVITY	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
BTN ASSIGNMENT	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
	100.0%	111	54.1%	60	45.9%	51	28.8%	32	17.1%	19

TOP REJECTS FOR MOVE:

MCI CODE [Z23] name/address	56%	62
ALL REMAINING UNKNOWNS	18%	20
MCI CODE [Z16] invalid TN	13%	14
MCI CODE [Z36] WSOP / new line	5%	6
MCI CODE [Z12] pending order	4%	4
MCI CODE [Z14] supplement invalid	1%	1
MCI CODE [Z15] multiple BTN	1%	1
MCI CODE [Z22] due date	1%	1
MCI CODE [Z33] conflict with order activity	1%	1
MCI CODE [Z37] billing account number	1%	1
AO ASSIGNABLE ORDER	0%	0
CA CANCELLED ORDER	0%	0
CP COMPLETED ORDER	0%	0
PD PENDING ORDER	0%	0
D4045 - DLNUM=&DLNM LTN=<N ASSOCIATED LACT COMBINATION I OR O MISSING	0%	0
D4055 - DLNUM=&DLNM LTN=<N ALI MUST BE UNIQUE	0%	0
D4065 - DLNUM=&DLNM LTN=<N ASSOCIATED LACT COMBINATION I AND O IS MISSING	0%	0
D4310 - DLNUM=0001 LTN=9127485928 LANO PROHIBITED WITHOUT LASN	0%	0
E2040 - LOCNUM=000 SANO PROHIBITED WHEN SASN IS NOT POPULATED AT THIS LOCATION	0%	0
E2060 - LOCNUM=000 SASN REQUIRED WITH THIS REQTYP/ACT TYP COMBINATION AT THIS LOCATION	0%	0

RECORD	ALL VERSIONS		INITIAL		SUPPLEMENT		VERSION 2		VERSION 3+	
LISTING REJECTS	27.3%	6	22.7%	5	4.5%	1	4.5%	1	0.0%	0
NAME/ADDRESS	18.2%	4	18.2%	4	0.0%	0	0.0%	0	0.0%	0
REJECTS NEEDING RESEARC	18.2%	4	13.6%	3	4.5%	1	4.5%	1	0.0%	0
PENDING ORDER	18.2%	4	18.2%	4	0.0%	0	0.0%	0	0.0%	0
INVALID TN	9.1%	2	9.1%	2	0.0%	0	0.0%	0	0.0%	0
PON/VERSION REJECTS	9.1%	2	9.1%	2	0.0%	0	0.0%	0	0.0%	0
NEW LINE	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
CLASS OF SERVICE (CID)	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
DUE DATE	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
BILLING ACCOUNT NUMBER	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
MULTIPLE BTN	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
FEATURES/USOCS	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
PIC REJECTS	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
INVALID LEC REJECTS	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
DUPLICATE INSTALL/MIGRATI	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
MIGRATION DECLINED	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
LOCAL FREEZE	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
PON AGED OFF	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
LCON	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
BST REJECTS	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
DISCONNECTION DETAILS	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
PON ACTIVITY/LINE ACTIVITY	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
INVALID/MISSING DATA	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
DEACTIVATION DETAIL	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
SUSPEND/RESTORE ACTIVITY	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
BTN ASSIGNMENT	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
	100.0%	22	90.9%	20	9.1%	2	9.1%	2	0.0%	0

TOP REJECTS FOR RECORD:

MCI CODE [Z25] ali code / listing activity	27%	6
MCI CODE [Z12] pending order	18%	4
MCI CODE [Z23] name/address	18%	4
ALL REMAINING UNKNOWNS	18%	4
MCI CODE [Z13] duplicate PON / version	9%	2
MCI CODE [Z16] invalid TN	9%	2
AO ASSIGNABLE ORDER	0%	0
CA CANCELLED ORDER	0%	0
CP COMPLETED ORDER	0%	0
PD PENDING ORDER	0%	0
D4045 - DLNUM=&DLNM LTN=<N ASSOCIATED LACT COMBINATION I OR O MISSING	0%	0
D4055 - DLNUM=&DLNM LTN=<N ALI MUST BE UNIQUE	0%	0
D4065 - DLNUM=&DLNM LTN=<N ASSOCIATED LACT COMBINATION I AND O IS MISSING	0%	0
D4310 - DLNUM=0001 LTN=9127485928 LANO PROHIBITED WITHOUT LASN	0%	0
E2040 - LOCNUM=000 SANO PROHIBITED WHEN SASN IS NOT POPULATED AT THIS LOCATION	0%	0
E2060 - LOCNUM=000 SASN REQUIRED WITH THIS REQTYP/ACT TYP COMBINATION AT THIS LOCATION	0%	0
E2080 - LOCNUM=000 SADLO REQUIRED WHEN SANO IS NOT POPULATED AT THIS LOCATION	0%	0
E2085 - LOCNUM=000 FLOOR-EU MUST NOT BE POPULATED WITH FLR IN ANY POSITION AT THIS LOCATION	0%	0
E2115 - LOCNUM=000 ZIP CODE-EU MUST BE 5 OR 9 NUMERICS AT THIS LOCATION	0%	0
E2120 - LCON-NAME MUST BE UP TO 15 ALPHANUMERICS WITH EMBEDDED BLANKS AT MAIN LOCATION	0%	0

SUSPEND/RESTORE	ALL VERSIONS		INITIAL		SUPPLEMENT		VERSION 2		VERSION 3+	
NAME/ADDRESS	48.0%	12	48.0%	12	0.0%	0	0.0%	0	0.0%	0
INVALID TN	36.0%	9	36.0%	9	0.0%	0	0.0%	0	0.0%	0
REJECTS NEEDING RESEARC	16.0%	4	16.0%	4	0.0%	0	0.0%	0	0.0%	0
LISTING REJECTS	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
PENDING ORDER	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
PON/VERSION REJECTS	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
NEW LINE	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
CLASS OF SERVICE (CID)	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
DUE DATE	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
BILLING ACCOUNT NUMBER	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
MULTIPLE BTN	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
FEATURES/USOCS	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
PIC REJECTS	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
INVALID LEC REJECTS	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
DUPLICATE INSTALL/MIGRATI	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
MIGRATION DECLINED	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
LOCAL FREEZE	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
PON AGED OFF	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
LCON	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
BST REJECTS	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
DISCONNECTION DETAILS	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
PON ACTIVITY/LINE ACTIVITY	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
INVALID/MISSING DATA	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
DEACTIVATION DETAIL	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
SUSPEND/RESTORE ACTIVITY	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
BTN ASSIGNMENT	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
	100.0%	25	100.0%	25	0.0%	0	0.0%	0	0.0%	0

TOP REJECTS FOR SUSPEND AND RESTORE:

MCI CODE [Z23] name/address	48%	12
MCI CODE [Z16] invalid TN	24%	6
ALL REMAINING UNKNOWNS	16%	4
MCI CODE [Z34] customer has migrated away from MCI	12%	3
AO ASSIGNABLE ORDER	0%	0
CA CANCELLED ORDER	0%	0
CP COMPLETED ORDER	0%	0
PD PENDING ORDER	0%	0
D4045 - DLNUM=&DLNM LTN=<N ASSOCIATED LACT COMBINATION I OR O MISSING	0%	0
D4055 - DLNUM=&DLNM LTN=<N ALI MUST BE UNIQUE	0%	0
D4065 - DLNUM=&DLNM LTN=<N ASSOCIATED LACT COMBINATION I AND O IS MISSING	0%	0
D4310 - DLNUM=0001 LTN=9127485928 LANO PROHIBITED WITHOUT LASN	0%	0
E2040 - LOCNUM=000 SANO PROHIBITED WHEN SASN IS NOT POPULATED AT THIS LOCATION	0%	0
E2060 - LOCNUM=000 SASN REQUIRED WITH THIS REQTYP/ACT TYP COMBINATION AT THIS LOCATION	0%	0
E2080 - LOCNUM=000 SADLO REQUIRED WHEN SANO IS NOT POPULATED AT THIS LOCATION	0%	0
E2085 - LOCNUM=000 FLOOR-EU MUST NOT BE POPULATED WITH FLR IN ANY POSITION AT THIS LOCATION	0%	0
E2115 - LOCNUM=000 ZIP CODE-EU MUST BE 5 OR 9 NUMERICS AT THIS LOCATION	0%	0
E2120 - LCON-NAME MUST BE UP TO 15 ALPHANUMERICS WITH EMBEDDED BLANKS AT MAIN LOCATION	0%	0
E2130 - LOCNUM=000 TEL NO-LCON MUST BE 10 NUMERICS AT THIS LOCATION	0%	0
G7020 - NUM= TELNO= TN NOT FOUND IN CRIS	0%	0

DEACTIVATION	ALL VERSIONS		INITIAL		SUPPLEMENT		VERSION 2		VERSION 3	
NAME/ADDRESS	57.6%	19	57.6%	19	0.0%	0	0.0%	0	0.0%	0
INVALID TN	27.3%	9	27.3%	9	0.0%	0	0.0%	0	0.0%	0
PENDING ORDER	6.1%	2	6.1%	2	0.0%	0	0.0%	0	0.0%	0
INVALID LEO REJECTS	6.1%	2	3.0%	1	3.0%	1	3.0%	1	0.0%	0
REJECTS NEEDING RESEARC	3.0%	1	3.0%	1	0.0%	0	0.0%	0	0.0%	0
LISTING REJECTS	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
PON/VERSION REJECTS	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
NEW LINE	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
CLASS OF SERVICE (CID)	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
DUE DATE	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
BILLING ACCOUNT NUMBER	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
MULTIPLE BTN	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
FEATURES/USOCS	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
PIC REJECTS	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
DUPLICATE INSTALL/MIGRATE	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
MIGRATION DECLINED	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
LOCAL FREEZE	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
PON AGED OFF	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
LCON	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
BST REJECTS	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
DISCONNECTION DETAILS	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
PON ACTIVITY/LINE ACTIVITY	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
INVALID/MISSING DATA	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
DEACTIVATION DETAIL	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
SUSPEND/RESTORE ACTIVITY	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
BTN ASSIGNMENT	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0
	100.0%	33	97.0%	32	3.0%	1	3.0%	1	0.0%	0

TOP REJECTS FOR DEACTIVATION:

MCI CODE [Z23] name/address	58%	19
MCI CODE [Z16] Invalid TN	18%	6
MCI CODE [Z34] customer has migrated away from MCI	9%	3
MCI CODE [Z10] Invalid or insufficient reject detail	6%	2
MCI CODE [Z12] pending order	6%	2
ALL REMAINING UNKNOWNS	3%	1
AO ASSIGNABLE ORDER	0%	0
CA CANCELLED ORDER	0%	0
CP COMPLETED ORDER	0%	0
PD PENDING ORDER	0%	0
D4045 - DLNUM=&DLNM LTN=<N ASSOCIATED LACT COMBINATION I OR O MISSING	0%	0
D4055 - DLNUM=&DLNM LTN=<N ALI MUST BE UNIQUE	0%	0
D4065 - DLNUM=&DLNM LTN=<N ASSOCIATED LACT COMBINATION I AND O IS MISSING	0%	0
D4310 - DLNUM=0001 LTN=9127485928 LANO PROHIBITED WITHOUT LASN	0%	0
E2040 - LOCNUM=000 SANO PROHIBITED WHEN SASN IS NOT POPULATED AT THIS LOCATION	0%	0
E2060 - LOCNUM=000 SASN REQUIRED WITH THIS REQTYP/ACT TYP COMBINATION AT THIS LOCATION	0%	0
E2080 - LOCNUM=000 SADLO REQUIRED WHEN SANO IS NOT POPULATED AT THIS LOCATION	0%	0
E2085 - LOCNUM=000 FLOOR-EU MUST NOT BE POPULATED WITH FLR IN ANY POSITION AT THIS LOCATION	0%	0
E2115 - LOCNUM=000 ZIP CODE-EU MUST BE 5 OR 9 NUMERICS AT THIS LOCATION	0%	0
E2120 - LCON-NAME MUST BE UP TO 15 ALPHANUMERICS WITH EMBEDDED BLANKS AT MAIN LOCATION	0%	0

ATTACHMENT 3

MCI WORLDCOM

Local LEC Interface
Management System

Search UNE-P Order By PON: [   ]

Inbound Report

PON= S004490777BSGAPR

version= 1

status=Unknown

Local Service Request

Administrative Section

CCNA	PNUM	VERSION	AN	ATN			
WUA	S004490777BSGAPR	1		7704325137			
LSRNO	**ORD**	**CNO**	**INIT**	**CDTSENT**			
7229200109250000332			MCIW EPS	20010925			
REP	**ST**	**IBT**	**TELNO**	**RT**	CHC	FDT	D
LCSC			8007734967				
BI1	**BAN1**						
BI2	**BAN2**						
EC_VER	**DSGCON**	NSP_DSGCON	NSP_DSGCON_TEL_NO				
ONSP	**TDTR**						

Reason Detail Section

REF_NUM	LNUM	RCODE	RDET	ESDD	AFVR	ORD	LORD
0		1000	ADDRESS DOES NOT MATCH CSR				

LR Hunt Section

LOCNUM	HNUM	HID	TLI	HTSEQ

DID Section

REF_NUM	LOCNUM	DSTN	DTLI	DTK	DTGN	DRTI	DTGKID	DGOUT	DTNR

LR Circuit Detail Section

REF_NUM	LOCNUM	LNUM	LNEX	ECCKT	DSN	LTC	NOTYP
0	000	00001					

TNS	TERS	MATN
7704325137		

CKR	ISPID	CFA	LORD

NPORD

LR Secloc Section

Directory Section

DATN	DRT	CC	DOR	DLORD	DAORD				
DSR_NO	DDA	DINIT	DCHC	DADT					
DBI1	DBAN1	DBI2	DBAN2	DLCON_INIT	DLCON_TN	DACON_INIT	DACON_TN	DLQTYR	SQTY

Remarks

LEC_REMARKS

| Home |

ATTACHMENT 4

TOO VOLUMINOUS TO COPY

ATTACHMENT 5

BST - MIGRATION REJECTS

LLIMS GUI DATA	
VERSIONS SENT	26829
REJECTS	7453
REJECT RATE	27.8%
INITIAL REJECT VOLUME	59 4%
RE-REJECT VOLUME	40 6%

METIS DATA	
INITIAL REJECT RATE	#DIV/0!
SUPPLEMENTAL REJECT RATE	#DIV/0!
OVERALL REJECT RATE	#DIV/0!

REJECTS BY ORDER TYPE		
MIGRATION	7875	100 0%
NEW INSTALL	0	
CHANGE	0	
MOVE	0	
RECORD	0	
SUSPEND	0	
RESTORE	0	
DEACTIVATION	0	
TOTAL	7875	100%

RE-REJECT ANALYSIS		
INITIAL	59.4%	4676
2X	31.9%	2513
3X OR >	8.7%	686
TOTAL	100%	7875

TOP ISSUES	ALL REJECTS			INITIAL			SUPPLEMENTAL		
	REJECT VOLUME	% OF REJECTS	% OF ORDERS	REJECT VOLUME	% OF REJECTS	% OF ORDERS	REJECT VOLUME	% OF REJECTS	% OF ORDERS
1 MULTIPLE BTN	2094	27%	7.4%	1369	17.4%	4.8%	725	9.2%	2.6%
2 NAME/ADDRESS	1637	21%	5 8%	1165	14.8%	4.1%	472	6.0%	1.7%
3 PON/VERSION REJECTS	861	11%	3 0%	15	0.2%	0.1%	846	10.8%	3.0%
4 LCON	673	9%	2 4%	660	8.4%	2.3%	13	0.2%	0.0%
5 PON AGED OFF	598	8%	2.1%	4	0.1%	0.0%	594	7.6%	2.1%
6 MIGRATION DECLINED	336	4%	1.2%	327	4.2%	1.2%	9	0.1%	0.0%
7 FEATURES/USOCS	298	4%	1.1%	191	2.4%	0.7%	107	1.4%	0.4%
8 INVALID TN	198	3%	0.7%	114	1.5%	0.4%	84	1.1%	0.3%
9 REJECTS NEEDING RESEARCH	175	2%	0 6%	100	1.3%	0.4%	75	1.0%	0.3%
10 LOCAL FREEZE	160	2%	0 6%	157	2.0%	0.6%	3	0.0%	0.0%

TOP 5 OF INITIAL VERSIONS	REJECT VOLUME	% OF REJECTS	% OF ORDERS
MULTIPLE BTN	1369	17%	4 8%
NAME/ADDRESS	1165	15%	4.1%
LCON	660	8%	2.3%
MIGRATION DECLINED	327	4%	1.2%
FEATURES/USOCS	191	2%	0.7%

TOP 5 OF SUPPLEMENTAL VERSIONS	REJECT VOLUME	% OF REJECTS	% OF ORDERS
PON/VERSION REJECTS	846	11%	3.0%
MULTIPLE BTN	725	9%	2.6%
PON AGED OFF	594	8%	2.1%
NAME/ADDRESS	472	6%	1.7%
FEATURES/USOCS	107	1%	0 4%

TOP REJECT CODES

G9496 - TNS=7704753071 ON LNUM=00002 NOT FOUND ON EATN=7704753071 FOR ACT=	26%	2024
MCI CODE [Z23] name/address	12%	916
R1030 - VER MUST BE GREATER THAN PREVIOUS VERSION	10%	793
E2120 - LCON-NAME MUST BE UP TO 15 ALPHANUMERICS WITH EMBEDDED BLANKS AT MAIN LOCATION	8%	662
R1645 - LSR/PON AGED OFF	8%	598
G7250 - LSR HOUSENUMBER INCORRECT	4%	307
G9626 - CLASS OF SERVICE LNPRL NOT ELIGIBLE FOR CONVERSION TO PORT/LOOP SERVICE	4%	301
G7905 - RSAG - INCORRECT COMMUNITY, INCORRECT ZIP CODE OR INVALID ADDRESS FORMAT	3%	256
ALL REMAINING UNKNOWNS	2%	175
G9860 - UNABLE TO HANDLE REQUEST; ENDUSER ACCOUNT FROZEN	2%	159
MCI CODE [Z10] invalid or insufficient reject detail	2%	119
MCI CODE [Z12] pending order	1%	108
G8209 - USOC COMBINATION IS INVALID. FORMAT SAE 587 I1 ESXDC /TN 770 532-2155	1%	96
G8830 - CLEC ALREADY OWNS THIS ACCOUNT	1%	94
MCI CODE [Z28] feature detail conflicts	1%	93
G9685 - DUE DATE COULD NOT BE CALCULATED	1%	81
G7055 - NUM=7703939880 TELNO=7703939880 ACCOUNT IS FINAL	1%	73
G9627 - ALL CUSTOMER RECORDS ARE FINAL FOR THIS NUMBER	1%	66
AO ASSIGNABLE ORDER	1%	63
G8945 - LINECLSSVC AND TOS DO NOT MATCH	1%	62

BST - ALL REJECTS

LLIMS GUI DATA	
VERSIONS SENT	36867
REJECTS	10865
REJECT RATE	29.5%
INITIAL REJECT VOLUME	62.8%
RE-REJECT VOLUME	37.2%

METIS DATA	
INITIAL REJECT RATE	#DIV/0!
SUPPLEMENTAL REJECT RATE	#DIV/0!
OVERALL REJECT RATE	#DIV/0!

REJECTS BY ORDER TYPE		
MIGRATION	7875	64.6%
NEW INSTALL	1698	13.9%
CHANGE	1893	15.5%
MOVE	198	1.6%
RECORD	62	0.5%
SUSPEND	165	1.4%
RESTORE	5	0.0%
DEACTIVATION	298	2.4%
TOTAL	12194	100%

September

RE-REJECT ANALYSIS		
INITIAL	62.8%	7652
2X	27.8%	3387
3X OR >	9.5%	1155
TOTAL	100%	12194

TOP ISSUES	ALL REJECTS			INITIAL			SUPPLEMENTAL		
	REJECT VOLUME	% OF REJECTS	% OF ORDERS	REJECT VOLUME	% OF REJECTS	% OF ORDERS	REJECT VOLUME	% OF REJECTS	% OF ORDERS
1. NAME/ADDRESS	2752	23%	6.8%	1846	15.6%	4.6%	906	7.7%	2.3%
2. MULTIPLE BTN	2097	18%	5.2%	1371	11.6%	3.4%	726	6.1%	1.8%
3. PON/VERSION REJECTS	1172	10%	2.9%	63	0.5%	0.2%	1109	9.4%	2.8%
4. INVALID TN	819	7%	2.0%	654	5.5%	1.6%	165	1.4%	0.4%
5. PON AGED OFF	761	6%	1.9%	4	0.0%	0.0%	757	6.4%	1.9%
6. LCON	699	6%	1.7%	686	5.8%	1.7%	13	0.1%	0.0%
7. LISTING REJECTS	566	5%	1.4%	500	4.2%	1.2%	66	0.6%	0.2%
8. FEATURES/USOCS	449	4%	1.1%	277	2.3%	0.7%	172	1.5%	0.4%
9. BST REJECTS	398	3%	1.0%	264	2.2%	0.7%	134	1.1%	0.3%
10. MIGRATION DECLINED	342	3%	0.9%	330	2.8%	0.8%	12	0.1%	0.0%

TOP 5 OF INITIAL VERSIONS	REJECT VOLUME	% OF REJECTS	% OF ORDERS
NAME/ADDRESS	1846	16%	4.6%
MULTIPLE BTN	1371	12%	3.4%
LCON	686	6%	1.7%
INVALID TN	654	6%	1.6%
LISTING REJECTS	500	4%	1.2%

TOP 5 OF SUPPLEMENTAL VERSIONS	REJECT VOLUME	% OF REJECTS	% OF ORDERS
PON/VERSION REJECTS	1109	9%	2.8%
NAME/ADDRESS	906	8%	2.3%
PON AGED OFF	757	6%	1.9%
MULTIPLE BTN	726	6%	1.8%
FEATURES/USOCS	172	1%	0.4%

TOP REJECT CODES

G9496 - TNS=7704753071 ON LNUM=00002 NOT FOUND ON EATN=7704753071 FOR ACT=	17%	2025
MCI CODE [Z23] name/address	11%	1316
R1030 - VER MUST BE GREATER THAN PREVIOUS VERSION	8%	1036
G7905 - RSAG - INCORRECT COMMUNITY, INCORRECT ZIP CODE OR INVALID ADDRESS FORMAT	7%	879
R1645 - LSR/PON AGED OFF	6%	761
E2120 - LCON-NAME MUST BE UP TO 15 ALPHANUMERICS WITH EMBEDDED BLANKS AT MAIN LOCATION	6%	688
D4045 - DLNUM=&DLNM LTN=<N ASSOCIATED LACT COMBINATION I OR O MISSING	3%	354
D4065 - DLNUM=&DLNM LTN=<N ASSOCIATED LACT COMBINATION I AND O IS MISSING	3%	354
AO ASSIGNABLE ORDER	3%	337
G7400 - CLEC DOES NOT OWN THIS ACCOUNT.	3%	309
G7250 - LSR HOUSENUMBER INCORRECT	3%	307
G9626 - CLASS OF SERVICE LNPRL NOT ELIGIBLE FOR CONVERSION TO PORT/LOOP SERVICE	2%	301
ALL REMAINING UNKNOWNS	2%	293
G9627 - ALL CUSTOMER RECORDS ARE FINAL FOR THIS NUMBER	2%	243
G9442 - DLNUM=0001 LTN=7709961213 ALI MUST BE UNIQUE	1%	170
G9860 - UNABLE TO HANDLE REQUEST; ENDUSER ACCOUNT FROZEN	1%	159
MCI CODE [Z12] pending order	1%	159
MCI CODE [Z28] feature detail conflicts	1%	135
G7055 - NUM=7703939880 TELNO=7703939880 ACCOUNT IS FINAL	1%	130
MCI CODE [Z10] invalid or insufficient reject detail	1%	130

BST - MIGRATION REJECTS

LLIMS GUI DATA	
VERSIONS SENT	32088
REJECTS	8394
REJECT RATE	26.2%
INITIAL REJECT VOLUME	63.9%
RE-REJECT VOLUME	36.1%
METIS DATA	
INITIAL REJECT RATE	#DIV/0!
SUPPLEMENTAL REJECT RATE	#DIV/0!
OVERALL REJECT RATE	#DIV/0!

REJECTS BY ORDER TYPE		
MIGRATION	9165	100%
NEW INSTALL	0	
CHANGE	0	
MOVE	0	
RECORD	0	
SUSPEND	0	
RESTORE	0	
DEACTIVATION	0	
TOTAL	9165	100%

August

RE-REJECT ANALYSIS		
INITIAL	63.9%	5860
2X	34.8%	3189
3X OR >	1.3%	116
TOTAL	100%	9165

TOP ISSUES	ALL REJECTS			INITIAL			SUPPLEMENTAL		
	REJECT VOLUME	% OF REJECTS	% OF ORDERS	REJECT VOLUME	% OF REJECTS	% OF ORDERS	REJECT VOLUME	% OF REJECTS	% OF ORDERS
1 PON AGED OFF	2471	27%	7.1%	26	0.3%	0.1%	2445	26.7%	7.0%
2 MULTIPLE BTN	2160	24%	6.2%	1944	21.2%	5.5%	216	2.4%	0.6%
3 NAME/ADDRESS	1747	19%	5.0%	1610	17.6%	4.6%	137	1.5%	0.4%
4 LCON	484	5%	1.4%	479	5.2%	1.4%	5	0.1%	0.0%
5 MIGRATION DECLINED	433	5%	1.2%	425	4.6%	1.2%	8	0.1%	0.0%
6 PON/VERSION REJECTS	393	4%	1.1%	128	1.4%	0.4%	265	2.9%	0.8%
7 FEATURES/USOCS	326	4%	0.9%	276	3.0%	0.8%	50	0.5%	0.1%
8 REJECTS NEEDING RESEARCH	202	2%	0.6%	155	1.7%	0.4%	47	0.5%	0.1%
9 LOCAL FREEZE	184	2%	0.5%	179	2.0%	0.5%	5	0.1%	0.0%
10 PENDING ORDER	179	2%	0.5%	149	1.6%	0.4%	30	0.3%	0.1%

TOP 5 OF INITIAL VERSIONS	REJECT VOLUME	% OF REJECTS	% OF ORDERS
MULTIPLE BTN	1944	21%	5.5%
NAME/ADDRESS	1610	18%	4.6%
LCON	479	5%	1.4%
MIGRATION DECLINED	425	5%	1.2%
FEATURES/USOCS	276	3%	0.8%

TOP 5 OF SUPPLEMENTAL VERSIONS	REJECT VOLUME	% OF REJECTS	% OF ORDERS
PON AGED OFF	2445	27%	7.0%
PON/VERSION REJECTS	265	3%	0.8%
MULTIPLE BTN	216	2%	0.6%
NAME/ADDRESS	137	1%	0.4%
FEATURES/USOCS	50	1%	0.1%

TOP REJECT CODES

R1645 - LSR/PON AGED OFF	27%	2471
G9496 - TNS=7704753071 ON LNUM=00002 NOT FOUND ON EATN=7704753071 FOR ACT=	23%	2124
MCI CODE [Z23] name/address	12%	1141
E2120 - LCON-NAME MUST BE UP TO 15 ALPHANUMERICS WITH EMBEDDED BLANKS AT MAIN LOCATION	5%	484
G9626 - CLASS OF SERVICE LNPRL NOT ELIGIBLE FOR CONVERSION TO PORT/LOOP SERVICE	4%	402
G7250 - LSR HOUSENUMBER INCORRECT	3%	293
G7905 - RSAG - INCORRECT COMMUNITY, INCORRECT ZIP CODE OR INVALID ADDRESS FORMAT	2%	191
G9860 - UNABLE TO HANDLE REQUEST; ENDUSER ACCOUNT FROZEN	2%	184
R1030 - VER MUST BE GREATER THAN PREVIOUS VERSION	2%	172
MCI CODE [Z12] pending order	1%	118
G8209 - USOC COMBINATION IS INVALID. FORMAT SAE 587 I1 ESXDC /TN 770 532-2155	1%	105
R1015 - PON DUPLICATE ON INITIAL LSR	1%	88
MCI CODE [Z29] feature combination invalid	1%	88
G8195 - CALL FORWARDING USOC MUST NOT APPEAR. FORMAT SAE 540 I1 GCJ /TN 770 227-1838 /CFND 404 862-4825	1%	71
PD PENDING ORDER	1%	61
G8945 - LINECLSSVC AND TOS DO NOT MATCH	1%	60
MCI CODE [Z14] supplement invalid	1%	51
MCI CODE [Z22] due date	1%	51
MCI CODE [Z33] conflict with order activity	1%	50
MCI CODE [Z28] feature detail conflicts	1%	49

BST - ALL REJECTS

LLIMS GUI DATA	
VERSIONS SENT	38712
REJECTS	10080
REJECT RATE	26 0%
INITIAL REJECT VOLUME	65.9%
RE-REJECT VOLUME	34.1%
METIS DATA	
INITIAL REJECT RATE	#DIV/0!
SUPPLEMENTAL REJECT RATE	#DIV/0!
OVERALL REJECT RATE	#DIV/0!

REJECTS BY ORDER TYPE		
MIGRATION	9165	81%
NEW INSTALL	868	8%
CHANGE	1044	9%
MOVE	96	1%
RECORD	39	0%
SUSPEND	34	0%
RESTORE	4	0%
DEACTIVATION	77	1%
TOTAL	11327	100%

August

RE-REJECT ANALYSIS		
INITIAL	65.9%	7467
2X	32 6%	3688
3X OR >	1.5%	172
TOTAL	100%	11327

TOP ISSUES	ALL REJECTS			INITIAL			SUPPLEMENTAL		
	REJECT VOLUME	% OF REJECTS	% OF ORDERS	REJECT VOLUME	% OF REJECTS	% OF ORDERS	REJECT VOLUME	% OF REJECTS	% OF ORDERS
1 PON AGED OFF	2746	24%	6.3%	33	0.3%	0.1%	2713	24.0%	6.2%
2 NAME/ADDRESS	2349	21%	5.4%	2136	18.9%	4.9%	213	1.9%	0.5%
3 MULTIPLE BTN	2160	19%	5.0%	1944	17.2%	4.5%	216	1.9%	0.5%
4 PON/VERSION REJECTS	519	5%	1.2%	190	1.7%	0 4%	329	2.9%	0.8%
5 LCON	492	4%	1.1%	487	4.3%	1.1%	5	0.0%	0.0%
6 MIGRATION DECLINED	437	4%	1.0%	428	3.8%	1.0%	9	0.1%	0.0%
7 INVALID TN	409	4%	0.9%	380	3.4%	0.9%	29	0.3%	0.1%
8 FEATURES/USOCS	409	4%	0.9%	333	2.9%	0.8%	76	0.7%	0.2%
9 LISTING REJECTS	360	3%	0.8%	349	3.1%	0.8%	11	0.1%	0.0%
10 REJECTS NEEDING RESEARCH	284	3%	0.7%	214	1.9%	0.5%	70	0.6%	0.2%

TOP 5 OF INITIAL VERSIONS	REJECT VOLUME	% OF REJECTS	% OF ORDERS
NAME/ADDRESS	2136	19%	4.9%
MULTIPLE BTN	1944	17%	4.5%
LCON	487	4%	1.1%
MIGRATION DECLINED	428	4%	1.0%
INVALID TN	380	3%	0.9%

TOP 5 OF SUPPLEMENTAL VERSIONS	REJECT VOLUME	% OF REJECTS	% OF ORDERS
PON AGED OFF	2713	24%	6.2%
PON/VERSION REJECTS	329	3%	0.8%
MULTIPLE BTN	216	2%	0.5%
NAME/ADDRESS	213	2%	0.5%
FEATURES/USOCS	76	1%	0.2%

TOP REJECT CODES

R1645 - LSR/PON AGED OFF	24%	2746
G9496 - TNS=7704753071 ON LNUM=00002 NOT FOUND ON EATN=7704753071 FOR ACT=	19%	2124
MCI CODE [Z23] name/address	11%	1299
G7905 - RSAG - INCORRECT COMMUNITY, INCORRECT ZIP CODE OR INVALID ADDRESS FORMAT	5%	578
E2120 - LCON-NAME MUST BE UP TO 15 ALPHANUMERICS WITH EMBEDDED BLANKS AT MAIN LOCATION	4%	492
G9626 - CLASS OF SERVICE LNPRL NOT ELIGIBLE FOR CONVERSION TO PORT/LOOP SERVICE	4%	402
G7250 - LSR HOUSENUMBER INCORRECT	3%	293
R1030 - VER MUST BE GREATER THAN PREVIOUS VERSION	2%	205
G9860 - UNABLE TO HANDLE REQUEST; ENDUSER ACCOUNT FROZEN	2%	184
D4045 - DLNUM=&DLNM LTN=<N ASSOCIATED LACT COMBINATION I OR O MISSING	1%	159
D4065 - DLNUM=&DLNM LTN=<N ASSOCIATED LACT COMBINATION I AND O IS MISSING	1%	159
MCI CODE [Z12] pending order	1%	153
G7400 - CLEC DOES NOT OWN THIS ACCOUNT.	1%	131
AO ASSIGNABLE ORDER	1%	130
G7055 - NUM=7703939880 TELNO=7703939880 ACCOUNT IS FINAL	1%	119
R1015 - PON DUPLICATE ON INITIAL LSR	1%	112
G8209 - USOC COMBINATION IS INVALID. FORMAT SAE 587 I1 ESXDC /TN 770 532-2155	1%	110
G9627 - ALL CUSTOMER RECORDS ARE FINAL FOR THIS NUMBER	1%	103
MCI CODE [Z29] feature combination invalid	1%	95
G8195 - CALL FORWARDING USOC MUST NOT APPEAR. FORMAT SAE 540 I1 GCJ /TN 770 227-1838 /CFND 404 862-4825	1%	71

BST - MIGRATION REJECTS

LLIMS GUI DATA	
VERSIONS SENT	28819
REJECTS	8144
REJECT RATE	28.3%
INITIAL REJECT VOLUME	75.8%
RE-REJECT VOLUME	24.2%
METIS DATA	
INITIAL REJECT RATE	#DIV/0!
SUPPLEMENTAL REJECT RATE	#DIV/0!
OVERALL REJECT RATE	#DIV/0!

REJECTS BY ORDER TYPE		
MIGRATION	9094	100%
NEW INSTALL	0	
CHANGE	0	
MOVE	0	
RECORD	0	
SUSPEND	0	
RESTORE	0	
DEACTIVATION	0	
TOTAL	9094	100%

JULY

RE-REJECT ANALYSIS		
INITIAL	75.8%	6892
2X	22.1%	2014
3X OR >	2.1%	188
TOTAL	100%	9094

TOP ISSUES	ALL REJECTS			INITIAL			SUPPLEMENTAL		
	REJECT VOLUME	% OF REJECTS	% OF ORDERS	REJECT VOLUME	% OF REJECTS	% OF ORDERS	REJECT VOLUME	% OF REJECTS	% OF ORDERS
1 NAME/ADDRESS	2544	28%	7.9%	2446	26.9%	7.6%	98	1.1%	0.3%
2 PON AGED OFF	1747	19%	5.4%	39	0.4%	0.1%	1708	18.8%	5.3%
3 MULTIPLE BTN	1542	17%	4.8%	1513	16.6%	4.7%	29	0.3%	0.1%
4 CLASS OF SERVICE (CID)	634	7%	2.0%	600	6.6%	1.9%	34	0.4%	0.1%
5 MIGRATION DECLINED	454	5%	1.4%	435	4.8%	1.4%	19	0.2%	0.1%
6 PON/VERSION REJECTS	368	4%	1.1%	314	3.5%	1.0%	54	0.6%	0.2%
7 LCON	338	4%	1.1%	336	3.7%	1.0%	2	0.0%	0.0%
8 FEATURES/USOCS	314	3%	1.0%	221	2.4%	0.7%	93	1.0%	0.3%
9 REJECTS NEEDING RESEARCH	271	3%	0.8%	213	2.3%	0.7%	58	0.6%	0.2%
10 LOCAL FREEZE	167	2%	0.5%	146	1.6%	0.5%	21	0.2%	0.1%

TOP 5 OF INITIAL VERSIONS	REJECT VOLUME	% OF REJECTS	% OF ORDERS
NAME/ADDRESS	2446	27%	7.6%
MULTIPLE BTN	1513	17%	4.7%
CLASS OF SERVICE (CID)	600	7%	1.9%
MIGRATION DECLINED	435	5%	1.4%
LCON	336	4%	1.0%

TOP 5 OF SUPPLEMENTAL VERSIONS	REJECT VOLUME	% OF REJECTS	% OF ORDERS
PON AGED OFF	1708	19%	5.3%
NAME/ADDRESS	98	1%	0.3%
FEATURES/USOCS	93	1%	0.3%
REJECTS NEEDING RESEARCH	58	1%	0.2%
PON/VERSION REJECTS	54	1%	0.2%

TOP REJECT CODES

WCOM[Z23] name/address	20%	1831
R1645 - LSR/PON AGED OFF	19%	1747
G9496 - TNS=7704753071 ON LNUM=00002 NOT FOUND ON EATN=7704753071 FOR ACT=	17%	1517
WCOM[Z17] class of service	6%	580
G9626 - CLASS OF SERVICE LNPRL NOT ELIGIBLE FOR CONVERSION TO PORT/LOOP SERVICE	4%	402
G7250 - LSR HOUSENUMBER INCORRECT	4%	390
E2120 - LCON-NAME MUST BE UP TO 15 ALPHANUMERICS WITH EMBEDDED BLANKS AT MAIN LOCATION	4%	338
G8209 - USOC COMBINATION IS INVALID. FORMAT SAE 587 I1 ESXDC /TN 770 532-2155	3%	242
G7905 - RSAG - INCORRECT COMMUNITY, INCORRECT ZIP CODE OR INVALID ADDRESS FORMAT	2%	217
R1015 - PON DUPLICATE ON INITIAL LSR	2%	210
G9860 - UNABLE TO HANDLE REQUEST; ENDUSER ACCOUNT FROZEN	2%	167
R1110 - D/TSENT MUST BE CURRENT DATE, OR A FUTURE DATE	2%	150
WCOM[Z10] invalid or insufficient reject detail	1%	75
WCOM[Z18] supplement invalid	1%	72
PD PENDING ORDER	1%	69
WCOM[Z12] pending order	1%	66
G8945 - LINECLSSVC AND TOS DO NOT MATCH	1%	54
G8825 - ORDER ERR:	1%	52
WCOM[Z21] business, DSL, special line	1%	47
G8820 - SOCS ERROR:	0%	40

BST - ALL REJECTS

JULY

LLIMS GUI DATA	
VERSIONS SENT	34643
REJECTS	9425
REJECT RATE	27.2%
INITIAL REJECT VOLUME	77.1%
RE-REJECT VOLUME	22.9%
METIS DATA	
INITIAL REJECT RATE	#DIV/0!
SUPPLEMENTAL REJECT RATE	#DIV/0!
OVERALL REJECT RATE	#DIV/0!

REJECTS BY ORDER TYPE		
MIGRATION	9094	87%
NEW INSTALL	359	3%
CHANGE	864	8%
MOVE	37	0%
RECORD	28	0%
SUSPEND	0	
RESTORE	0	
DEACTIVATION	27	0%
TOTAL	10409	100%

RE-REJECT ANALYSIS		
INITIAL	77.1%	8029
2X	20.9%	2174
3X OR >	2.0%	207
TOTAL	100%	10410

TOP ISSUES	ALL REJECTS			INITIAL			SUPPLEMENTAL		
	REJECT VOLUME	% OF REJECTS	% OF ORDERS	REJECT VOLUME	% OF REJECTS	% OF ORDERS	REJECT VOLUME	% OF REJECTS	% OF ORDERS
1 NAME/ADDRESS	2832	27%	7 4%	2712	26.1%	7.1%	120	1.2%	0.3%
2 PON AGED OFF	1874	18%	4.9%	41	0.4%	0.1%	1833	17.6%	4.8%
3 MULTIPLE BTN	1542	15%	4.0%	1513	14.5%	4.0%	29	0.3%	0.1%
4 CLASS OF SERVICE (CID)	706	7%	1.8%	672	6.5%	1.8%	34	0.3%	0.1%
5 MIGRATION DECLINED	456	4%	1.2%	436	4.2%	1.1%	20	0.2%	0.1%
6 FEATURES/USOCS	445	4%	1.2%	343	3.3%	0.9%	102	1.0%	0.3%
7 PON/VERSION REJECTS	418	4%	1.1%	360	3.5%	0.9%	58	0.6%	0.2%
8 INVALID TN	389	4%	1.0%	373	3.6%	1.0%	16	0.2%	0.0%
9 LCON	342	3%	0 9%	340	3.3%	0.9%	2	0.0%	0.0%
10 REJECTS NEEDING RESEARCH	337	3%	0.9%	271	2.6%	0.7%	66	0.6%	0.2%

TOP 5 OF INITIAL VERSIONS	REJECT VOLUME	% OF REJECTS	% OF ORDERS
NAME/ADDRESS	2712	26%	7.1%
MULTIPLE BTN	1513	15%	4.0%
CLASS OF SERVICE (CID)	672	6%	1.8%
MIGRATION DECLINED	436	4%	1.1%
INVALID TN	373	4%	1.0%

TOP 5 OF SUPPLEMENTAL VERSIONS	REJECT VOLUME	% OF REJECTS	% OF ORDERS
PON AGED OFF	1833	18%	4.8%
NAME/ADDRESS	120	1%	0.3%
FEATURES/USOCS	102	1%	0.3%
REJECTS NEEDING RESEARCH	66	1%	0.2%
PON/VERSION REJECTS	58	1%	0.2%

TOP REJECT CODES

WCOM[Z23] name/address	18%	1910
R1645 - LSR/PON AGED OFF	18%	1874
G9496 - TNS=7704753071 ON LNUM=00002 NOT FOUND ON EATN=7704753071 FOR ACT=	15%	1517
WCOM[Z17] class of service	6%	652
G9626 - CLASS OF SERVICE LNPRL NOT ELIGIBLE FOR CONVERSION TO PORT/LOOP SERVICE	4%	402
G7905 - RSAG - INCORRECT COMMUNITY, INCORRECT ZIP CODE OR INVALID ADDRESS FORMAT	4%	396
G7250 - LSR HOUSENUMBER INCORRECT	4%	390
E2120 - LCON-NAME MUST BE UP TO 15 ALPHANUMERICS WITH EMBEDDED BLANKS AT MAIN LOCATION	3%	342
G8209 - USOC COMBINATION IS INVALID. FORMAT SAE 587 I1 ESXDC /TN 770 532-2155	3%	280
R1015 - PON DUPLICATE ON INITIAL LSR	2%	218
G7400 - CLEC DOES NOT OWN THIS ACCOUNT.	2%	201
G9860 - UNABLE TO HANDLE REQUEST; ENDUSER ACCOUNT FROZEN	2%	167
R1110 - D/TSENT MUST BE CURRENT DATE, OR A FUTURE DATE	1%	150
WCOM[Z12] pending order	1%	94
PD PENDING ORDER	1%	86
G7055 - NUM=7703939880 TELNO=7703939880 ACCOUNT IS FINAL	1%	86
D4045 - DLNUM=&DLNM LTN=<N ASSOCIATED LACT COMBINATION I OR O MISSING	1%	82
D4065 - DLNUM=&DLNM LTN=<N ASSOCIATED LACT COMBINATION I AND O IS MISSING	1%	82
WCOM[Z10] invalid or insufficient reject detail	1%	75
WCOM[Z18] supplement invalid	1%	75

ATTACHMENT 6

BellSouth Interconnection Services

1960 West Exchange Place
Suite 420
Tucker, Georgia 30084

October 1, 2001

Ms. Amanda Hill
Manager - Carrier Management
WorldCom
Two Northwinds Center
2520 Northwinds Parkway
Suite 500
Alpharetta, Georgia 30004

Dear Amanda:

This is in response to your e-mail dated August 28, 2001 to Kathy Ragsdale, requesting an investigation and written explanation regarding Purchase Order Numbers (PON) S004004221BSGAPR, S003868104BSGAPR and S003847727BSGAPR, which BellSouth returned to MCI Metro (MCIm) for clarification and then issued and completed the service orders prior to receiving MCIm's response to the clarification. Ms. Ragsdale requested that I respond to your request. Following are the results of BellSouth's investigation associated with each of MCIm's questions:

MCIm Question #1: Were these migration PONs completed, as stated by the version 2 clarification?

        a. If so, which version was completed by BellSouth ?
        b. Were both a FOC and completion notifier sent to MCI for each of these
           orders ?
        c. If not, why did the BST rep type the version 2 clarification, which
           indicated that the PON was completed on the initial version

BellSouth Response: The migration has been completed and the Customer Service Record (CSR) has been updated to reflect MCIm as the local service provider. Following is the sequence of events for each individual PON:

S004004221BSGAPR – This PON was received electronically through BellSouth's Electronic Data Interchange (EDI). The system issued service orders NOC4BP80 and DOC30HJ9. Because the "D" order removed BellSouth's Voice Mail, the Local Exchange Service Order Generator (LESOG) placed both orders in an "error" status for manual review. In Georgia and

North Carolina, the "D" order requires a Field Identifier (FID) of ZLIG when the Call Forwarding feature is not being retained on the "N" service order.

The Mechanized Questionable Activity (QA) group reviews and clears errors of this type. Since the service order "dropped" for manual review, a service representative must review the entire order. If other errors are found, the PON will be returned to MClm for clarification. This was the case with this PON. The end user name on the PON was different from the name on the CSR (MClm CSR reflects LN of Nathaniel Edwards, LSR requested Robert Hudson with ERL Y). When the PON was returned for clarification, the service representative failed to cancel the pending orders that were issued by LESOG. When the ZLIG error was cleared, LESOG attempted to send a Firm Order Confirmation (FOC) to MClm. The attempts failed because the LSR was in clarification. However, the service orders issued by LESOG processed and posted to the CSR. Due to the LSR being in a clarified status, the completion notification failed as well.

S003868104BSGAPR - PON had Call Forwarding feature. LESOG issued service orders NOC9NBR3 and DOC6WG10 and the system recognized that the ZLIG FID needed to be added and therefore, placed both orders in an error status. The service representative reviewed the order and the PON was returned for clarification because the EU page was incorrect with ERL of Y (MClm CSR reflects LN of Jamie Yarbrough, LSR requested Kristi Yarbrough). The service representative failed to cancel the pending LESOG orders.

The Mechanized QA group cleared ZLIG error, LESOG made multiple attempts to send a FOC and failed. The service orders processed, completed and posted to the CSR. Completion notice failed due to the LSR being held in a clarified status.

S003847727BSGAPR - PON had Call Forwarding feature. LESOG issued service orders NO5C5MG8 and DO55CM73 and the system recognized that the ZLIG FID needed to be added and therefore, placed both orders in an error status. The service representative reviewed the order and the PON was returned for clarification because the EU page was incorrect with ERL of Y (MClm CSR reflects LN of Phillip Woodside, LSR requested Phil Woodside). The service representative failed to cancel the pending LESOG orders.

The Mechanized QA group cleared ZLIG error, LESOG made multiple attempts to send FOC and failed. The service orders processed, completed and posted to the CSR. The completion notice failed due to the LSR being held in a clarified status.

MClm Question #2: The version 1 was returned to MCI with an automated notification "AO ASSIGNABLE ORDER" in addition to the clarification.

> a. What does this automated response indicate?

BellSouth Response #2: "AO assignable Order" is message sent by BellSouth's electronic system acknowledging that a service order has been issued and is in a hold status for manual review.

The LCSC management has been requested to cover the service representatives of the correct procedures to use in situations as described above.

I trust that this information satisfies your concerns regarding this matter. Please feel free to call at me at 770-492-7543, if you have additional questions.

Sincerely,

Pamela D. Reynolds
Industrial Specialist

cc: Shannon Waters

ATTACHMENT 7

1   BEFORE THE NORTH CAROLINA UTILITIES COMMISSION
2
           IN THE MATTER OF:
3
4   APPLICATION OF BELLSOUTH TELECOMMUNICATION, INC.,
     TO PROVIDE IN-REGION INTERLATA SERVICES PURSUANT
5   TO DOCKET NO. 9-55 SECTION 271 OF THE SUB1022
              TELECOMMUNICATIONS ACT OF 1996
6   ---
7
                       DEPOSITION OF
8
                       WILLIAM STACY
9
                   November 28th, 2001
10
                        9:00 a.m.
11
              675 West Peachtree Street
12
                   Atlanta, Georgia
13
14
           Elizabeth Gallo, CCR-B-1997
15
16
17
18
19
20
21
22
23
24
25
1   APPEARANCES OF COUNSEL
2   .
3   On behalf of AT&T:
4   MICHAEL A. HOPKINS, Esquire
5   McKenna & Cuneo
6   1900 K Street, NW
7   Washington, DC   20006
8   .
9   On behalf of MCI WorldCom:
10   DULANEY L. O'ROARK, III, Esquire
11   KENNARD B. WOODS, Esquire
12   MCI Law & Public Policy
13   Six Concourse Parkway, Suite 3200
14   Atlanta, Georgia   30328
15   .
16   On behalf of BellSouth:
17   LISA FOSHEE, Attorney at Law
18   BellSouth Law Department
19   675 West Peachtree Street
20   Suite 4300
21   Atlanta, Georgia   30375
22   .
23   Also Present:
24   Ron Pate

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10      Q.      So there will be a --
11      A.      10.0 and a 10.1.
12      Q.      We skipped --
13      A.      Excuse me, three, 10.0, 10.1,
14   10.2.  10.0 is happening now.
15      Q.      So in your capacity in your job
16   now, are you at all involved in the
17   retirement of operational support systems that
18   support CLEC operations?
19      A.      Yes, I am.
20      Q.      What is your role in that process?
21      A.      It is a two-step process.  The
22   way I characterize it, there is a strategic
23   process.
24      Q.      Let me back up a second.  I don't
25   know if I used the right words.  I think I
00142
1    might have said retirement.  What I mean is,
2    the replacement of older systems with new
3    systems rather than just cutting out an
4    obsolete system all together?
5       A.      The answer is, yes, I'm also
6    involved in that.
7            MS. FOSHEE:   I'm talking about
8    retail systems or CLEC?
9            MR. HOPKINS:   I didn't break it
10   down between retail and wholesale.  I'm
11   talking about systems I use to support CLECs.
12   They may be purely wholesale.
13           MS. FOSHEE:   Includes BellSouth
14   Legacy systems.
15           MR. HOPKINS:   It could involve
16   BellSouth Legacy systems.
17           THE WITNESS:  Let me qualify my
18   answer, then, to some extent.  My primary
19   involvement is when we are replacing one of
20   the CLEC facing operational support systems,
21   like EDI, TAG, LENS, and their components.
22           That is my primary function, when
23   we are considering replacement or retirement
24   of those.  It is a two-step process.  There
25   is a plan put together by the corporation
00143
1    with input from me and other people that is
2    a strategic plan that says here is a future
3    state that we would like to arrive at where
4    we have changed the components of our
5    operational support systems in total, and here
6    is where we would like to be in five years.
7            Once I give my input to that
8    plan, that is mostly done by the BellSouth IT
9    community and the hardware and software
10   architects who are looking out into the
11   future and saying, what is the most desirable
12   kind of software, what servers should we run
13   it on, how is all that supposed to look two
14   years, three years, five years from now?
15           Then there are a series of what
16   I generally call tactical decisions, which
17   say, what are we going to do for the next 12
18   months, 18 month.  I'm heavily involved in
```

19	those. One of those that is going on right
20	now is a decision about where does the next
21	piece of ordering functionality go and the
22	next piece of ordering functionality that was
23	sort of different was the Georgia order, I
24	believe in y'all's arbitration case, but I
25	may be3 remembering that wrong.

00144

1	That was brand new. Nobody had
2	ever done it before. We don't have anything
3	we could change to make it work that way.
4	It is a new effort. There is a strategic
5	and tactical decision to be made at that
6	point.
7	The strategic decision looking
8	toward the long-term plan says put it on what
9	we call the Telcordia platform. You have
10	seen those in our documents, the series of
11	things that start out with COG and DOM and
12	SOG.
13	We are using that right now to
14	produce XDSL orders and handle makeup
15	inquires. Those were the first two functions
16	that got put up on that new strategic
17	platform. We decided, because of time and
18	budget constraints, we could not go there
19	with line splitting.
20	It is being done mostly on the
21	LESOG platform with Accenture doing the work.
22	The tactical decisions I have to make on a
23	month-to-month basis are, here is the strategy
24	the corporation has charged me to move to in
25	the long term. Here is how much funding I

00145

1	have this year, and here are two vendors,
2	different vendors saying I could accomplish
3	the work for different amounts of money and
4	time, which do I choose?
5	The time constraints on that
6	particular Georgia order, Telcordia could not
7	meet. Accenture could, so I gave it to that
8	corporation. But the long term direction
9	says move everything toward the Telcordia
10	platform. That is the strategy versus the
11	tactics side of it.
12	Q. (By Mr. Hopkins) When you say
13	you told them to go, is this your authority
14	to make?
15	A. There is a small group I consult
16	with. My boss obviously has the ultimate
17	authority for that. That is primarily my
18	charge.
19	Q. You're responsible, but she may
20	take your recommendation?
21	A. Right.
22	Q. What systems does that authority
23	run to?
24	A. The CLEC facing set of systems:
25	TAG, EDI, LENS, CSOTS, et cetera.

00146

1	Q. Then you said there is that

2   separate set of systems, the other systems.
3   A.   What we referred to a minute ago,
4   the Legacy systems of the corporation --
5   SOCS, CRIS, ELMOS, WAFA -- things that are
6   used in common by BellSouth's retail unit and
7   the CLEC.
8   Q.   Where would LEO and LESOG fit?
9   A.   They are in mine.
10   Q.   So you have CLEC-specific systems,
11   whether they are facing them directly or not?
12   A.   Right.
13   Q.   Are there any other tactical
14   movements other than line splitting?
15   A.   Well, I mean that was the last
16   one. Literally every function that we are
17   ordered to do, we have to make those kinds
18   of decisions on. The other one that is in
19   that same January release is CSR parson. It
20   went the other way.
21   Accenture was not able to do most
22   of the work quickly enough. Telcordia wound
23   up with the jobs, so we are moving it
24   through the strategic platform now rather than
25   two years from now.
00147
1   Q.   How do you access the CSRs?
2   Through TAG or LENS?
3   A.   Behind the TAG, TAG talks to, in
4   this case, the system we call COG.
5   Q.   It currently does?
6   A.   Yes, for XDSL orders for today.
7   We are adding a new function between TAG and
8   COG and then between COG and DOM to parse
9   service requests and send it back.
10   From the user's standpoint --
11   well, parse CSR is a bad example because that
12   requires a lot of work on the CLEC side.
13   They have to accept new information coded
14   differently.
15   From the user's standpoint, it is
16   sort of a don't care what happens underneath
17   there if the data comes to you is the same.
18   Q.   I don't know if this would be
19   tactical or a strategic decision, to move
20   from LEOLA SOG to the Telcordia platform?
21   A.   That is clearly the strategic
22   direction. The decisions about when to do it
23   are tactical.
24   Q.   Are there any plans in the next
25   18 months to begin that?
00148
1   A.   In the sense that I told you a
2   minute ago, every time we add a function,
3   that decision is examined. The one that we
4   are trying to put on the table now to
5   discuss is that we have an implementation of
6   the ELMS-5 ordering map sitting out there per
7   the change control board in, I think, the
8   July, August, September time frame.
9   I don't remember exactly when it
10   was planned for. We will have to make a

20	that. They are business owners inside the
21	other units. If the business owner for ELMOS
22	were to propose a change, that would mean
23	that I was going to have to spend the money
24	rewrite all of CLEC pathy, as well as him.
25	He is who is the owner having to rewrite all

00151

1	of retail pathy.
2	Then I get input into that
3	decision. It is like the relationship we
4	have with the CLEC. If they are going
5	things that don't affect me, I don't get into
6	that part of the business.
7	Q. So you may ask them to do things
8	to help you?
9	A. Yes, in general. Most everything
10	we do requires some cooperation on their part
11	at least.
12	Q. So they support you in some
13	respects?
14	A. In some respects, yes.
15	Q. And then changes that they do may
16	impact your systems and you have to account
17	for those?
18	A. Yes.
19	Q. Are you aware of any changes in
20	those Legacy systems that have been discussed
21	that would impact the systems you are
22	responsible for?
23	A. There is only one that I'm aware
24	of. It is still at a very preliminary
25	stage. That is --

00152

1	MS. FOSHEE: Is this proprietary
2	information that we need to mark as
3	confidential?
4	THE WITNESS: It may be still.
5	It is considered confidential. I'm not sure
6	if it was shared outside the business.
7	Q. (By Mr. Hopkins) Let me see if
8	I could get to it. If you think this
9	information is confidential, tell me before
10	you answer or don't answer if you think it
11	is.
12	What OSS function is it related
13	to?
14	A. Repair.
15	MR. HOPKINS: That is my Navy
16	training. I don't want to deal with
17	confidential information because it is too
18	much of a pain to keep track with.
19	I'm going to take a minute to see
20	if I have anymore questions, but I think I'm
21	done.
22	(A recess was taken.)
23	MR. HOPKINS: I don't have anymore
24	questions, but if you want to tell me
25	anything you think I'm interesting in, I'll

00153

1	be happy to listen.
2	THE WITNESS: I don't think so.

3	CROSS-EXAMINATION
4	BY-MR.O'ROARK:
5	Q. Good afternoon. As you know, I'm
6	De O'Roark. It is good to see you again.
7	Towards the end of your discuss with Mr.
8	Hopkins, you talked about vendors that
9	BellSouth uses for certain systems. Has
10	BellSouth used outside vendors at least to
11	some extent to develop the OSS systems that
12	serve CLEC?
13	A. Yes.
14	Q. Has BellSouth used vendors
15	exclusively for some of that work done
16	in-house?
17	A. Let's see. Going back in time, I
18	will not have the dates precise, BellSouth
19	had, prior to '96, its own IT department.
20	At some point during the '96-97-98 time
21	frame, that was outsourced.
22	Q. The entire IT function?
23	A. The entire IT function, and was
24	picked up by Accenture, then Anderson later
25	as they changed corporate structures.
00154	
1	Accenture did -- let me back up. EDS got
2	the contract to manage the data center, take
3	care of the network and air conditioning and
4	that stuff, and Accenture/Anderson wanted the
5	contract to manage the code to do the
6	software work.
7	There was a small fragment of what
8	used to be
9	IT retained in BellSouth to manage the
10	projects.
11	Q. Anything that happened in '97-98?
12	A. To the best of my recollection, it
13	was between '96 and '97, but it was long
14	enough ago that I forgot which year it
15	happened. We have, of course, used other
16	vendors prior to that. Telcordia was a
17	vendor for some of the systems since prior to
18	the eighties.
19	Q. For BellSouth's Legacy systems?
20	A. Primarily, yes.
21	Q. Was the dichotomy that Telcordia
22	did a lot of the work on the Legacy systems
23	and Anderson/Accenture did most of the work
24	on the CLEC systems?
25	A. For a period of time, but that is
00155	
1	not -- Anderson/Accenture has a tremendous
2	amount of work in the Legacy systems also.
3	It varies by systems. I will not have this
4	exactly correct, but for instance, CRIS, the
5	customer records inventory system, is almost
6	entirely an Accenture created and maintained
7	product.
8	On the other hand, one of the
9	maintenance systems, WAFA was, I believe,
10	originally written by Telcordia and any new
11	work on it is kind of split between Accenture

```
12      and Telcordia.
13          Q.      Back in roughly '98 when BellSouth
14      outsourced most of its IT work, did the
15      BellSouth department go to Accenture?
16          A.      Large portions of the BellSouth
17      people actually went to Accenture.
18          Q.      Does Accenture run the EDI
19      ordering system that BellSouth provides the
20      CLEC?
21          A.      Yes, they do.
22          Q.      Is there a point person at
23      Accenture who handles that project?
24          A.      There is, but I don't normally
25      work with them.  As I said, we kept some of
00156
1       our internal resources who do the project
2       management, so my contact that would get to
3       that point is Linda Tate.
4           Q.      That is a name I have heard
5       before.  She was, I gather, in the BellSouth
6       IT department and remained with BellSouth
7       rather than going to Accenture?
8           A.      Right.  She was actually a project
9       manager supervisor or project manager rather
10      than a co-developer kind of person, and the
11      function we call project management we
12      retained inside BellSouth.
13          Q.      Who created the EDI ordering
14      system?  Was that done by the BellSouth's IT
15      department pre-Accenture?
16          A.      Yes, BellSouth IT.
17          Q.      Then Accenture took it over after
18      the IT department went to Accenture?
19          A.      Yes.  Well, I suppose the first
20      was in '97.
21              MS. FOSHEE:    None of this is
22      confidential?
23              THE WITNESS: No.  The original
24      work, when it was done in '97, would have
25      been done by BellSouth IT when we were
00157
1       working with AT&T to set up an EDI ordering
2       process.
3               Whenever the outsourcing happened,
4       it moved to Accenture.
5           Q.      (By Mr. Hopkins)  A CLEC, such as
6       MCI, that is using EDI for ordering and
7       wanting to get information to help the
8       systems run more smoothly or get information
9       for whatever reason, is initially going to go
10      through its account team at BellSouth?
11          A.      It depends upon the information.
12      I suppose they would go through the account
13      team or if it was a production question, they
14      could go to the group we call EC support,
15      electronic communications support.
16          Q.      Is EC support part of that IT
17      remanent or is that some other group?
18          A.      It is another group.  It actually
19      is part of Mr. Agerton's organization with
20      close ties to both the IT remanent and to
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21          Accenture.
22              Q.      Since most of the brain power that
23          created and to this day maintains the EDI
24          ordering system is now remanent and Accenture,
25          who today at BellSouth has a thorough
00158
 1          understanding of how the EDI ordering systems
 2          work?  Is that what I call the IT remanent
 3          or are there other folks at BellSouth who
 4          know that?
 5              A.      No.  It is the people in Linda
 6          Tate's organization who actually are the
 7          managers for that function and their Accenture
 8          counterparts.  It is a partnership.  It is
 9          not an either/or.
10              Q.      Partnership between who?
11              A.      Accenture and BellSouth.
12              Q.      Meaning not literally in a legal
13          sense of a partnership, but they just work
14          together?
15              A.      Right.  The outsourcing contracts,
16          I have seen them, but they were designed to
17          ensure the parties work closely together.
18              Q.      So if we, MCI, have production
19          questions and we go to EC support, I gather
20          that the EC support folks are probably going
21          to need to go to Linda Tate's group to get
22          specific EDI ordering information?
23              A.      Well, it is more layers than that.
24              Q.      Please explain.
25              A.      EC support would be able to handle
00159
 1          any of a number of routine problems, and let
 2          me describe the EDI one.  In LENS -- sorry,
 3          let me do it the other way around.  In LENS,
 4          they deal with tens of requests a day where
 5          the user has forgotten their password or
 6          something wrong with their password.
 7                      Obviously, that is less typical in
 8          EDI.  There are cases in EDI when something
 9          happened to the training partner ID where
10          they would have the knowledge and they would
11          respond.
12                      If it gets deeper than that, they
13          would be going back through Linda Tate's
14          organization or directly to Accenture
15          depending upon what the problem was.
16              Q.      Would that also be true for TAG
17          preordering?
18              A.      No.  For TAG preordering there are
19          two places.  Again, EC support could answer
20          some of the questions.  They would generally
21          then have to go to Telcordia depending upon
22          what.  If it looked like a code problem,
23          they would have to go to Telcordia.
24              Q.      Did Telcordia develop TAG for
25          BellSouth?
00160
 1              A.      Yes, they did.
 2              Q.      As opposed to the Accenture
 3          situation where EDI was developed on BellSouth
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13   my company and our Georgia launch. We are
14   talking about an LSR that is submitted for a
15   migration as specified using EDI for UNE-P.
16   A.   Okay.
17   Q.   I'm limiting the question to that
18   context.
19   When we, MCI, submit that LSR, the
20   first place it will go is to MCI's value
21   added network; is that your understanding?
22   A.   That is my understanding of the
23   MCI connection. That is right.
24   Q.   Then the next step is it goes
25   from R to VAN to the BellSouth VAN, which is
00163
1   Harbinger?
2   A.   Yes. That is my understanding
3   also.
4   Q.   Let me stop right there. There
5   is another way a CLEC could submit an LSR.
6   That would be through direct connect; is that
7   right?
8   A.   Connect direct.
9   Q.   Connect direct?
10   A.   It is the other way around.
11   Q.   I gather that there are pros and
12   cons of whether you go connect direct or
13   through the VANS?
14   A.   Yes. They are generally the
15   preference of the ordering company as to how
16   they prefer to do business, but there are, as
17   you said, pros and cons depending upon volume
18   and number of trading partners and lots of
19   other things.
20   Q.   Can you summarize at a higher
21   lever what the benefits are to going connect
22   direct versus through a VAN?
23   A.   At least from my understanding, a
24   VAN was set up primarily for occasional or
25   intermittent or low-volume connection
00164
1   requirements, and that we recommended connect
2   direct for high-volume continuing
3   relationships.
4   In other words, if you were only
5   going to send us 50 orders a month through
6   EDI, it was the right thing to do to set up
7   through a VAN who handled it on a per order
8   basis. If you send 50,000, the right
9   mechanism was connect direct is my
10   understanding.
11   Obviously, there are lots of
12   trade-offs all along that scheme.
13   Q.   Getting back to the LSR flow, it
14   has gone from the MCI VAN to Harbinger.
15   Now, it goes to BellSouth. Was the entry
16   point at BellSouth is LEO?
17   A.   No. Because we are talking EDI,
18   the entry point at BellSouth is an computer
19   called EDI central.
20   Q.   What function does EDI central
21   perform?

22   A.   It accepts EDI transactions on the
23   side that faces MCI in this case. The
24   function is called unwrap. It unwraps those
25   transactions and provides them, as you were
00165
 1   about to say a moment ago, to LEO; so on the
 2   MCI side of EDI central, you have an LSR,
 3   but wrapped around it is the thing called an
 4   EDI envelope.
 5   Q.   The ISA code?
 6   A.   No. ISA code is part of that
 7   envelope. I was carrying this analogy too
 8   far. The ISA code is kind of like the
 9   return address.
10   Q.   That identifies the envelope?
11   A.   It identifies the envelope, but
12   all of the junk in the envelope is designed
13   to make sure that the LSR gets securely from
14   point A to point B.
15   Q.   Does EDI central perform any
16   edits?
17   A.   No. Other than unwrapping the
18   envelope -- let me correct that. Well,
19   sorry, it is not an edit. They have a duty
20   to return a transaction called a functional
21   acknowledgment, so in the sense they look at
22   the envelope and say, does this envelope meet
23   all of the EDI perimeters for correctness,
24   they do an edit, but it is a standard EDI
25   function that says is this a good envelope or
00166
 1   not.
 2   If it is a good envelope, I send
 3   back a functional acknowledgment and say I
 4   have got it. If the envelope is bad, if the
 5   corner is torn off -- that is carrying the
 6   analogy too far. If there are bites missing
 7   at the end, if the thing does not match up,
 8   it sends up a negative acknowledge. Bad
 9   envelope, send it again.
10   Q.   It does not edit the original LSRs
11   within that envelope?
12   A.   No. It opens it up, unpacks it,
13   and sends it back to LEO.
14   Q.   LEO, I gather, does do some edits?
15   A.   Yes.
16   Q.   Then LESOG, which we will talk
17   about in a moment, I'm sure does some more
18   edits?
19   A.   Yes.
20   Q.   Can you tell me at the LEO stage
21   what edits are done and against what
22   databases?
23   A.   Again, in very general terms, to
24   do this takes the ordering guide to walk
25   through all the edits that are done. In
00167
 1   general, the edits are divided into two
 2   groups. In LEO, the edit is called level-one
 3   edits which are applied.
 4   They have to do with, is there

1   analysis in that study that was done. All
2   that has been communicated back to MCI. We
3   believe either a service rep is doing that or
4   there is a computer system glitch on the MCI
5   side that they are not transferring the
6   information properly -- I believe you are all
7   using TAG -- from TAG into the EDI system.
8   Q.   Is there any point in the ordering
9   process where BellSouth bounces the address up
10 against the customer service record address?
11   A.   Not to my knowledge.
12   Q.   When the BellSouth rep takes an
13 LSR that has fallen out from manual
14 processing, are there any additional edit
15 checks or databases that the DON order
16 created by the rep who goes through, or is
17 editing against it outside what MCI would
18 normally experience?
19   A.   No. Outside of what MCI would
20 normally experience, I can't think of any.
21 They use the same set of databases to
22 validate the order. Those are where our
23 primary data is contained.
24   Q.   Your understanding is the D and N
25 order were submitted directly into sock and

1   that there are no additional edits that are
2   applied?
3   A.   Directly into sock from DOE, there
4   are no additional edits applied.
5   Q.   Are there any system edits that
6   DOE imposes?
7   A.   Like LESOG, DOE has a subset of
8   the SOCS edits that are a part of it. So
9   there are no additional edits, but there are
10 more applied when it gets to SOCS.
11   Q.   Are the edits in DOE the same as
12 the edits in LESOG or are they different?
13   A.   They are different subsets.
14   Q.   Let's talk about design manual
15 fallout a little bit more. Is it your
16 understanding that when a BellSouth customer
17 had memory call, MCI wins the customer. The
18 customer migrated to BellSouth, but the LSR
19 in that case will automatically fall out to
20 manual processing?
21   A.   No. My understanding is that it
22 does not. Although I was told this morning
23 we are chasing the defect in a code that
24 does indeed cause it to fall out in some
25 cases, it is not planned, not in the design

1   of the system that that should fall out. In
2   fact, the design specifically states
3   otherwise.
4   We tested it and it worked. I
5   understand there has been a code, some code
6   defect detected in the last week or so that
7   indicates some of those orders do fall out
8   for manual handling, and they are getting

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 9      classified as BellSouth caused fallouts
10      because the service rep is having to put some
11      character or FID on the order that is not
12 ·    there.
13          Q.      Is that the ZLIG FID?
14          A.      Yes.  I could not remember the
15      name.
16          Q.      How about call-forwarding, we have
17      been told that if the BellSouth customer has
18      call-forwarding that LSR will fall out for
19      manual processing?
20          A.      Designed to fall through, not fall
21      out.  I'm not aware of an error in that
22      processing at the moment.  Let me just chase
23      that one all the way to the other side at
24      the moment.  The things that are designed to
25      fall out  in your case at the moment are
00196
 1      enhanced services.
 2              So if the customer has voice mail,
 3      the package we call enhanced voice mail,
 4      instead of memory call, that is designed to
 5      fall out because it is not available.  So we
 6      make a point of what do you want to do with
 7      it.  There are cases around the DSL service
 8      where we have not settled these issues of,
 9      are we going to provide BellSouth DSL service
10      on an NEP owned by MCI?
11              There are some of those cases that
12      fall out from manual handling.  It is
13      enhanced services, not the basic service
14      packages.
15          Q.      The two principle examples that
16      you are aware of are DSL and enhanced voice
17      mail?
18          A.      Yes.
19          Q.      If somebody in BellSouth wanted to
20      figure out what was causing fallout, you
21      would have to go to Linda Tate's group or
22      Accenture?
23          A.      Or actually to both.  If we order
24      Accenture to do a study, it would go through
25      Linda Tate's group.
00197
 1          Q.      I gather it is your understanding
 2      if the BellSouth customer has Complete Choice,
 3      that is not supposed to fallout for manual
 4      processing?
 5          A.      Other than with those exceptions.
 6      You can have a voice mail as a part of
 7      Complete Choice, although I'm not 100 percent
 8      sure on that.  I never looked at that
 9      product specifically until we got into this
10      question about what happens, but in general,
11      the Complete Choice package consists of
12      switch-base features that are supposed to flow
13      through.
14          Q.      The ZLIG FID has to be added to
15      the enhance services?
16          A.      No.  The ZLIG FID, as best as I
17      understand it right now, is what has to be
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18	added to fix the memory call problem.
19	Q. How can a CLEC cause memory
20	fallout?
21	A. Well, if you are talking about the
22	whole category, the first manual fallout is
23	that they could place an order for something
24	that is not on the flow-through list.
25	Q. Let me narrow it to MCI, UNE-P,

00198

1	LSR.
2	A. Place orders for those things that
3	are manual fallout. The two prime examples
4	are a customer that has DSL and one that has
5	voice mail.
6	Q. That would be a CLEC considered
7	fallout or CLEC caused fall out?
8	A. I don't know. I'm not sure on
9	that, on the flow-through report. I'm not
10	sure if that is classified as manual fallout
11	or CLEC caused fallout. I'm not clear which
12	bucket that is being put in.
13	They are both CLEC caused, but I
14	can't remember whether the edit for voice
15	mail is done early or late.
16	Q. Well, if the BellSouth customer
17	has enhanced voice mail, there is not any way
18	we would know that is true?
19	A. No, but you looked at their
20	customer service record and know they have
21	enhanced voice mail.
22	Q. Is there any way we could order
23	electronically and not have it fall to
24	manual?
25	A. Not in that particular case that I

00199

1	know of.
2	Q. So as I understand it, everything
3	in the CLEC caused fallout category will be
4	rejected. What you are describing is
5	something that is not going to be a reject?
6	A. No. This is a reject. We will
7	reject that order to you and say we can't
8	complete this order because this customer has
9	enhanced voice mail. I don't know what the
10	error code is, as I understand it.
11	Q. I think I understand what you just
12	said, but this is news to me.
13	A. Maybe I am misstating it. We
14	probably should put this to Mr. Pate, because
15	I read the discussion of it, but I was going
16	to your general question.
17	Q. Well, let me try one more run
18	just to make sure I understand what I think
19	you are telling me. If that were true, any
20	time we submitted an LSR, BellSouth customer
21	has enhanced voice mail, if that LSR is going
22	to be rejected, you are telling me there is
23	no way we could migrate that customer to MCI?
24	A. No, I'm not telling you that.
25	That customer has to make a choice about

00200

their enhanced voice mail. They would have
to disconnect it or you would have to provide
it differently. I don't know what the
choices are on an advanced service.
    Q.   Maybe it will help you to
understand that MCI is not offering enhanced
voice mail to its customers?
    A.   Right. That customer then would
have to make a choice about, as I understand
it, keeping their enhanced voice mail or
moving to MCI. It is my understanding that
they could not have both at the same time on
an UNE-P.
    Q.   Well, of course, we have told the
customer what services it is going to get,
and we are not offering enhanced voice mail.
By making a choice to go to MCI, the
customer is choosing not to have the voice
mail?
    A.   Yes.
    Q.   Why are you going to reject our
LSR?
    A.   The customer has not disconnected
their enhanced voice mail. Again, maybe that
is something we need to work out between the

00201

companies as far as an ordering scenario.
    Q.   What I understand you are saying
is the customer first needs to call
BellSouth, disconnect its enhanced voice mail,
and then MCI could submit the LSR and it
will go through, but not before?
    A.   That is the best I understand it.
    Q.   The same is true if the customer
has BellSouth DSL?
    A.   Yes. Although that is a policy
question that is being currently discussed
with MCI and AT&T both. I have not been in
those discussions for seven or eight weeks
about whether we will provide it and if so,
under what terms and conditions.
    Q.   Let's do a little comparison, Mr.
Stacy. For this you need to look at all
three exhibits, 11, 12 and 13. It is easy
to figure out which one is MCI in these
because of the numbers, but for Exhibit 11,
let me ask you to turn to page 3.
        You might want to put a star next
to the 130. For Exhibit 12, the July
flow-through UNE report, I'll ask you to turn
to page 4 and put a star by 118.

00202

        Then for Exhibit 13, please turn
to page 2
      and focus on number 69. Let's focus
on the chief flow-through category for a
moment.
    A.   Just a second. Let me make sure
I have these or I could find the numbers.
Kay.
    Q.   You will see from June --

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22        what time it is placed.  If it is placed at
23        a time on Saturday, which intersects the time
24        when march is down for maintenance on Sunday,
25        it may not get a Sunday due date.  It may
00226
1         get a Monday morning due date.
2                    The due date calculator performs
3         that function.
4              Q.        So essentially what I think you
5         are telling me the reason is, is that you
6         don't want BellSouth's system to be trying to
7         provision a UNE-P order on a day when it
8         can't be provisioned?
9              A.        Right.  We don't want to return a
10        firm order confirmation with an erroneous due
11        date on it, a day we know we cannot do it
12        on time.
13             Q.        Does that mean, then, that the LSR
14        is going to be bumped up against the DSAP
15        database?
16             A.        Yes, or a portion of it.
17             Q.        Would that happen in LESOG or at
18        the SOCS stage?
19             A.        It happens in LESOG.
20             Q.        With respect to FOC timeliness, is
21        that measured when the FOC is generated in
22        LEO?  FOC is generated in SOCS, isn't it?
23             A.        Well, no.
24             Q.        Let's start with this assumption.
25             A.        Let me start at the beginning.
00227
1         The order comes through the door.  Let's say
2         in your case it comes through EDI.  At the
3         output of EDI central when that envelope has
4         been unwrapped, there is a unique LSR number.
5                    There is a time stamp put on it.
6         That is the received time.  That transaction
7         goes all the way down to SOCS, orders good,
8         status changes in SOCS.  SOCS sends a
9         transaction back to LEO and says create an
10        FOC and send it back.
11                   LEO creates the FOC and sends it.
12        That is time stamped out when EDI gets that
13        transaction.
14             Q.        What do you mean by EDI?
15             A.        EDI central, when they get that
16        transaction and put it in the envelope.
17        Georgia moved that as a result of the Georgia
18        order.  It used to be at LEO. Now, it is at
19        EDI central.
20             Q.        If we have that missing notifier
21        problem, about which MCI expressed concern, it
22        is generated in LEO but doesn't get to the
23        VAN, it is nevertheless time stamped for
24        measurement purposes?
25             A.        Yes.  It would have been time
00228
1         stamped.  If it got from LEO to EDI central
2         and the problem is in EDI central, it would
3         have been time stamped there.
4              Q.        Mr. Hopkins asked you about the
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5   CAVE environment, I believe mostly relating to
6   the timing of when it was going to be taken
7   off the line?
8   I would like to understand a
9   little bit more about what the CAVE
10   environment is. My understanding is that the
11   CAVE environment is not a mirror image of
12   BellSouth's production environment; is that
13   accurate?
14   A.   That is accurate and inaccurate.
15   Let me qualify that. It is a mirror image
16   of BellSouth's production environment, except
17   for the amount of hardware.
18   Q.   What do you mean by that?
19   A.   For instance, to handle the
20   volumes that we use in production on a
21   day-to-day basis, there are three TAG servers
22   with all of the customer volume spread over
23   the three of them. There is only one of
24   those in the CAVE environment, because the
25   CAVE environment is designed to handle the

00229

1   CLECs. It is not designed to handle
2   production volumes.
3   The software is all identical, but
4   the hardware configuration is smaller.
5   Q.   When you say one of the three,
6   does that mean one of the three TAG servers
7   is used for CAVE?
8   A.   No.
9   Q.   Or is it entirely separate?
10   A.   It is separately. CAVE is an
11   entirely separate copy of the production
12   system, except that it is smaller. It has
13   less capacity.
14   Q.   How about for EDI, the same kind
15   of thing?
16   A.   Yes.
17   Q.   One EDI server?
18   A.   Well, EDI runs on a mainframe, but.
19   there is a portion of the mainframe that is
20   dedicated to the CAVE environment. No
21   production orders flow through there. It is
22   just for CAVE.
23   Q.   As you know, a CLEC that wants to
24   use CAVE can't just send a regular LSR into
25   the CAVE environment? I believe you have to

00230

1   change the OCN?
2   A.   Right.
3   Q.   So that it is clear that this is
4   a test LSR and not a real one?
5   A.   Yes. The data sets. One of the
6   things you have to have in the test
7   environment is set of fictitious -- I'll use
8   that in the database sense -- a set of
9   fictitious accounts to order against. There
10   is a copy in CRIS. There is a copy of
11   certain CRIS accounts in CAVE.
12   They are not the real ones because
13   there is a test environment. One of the

ATTACHMENT 8

TELEPHONE NUMBER	MIGRATION COMPLETE	TROUBLE REPORTED	DAYS FROM MIGRATION	TROUBLE REASON	TROUBLE CLOSED	CLOSURE INFORMATION	DATE LLN RECEIVED	DAYS BETWEEN TROUBLE AND LLN
6784130991	5/16/01	5/16/01	0	ND1	5/17/01	REPAIRED AERIAL F2		
7706032061	5/11/01	5/19/01	8	NDT	5/21/01	REPAIRED TERMINATING WIRE		
7702511855	5/16/01	5/22/01	6	NDT	5/23/01	CHARGED LIU CARD		
6784759990	5/14/01	5/25/01	11	NDT	5/23/01	REPLACED CROSSED JUMPER CABLE		
4042360366	5/22/01	5/23/01	1	NDT	5/24/01	TICKET CANCELLED AT CUST REQUEST		
7706677590	5/18/01	5/28/01	10	NDT	5/28/01	CUSTOMER FOUND PROBLEM		
6783635790	5/24/01	5/29/01	5	NDT	5/30/01	REPAIRED AERIAL DROP WIRE		
7707180652	5/14/01	5/30/01	16	NDT	5/31/01	PLANT EQUIPMENT		
7707922256	5/15/01	5/31/01	16	NDT	6/1/01	REPLACED JUMPER IN CROSS BOX		
7703822853	5/12/01	5/31/01	19	NDT	6/1/01	REPLACED NID		
7705641276	5/22/01	6/1/01	10	NDT	6/1/01	BURIED SERVICE WIRE		
7704760770	5/22/01	6/2/01	11	NDT	6/2/01	SERVICE DROP WIRE		
7707252242	5/15/01	6/2/01	18	NDT	6/2/01	CLEARED DEFECTIVE PAIR, RECONNECTED THREE LOCATIONS		
7709220171	5/12/01	6/2/01	21	NDT	6/2/01	REPAIRED JUMPER IN CROSS BOX		
9123554539	5/24/01	6/2/01	9	NDT	6/4/01	CABLE PAIR TRANSFER		
7704651642	5/22/01	6/3/01	12	NDT	6/4/01	NO ACCESS		
4048880920	6/1/01	6/4/01	3	NDT	6/4/01	CHANGED CABLE PAIR		
7706843339	5/26/01	6/4/01	9	NDT	6/4/01	STATION WIRE		
6784170545	6/1/01	6/2/01	1	NDT	6/5/01	NO PAIR CONNECTED	6/2/01	0
7704651034	5/21/01	6/4/01	14	NDT	6/5/01	CPE-ISW TROUBLE		
7709856751	6/4/01	6/5/01	1	NDT	6/5/01	NO ACCESS	6/6/01	1
7702140188	6/4/01	6/5/01	1	NDT	6/5/01	CABLE PROBLEM		
6784793136	5/19/01	6/2/01	14	NDT	6/6/01	RETEST OK		
7706320962	5/14/01	6/4/01	21	NDT	6/6/01	RETEST OK	6/8/01	4
7702330559	6/4/01	6/4/01	0	NDT	6/6/01	CHANNEL UNIT		
7704651642	5/22/01	6/4/01	13	NDT	6/6/01	NO TROUBLE FOUND		
6785841051	6/4/01	6/7/01	3	NDT	6/6/01	TEST OK NO TROUBLE FOUND		
7709851369	5/19/01	6/6/01	18	NDT	6/7/01	CPE ISW TROUBLE		
4045238383	6/6/01	6/7/01	1	NDT	6/7/01	DROP WIRE SERVICE		
7708860541	6/5/01	6/7/01	2	NDT	6/7/01	BURIED SERVICE WIRE		
7702871211	5/22/01	6/7/01	16	NDT	6/7/01	CPE TROUBLE		
4045080998	5/30/01	6/7/01	8	NDT	6/8/01	AERIAL DROP WIRE		
7702970113	6/7/01	6/8/01	1	NDT	6/8/01	REPAIRED PROTECTOR		
7709322046	6/6/01	6/8/01	2	NDT	6/8/01	REPAIRED PROTECTOR		
7702713324	5/28/01	6/8/01	11	NDT	6/8/01	CPE ISW TROUBLE		
4048470052	5/24/01	6/7/01	14	NDT	6/9/01	REPAIRED GROUND WIRE		
7708360330	5/17/01	6/8/01	22	NDT	6/10/01	ISW TROUBLE		
7702140987	6/4/01	6/10/01	6	NDT	6/11/01	NO TROUBLE FOUND		
7705020095	5/15/01	6/10/01	26	NDT	6/11/01	AERIAL DROP WIRE ALSO REPLACED DMARK		
6783427196	6/6/01	6/11/01	5	NDT	6/11/01	REPAIRED CROSS JUMPER		
7709988740	6/1/01	6/11/01	10	NDT	6/11/01	ISW TROUBLE		
7709712534	5/22/01	6/11/01	20	NDT	6/11/01	NO ACCESS		
6785470283	6/4/01	6/11/01	7	NDT	6/12/01	CHANGED PIC		
7705993426	5/14/01	6/11/01	28	NDT	6/12/01	NO TROUBLE FOUND		
7704121106	5/22/01	6/12/01	21	NDT	6/12/01	NO TROUBLE FOUND	6/19/01	7
7705351342	6/4/01	6/11/01	7	NDT	6/13/01	TICKET EXCLUDED ADDRESS CORRECTION REQUESTED		
4044590049	6/12/01	6/13/01	1	NDT	6/14/01	CABLE PAIR TRANSFER		
6789240198	6/12/01	6/13/01	1	NDT	6/14/01	EXCLUDED PER SERVICE ORDER		
7706400427	5/17/01	6/13/01	27	NDT	6/14/01	CABLE PAIR		
4048452277	6/13/01	6/14/01	1	NDT	6/14/01	CABLE WIRE		
7702630542	6/12/01	6/14/01	2	NDT	6/14/01	NETWORK INTERFACE		
6784793136	5/30/01	6/13/01	14	NDT	6/15/01	ISW CPE TROUBLE		
7707872229	5/12/01	6/14/01	33	NDT	6/15/01	CABLE PAIR	6/14/01	0
4043670732	6/14/01	6/14/01	0	NDT	6/15/01	RETEST OK		
7709555273	6/14/01	6/14/01	0	NDT	6/15/01	FOUND OK		

TELEPHONE NUMBER	MIGRATION COMPLETE	TROUBLE REPORTED	DAYS FROM MIGRATION	TROUBLE REASON	TROUBLE CLOSED	CLOSURE INFORMATION	DATE LLN RECEIVED	BETWEEN TROUBLE AND LLN
7704380477	6/4/01	6/14/01	10	NDT	6/15/01	REPAIRED NETWORK TERM WIRE		
7702541620	5/11/01	6/14/01	34	NDT	6/15/01	BURIED SERVICE WIRE		
7702320917	6/13/01	6/15/01	2	NDT	6/15/01	ELECTRONIC X JAY		
7704662846	6/14/01	6/14/01	0	NDT	6/16/01	CABLE PAIR		
4043275998	6/8/01	6/14/01	6	NDT	6/16/01	AERIAL DROP WIRE		
7709611849	6/12/01	6/15/01	3	NDT	6/16/01	ISW TROUBLE		
4045841361	6/4/01	6/15/01	11	NDT	6/16/01	ISW TROUBLE		
7708087504	5/20/01	6/16/01	27	NDT	6/17/01	NO TICKET FOUND FOR THIS ANI		
7066500030	6/13/01	6/15/01	2	NDT	6/18/01	ISW CPE TROUBLE		
7704221810	6/19/01	6/17/01	-2	NDT	6/18/01	RE TEST OK NO TROUBLE FOUND		
4048170888	6/8/01	6/17/01	9	NDT	6/18/01	CANCELLED TICKET PER DIAL TONE RESTORED		
7702370956	5/21/01	6/17/01	27	NDT	6/18/01	RETEST FOUND OK		
7708010652	6/5/01	6/16/01	11	NDT	6/19/01	CABLE PAIR		
7703232123	6/13/01	6/18/01	5	NDT	6/19/01	CO TROUBLE		
4048170888	6/8/01	6/18/01	10	NDT	6/19/01	NOT RELATED TO THE CO EQUIPMENT		
4043670732	5/19/01	6/18/01	30	NDT	6/19/01	CABLE PAIR		
4047529912	6/15/01	6/19/01	4	NDT	6/19/01	CABLE TROUBLE		
7706194002	6/16/01	6/19/01	3	NDT	6/20/01	CO TROUBLE		
7707881524	6/13/01	6/19/01	6	NDT	6/20/01	RE TEST OK		
7703237034	6/4/01	6/19/01	15	NDT	6/20/01	SPLICE CASE		
7709650192	5/18/01	6/19/01	32	NDT	6/20/01	CABLE TROUBLE		
7709180357	5/16/01	6/20/01	35	NDT	6/20/01	PAIR RECONSTRUCTED	9/13/01	85
7707750985	6/11/01	6/20/01	9	NDT	6/20/01	FOUND OK		
7704980954	6/19/01	6/20/01	1	NDT	6/21/01	DIAL TONE RESTORED DUE TO RESTORAL ORDER		
7702523036	6/4/01	6/20/01	16	NDT	6/21/01	REPLACED PROTECTOR		
6784793136	6/1/01	6/20/01	19	NDT	6/21/01	FOUND OK		
7706451077	5/22/01	6/20/01	29	NDT	6/21/01	BROKEN JUMPER AT CROSS BOX		
6787140940	6/20/01	6/21/01	1	NDT	6/21/01	BURIED SERVICE WIRE		
4048743830	6/19/01	6/21/01	2	NDT	6/21/01	CROSS JUMPER REPAIRED		
4045242176	6/7/01	6/21/01	14	NDT	6/21/01	NO TROUBLE FOUND		
7705911642	6/1/01	6/21/01	20	NDT	6/21/01	FOUND OK NO DISPATCH		
7704512104	6/18/01	6/20/01	2	NDT	6/22/01	AERIAL DROP WIRE		
7705310970	6/14/01	6/21/01	7	NDT	6/22/01	BURIED SERVICE WIRE		
6786240098	6/6/01	6/22/01	16	NDT	6/22/01	SPLICED BURIED SERVICE WIRE		
6784222356	6/4/01	6/22/01	18	NDT	6/22/01	CPE ISW TROUBLE		
7703394467	5/21/01	6/22/01	32	NDT	6/22/01	CABLE FAILURE DIAL TONE RESTORED		
7704783066	6/20/01	6/20/01	0	NDT	6/23/01	ISW TROUBLE		
4047672774	6/6/01	6/22/01	16	NDT	6/23/01	TEST OK NO TROUBLE FOUND	7/3/01	11
7708864114	6/19/01	6/22/01	3	NDT	6/23/01	CPE TROUBLE		
4043774364	6/13/01	6/22/01	9	NDT	6/23/01	BROKEN WIRE REWIRED IN CO		
7708059848	6/3/01	6/22/01	19	NDT	6/23/01	DIAL TONE GOOD TO DMARK		
4046915315	5/23/01	6/23/01	31	NDT	6/23/01	TROUBLE ON CPE ISW		
4046241212	6/9/01	6/23/01	14	NDT	6/24/01	REPAIRED AERIAL SERVICE WIRE		
7709533976	6/20/01	6/22/01	2	NDT	6/25/01	CUSTOMER NO LONGER WITH MCI MIGRATED BACK TO BELL SOUTH	6/22/01	0
4042411869	6/13/01	6/22/01	9	NDT	6/25/01	AERIAL SERVICE WIRE FIXED AT THE CROSS BOX		
7707611075	5/11/01	6/22/01	42	NDT	6/25/01	NO ACCESS		
7705742297	6/21/01	6/23/01	2	NDT	6/25/01	TROUBLE ON CABLE REPAIRED		
7705060552	6/16/01	6/23/01	7	NDT	6/25/01	SWITCHED PAIRS IN CO FRAME		
7708860676	6/4/01	6/23/01	19	NDT	6/25/01	CHANGED PAIR ON POLE		
7706146199	6/19/01	6/24/01	5	NDT	6/25/01	NO TROUBLE FOUND		
7709200558	6/12/01	6/24/01	12	NDT	6/25/01	REPAIR GOING INSIDE		
4042981258	6/1/01	6/24/01	23	NDT	6/25/01	DEFECTIVE F2 PAIR		
7705832604	5/11/01	6/24/01	44	NDT	6/25/01	CHANGED ALPHA ONE PAIR		
7703216066	6/15/01	6/25/01	10	NDT	6/25/01	REPAIRED JUMPER IN CO	6/28/01	3
7706841195	5/15/01	6/25/01	41	NDT	6/25/01	CHANGED DEFECTIVE CHANNEL UNIT AT CABLE		

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4046910129	6/12/01	6/25/01	13	NDT	6/26/01	TROUBLE DETERMINED TO BE ON CPE	6/29/01	4
7707755723	6/20/01	6/25/01	5	NDT	6/26/01	EXCLUDED PER NON BILLED SERVICE	7/2/01	7
4046220160	6/22/01	6/25/01	3	NDT	6/26/01	AERIAL DROP WIRE	9/7/01	74
7708221203	6/25/01	6/25/01	0	NDT	6/26/01	NO TROUBLE FOUND		
7703040193	6/21/01	6/25/01	4	NDT	6/26/01	NO TROUBLE FOUND ON F2		
4048730528	6/7/01	6/26/01	19	NDT	6/26/01	FOUND OK	9/19/01	85
7709291536	6/23/01	6/26/01	3	NDT	6/26/01	REPAIRED DEFECTIVE ISW		
7709608072	6/21/01	6/26/01	5	NDT	6/26/01	NETWORK NOT CONNECTED		
4043771113	6/20/01	6/26/01	6	NDT	6/26/01	REPLACED HEAT COIL		
7704494316	6/19/01	6/26/01	7	NDT	6/26/01	NETWORK TERM WIRE PROBLEM		
7705061830	6/18/01	6/26/01	8	NDT	6/26/01	TWO WAY SNIP ON THE LINE		
7702791022	6/19/01	6/26/01	7	NDT	6/27/01	REPAIRED TWO CHANNEL UNITS		
7704454447	6/15/01	6/26/01	11	NDT	6/27/01	SPLICE CASE BURIED SERVICE WIRE		
6783638390	6/13/01	6/26/01	13	NDT	6/27/01	NO TROUBLE FOUND		
4043503393	6/6/01	6/26/01	20	NDT	6/27/01	LINE OK		
7705323617	6/26/01	6/27/01	1	NDT	6/27/01	REPAIRED AT CABLE		
7709480676	6/25/01	6/27/01	2	NDT	6/27/01	PAIR CHANGED		
4042124972	6/21/01	6/27/01	6	NDT	6/27/01	NO TROUBLE FOUND		
7704231460	6/20/01	6/27/01	7	NDT	6/27/01	CHANNEL UNIT CHANGED		
7709811904	6/19/01	6/27/01	8	NDT	6/27/01	REPLACED BRIDGE SERVICE WIRE		
7704420168	6/14/01	6/27/01	13	NDT	6/27/01	REPAIRED BURIAL NETWORK TERMINATING CABLE		
4042972057	6/12/01	6/27/01	15	NDT	6/27/01	RECORDING REMOVED		
7708873208	6/8/01	6/26/01	18	NDT	6/28/01	DIAL TONE GOOD TO DMARK TEST OK		
4048730528	6/7/01	6/27/01	20	NDT	6/28/01	MISSING JUMPER REPLACED	9/19/01	84
7709713449	6/21/01	6/27/01	6	NDT	6/28/01	SERVICE WIRE REPLACED		
7705161843	6/18/01	6/27/01	9	NDT	6/28/01	AERIAL DROP WIRE		
7709262447	6/18/01	6/27/01	9	NDT	6/28/01	PAIR CHANGED		
4048728113	6/8/01	6/27/01	19	NDT	6/28/01	REPARED AERILA CABLE		
6784820339	6/28/01	6/28/01	0	NDT	6/28/01	CPE ISW TROUBLE	7/16/01	18
4042840373	6/20/01	6/28/01	8	NDT	6/28/01	ISW TROUBLE	7/24/01	26
4047681833	6/26/01	6/28/01	2	NDT	6/28/01	TROUBLE AT THE CENTRAL OFFICE		
6784421351	6/26/01	6/28/01	2	NDT	6/28/01	CPE ISW TROUBLE		
7705352517	6/25/01	6/28/01	3	NDT	6/28/01	NETWORK INTERFACE		
7702510069	5/15/01	6/28/01	44	NDT	6/28/01	REPAIRED WIRE IN TERMINAL		
7702524328	6/28/01	6/28/01	0	NDT	6/29/01	NO TROUBLE FOUND	8/30/01	63
7709943485	6/23/01	6/28/01	5	NDT	6/29/01	NO TROUBLE FOUND		
7707480232	6/21/01	6/28/01	7	NDT	6/29/01	LINE CAME CLEAR		
7708360330	5/17/01	6/28/01	42	NDT	6/29/01	BLOWN CARBON		
4048723113	6/26/01	6/29/01	3	NDT	6/29/01	AERIAL DROP WIRE	7/10/01	11
6784450506	6/20/01	6/29/01	9	NDT	6/29/01	NO TROUBLE FOUND		
7703584320	6/20/01	6/29/01	9	NDT	6/29/01	LINE CAME CLEAR		
7705673940	6/19/01	6/29/01	10	NDT	6/29/01	DIAL TONE GOOD TO THE NID		
7704202624	6/25/01	6/27/01	2	NDT	6/30/01	REPLACED F1		
7709832160	6/20/01	6/28/01	8	NDT	6/30/01	TROUBLE TO INSIDE		
7707192182	6/19/01	6/29/01	10	NDT	6/30/01	SOFTWARE UPGRADED	7/30/01	31
7709771710	6/22/01	6/29/01	7	NDT	6/30/01	REPAIRED ISW NO CHARGE		
7703863706	6/12/01	6/29/01	17	NDT	6/30/01	PROTECTOR REPAIRED		
7704340180	6/9/01	6/29/01	20	NDT	6/30/01	FOUND OK OUT		
6317342676	5/21/01	6/29/01	39	NDT	6/30/01	REPLACED A JUMPER		
7707192182	6/19/01	6/30/01	11	NDT	6/30/01	central office trouble	7/30/01	30
7708872722	6/4/01	6/29/01	25	NDT	7/1/01	AERIAL DROP WIRE		
7705060083	6/16/01	7/1/01	15	NDT	7/1/01	TICKET EXCLUDED LINE CAME CLEAR	7/2/01	1
7705372731	6/25/01	7/1/01	6	NDT	7/1/01	NO TROUBLE FOUND	7/3/01	2
6785672118	6/20/01	7/1/01	11	NDT	7/1/01	SLICK SWITCH REPLACED		
7709241306	6/21/01	6/29/01	8	NDT	7/2/01	REPAIRED OSW WIRES		

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7709322022	6/1/01	6/29/01	28	NDT	7/2/01	SHORT GOING INSIDE		
7705622323	6/22/01	7/1/01	9	NDT	7/2/01	LINE OK	7/10/01	9
7708344062	6/29/01	7/1/01	2	NDT	7/2/01	CPE ISW TROUBLE	8/6/01	36
7709642017	6/20/01	7/1/01	11	NDT	7/2/01	AERIAL DROP WIRE	8/22/01	52
7704783066	6/6/01	7/1/01	25	NDT	7/2/01	DEFECTIVE AERIAL WIRE REPAIRED		
7707451949	5/24/01	7/1/01	38	NDT	7/2/01	NETWORK TERMINATIONS		
7705621424	5/23/01	7/1/01	39	NDT	7/2/01	DEFECTIVE CHANNEL UNIT		
4042885145	6/29/01	7/2/01	3	NDT	7/2/01	CABLE PAIR REPAIRED		
7709943842	6/20/01	7/2/01	12	NDT	7/2/01	LINE CAME CLEAR		
7708360432	6/4/01	7/2/01	28	NDT	7/2/01	ISW TROUBLE		
6784793136	5/30/01	7/2/01	33	NDT	7/2/01	NETWORK TERMINATIONS		
7706022658	6/5/01	6/26/01	21	NDT	7/3/01	NO TROUBLE FOUND	7/17/01	21
6784731810	6/27/01	7/2/01	5	NDT	7/3/01	REPLACED CROSS JUMPER		
7709541279	6/21/01	7/2/01	11	NDT	7/3/01	BURIED DROP WIRE		
7702280692	6/20/01	7/2/01	12	NDT	7/3/01	NO TROUBLE FOUND		
7702536875	5/21/01	7/2/01	42	NDT	7/3/01	NETWORK INTERFACE REPLACED		
7709670971	5/17/01	7/2/01	46	NDT	7/3/01	CROSS JUMPER FIXED		
7705792854	6/29/01	7/3/01	4	NDT	7/3/01	WIRING ERROR CORRECTED	7/11/01	8
7702370456	6/29/01	7/3/01	4	NDT	7/3/01	REPLACED CARBONS ON POLE	9/13/01	72
7704990429	7/2/01	7/3/01	1	NDT	7/3/01	AERIAL DROP WIRE	9/17/01	76
7703947458	6/27/01	7/3/01	6	NDT	7/3/01	NO LONGER WITH MCI		
7709833450	6/19/01	7/3/01	14	NDT	7/3/01	REPAIRED F2 CABLE PAIR		
7709850533	5/28/01	7/3/01	36	NDT	7/3/01	LINE OK		
7707452793	6/28/01	6/29/01	1	NDT	7/4/01	TEST OK		
4047663836	7/3/01	7/3/01	0	NDT	7/4/01	RESPLICED F2 CABLE PAIR		
7702521123	6/21/01	7/3/01	12	NDT	7/4/01	TEST OK NO TROUBLE FOUND		
7702521985	6/21/01	7/3/01	12	NDT	7/4/01	TESTED OK		
6787400085	6/20/01	7/3/01	13	NDT	7/4/01	LINE OK LOCATED AND REPAIRED		
4043552830	6/19/01	7/3/01	14	NDT	7/4/01	WIRE REPAIRED		
7065381776	6/19/01	7/3/01	14	NDT	7/4/01	REPAIRED BURIED CABLE		
7709270204	5/14/01	7/4/01	51	NDT	7/4/01	REPLACED WIRES		
4042944070	6/21/01	7/2/01	11	NDT	7/5/01	TROUBLE TO INSIDE		
6785137487	7/2/01	7/3/01	1	NDT	7/5/01	REPAIRED CUT CABLE		
7707886808	7/2/01	7/3/01	1	NDT	7/5/01	CLOSED PER LINE CAME CLEAR		
6784223231	6/27/01	7/3/01	6	NDT	7/5/01	CHANGED F2 CABLE PAIR		
7705833100	6/25/01	7/3/01	8	NDT	7/5/01	TEST OK POSSIBLE CPE		
7704272355	6/20/01	7/3/01	13	NDT	7/5/01	NO TROUBLE FOUND		
4043513860	7/3/01	7/4/01	1	NDT	7/5/01	NO TROUBLE FOUND		
7704282917	7/1/01	7/4/01	3	NDT	7/5/01	CORRECTED CROSS CONNECT		
7703438961	6/28/01	7/4/01	6	NDT	7/5/01	FOK REPAIRED		
7705210102	6/25/01	7/4/01	9	NDT	7/5/01	NO TROUBLE FOUND		
7706022765	6/25/01	7/4/01	9	NDT	7/5/01	AERIAL DROP WIRE		
7708843284	6/19/01	7/4/01	15	NDT	7/5/01	SPLICE CASE		
7705060110	6/9/01	7/4/01	25	NDT	7/5/01	ISW TROUBLE		
4045230371	6/7/01	7/4/01	27	NDT	7/5/01	REPLACED PROTECTOR		
6783390798	5/28/01	7/4/01	37	NDT	7/5/01	FOUND OK TROUBLE CLEARED		
7705041038	5/22/01	7/4/01	43	NDT	7/5/01	FOUND OK OUT		
7704843433	7/3/01	7/5/01	2	NDT	7/5/01	FOUND OK OUT		
7703583989	6/21/01	7/5/01	14	NDT	7/5/01	REPAIRED ONI-SHORT TO ISW		
7709180257	6/12/01	7/5/01	23	NDT	7/5/01	NO TROUBLE FOUND		
7704875400	7/5/01	7/5/01	0	NDT	7/6/01	CPE TROUBLE		
7709482035	7/3/01	7/5/01	2	NDT	7/6/01	FOUND OK OUT		
4043771801	5/19/01	7/6/01	48	NDT	7/6/01	JUMPER FIXED AT CROSS BOX	7/11/01	5
4044170584	6/22/01	7/6/01	14	NDT	7/6/01	NO TROUBLE FOUND	8/6/01	31
6784239002	6/28/01	7/6/01	8	NDT	7/6/01	REPAIRED DAMAGED SERVICE WIRE		

TELEPHONE NUMBER	MIGRATION COMPLETE	TROUBLE REPORTED	DAYS FROM MIGRATION	TROUBLE REASON	TROUBLE CLOSED	CLOSURE INFORMATION	DATE LLN RECEIVED	DAYS BETWEEN TROUBLE AND LLN
6789470216	6/27/01	7/6/01	9	NDT	7/6/01	INTERCEPT IS GONE AND THE LINE IS TESTING OK		
7707170521	6/20/01	7/6/01	16	NDT	7/6/01	REPAIRED PROTECTOR AT THE CROSS BOX		
4042090799	6/15/01	7/6/01	21	NDT	7/6/01	CPE TROUBLE		
4047583202	6/8/01	6/28/01	20	NDT	7/7/01	NO LONGER WITH MCI		
4042522524	6/26/01	7/3/01	7	NDT	7/7/01	DEFECTIVE CPE	8/3/01	31
7704140258	6/25/01	7/6/01	11	NDT	7/7/01	CPE ISW TROUBLE	7/16/01	10
7707886828	7/5/01	7/6/01	1	NDT	7/7/01	AERIAL DROP WIRE		
4046990422	6/18/01	7/6/01	18	NDT	7/7/01	REPAIRED AERIAL SERVICE WIRE		
7702280304	6/13/01	7/6/01	23	NDT	7/7/01	REPLACED BURY SERVICE WIRE		
7709487969	6/4/01	7/6/01	32	NDT	7/7/01	ISW TROUBLE		
7704651642	5/19/01	7/6/01	48	NDT	7/7/01	REPAIRED BURIED CABLE		
4046991643	6/21/01	7/7/01	16	NDT	7/7/01	DIAL TONE GOOD TO DMARK		
7702973309	6/5/01	7/7/01	32	NDT	7/7/01	CABLE PAIR TRANSFER		
7702512983	6/4/01	7/7/01	33	NDT	7/7/01	NETWORK INTERFACE		
4043701390	7/1/01	7/6/01	5	NDT	7/8/01	REPAIRED AERIAL NETWORK		
4047922046	6/22/01	7/6/01	14	NDT	7/8/01	AERIAL DROP WIRE		
7702512983	6/4/01	7/6/01	32	NDT	7/8/01	REPAIRED NID		
7703231902	5/23/01	7/6/01	44	NDT	7/8/01	REPAIRED BURIED SERVICE WIRE		
7705020792	6/21/01	7/7/01	16	NDT	7/8/01	FOUND OK	9/6/01	61
6785260001	5/24/01	7/8/01	45	NDT	7/8/01	CPE TROUBLE	7/18/01	10
7704742790	6/16/01	7/8/01	22	NDT	7/8/01	REPLACED SLICK CARD		
7709200558	6/14/01	7/8/01	24	NDT	7/8/01	TEST OK DIDN'T DISPATCH		
4043503393	6/3/01	7/8/01	35	NDT	7/8/01	REPLACED SLICK CARD		
7704913077	5/23/01	7/8/01	46	NDT	7/8/01	LINE TEST OK IN CO / NO AUTHORIZATION TO DPO		
6783801441	6/20/01	7/5/01	15	NDT	7/9/01	NO ACCESS	8/1/01	27
7703583989	7/3/01	7/8/01	5	NDT	7/9/01	CPE ISW TROUBLE		
7703580633	6/26/01	7/8/01	12	NDT	7/9/01	REPAIRED BURIED SERVICE WIRE		
7703380027	6/19/01	7/8/01	19	NDT	7/9/01	CAME CLEAR AFTER DISPATCH		
7702515287	6/18/01	7/8/01	20	NDT	7/9/01	REPAIRED ON NI NETWORK INTERFACE		
7709630132	6/18/01	7/8/01	20	NDT	7/9/01	REPAIRED BURY DROP WIRE		
7705360901	7/5/01	7/9/01	4	NDT	7/9/01	CPE ISW TROUBLE		
7704560813	6/28/01	7/9/01	11	NDT	7/9/01	AERIAL DROP WIRE		
7709442980	6/21/01	7/9/01	18	NDT	7/9/01	REPLACED NID		
7705946808	6/12/01	7/9/01	27	NDT	7/9/01	IW TROUBLE		
4043515484	6/29/01	7/7/01	8	NDT	7/10/01	NETWORK INTERFACE	7/8/01	1
7707875551	27-Jun	7/7/01	10	NDT	7/10/01	TEST OK		
7706031853	6/25/01	7/8/01	13	NDT	7/10/01	NO TROUBLE FOUND AFTER DISPATCH OUT		
7704832978	6/19/01	7/9/01	20	NDT	7/10/01	REPAIRED CABLE PAIR		
7705323790	6/6/01	7/10/01	34	NDT	7/10/01	CUSTOMER NO LONGER WITH MCI	7/18/01	8
7709143396	6/4/01	7/10/01	36	NDT	7/10/01	REPAIRED FIBER PER WAS CUT BY CONSTRUCION COMPANY	7/25/01	15
7705353143	6/28/01	7/10/01	12	NDT	7/10/01	FIBER CUT BY WATER DEPT REPAIRED		
7708983105	6/16/01	7/10/01	24	NDT	7/10/01	REPAIRED FIBER CUT		
7709141086	6/8/01	7/10/01	32	NDT	7/10/01	REPAIRED FIBER CUT		
7703862301	6/7/01	7/10/01	33	NDT	7/10/01	TICKET CANCELLED PER DIAL TONE RESTORED		
7707490251	6/7/01	7/10/01	33	NDT	7/10/01	DISPATCHED OUT FOUND OK OUT		
7705340222	6/4/01	7/10/01	36	NDT	7/10/01	REPLACED CARBON		
7707752081	6/4/01	7/6/01	32	NDT	7/11/01	LINE OK RECEIVED FAX TONE		
6784825955	6/27/01	7/10/01	13	NDT	7/11/01	REPAIRED BURIED SERVICE WIRE		
7705934496	6/26/01	7/10/01	14	NDT	7/11/01	PLACED JUMPER ON CORRECT BINDING POST		
4042960231	6/21/01	7/10/01	19	NDT	7/11/01	REPAIRED BURIED CABLE		
7709571129	6/6/01	7/10/01	34	NDT	7/11/01	CPE TROUBLE		
7705160584	6/26/01	7/11/01	15	NDT	7/11/01	ISW TROUBLE CAME CLEAR	7/17/01	6
4048745375	7/8/01	7/11/01	3	NDT	7/11/01	REPAIRED MISSING JUMPER	9/6/01	57
7702426467	7/10/01	7/11/01	1	NDT	7/11/01	CABLE PAIR		
4047993176	6/29/01	7/11/01	12	NDT	7/11/01	AERIAL CABLE REPAIRED		

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7703580633	6/26/01	7/11/01	15	NDT	7/11/01	REPAIRED CABLE AND PLACED A TEMP DROP		
7706074127	6/28/01	7/10/01	12	NDT	7/12/01	REPAIRED F2		
7703824946	6/22/01	7/10/01	18	NDT	7/12/01	CPE TROUBLE		
7703872134	6/12/01	7/10/01	28	NDT	7/12/01	REPAIRED BURIED CABLE		
7707950675	6/14/01	7/11/01	27	NDT	7/12/01	DIAL TONE GOOD TO THE NID TRANSLATIONS	8/9/01	29
7703223015	6/27/01	7/11/01	14	NDT	7/12/01	CABLE FAILURE AREA LINE OK	8/21/01	41
7704127078	7/11/01	7/11/01	0	NDT	7/12/01	REPLACED AERIAL SERVICE WIRE		
7708346800	7/10/01	7/11/01	1	NDT	7/12/01	CPE TROUBLE		
7707875468	7/9/01	7/11/01	2	NDT	7/12/01	GROUND WIRE		
7702584160	7/6/01	7/11/01	5	NDT	7/12/01	AERIAL DROP WIRE		
7705916683	7/6/01	7/11/01	5	NDT	7/12/01	TERMINAL		
6784132733	7/3/01	7/11/01	8	NDT	7/12/01	LINE OK		
7704642241	7/2/01	7/11/01	9	NDT	7/12/01	TROUBLE ISOLATED TO BAD CPE		
7703824726	6/28/01	7/11/01	13	NDT	7/12/01	AERIAL DROP WIRE		
4048757772	6/27/01	7/11/01	14	NDT	7/12/01	BURIED DROP WIRE		
4048880090	6/15/01	7/11/01	26	NDT	7/12/01	LINE OK		
7704430597	6/8/01	7/11/01	33	NDT	7/12/01	AERIAL DROP WIRE		
7707483319	6/28/01	6/29/01	1	NDT	7/13/01	BAD PHONE DIAL TONE GOOD TO THE NID		
6784760460	5/16/01	7/6/01	51	NDT	7/13/01	NO LONGER WITH MCI	7/11/01	5
7703870258	6/28/01	7/8/01	10	NDT	7/13/01	TICKET EXCLUDED DUE TO MULTIPLE TICKETS OPENED		
7704574079	7/9/01	7/11/01	2	NDT	7/13/01	AERIAL DROP WIRE		
7703198410	7/8/01	7/12/01	4	NDT	7/13/01	CABLE PAIR TRANSFER		
7704934729	7/6/01	7/12/01	6	NDT	7/13/01	NO TROUBLE FOUND LINE OK		
7709200558	6/25/01	7/12/01	17	NDT	7/13/01	SHORT ON ISW AT NID		
7705361328	6/6/01	7/12/01	36	NDT	7/13/01	CPE ISW TROUBLE		
7706031592	7/11/01	7/13/01	2	NDT	7/13/01	REPLACED TRAVELER CARD		
7702513394	6/25/01	7/13/01	18	NDT	7/13/01	AERIAL DROP WIRE		
7704161782	6/13/01	7/13/01	30	NDT	7/13/01	REPAIRED CABLE		
7704270684	6/12/01	7/13/01	31	NDT	7/13/01	LINE OK		
7709261645	5/21/01	7/13/01	53	NDT	7/13/01	RESEATED CPU,SPU,TRU AND FORCED DOWNLOND		
7706844962	7/11/01	7/11/01	0	NDT	7/14/01	ISW TROUBLE		
6784943260	7/11/01	7/13/01	2	NDT	7/14/01	FOUND OK AT THE NID		
7705062340	6/10/01	7/13/01	33	NDT	7/14/01	DIAL TONE GOOD TO THE NID		
7709290028	6/28/01	7/14/01	16	NDT	7/14/01	CUSTOMER NO LONGER WITH MCI	7/15/01	1
6785743551	6/22/01	7/14/01	22	NDT	7/14/01	CHANGED CHANNEL TNWK		
7705074327	6/21/01	7/14/01	23	NDT	7/14/01	RAN ISW TO OTHER DMARK		
4047583375	6/6/01	7/14/01	38	NDT	7/14/01	ISW TROUBLE		
7704764038	6/25/01	6/28/01	3	NDT	7/15/01	ANI DEACTIVATED	6/29/01	1
7704391789	6/8/01	6/29/01	21	NDT	7/15/01	CUST NO LONGER WITH MCI	7/10/01	11
7708086651	7/11/01	7/13/01	2	NDT	7/15/01	CABLE PAIR REPAIRED		
7703824946	6/8/01	7/13/01	35	NDT	7/15/01	REPLACED OPEN AERIAL SERVICE WIRE		
7709464062	7/6/01	7/14/01	8	NDT	7/15/01	NO TROUBLE FOUND OUT CPE TROUBLE	7/23/01	9
6783762717	6/28/01	7/15/01	17	NDT	7/15/01	CPE TROUBLE		
7704521502	5/29/01	7/15/01	47	NDT	7/15/01	NO ACCESS		
7706060143	6/26/01	7/13/01	17	NDT	7/16/01	REPLACED BROKEN DROP		
7704574079	7/7/01	7/14/01	7	NDT	7/16/01	REPLACED CARBON IN NID AND CHANGED AERIAL CABLE PAIR		
7706225394	6/21/01	7/14/01	23	NDT	7/16/01	CAME CLEAR AFTER DISPATCH		
7704482857	5/25/01	7/14/01	50	NDT	7/16/01	PAIR CHANGE		
4045591657	6/29/01	7/16/01	17	NDT	7/16/01	TROUBLE ON ISW		
4047586846	6/28/01	7/16/01	18	NDT	7/16/01	LINE OK		
7709482398	6/13/01	7/16/01	33	NDT	7/16/01	AERIAL DROP WIRE		
7706646960	7/7/01	7/14/01	7	NDT	7/17/01	NO TROUBLE FOUND	8/24/01	41
4043621362	6/29/01	7/16/01	17	NDT	7/17/01	REPAIRED DEFECTIVE AC PAIR		
7708863539	7/16/01	7/17/01	1	NDT	7/17/01	DT GOOD TO DMARK	7/23/01	6
6787150965	7/16/01	7/17/01	1	NDT	7/17/01	REPAIRED BAD F2		

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7709411814	7/5/01	7/17/01	12	NDT	7/17/01	REPLACED BROKEN JUMPER		
7705294874	6/27/01	7/17/01	20	NDT	7/17/01	REPAIRED BSW		
7709413259	6/27/01	7/17/01	20	NDT	7/17/01	CABLE FAILURE AREA, TECH REPAIRED CABLE		
4049821067	6/26/01	7/17/01	21	NDT	7/17/01	CHANGED CROSS CONNECT AT THE CROSS BOX		
6783772444	6/24/01	7/17/01	23	NDT	7/17/01	REPAIRED BURIED SERVICE WIRE		
7708224080	6/23/01	7/17/01	24	NDT	7/17/01	TRANSLATIONS DISCONNECT RECORDING REMOVED		
7707862667	6/18/01	7/17/01	29	NDT	7/17/01	NO TROUBLE FOUND		
7709951495	6/7/01	7/17/01	40	NDT	7/17/01	LINE OK OUT		
7706071798	6/25/01	7/4/01	9	NDT	7/18/01	CABLE PAIR REPAIRED		
7704271034	6/25/01	7/11/01	16	NDT	7/18/01	FIBER SPLICE REPAIRED		
6785743551	7/6/01	7/13/01	7	NDT	7/18/01	BAD WIRING SWITCHED PAIRS DIAL TONE GOOD		
7705099312	6/22/01	7/16/01	24	NDT	7/18/01	CHANGED DIF 1 CABLE PAIR		
7708970251	6/22/01	7/17/01	25	NDT	7/18/01	LINE OK		
7703790519	7/18/01	7/18/01	0	NDT	7/18/01	DIAL TONE RESTORED PER RESTORAL ORDER# N0DB9187		
7065611410	7/16/01	7/18/01	2	NDT	7/18/01	CABLE PAIR TRANSFER		
7705021827	7/12/01	7/18/01	6	NDT	7/18/01	REPAIRED CUT CABLE		
7702637367	7/6/01	7/18/01	12	NDT	7/18/01	NETWORK TERMINATIONS WIRE		
7708347346	7/5/01	7/18/01	13	NDT	7/18/01	PLACED A TEMP DROP WIRE DUE TO ROAD CONSTRUCION		
7707491040	6/19/01	7/18/01	29	NDT	7/18/01	SHORT IN F2 CABLE		
4044990688	7/16/01	7/17/01	1	NDT	7/19/01	DEFECTIVE ALARM WIRE	8/22/01	36
4046915610	7/9/01	7/17/01	8	NDT	7/19/01	DIAL TONE GOOD TO THE NID TROUBLE INSIDE		
4042480179	6/27/01	7/17/01	20	NDT	7/19/01	LINE OK RESTORED		
7707721665	6/23/01	7/17/01	24	NDT	7/19/01	REPLACED PARTS CARD FOR TELEPHONE SYSTEM		
7709640453	6/8/01	7/17/01	39	NDT	7/19/01	CHANGED F1 PAIR		
4042999611	7/18/01	7/18/01	0	NDT	7/19/01	MISSING A CROSS CONNECT		
4046273804	7/3/01	7/18/01	15	NDT	7/19/01	SHORT ON ISW		
7702271034	6/21/01	7/18/01	27	NDT	7/19/01	REPLACED DEFECTIVE AERIAL		
7702512670	5/15/01	7/18/01	64	NDT	7/19/01	ISW TROUBLE		
7704575995	7/16/01	7/19/01	3	NDT	7/19/01	REPAIRED NETWORK INTERFACE	7/19/01	0
7708083246	7/10/01	7/19/01	9	NDT	7/19/01	AERIAL DROP WIRE	7/20/01	1
4043521440	5/24/01	7/19/01	56	NDT	7/19/01	CHANGED F2 PAIR	8/16/01	28
7708884543	7/15/01	7/19/01	4	NDT	7/19/01	CPE ISW TROUBLE		
4048744049	7/3/01	7/19/01	16	NDT	7/19/01	CPE TROUBLE		
7704981422	6/23/01	7/19/01	26	NDT	7/19/01	CABLE PAIR TRANSFER		
4045590322	6/22/01	7/19/01	27	NDT	7/19/01	TRANSLATIONS		
7704450761	6/20/01	7/19/01	29	NDT	7/19/01	AERIAL SERVICE WIRE		
4046050336	6/5/01	7/19/01	44	NDT	7/19/01	RESET CHANNEL UNIT		
7704319140	5/22/01	7/19/01	58	NDT	7/19/01	REPAIRED CABLE		
4046050336	6/14/01	7/16/01	32	NDT	7/20/01	PROTECTOR GOT PULLED OUT		
4047630363	6/25/01	7/19/01	24	NDT	7/20/01	CPE TROUBLE	8/15/01	27
6789855337	7/18/01	7/19/01	1	NDT	7/20/01	CABLE PAIR CHANGED		
4046243136	7/17/01	7/19/01	2	NDT	7/20/01	CABLE PAIR REPAIRED		
4046915610	7/9/01	7/19/01	10	NDT	7/20/01	ISW PROBLEM		
4042431135	6/30/01	7/19/01	19	NDT	7/20/01	ISW TROUBLE		
7709219991	7/18/01	7/20/01	2	NDT	7/20/01	OSW TECH DID A TIE DOWN		
7707300076	7/16/01	7/20/01	4	NDT	7/20/01	PAIR CHANGE		
7709920760	6/25/01	7/20/01	25	NDT	7/20/01	LINE OK IN THE CO		
7708301581	7/10/01	7/11/01	1	NDT	7/21/01	DIAL TONE GOOD TO THE NID		
7702420905	7/16/01	7/19/01	3	NDT	7/21/01	REPLACED MISSING ELECT JUMPER		
7703932989	5/27/01	7/19/01	53	NDT	7/21/01	SPLICE CASE		
4044869655	7/20/01	7/20/01	0	NDT	7/21/01	DIAL TONE GOOD TO THE NID		
7704332483	7/20/01	7/20/01	0	NDT	7/21/01	ERROR IN THE SERVICE ORDER DIAL TONE RESTORED		
7702540952	7/19/01	7/20/01	1	NDT	7/21/01	REPAIR TO CABLE		
7705071367	7/18/01	7/20/01	2	NDT	7/21/01	DIAL TONE GOOD TO DMARC		
7709880851	7/15/01	7/20/01	5	NDT	7/21/01	CABLE PAIR TRANSFER		

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4047947326	7/13/01	7/20/01	7	NDT	7/21/01	CPE ISW TROUBLE		
4042410498	6/28/01	7/20/01	22	NDT	7/21/01	TICKET CANCELLED BY CUST DIAL TONE GOOD TO THE NID		
7707874269	6/19/01	7/20/01	31	NDT	7/21/01	CABLE REPAIRED		
7704873954	7/16/01	7/21/01	5	NDT	7/21/01	REPLACED JUMPER IN CROSS BOX		
7708884543	7/15/01	7/21/01	6	NDT	7/21/01	REPAIRED BURIED SERVICE WIRE		
6783640530	7/3/01	7/21/01	18	NDT	7/21/01	REPAIRED CROSS PAIR IN AERIAL WIRE		
7704244742	6/29/01	7/21/01	22	NDT	7/21/01	RETERMINATED NETWORK TERM WIRES		
7065386510	6/19/01	7/21/01	32	NDT	7/21/01	RESPLICED OPEN F2 PAIR	7/13/01	2
7705321084	5/22/01	7/11/01	50	NDT	7/22/01	CUSTOMER NO LONGER WITH MCI	7/17/01	6
7705160584	7/6/01	7/11/01	5	NDT	7/22/01	CUSTOMER NO LONGER WITH MCI	7/19/01	7
4047945997	7/6/01	7/12/01	6	NDT	7/22/01	LINE OK		
7065628791	7/12/01	7/14/01	2	NDT	7/22/01	TICKET EXCLUDED		
7704430597	6/12/01	7/18/01	36	NDT	7/22/01	AERIAL DROP WIRE		
7709480930	5/11/01	7/21/01	71	NDT	7/22/01	REPAIRED F2 PAIR	7/30/01	8
4046853155	7/18/01	7/22/01	4	NDT	7/22/01	CUSTOMERS EQUIPMENT NOT PLUGGED IN	9/5/01	45
4047662354	6/30/01	7/22/01	22	NDT	7/22/01	AERIAL DROP WIRE		
7704605996	7/15/01	7/22/01	7	NDT	7/22/01	NO TROUBLE FOUND CPE TROUBLE		
4042961990	6/25/01	7/22/01	27	NDT	7/22/01	NETWORK INTERFACE		
6783800687	6/23/01	7/22/01	29	NDT	7/22/01	REPLACED NID STATES COULD BE SHORT ON ISW		
4045081963	6/15/01	7/22/01	37	NDT	7/22/01	REPAIRED NETWORK WIRE		
7706383070	7/19/01	7/20/01	1	NDT	7/23/01	REPAIRED A CROSS CONNECT		
4045890423	7/17/01	7/20/01	3	NDT	7/23/01	REPLACED F1 PAIR		
7702292015	6/5/01	7/21/01	46	NDT	7/23/01	NO TROUBLE FOUND LINE OK		
7709736456	7/15/01	7/22/01	7	NDT	7/23/01	POWER FAILURE		
7705934807	6/26/01	7/22/01	26	NDT	7/23/01	POWER FAILURE	8/25/01	33
7709260746	7/18/01	7/23/01	5	NDT	7/23/01	SERVICE WIRE REPAIRED		
7709298201	7/17/01	7/23/01	6	NDT	7/23/01	LINE RESTORAL		
7709338804	6/29/01	7/23/01	24	NDT	7/23/01	TEST OK OUT		
7702292749	6/27/01	7/23/01	26	NDT	7/23/01	AERIAL WIRE REPAIRED		
7706504179	6/25/01	7/23/01	28	NDT	7/23/01	RESPLICED PAIR		
7709181293	6/19/01	7/23/01	34	NDT	7/23/01	SHORT IN ALARM		
7706843339	6/12/01	7/23/01	41	NDT	7/23/01	BURIED DROP WIRE		
7705918190	5/18/01	7/23/01	66	NDT	7/23/01	WIRE REPAIRED		
7709343014	7/13/01	7/23/01	10	NDT	7/24/01	REPAIR IN FRAME		
7709970723	7/6/01	7/23/01	17	NDT	7/24/01	PAIR REPAIRED		
7706824080	6/25/01	7/23/01	28	NDT	7/24/01	CABLE REPAIRED		
7703043422	6/15/01	7/23/01	38	NDT	7/24/01	SERVICE WIRE REPAIRED	8/14/01	21
7705062408	7/1/01	7/24/01	23	NDT	7/24/01	REPAIR TO WIRE		
7709746760	7/22/01	7/24/01	2	NDT	7/24/01	REFER TO SERVICE ORDER DI44FLP6		
7706845408	6/29/01	7/24/01	25	NDT	7/24/01	OK TO PREM		
6785569664	6/26/01	7/24/01	28	NDT	7/24/01	AERIAL DROP WIRE		
7704893967	6/23/01	7/24/01	31	NDT	7/24/01	TEST OK AT THE CO		
4042431135	6/29/01	7/20/01	21	NDT	7/25/01	AERIAL DROP WIRE		
7702334873	7/16/01	7/22/01	6	NDT	7/25/01	LINE OK		
7704743407	7/12/01	7/23/01	11	NDT	7/25/01	REPAIRED TO CABLE PAIR		
6787147759	7/10/01	7/23/01	13	NDT	7/25/01	REPAIR TO CABLE PAIR		
7704745529	7/6/01	7/23/01	17	NDT	7/25/01	CABLE REPAIRED		
7704891802	6/25/01	7/23/01	28	NDT	7/25/01	SERVICE WIRE REPAIRED		
7708228299	7/17/01	7/24/01	7	NDT	7/25/01	DIAL TONE OK TO DMARC		
7704746956	7/10/01	7/24/01	14	NDT	7/25/01	WET CABLE PAIR		
7709676446	7/6/01	7/24/01	18	NDT	7/25/01	OK TO DMARC		
7702520860	5/31/01	7/24/01	54	NDT	7/25/01	CHANNEL UNIT REPLACED		
4048140746	7/24/01	7/25/01	1	NDT	7/25/01	GOOD TO NID		
4042842618	7/19/01	7/25/01	6	NDT	7/25/01	CHANGED F1 PAIR		
7702288900	7/19/01	7/25/01	6	NDT	7/25/01	REPAIRED THE AERIAL DROP WIRE		

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4046969301	7/15/01	7/25/01	10	NDT	7/25/01	CHANGED CABLE PAIR		
7704724302	7/11/01	7/25/01	14	NDT	7/25/01	TEST WAS RESOLUTION TO CORNCERN		
7707491709	6/16/01	7/25/01	39	NDT	7/25/01	REPAIRED AN OPEN AT THE NID		
7709732297	6/2/01	7/25/01	53	NDT	7/25/01	TECH CHANGED CABLE		
7705925398	7/20/01	7/21/01	1	NDT	7/26/01	TRANSLATIONS		
7705925398	7/18/01	7/23/01	5	NDT	7/26/01	FRAME HARDWARE		
7704784407	17-Jul	7/24/01	7	NDT	7/26/01	REPAIR TO CABLE PAIR	7/25/01	1
7704432295	6/29/01	7/24/01	25	NDT	7/26/01	AERIAL REPAIR		
7707847095	7/25/01	7/25/01	0	NDT	7/26/01	SERVICE ORDER ACTIVITY	7/31/01	6
7704982673	7/20/01	7/25/01	5	NDT	7/26/01	CHANGED A DEFECTIVE F2 PAIR		
7702106059	7/13/01	7/25/01	12	NDT	7/26/01	REPAIRED PAIR		
7703586027	7/11/01	7/25/01	14	NDT	7/26/01	BURIED DROP WIRE		
7706071798	7/2/01	7/25/01	23	NDT	7/26/01	ISW TROUBLE		
4043441776	6/25/01	7/25/01	30	NDT	7/26/01	REPAIRED AERIAL SERVICE WIRE		
7708222899	6/25/01	7/25/01	30	NDT	7/26/01	LINE OK BURIED LINE		
7704397589	7/25/01	7/26/01	1	NDT	7/26/01	REPAIRED AT THE NID	9/4/01	40
7704670051	7/23/01	7/26/01	3	NDT	7/26/01	REPAIRED CRS JUMPER		
4042331755	7/21/01	7/26/01	5	NDT	7/26/01	REPAIRED AT THE FRAME IN THE CENTRAL OFFICE		
6784225664	7/19/01	7/26/01	7	NDT	7/26/01	DIAL TONE GOOD TO NID		
7708891358	7/19/01	7/26/01	7	NDT	7/26/01	REPAIRED BURIED DROP WIRE		
7709874249	6/28/01	7/26/01	28	NDT	7/26/01	TECH STATES OK TO NID		
7709933316	6/25/01	7/26/01	31	NDT	7/26/01	REPLACED CARBONS		
4047664467	6/22/01	7/26/01	34	NDT	7/26/01	FOUND OK OUT		
7709251737	6/20/01	7/26/01	36	NDT	7/26/01	DIAL TONE GOOD TO NID SHORT ON ISW		
7705925398	6/6/01	7/26/01	50	NDT	7/26/01	NO TROUBLE FOUND DIAL TONE RESTORED		
4046340250	5/13/01	7/26/01	74	NDT	7/26/01	REWIRED NID		
4042480938	6/1/01	7/27/01	56	NDT	7/26/01	DIAL TONE GOOD TO THE NID		
7702334680	7/24/01	7/25/01	1	NDT	7/27/01	AERIAL DROP WIRE		
4047536397	7/18/01	7/25/01	7	NDT	7/27/01	CHANGED A CABLE PAIR		
6785662617	7/10/01	7/25/01	15	NDT	7/27/01	LINE TEST OK		
7704762270	6/22/01	7/25/01	33	NDT	7/27/01	CHANGED F1 PAIR		
4046961583	5/24/01	7/25/01	62	NDT	7/27/01	CUST HAD DEFECTIVE PHONES		
7704822760	7/3/01	7/26/01	23	NDT	7/27/01	REPAIRED CABLE PAIR	7/27/01	1
6785265373	7/24/01	7/26/01	2	NDT	7/27/01	REPAIRED CUT FIBER IN CABLE	8/8/01	13
7709189602	7/27/01	7/26/01	-1	NDT	7/27/01	TECH STATES NO TROUBLE FOUND		
7709558872	7/24/01	7/26/01	2	NDT	7/27/01	DIAL TONE GOOD TO THE NID		
7704847851	7/22/01	7/26/01	4	NDT	7/27/01	REPLACED CABLE PAIR		
7704821656	7/20/01	7/26/01	6	NDT	7/27/01	REPLACED FIBER IN CABLE		
4047946413	7/17/01	7/26/01	9	NDT	7/27/01	REPAIRED THE UNDERGROUND F1		
6785260309	7/17/01	7/26/01	9	NDT	7/27/01	REPAIRED AERIAL CABLE		
7703890830	7/16/01	7/26/01	10	NDT	7/27/01	REPAIRED BURIED SERVICE WIRE		
7704836826	7/12/01	7/26/01	14	NDT	7/27/01	CABLE REPAIRED		
7704600388	6/29/01	7/26/01	27	NDT	7/27/01	REPLACED AERIAL SERVICE WIRE		
7704842490	6/23/01	7/26/01	33	NDT	7/27/01	REPAIRED A CUT IN THE FIBERS IN CABLE		
6789470260	6/8/01	7/26/01	48	NDT	7/27/01	NO TROUBLE FOUND		
7704848161	7/17/01	7/27/01	10	NDT	7/27/01	CUST NO LONGER WITH MCI	7/27/01	0
6784824434	7/26/01	7/27/01	1	NDT	7/27/01	DIAL TONE GOOD TO THE NID		
6785463509	7/25/01	7/27/01	2	NDT	7/27/01	LINE TEST OK		
7702334680	7/24/01	7/27/01	3	NDT	7/27/01	DIAL TONE RESTORED NO TROUBLE FOUND		
4046077387	7/10/01	7/27/01	17	NDT	7/27/01	CHANGED F1 PAIR		
7709148228	6/28/01	7/27/01	29	NDT	7/27/01	REPAIRED A DEFECTIVE TRU		
7704664682	6/21/01	7/27/01	36	NDT	7/27/01	REPAIRED AERIAL F2		
3135811735	5/30/01	7/27/01	58	NDT	7/27/01	AERIAL DROP WIRE		
4047942385	6/10/01	7/23/01	43	NDT	7/28/01	PAIR REPAIRED		
7704587266	7/20/01	7/25/01	5	NDT	7/28/01	CHANGED AERIAL PAIR	7/30/01	5

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7703951711	7/10/01	7/26/01	16	NDT	7/28/01	ISW TROUBLE	7/26/01	0
7708148813	7/25/01	7/26/01	1	NDT	7/28/01	CPE TROUBLE		
7709694291	7/25/01	7/26/01	1	NDT	7/28/01	NO TROUBLE FOUND		
7709695257	7/6/01	7/26/01	20	NDT	7/28/01	LINE TEST OK		
7702540952	7/26/01	7/27/01	1	NDT	7/28/01	REPAIR TO CABLE PAIR		
7706628238	7/26/01	7/27/01	1	NDT	7/28/01	REPAIRED CROSS CONNECT		
4042525398	7/24/01	7/27/01	3	NDT	7/28/01	GOOD TO TERM		
4046223791	7/18/01	7/27/01	9	NDT	7/28/01	NETWORK TERMINATING WIRE		
7708440049	7/17/01	7/27/01	10	NDT	7/28/01	REPAIRED AERIAL DROP		
7702528693	7/16/01	7/27/01	11	NDT	7/28/01	REPAIRED CUT IN CABLE		
7702338893	7/15/01	7/27/01	12	NDT	7/28/01	DIAL TONE GOOD TO THE NID ISW TROUBLE		
7705021575	7/9/01	7/27/01	18	NDT	7/28/01	FOUND LINE OK		
7706465959	7/9/01	7/27/01	18	NDT	7/28/01	CPE TROUBLE		
7707480318	6/18/01	7/27/01	39	NDT	7/28/01	REPLACED PROTECTOR		
7704762270	6/15/01	7/27/01	42	NDT	7/28/01	AERIAL DROP WIRE		
7702286675	6/12/01	7/27/01	45	NDT	7/28/01	CPE TROUBLE		
6787210448	6/20/01	7/28/01	38	NDT	7/28/01	REPAIRED CABLE PAIR	8/23/01	26
7704676639	7/26/01	7/28/01	2	NDT	7/28/01	AERIAL DROP WIRE		
7709311107	7/20/01	7/28/01	8	NDT	7/28/01	REPAIRED A CUT IN THE BURIED SERVICE WIRE		
7709920760	6/25/01	7/28/01	33	NDT	7/28/01	LINE OK AT THE CO		
7708874278	6/19/01	7/28/01	39	NDT	7/28/01	GROUND WIRE REPAIRED		
7702334873	7/19/01	7/19/01	0	NDT	7/29/01	CUSTOMER NO LONGER WITH MCI		
6783800687	6/29/01	7/26/01	27	NDT	7/29/01	CPE ISW TROUBLE		
4048726701	7/16/01	7/27/01	11	NDT	7/29/01	SERVICE ORDER TO DISCONNECT SERVICE BACK TO PREVIOUS CARRIER	7/28/01	1
7707770229	6/2/01	7/27/01	55	NDT	7/29/01	REPAIRED THE BURIED SERVICE WIRE		
7704482558	7/19/01	7/28/01	9	NDT	7/29/01	PREMISE TROULBE	9/1/01	35
6783640329	6/30/01	7/28/01	28	NDT	7/29/01	AERIAL DROP WIRE		
7705833185	6/29/01	7/28/01	29	NDT	7/29/01	PAIR TRANSFER REPAIRED		
7704450030	6/28/01	7/28/01	30	NDT	7/29/01	REPAIRED COIL		
7705188299	6/25/01	7/28/01	33	NDT	7/29/01	LINE TESTED OK		
7702541446	6/13/01	7/28/01	45	NDT	7/29/01	CABLE FAILURE REPAIRED		
7709919249	5/16/01	7/28/01	73	NDT	7/29/01	ISW TROUBLE		
4047584277	6/21/01	7/29/01	38	NDT	7/29/01	DIAL TONE GOOD TO NID ISW TROUBLE	8/1/01	3
4046333224	7/10/01	7/29/01	19	NDT	7/29/01	REPAIRED CROSS JUMPER A THE CROSS BOX		
7709727839	7/24/01	7/30/01	6	NDT	7/29/01	AERIAL DROP WIRE		
7704261418	6/16/01	7/3/01	17	NDT	7/30/01	FIXED SHORTED CABLE		
7709541240	6/25/01	7/9/01	14	NDT	7/30/01	FOUND OK OUT		
7704828950	7/26/01	7/26/01	0	NDT	7/30/01	BURIED F2 PAIR REPAIRED		
7704828950	7/19/01	7/27/01	8	NDT	7/30/01	REPAIRED BURIED F2 PAIR		
7703879275	7/27/01	7/28/01	1	NDT	7/30/01	CHANGED F1 PAIR		
7705748127	7/24/01	7/28/01	4	NDT	7/30/01	REPAIRED CABLE		
7704789194	7/21/01	7/28/01	7	NDT	7/30/01	CABLE PAIR REPAIRED		
4042897077	6/29/01	7/28/01	29	NDT	7/30/01	AERIAL DROP WIRE REPAIRED		
7704725550	7/14/01	7/29/01	15	NDT	7/30/01	NETWORK CABLE REPAIRS		
4042121038	7/13/01	7/29/01	16	NDT	7/30/01	NO TROUBLE FOUND LINE OK TO NID		
7704453247	7/13/01	7/29/01	16	NDT	7/30/01	AERIAL DROP REPAIRS		
7704455105	6/28/01	7/29/01	31	NDT	7/30/01	REPAIRS F2 CABLE		
7705622142	6/28/01	7/29/01	31	NDT	7/30/01	NO TROUBLE FOUND		
7705180008	6/27/01	7/29/01	32	NDT	7/30/01	CABLE FAILURE REPAIRED		
6784231886	6/20/01	7/29/01	39	NDT	7/30/01	LINE OK UP TO THE NID		
6789850200	6/14/01	7/29/01	45	NDT	7/30/01	REPLACED HEAT COIL		
6782971958	5/19/01	7/30/01	72	NDT	7/30/01	REPLACED CHANNEL UNIT AT NID	7/31/01	1
7704779284	7/20/01	7/30/01	10	NDT	7/30/01	CUSTOMER NO LONGER WITH MCI	8/8/01	9
4046292494	7/7/01	7/30/01	23	NDT	7/30/01	AERIAL DROP WIRE	8/18/01	19
7708084011	7/25/01	7/30/01	5	NDT	7/30/01	TROUBLE ISW		

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7702775185	7/24/01	7/30/01	6	NDT	7/30/01	REMOVED BAD ISW		
6783420208	7/23/01	7/30/01	7	NDT	7/30/01	REPAIRED BURIED CABLE		
7704482160	6/28/01	7/30/01	32	NDT	7/30/01	CABLE PAIR REPAIRED		
7708322742	6/26/01	7/30/01	34	NDT	7/30/01	REPLACED AERIAL SERVICE WIRE		
4047530480	6/12/01	7/30/01	48	NDT	7/30/01	LINE OK OUT		
7704822183	6/26/01	7/26/01	30	NDT	7/31/01	LINE OK		
4042995144	7/15/01	7/30/01	15	NDT	7/31/01	DIAL TONE GOOD TO THE NID	7/31/01	1
7706504179	7/30/01	7/30/01	0	NDT	7/31/01	SPRINKLER SYSTEM DAMAGED		
4042121809	7/27/01	7/30/01	3	NDT	7/31/01	NETWORK INTERFACE REPAIRED		
7704678043	7/24/01	7/30/01	6	NDT	7/31/01	REPAIRED BARE NID WIRE LIGHTENING SHORT		
7705926846	7/21/01	7/30/01	9	NDT	7/31/01	NO TROUBLE FOUND		
7702187787	7/16/01	7/30/01	14	NDT	7/31/01	REPLACED BATTERY CHARGER		
7702792906	7/13/01	7/30/01	17	NDT	7/31/01	REPLACED DEFECTIVE CARD		
7705051198	6/25/01	7/30/01	35	NDT	7/31/01	NO TROUBLE FOUND		
7703221590	6/14/01	7/30/01	46	NDT	7/31/01	TECH FOUND OK OUT		
7709648490	6/11/01	7/30/01	49	NDT	7/31/01	AERIAL DROP WIRE		
7708321411	5/15/01	7/30/01	76	NDT	7/31/01	NETWORK INTERFACE REPAIRED		
7702338829	7/28/01	7/31/01	3	NDT	7/31/01	TES OK NO TROUBLE FOUND		
7703945867	7/27/01	7/31/01	4	NDT	7/31/01	TERMINAL		
7709635373	7/18/01	7/31/01	13	NDT	7/31/01	RESPLICED CABLE		
4042627847	7/16/01	7/31/01	15	NDT	7/31/01	DIAL TONE GOOD TO THE NID		
6784500228	7/16/01	7/31/01	15	NDT	7/31/01	CPE TROUBLE		
7705184804	7/16/01	7/31/01	15	NDT	7/31/01	BAD TRU REPLACED		
7704195663	7/13/01	7/31/01	18	NDT	7/31/01	REPLACED BATTERY CHARGER		
7702295161	7/11/01	7/31/01	20	NDT	7/31/01	DIAL TONE RESTORED		
7704195573	7/5/01	7/31/01	26	NDT	7/31/01	REWIRED FRAME AT THE CENTRAL OFFICE		
7707255904	7/3/01	7/31/01	28	NDT	7/31/01	NO TROUBLE FOUND		
4042627847	6/29/01	7/31/01	32	NDT	7/31/01	FOUND OK OUT		
7702180134	8-Jun	7/31/01	53	NDT	7/31/01	WIRE REPAIRED		
7708381832	6/1/01	7/31/01	60	NDT	7/31/01	LINE DISCONNECTED		
4046221791	7/10/01	7/10/01	0	NDT	8/1/01	CHANGED F1 PAIR		
7703820736	7/5/01	7/27/01	22	NDT	8/1/01	NO TROUBLE FOUND		
7704933698	7/20/01	7/30/01	10	NDT	8/1/01	REPAIRED SHORT ON CABLE		
7703947143	7/18/01	7/30/01	12	NDT	8/1/01	REPAIRED F1 CABLE		
4049826627	6/26/01	7/30/01	34	NDT	8/1/01	DIAL TONE GOOD TO THE NID		
7702375432	7/24/01	7/31/01	7	NDT	8/1/01	NO TROUBLE FOUND		
7066893113	7/22/01	7/31/01	9	NDT	8/1/01	LINE OK NO TROUBLE FOUND		
4043550666	7/16/01	7/31/01	15	NDT	8/1/01	CHANGED F2 PAIR		
7703040864	7/16/01	7/31/01	15	NDT	8/1/01	WIRE FIXED		
7706061213	7/16/01	7/31/01	15	NDT	8/1/01	NO TROUBLE FOUND		
6785740761	7/13/01	7/31/01	18	NDT	8/1/01	DIAL TONE GOOD TO COILS IN THE CENTRAL OFFICE		
4046910142	7/10/01	7/31/01	21	NDT	8/1/01	AERIAL DROP WIRE		
6789851184	7/5/01	7/31/01	26	NDT	8/1/01	AERIAL DROP WIRE		
7702871892	6/28/01	7/31/01	33	NDT	8/1/01	CABLE FAILURE REPAIRED		
7709621175	6/28/01	7/31/01	33	NDT	8/1/01	DROP SERVICE WIRE REPAIRED		
6783770019	6/27/01	7/31/01	34	NDT	8/1/01	REPLACED LIBER WIRE		
6784760889	6/25/01	7/31/01	36	NDT	8/1/01	AERIAL DROP WIRE		
7709672936	6/14/01	7/31/01	47	NDT	8/1/01	TEST OK		
7704272393	6/26/01	8/1/01	36	NDT	8/1/01	LINE CAME CLEAR		
7704273616	6/26/01	8/1/01	36	NDT	8/1/01	DIAL TONE GOOD TO THE NID		
7704991196	6/26/01	8/1/01	36	NDT	8/1/01	CABLE FAILURE DT GOOD TO THE NID		
7704260666	6/19/01	8/1/01	43	NDT	8/1/01	CENTRAL OFFICE TROUBLED FIXED		
7704772071	6/14/01	8/1/01	48	NDT	8/1/01	CABLE PAIR PLANT EQUIPMENT		
7704990945	6/14/01	8/1/01	48	NDT	8/1/01	NO TROUBLE FOUND GOOD TO THE DMARK		
7708311089	5/15/01	8/1/01	78	NDT	8/1/01	NO TROUBLE FOUND CPE		

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7706225812	7/15/01	8/3/01	19	NDT	8/1/01	TROUBLE ON THE INSIDE		
7705347215	7/25/01	7/31/01	6	NDT	8/2/01	REPLACED AERIAL SERVICE WIRE		
6783766176	7/14/01	7/31/01	17	NDT	8/2/01	CABLE FAILURE REPAIRED		
7704456247	8/1/01	8/1/01	0	NDT	8/2/01	AERIAL WIRE REPAIRED	8/1/01	0
7704781889	7/7/01	8/1/01	25	NDT	8/2/01	CABLE PAIR FIXED	8/4/01	3
7703680330	7/31/01	8/1/01	1	NDT	8/2/01	DT GOOD TO THE NID		
7703866284	7/31/01	8/1/01	1	NDT	8/2/01	CABLE PAIR REPAIRED		
6784744745	7/27/01	8/1/01	5	NDT	8/2/01	PLACED CROSS JUMPER BURIED DROP		
4042121809	7/24/01	8/1/01	8	NDT	8/2/01	REPAIRED TERMINATED WIRE		
4046225828	7/17/01	8/1/01	15	NDT	8/2/01	RESPLICED AERIAL DROP		
4045591209	7/16/01	8/1/01	16	NDT	8/2/01	CUST MIGRATED		
7702705899	7/10/01	8/1/01	22	NDT	8/2/01	REPAIRED PROTECTOR		
6784237704	7/2/01	8/1/01	30	NDT	8/2/01	BURY SERVICE WIRE		
7708059848	6/2/01	8/1/01	60	NDT	8/2/01	TESTED OK CHANGED CHANEL UNIT		
7704450688	6/1/01	8/1/01	61	NDT	8/2/01	CABLE PAIR TRANSFERRED		
4047922372	7/16/01	8/2/01	17	NDT	8/2/01	FIXED BROKEN JUMPER		
7705187074	7/16/01	8/2/01	17	NDT	8/2/01	RETERMINATED CROSSBOX		
7705131304	6/13/01	8/2/01	50	NDT	8/2/01	INSIDE TROUBLE		
7709723390	6/6/01	8/2/01	57	NDT	8/2/01	FIXED JUMPER		
7705291120	6/1/01	8/2/01	62	NDT	8/2/01	REPLACED CUT WIRE		
4042986871	7/31/01	8/1/01	1	NDT	8/3/01	F1 PAIR CHANGED		
7704360184	6/8/01	8/1/01	54	NDT	8/3/01	DROP CUT BY BUILDING C/O TEMP DROP WIRE PUT UP		
6784438764	7/31/01	8/2/01	2	NDT	8/3/01	CHANGED DEFECTIVE PAIR	7/18/01	-15
7707170047	7/30/01	8/2/01	3	NDT	8/3/01	LINE FOUND OK		
7704465542	7/13/01	8/2/01	20	NDT	8/3/01	REPAIRED CUT CABLE		
7705347215	7/24/01	8/3/01	10	NDT	8/3/01	NO TROUBLE FOUND		
4042921497	7/21/01	8/3/01	13	NDT	8/3/01	OUTAGE CONDITION		
7709096891	7/15/01	8/3/01	19	NDT	8/3/01	CUST CANCELLED ACCOUNT		
4043500115	7/12/01	8/3/01	22	NDT	8/3/01	F1 CABLE REPAIRED		
7709737506	7/2/01	8/3/01	32	NDT	8/3/01	RESTORED PER RESTORAL ORDER # NO2NBK58		
6784500031	6/5/01	8/3/01	59	NDT	8/3/01	JUMPER CROSSED WITH WRONG PAIR		
7708885767	6/29/01	8/1/01	33	NDT	8/4/01	CUST CANCELLED LOCAL SERVICE	9/4/01	34
4043631567	7/18/01	8/1/01	14	NDT	8/4/01	CO VMS EQUIPMENT		
4043255001	7/31/01	8/2/01	2	NDT	8/4/01	LINE OK TROUBLE INSIDE		
7704840709	7/31/01	8/2/01	2	NDT	8/4/01	LINE TESTED OK		
7705075356	7/24/01	8/2/01	9	NDT	8/4/01	DIAL TONE GOOD TO THE NID		
7707875728	6/19/01	8/2/01	44	NDT	8/4/01	REPLACED CUT WIRE		
7707490967	6/18/01	8/2/01	45	NDT	8/4/01	FOUND OK OUT		
7705670727	5/15/01	8/2/01	79	NDT	8/4/01	CABLE PAIR TRASFERED		
7709425703	8/3/01	8/3/01	0	NDT	8/4/01	REPLACED AERIAL SERVICE WIRE	8/4/01	1
4042439329	8/2/01	8/3/01	1	NDT	8/4/01	DIAL TONE GOOD TO DMARK		
7709668141	8/2/01	8/3/01	1	NDT	8/4/01	AERIAL DROP WIRE		
7705361920	7/5/01	8/3/01	29	NDT	8/4/01	EQUIPMENT CHANGED		
7709412954	6/26/01	8/3/01	38	NDT	8/4/01	NO TROUBLE FOUND		
4047920998	6/13/01	8/3/01	51	NDT	8/4/01	BROKEN JUMPER REPLACED		
7705832694	7/16/01	8/4/01	19	NDT	8/4/01	LINE OK		
4047531957	7/15/01	8/4/01	20	NDT	8/4/01	TROUBLED ON CABLE CLEARED		
7704430597	6/8/01	8/4/01	57	NDT	8/4/01	REPAIRED DONE TO CABLE PAIR		
7709630132	6/13/01	7/31/01	48	NDT	8/5/01	CABLE FAILURE REPAIRED		
7707753305	6/19/01	8/3/01	45	NDT	8/5/01	CABLE PAIR TRANSFERRED		
7707401548	7/17/01	8/4/01	18	NDT	8/5/01	LINE OK CPE TROUBLE		
7702331172	6/21/01	8/4/01	44	NDT	8/5/01	SPLICED CABLE		
7707480878	6/11/01	8/4/01	54	NDT	8/5/01	FOUND OK OUT		
7705940682	6/28/01	8/5/01	38	NDT	8/5/01	CUST CANCELLED TICKET LINE OK		
7704933689	6/25/01	8/5/01	41	NDT	8/5/01	CUST CANCELLED TICKET LINE OK		

TELEPHONE NUMBER	MIGRATION COMPLETE	TROUBLE REPORTED	DAYS FROM MIGRATION	TROUBLE REASON	TROUBLE CLOSED	CLOSURE INFORMATION	DATE LLN RECEIVED	DAYS BETWEEN TROUBLE AND LLN
7703586723	7/27/01	8/1/01	5	NDT	8/6/01	CUT CABLE FIXED		
7706384947	7/16/01	8/2/01	17	NDT	8/6/01	AERIAL WIRE REPAIRED		
6784239595	8/2/01	8/3/01	1	NDT	8/6/01	REPLACED TERMINATING WIRE		
7705029325	8/2/01	8/3/01	1	NDT	8/6/01	REPLACED CHANNEL UNIT		
7707298026	8/2/01	8/3/01	1	NDT	8/6/01	REPLACED WIRE		
7703365429	7/6/01	8/3/01	28	NDT	8/6/01	FOUND OK CAME CLEAR		
4046078429	8/3/01	8/4/01	1	NDT	8/6/01	REPAIRED A DEFECTIVE JACK		
7709227069	8/2/01	8/4/01	2	NDT	8/6/01	REPAIRED DROP		
6784188893	7/30/01	8/4/01	5	NDT	8/6/01	REPLACED SURFACE WIRE		
7707365036	7/18/01	8/4/01	17	NDT	8/6/01	DIAL TONE GOOD TO DMARK		
7702790964	6/29/01	8/4/01	36	NDT	8/6/01	BURIED STANDING WIRE		
7703227044	6/27/01	8/4/01	38	NDT	8/6/01	CROSS CONNECT		
7704435351	7/24/01	8/5/01	12	NDT	8/6/01	CPE TROUBLE		
4045314828	7/20/01	8/5/01	16	NDT	8/6/01	FOUND OK OUT		
7704425380	7/16/01	8/5/01	20	NDT	8/6/01	REPLACED CARBONS REMOVED SHORTED ISW		
7704421902	6/29/01	8/5/01	37	NDT	8/6/01	SHEATH ISSUE		
7706829923	6/29/01	8/5/01	37	NDT	8/6/01	REPAIRED AERIAL DROP		
7706637955	6/28/01	8/5/01	38	NDT	8/6/01	LINE OK NO TROUBLE FOUND		
4048432145	6/21/01	8/5/01	45	NDT	8/6/01	LINE OK OUT		
7702971820	6/21/01	8/5/01	45	NDT	6-Aug	AERIAL DROP		
7708344651	6/18/01	8/5/01	48	NDT	8/6/01	DIAL TONE GOOD TO NID CPE TROUBLE		
6783520812	6/15/01	8/5/01	51	NDT	8/6/01	MOVED A BURIED SERVICE WIRE		
7709960093	6/11/01	8/5/01	55	NDT	8/6/01	DIAL TONE GOOD TO DMANK		
4042439329	8/2/01	8/6/01	4	NDT	8/6/01	FOUND OK OUT		
4042436970	8/1/01	8/6/01	5	NDT	8/6/01	TROUBLE INSIDE		
4047537627	7/28/01	8/6/01	9	NDT	8/6/01	REHUNG SERVICE WIRE		
7707867182	7/28/01	8/6/01	9	NDT	8/6/01	REPLACED AERIAL SERVICE WIRE		
7709348184	7/27/01	8/6/01	10	NDT	8/6/01	REPLACED AERIAL WIRE		
7704280803	7/21/01	8/6/01	16	NDT	8/6/01	COMMON CARRIERE CLOSED TO MCI		
4043782560	7/18/01	8/6/01	19	NDT	8/6/01	REPARIED ISW		
7704491578	6/26/01	8/6/01	41	NDT	8/6/01	NETWORK TROUBLE CABLE REPAIR		
6783541815	6/19/01	8/6/01	48	NDT	8/6/01	FOUND OK OUT		
7702770685	6/12/01	8/6/01	55	NDT	8/6/01	LINE TESTED OK		
7709941703	6/6/01	8/6/01	61	NDT	8/6/01	DIAL TONE GOOD TO DMARK		
7709225539	7/11/01	8/2/01	22	NDT	8/7/01	REPLACED DEFECTIVE CHANNEL UNIT IN UNDERGROUND CABLE		
7704725085	7/24/01	8/3/01	10	NDT	8/7/01	ANOTHER COMMON CARRIER		
4047672010	7/16/01	8/3/01	18	NDT	8/7/01	PAIR GAIN REPAIRED		
6784177676	7/31/01	8/4/01	4	NDT	8/7/01	REPAIRED BURIED SERVICE WIRE		
7709648983	7/25/01	8/4/01	10	NDT	8/7/01	SERVICE DROP WIRE		
4042923004	6/21/01	8/4/01	44	NDT	8/7/01	TROUBLE FIXED		
6783427696	8/1/01	8/5/01	4	NDT	8/7/01	CABLE PAIR REPAIRED		
7706843000	7/16/01	8/6/01	21	NDT	8/7/01	SHEATH LINE OK	8/9/01	3
7702878816	8/2/01	8/6/01	4	NDT	8/7/01	CABLE FAILURE MAC SYSTEM FAILURE	9/6/01	31
6784132471	7/31/01	8/6/01	6	NDT	8/7/01	REPAIRED NETWORK WIRE TO THE CUST DMARK		
7707255351	7/24/01	8/6/01	13	NDT	8/7/01	REPLACED THE RBN		
7704288060	7/22/01	8/6/01	15	NDT	8/7/01	NO TROUBLE FOUND CPE		
7704580770	7/20/01	8/6/01	17	NDT	8/7/01	GOOD TO NID EQUIPMENT TROUBLES		
7704420342	7/18/01	8/6/01	19	NDT	8/7/01	REPLACED DEFECTIVE CARD IN FRAME		
6786258733	7/6/01	8/6/01	31	NDT	8/7/01	NETWORK INTERFACE		
7708875743	6/30/01	8/6/01	37	NDT	8/7/01	BURIED SERVICE WIRE		
7708874241	6/29/01	8/6/01	38	NDT	8/7/01	CABLE PAIR REPAIRED		
7704453740	6/27/01	8/6/01	40	NDT	8/7/01	REPAIRED DEFECTIVE CARD		
7704763695	6/15/01	8/6/01	52	NDT	8/7/01	REPLACED SPLICE		
7707770055	5/22/01	8/6/01	76	NDT	8/7/01	BAD PROTECTOR OUTSIDE DUE TO LIGHTING		
4048754802	8/3/01	8/7/01	4	NDT	8/7/01	MISSING JUMPER WIRE		

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6784223130	8/2/01	8/7/01	5	NDT	8/7/01	REPARIED SERVICE WIRE		
6784737684	7/23/01	8/7/01	15	NDT	8/7/01	DIAL TONE RESTORED WITH ORDER # NO12GT07		
7708058941	7/22/01	8/7/01	16	NDT	8/7/01	FOUND OK TROUBLE INSIDE		
7702187431	7/18/01	8/7/01	20	NDT	8/7/01	NETWORK TROUBLE WIRE REPAIR		
7702528008	7/3/01	8/7/01	35	NDT	8/7/01	LINE TESTED OK		
4046077387	6/28/01	8/7/01	40	NDT	8/7/01	DIAL TONE GOOD TO DMARK		
7705924532	6/28/01	8/7/01	40	NDT	8/7/01	NO TROUBLE FOUND CPE		
7709454735	6/18/01	8/7/01	50	NDT	8/7/01	ROH CPE TROUBLE		
7705311556	5/24/01	8/7/01	75	NDT	8/7/01	CPE TROUBLE		
7709342662	7/31/01	8/1/01	1	NDT	8/8/01	NO TROUBLE FOUND		
4048768825	8/1/01	8/4/01	3	NDT	8/8/01	AERIAL DROP WIRE		
4046331766	7/7/01	8/4/01	28	NDT	8/8/01	CPE TROUBLE		
7704586211	7/20/01	8/5/01	16	NDT	8/8/01	NO TROUBLE FOUND	8/7/01	2
7706224922	8/2/01	8/6/01	4	NDT	8/8/01	REPAIRED JUMPER IN THE CROSSBOX	9/7/01	32
7704894455	6/28/01	8/7/01	40	NDT	8/8/01	CUSTOMER IS NO LONGER WITH MCI	8/8/01	1
7706843281	6/22/01	8/7/01	46	NDT	8/8/01	REPAIRED AERIAL CABLE	8/8/01	1
7704209536	7/31/01	8/7/01	7	NDT	8/8/01	REPLACED COIL IN SLICK	8/14/01	7
7708609675	8/2/01	8/7/01	5	NDT	8/8/01	REPAIRED SPLCED CABLE		
7705064286	7/31/01	8/7/01	7	NDT	8/8/01	DIAL TONE GOOD TO DMARK		
7704632837	7/28/01	8/7/01	10	NDT	8/8/01	REPARIED DROP WIRE		
7705327392	7/6/01	8/7/01	32	NDT	8/8/01	LIGHTING STRUCK TERMINAL		
7706061213	7/3/01	8/7/01	35	NDT	8/8/01	GROUNDED F2 BURIED CABLE AND REPAIRED LINE		
4042962119	6/27/01	8/7/01	41	NDT	8/8/01	REPAIRED F2 CABLE PAIR		
4042431135	6/26/01	8/7/01	42	NDT	8/8/01	WIRE REPAIRED		
6783640329	6/19/01	8/7/01	49	NDT	8/8/01	CHANGED PAIR		
6785461998	6/16/01	8/7/01	52	NDT	8/8/01	REPAIRED CUT BURIED SERVICE WIRE		
7708321411	6/4/01	8/7/01	64	NDT	8/8/01	TROUBLE TO ISW NO TROUBLE FOUND OSW		
7702051711	6/1/01	8/8/01	68	NDT	8/8/01	CUST NO LONGER WITH MCI	8/30/01	22
7705787659	8/3/01	8/8/01	5	NDT	8/8/01	CABLE PLANT EQUIPMENT		
4048151606	7/27/01	8/8/01	12	NDT	8/8/01	DISCONNNECTED EXCLUDED TO A SERVICE ORDER		
7702515872	7/26/01	8/8/01	13	NDT	8/8/01	CABLE PAIR TRANSFERRED		
7709488098	7/26/01	8/8/01	13	NDT	8/8/01	CABON REPLACED		
4043508244	7/13/01	8/8/01	26	NDT	8/8/01	PAIR CHANGED		
4043634425	7/11/01	8/8/01	28	NDT	8/8/01	NO DPRO NEEDED SERVICE ORDER COMPLETED AND BROUGHT DT UP		
6785832220	6/25/01	8/8/01	44	NDT	8/8/01	DIAL TONE RETURNED TO CABLE		
7708896572	7/5/01	8/1/01	27	NDT	8/9/01	F1 CABLE CHANGED PAIR REPAIRED		
7703826435	7/26/01	8/7/01	12	NDT	8/9/01	AERIAL DROP WIRE	8/15/01	8
6783801037	8/2/01	8/7/01	5	NDT	8/9/01	NO TROUBLE FOUND		
7707882857	6/19/01	8/8/01	50	NDT	8/9/01	REPAIRED AERIAL SERVICE WIRE	9/11/01	34
6783801037	8/3/01	8/8/01	5	NDT	8/9/01	NO LONGER WITH MCI HAS MIGRATED TO ANOTHER CARRIER		
7707297200	8/3/01	8/8/01	5	NDT	8/9/01	AERIAL DROP WIRE		
4045230946	7/18/01	8/8/01	21	NDT	8/9/01	REPARIED AERIAL SERVICE WIRE		
7705749712	7/16/01	8/8/01	23	NDT	8/9/01	REPLACED THE BURIED LINE		
7708866048	6/29/01	8/8/01	40	NDT	8/9/01	REPAIRED DAMAGED B CABLE		
7702056177	5/29/01	8/8/01	71	NDT	8/9/01	REPLACED SERVICE BURIED WIRE		
4043253543	7/25/01	8/9/01	15	NDT	8/9/01	BELL SOUTH ACCOUNT NO LONGER WITH MCI	8/10/01	1
4042922218	7/18/01	8/9/01	22	NDT	8/9/01	DO NOT NEED TO WRITE A RESTORAL ORDER	9/12/01	34
7708138543	8/7/01	8/9/01	2	NDT	8/9/01	REPAIRED AT CROSS JUMPER		
7709281987	8/6/01	8/9/01	3	NDT	8/9/01	WIRE REPAIRED		
7704575627	7/28/01	8/9/01	12	NDT	8/9/01	DEFECTIVE AERIAL WIRE PAIR REPLACED		
7705022308	7/28/01	8/9/01	12	NDT	8/9/01	OUTSIDE FACILITY TESTED OK		
7706193137	7/25/01	8/9/01	15	NDT	8/9/01	LINE WAS FOUND OK		
4045231860	7/24/01	8/9/01	16	NDT	8/9/01	TERMINAL OUTAGE		
4042921497	7/20/01	8/9/01	20	NDT	8/9/01	REPLACED JACK IN BEDROOM		
6783637735	7/17/01	8/9/01	23	NDT	8/9/01	TICKET CANCELLED PER CUST REQUEST DT HAS BEEN RESTORED		

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7704722614	7/17/01	8/9/01	23	NDT	8/9/01	CABLE PAIR		
4047613499	7/8/01	8/9/01	32	NDT	8/9/01	DIAL TONE GOOD TO THE DMARK		
7706461580	7/2/01	8/9/01	38	NDT	8/9/01	NO TROUBLE FOUND DT GOOD TO NID		
7709825450	6/29/01	8/9/01	41	NDT	8/9/01	NETWORK TERMATING TROUBLE		
7707920603	6/26/01	8/9/01	44	NDT	8/9/01	NUMBER CROSSED AT PEDISTAL		
7707873197	6/1/01	8/9/01	69	NDT	8/9/01	PAIR CHANGED		
4042410474	5/29/01	8/9/01	72	NDT	8/9/01	REPAIRED WIRE AT TOW POLES		
7705062660	7/14/01	8/6/01	23	NDT	8/10/01	BURY CABLE SERIVE WIRE		
4046220634	8/3/01	8/8/01	5	NDT	8/10/01	DIAL TONE GOOD TO DMARK	8/22/01	14
7705770979	8/7/01	8/8/01	1	NDT	8/10/01	NO TROUBLE FOUND LINE OK		
6783640387	6/20/01	8/8/01	49	NDT	8/10/01	PLACED AN OANI		
8107430280	6/12/01	8/8/01	57	NDT	8/10/01	FRAME HARDWARE		
6783420562	8/9/01	8/9/01	0	NDT	8/10/01	NO TROUBLE FOUND LINE OK	9/8/01	30
7702792666	8/7/01	8/9/01	2	NDT	8/10/01	SPLICE CASE REPAIRED		
6783099065	8/6/01	8/9/01	3	NDT	8/10/01	ISW TROUBLE		
4043215235	8/4/01	8/9/01	5	NDT	8/10/01	REPLACED JUMPER AT THE FRAME		
7704654963	8/3/01	8/9/01	6	NDT	8/10/01	ISW PROBLEM		
7708849340	7/31/01	8/9/01	9	NDT	8/10/01	TROUBLE INSIDE SHORT		
7703967053	7/24/01	8/9/01	16	NDT	8/10/01	CPE TROUBLE		
7707483209	7/18/01	8/9/01	22	NDT	8/10/01	RESPLICED A CABLE AND REBURRIED IT		
6784791300	7/17/01	8/9/01	23	NDT	8/10/01	CHANGED F1 CABLE AND PAIR		
7702291025	7/17/01	8/9/01	23	NDT	8/10/01	LINE GOOD TO DMARK		
7706844342	7/8/01	8/9/01	32	NDT	8/10/01	CUST CANCELLED TICKET PER DIAL TONE RESTORED		
7704481596	6/25/01	8/9/01	45	NDT	8/10/01	NO TROUBLE FOUND LINE OK		
7703042487	6/18/01	8/9/01	52	NDT	8/10/01	WIRE CUT REPAIRED		
7707751840	6/6/01	8/9/01	64	NDT	8/10/01	ISW TROUBLE		
7709201257	5/29/01	8/9/01	72	NDT	8/10/01	PLACED A NID REPLACED A PROTECTOR		
7702871227	5/15/01	8/10/01	87	NDT	8/10/01	NO LONGER WITH MCI MIGRATED TO ANOTHER CARRIER	8/28/01	18
7703467656	8/4/01	8/10/01	6	NDT	8/10/01	REPAIRED A BAD F2 CHANNEL		
7704149936	7/25/01	8/10/01	16	NDT	8/10/01	PAIR TRANSFERRED		
6785831693	7/20/01	8/10/01	21	NDT	8/10/01	LINE OK NO TROUBLE FOUND		
7703857514	7/6/01	8/10/01	35	NDT	8/10/01	BURRIED AND REPAIRED A CABLE		
6785460982	5/24/01	8/10/01	78	NDT	8/10/01	LINE OK		
7709238791	5/22/01	8/10/01	80	NDT	8/10/01	FRAME HARDWARE		
7709714878	7/25/01	8/11/01	17	NDT	8/10/01	NO TICKET FOUND UNDER THIS ANI		
7703583507	6/1/01	8/11/01	71	NDT	8/10/01	TROUBLED LINE CAME CLEAR		
7706400370	7/31/01	8/7/01	7	NDT	8/11/01	DIAL TONE GOOD TO DMARK		
6783420562	8/6/01	8/9/01	3	NDT	8/11/01	AERIAL DROP WIRE	9/8/01	30
6784181061	8/7/01	8/10/01	3	NDT	8/11/01	LINE OK DT GOOD TO DMARK		
7709792401	8/7/01	8/10/01	3	NDT	8/11/01	REPLACED POWER CARD		
7704785230	8/3/01	8/10/01	7	NDT	8/11/01	ISW TROUBLE		
7704207355	7/24/01	8/10/01	17	NDT	8/11/01	PLACED A CROSS JUMPER		
7705774201	7/16/01	8/10/01	25	NDT	8/11/01	REPAIRED NID		
4042624754	7/9/01	8/10/01	32	NDT	8/11/01	TROUBLE DETERMINATION		
6784760121	6/25/01	8/10/01	46	NDT	8/11/01	NO ACCESS		
7705873906	6/25/01	8/10/01	46	NDT	8/11/01	REPLACED COIL ON CABLE		
7707254315	6/29/01	8/11/01	43	NDT	8/11/01	CPE TROUBLE		
7709431841	6/23/01	8/11/01	49	NDT	8/12/01	CABLE PAIR CHANGED	8/17/01	6
7703040207	8/2/01	8/11/01	9	NDT	8/12/01	NO TROUBLE GOOD TO DMARK		
7702200702	7/26/01	8/11/01	16	NDT	8/12/01	GOOD TO DMARK TROUBLE ISW		
4046240225	6/25/01	8/11/01	47	NDT	8/12/01	REMOVED DEFECTIVE PAIR		
4047530484	5/21/01	8/11/01	82	NDT	8/12/01	DROP REPAIRED		
6787159188	8/7/01	8/12/01	5	NDT	8/12/01	NO TICKET OPENED UNDER THIS ANI		
7703893956	6/25/01	8/8/01	44	NDT	8/13/01	AERIAL DROP WIRE		
7708088186	8/7/01	8/10/01	3	NDT	8/13/01	NO TROUBLE FOUND DT GOOD TO DMARK		

TELEPHONE NUMBER	MIGRATION COMPLETE	TROUBLE REPORTED	DAYS FROM MIGRATION	TROUBLE REASON	TROUBLE CLOSED	CLOSURE INFORMATION	DATE LLN RECEIVED	BETWEEN TROUBLE AND LLN
7707849593	8/6/01	8/10/01	4	NDT	8/13/01	REPAIRED CUT BURIED SERVICE WIRE		
4047686754	8/3/01	8/10/01	7	NDT	8/13/01	LINE OK NO TROUBLE FOUND		
7704572383	8/1/01	8/10/01	9	NDT	8/13/01	AERIAL DROP WIRE		
7707868742	7/24/01	8/10/01	17	NDT	8/13/01	CROSS JUMPER TERMINAL REPAIRED		
7705799914	6/29/01	8/10/01	42	NDT	8/13/01	AERIAL DROP WIRE		
7703896591	7/17/01	8/11/01	25	NDT	8/13/01	TICKET CANCELLED PER CUST REQUEST DT HAS BEEN RESTORED		
7709411522	7/31/01	8/12/01	12 .	NDT	8/13/01	SHORT INSIDE	8/13/01	1
7704786324	8/7/01	8/12/01	5	NDT	8/13/01	FIXED JUMPER		
7704755798	7/30/01	8/12/01	13	NDT	8/13/01	PROBLEM IN CABLE MOISTURE		
4043250494	7/17/01	8/12/01	26	NDT	8/13/01	DIAL TONE GOOD TO THE NID		
7705998408	7/6/01	8/12/01	37	NDT	8/13/01	CPE TROUBLE		
7707747364	8/6/01	8/13/01	7	NDT	8/13/01	REPAIRED CU	8/29/01	16
4048757965	8/10/01	8/13/01	3	NDT	8/13/01	DIAL TONE GOOD TO THE NID		
7706452537	7/24/01	8/13/01	20	NDT	8/13/01	ROUTE CIRCUIT COMMON PACK		
4047610724	7/20/01	8/13/01	24	NDT	8/13/01	TROUBLE CAME CLEAR LINE OK		
7702280692	6/22/01	8/13/01	52	NDT	8/13/01	RESPLICED THE INSIDE WIRE NOW GOOD TO THE NID		
6785470991	6/8/01	8/13/01	66	NDT	8/13/01	REPAIRED SERVICE WIRE		
6784231886	6/5/01	8/13/01	69	NDT	8/13/01	REPAIRED F2 CABLE		
6783427875	8/4/01	8/7/01	3	NDT	8/14/01	SOFTWARE CROSS CONNECT	8/14/01	7
7704398376	8/7/01	8/11/01	4	NDT	8/14/01	REPAIRED BROKEN CONDUCTOR UNIT		
7708547931	8/3/01	8/11/01	8	NDT	8/14/01	THE SUBSCRIBER WAS CALLED AND FOUND OK		
7705923486	8/10/01	8/12/01	2	NDT	8/14/01	BURIED SERVICE WIRE		
7703956679	8/8/01	8/12/01	4	NDT	8/14/01	END USER ACTION NO NETWORK TROUBLE		
4046351421	6/25/01	8/13/01	49	NDT	8/14/01	COMMON CARRIER PUT SLASH ON THE INSIDE	8/31/01	18
7709339491	8/7/01	8/13/01	6	NDT	8/14/01	REPLACED ONI		
7709730843	7/24/01	8/13/01	20	NDT	8/14/01	CHANGED F2 PAIR		
7704971342	7/16/01	8/13/01	28	NDT	8/14/01	PAIR CHANGED		
6783544365	6/29/01	8/13/01	45	NDT	8/14/01	REPLACED CARD AND BURIED LINE		
6783800687	6/23/01	8/13/01	51	NDT	8/14/01	DOGS ATE WIRE WATER DAMAGE		
7708982507	6/23/01	8/13/01	51	NDT	8/14/01	REPAIRED CABLE PAIR		
7704360184	6/12/01	8/13/01	62	NDT	8/14/01	NETWORK TROUBLE WIRE REPAIR		
7707488360	8/7/01	8/10/01	3	NDT	8/15/01	NO TROUBLE FOUND LINE OK TO DMARK		
7706313138	8/3/01	8/10/01	7	NDT	8/15/01	REPAIRED CABLE		
6783090772	5/29/01	8/11/01	74	NDT	8/15/01	LINE OK AT THE NID	9/17/01	37
4045211083	7/18/01	8/12/01	25	NDT	8/15/01	PAIR CHANGED		
7703873164	6/30/01	8/12/01	43	NDT	8/15/01	FRAME HARDWARE		
7704556010	8/9/01	8/13/01	4	NDT	8/15/01	TESTED SHORT CPE DID NOT DISPATCH		
7709638773	8/9/01	8/13/01	4	NDT	8/15/01	SLICK WAS DOWN AND REPAIRED		
4047584287	8/8/01	8/13/01	5	NDT	8/15/01	ISOLATED OSW TROUBLE ON THE INSIDE		
4042968703	8/9/01	8/14/01	5	NDT	8/15/01	NO ACCESS		
7707951610	8/8/01	8/15/01	7	NDT	8/15/01	REMOVED ADSL CABLE		
6787211605	7/18/01	7/27/01	9	NDT	8/16/01	CUST NO LONGER WITH MCI	8/8/01	12
7709797647	8/11/01	8/15/01	4	NDT	8/16/01	SERVICE ORDER ACTIVITY		
4045860010	8/8/01	8/15/01	7	NDT	8/16/01	NO TROUBLE FOUND LINE OK		
7703947143	7/18/01	7/27/01	9	NDT	8/17/01	NO TROUBLE FOUND LINE OK TO NID		
6783544365	6/27/01	7/28/01	31	NDT	8/17/01	NETWORK TERMINATING WIRE		
6784504509	8/1/01	8/10/01	9	NDT	8/17/01	CHANGED CO EQUIPMENT		
7709491296	8/7/01	8/14/01	7	NDT	8/17/01	NO LONGER WITH MCI CUST HAS MIGRATED	8/16/01	2
7708138216	8/11/01	8/15/01	4	NDT	8/17/01	AERIAL DROP WIRE		
4042895532	8/14/01	8/16/01	2	NDT	8/17/01	TEST OK SEND GOOD FIX		
6784219674	8/14/01	8/16/01	2	NDT	8/17/01	FIXED CROSS JUMPER		
7709221493	6/8/01	8/17/01	70	NDT	8/17/01	NO LONGER WITH MCI	8/20/01	3
7703861253	8/10/01	8/17/01	7	NDT	8/17/01	REPAIRED CUT BURY SERVICE WIRE		
7709490868	8/1/01	8/17/01	16	NDT	8/17/01	TROW BEING MADE TO NEW LIGHT		
4046222375	7/21/01	8/17/01	27	NDT	8/17/01	TROUBLE OK OUT		

TELEPHONE NUMBER	MIGRATION COMPLETE	TROUBLE REPORTED	DAYS FROM MIGRATION	TROUBLE REASON	TROUBLE CLOSED	CLOSURE INFORMATION	DATE LLN RECEIVED	DAYS BETWEEN TROUBLE AND LLN
7705077987	7/21/01	8/17/01	27	NDT	8/17/01	CPE WIRING		
7707255904	7/8/01	8/17/01	40	NDT	8/17/01	ISOLATED TO CPE		
7702798148	7/6/01	8/17/01	42	NDT	8/17/01	AT&T BURY SERVICE WIRE		
4047680477	6/25/01	8/17/01	53	NDT	8/17/01	CAME CLEAR TEST OK		
7709711444	6/21/01	8/17/01	57	NDT	8/17/01	GOOD TO DMARK		
6783423673	6/5/01	8/17/01	73	NDT	8/17/01	REPLACED BURY SERVICE WIRE		
7709922309	8/14/01	8/16/01	2	NDT	8/18/01	BURIED TFBC EAST BANK DR		
7704121193	8/13/01	8/17/01	4	NDT	8/18/01	ISW TROUBLE		
4046709591	7/30/01	8/17/01	18	NDT	8/18/01	AERIAL PAIR FIXED		
6784610105	6/29/01	8/17/01	49	NDT	8/18/01	TICKET EXCLUDED FOUND OK		
4042091534	6/26/01	8/17/01	52	NDT	8/18/01	REPLACED CARBON PROTECTOR AT THE TERMINAL		
4046350649	6/11/01	8/17/01	67	NDT	8/18/01	TEST OK		
7709719127	8/14/01	8/18/01	4	NDT	8/18/01	F1 PAIR REPAIRED		
4042550484	7/26/01	8/18/01	23	NDT	8/18/01	REPAIRED JUMPER WIRE IN CROSS BOX		
7705695235	7/12/01	8/18/01	37	NDT	8/18/01	REPROVISION A UNIT		
7705219856	6/11/01	8/17/01	67	NDT	8/19/01	REPAIRED BURY SERVICE WIRE FIVE YARDS		
4042990643	6/19/01	8/18/01	60	NDT	8/19/01	PAIR CHANGED	8/22/01	4
7709948726	8/8/01	8/18/01	10	NDT	8/19/01	REPLACED AERIAL SERVICE WIRE		
6783544365	6/27/01	8/18/01	52	NDT	8/19/01	REPLACED BAD RT CHANNEL UNIT		
7705021789	6/21/01	8/18/01	58	NDT	8/19/01	DIAL TONE GOOD TO THE NID		
7707875728	6/21/01	8/18/01	58	NDT	8/19/01	VANDALIZM DROP WIRE CUT		
7703381281	5/19/01	8/18/01	91	NDT	8/19/01	FIXED TWO CUT SERVICE WIRES		
4046277316	6/28/01	8/19/01	52	NDT	8/19/01	NO TROUBLE FOUND		
7704121244	7/25/01	8/8/01	14	NDT	8/20/01	CHANGED AERIAL PAIR	8/17/01	9
4042410498	6/28/01	8/12/01	45	NDT	8/20/01	CHANGED F2		
7703587051	7/6/01	8/17/01	42	NDT	8/20/01	TERMINAL		
7705924739	7/5/01	8/17/01	43	NDT	8/20/01	DIAL TONE GOOD TO DMARK		
7708300483	7/24/01	8/18/01	25	NDT	8/20/01	CABLE PAIR		
7708544965	7/17/01	8/18/01	32	NDT	8/20/01	REPAIRED BURY SERVICE WIRE		
6783423248	7/16/01	8/18/01	33	NDT	8/20/01	REPLACED BURY SERVICE WIRE		
7707457541	6/29/01	8/18/01	50	NDT	8/20/01	TROUBLE GOOD TO PROTECTOR		
7707771171	6/23/01	8/18/01	56	NDT	8/20/01	NO TROUBLE FOUND OK TO DMARK		
7706033036	6/14/01	8/18/01	65	NDT	8/20/01	NO TROUBLE FOUND		
7702517636	8/15/01	8/19/01	4	NDT	8/20/01	NO TROUBLE FOUND		
7709192231	8/12/01	8/19/01	7	NDT	8/20/01	REPLACED DEFECTIVE CHANNEL UNIT		
6784219674	8/10/01	8/19/01	9	NDT	8/20/01	TERM WIRE HAD OPEN ON TERM WIRES ON ONE SIDE		
4046078429	7/31/01	8/19/01	19	NDT	8/20/01	SHORT GOING INSIDE		
7707457298	7/20/01	8/19/01	30	NDT	8/20/01	DIAL TONE GOOD TO THE NID SHORT GOING IN		
7709685648	6/29/01	8/19/01	51	NDT	8/20/01	DIAL TONE GOOD TO DMARK TROUBLE ISW		
4042410498	6/28/01	8/19/01	52	NDT	8/20/01	AERIAL PAIR CHANGED		
7704715714	6/26/01	8/19/01	54	NDT	8/20/01	CPE TROUBLE		
7703233160	7/30/01	8/20/01	21	NDT	8/20/01	GOOD TO DMARK	7/18/01	-33
4048170877	8/16/01	8/20/01	4	NDT	8/20/01	REWIRED MISSING JUMPER		
7704246440	8/14/01	8/20/01	6	NDT	8/20/01	DIAL TONE GOOD TO THE NID		
4046339592	8/12/01	8/20/01	8	NDT	8/20/01	CENTRAL OFFICE OE FIXED		
4046917937	8/10/01	8/20/01	10	NDT	8/20/01	TERMINAL		
6785746236	8/9/01	8/20/01	11	NDT	8/20/01	AERIAL DROP WIRE		
7709923666	8/9/01	8/20/01	11	NDT	8/20/01	NO TROUBLE FOUND		
4047928134	8/2/01	8/20/01	18	NDT	8/20/01	CENTRAL OFFICE TROUBLE		
6784321723	6/4/01	8/20/01	77	NDT	8/20/01	REPAIRED CUT SERVICE WIRE		
7709171082	6/1/01	8/20/01	80	NDT	8/20/01	BURY SERVICE WIRE RETERMINATED		
7709670839	6/22/01	8/9/01	48	NDT	8/21/01	CUST NO LONGER WITH MCI	8/10/01	1
7704431446	8/15/01	8/20/01	5	NDT	8/21/01	PAIR TRANSFER		
4042895532	8/14/01	8/20/01	6	NDT	8/21/01	REPAIRED CROSS BOX		
7707886458	8/9/01	8/20/01	11	NDT	8/21/01	FOUND OK IN CO		

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6785651780	8/6/01	8/20/01	14	NDT	8/21/01	CPE TROUBLE		
6784177148	8/5/01	8/20/01	15	NDT	8/21/01	CROSS CONNECT REPAIRED		
7709829116	7/30/01	8/20/01	21	NDT	8/21/01	BAD ROUTE CARD		
7705671156	7/26/01	8/20/01	25	NDT	8/21/01	JUMPER IN CROSS BOX REPAIRED		
6785133718	7/13/01	8/20/01	38	NDT	8/21/01	COMPLEX TRANSLATION PROBLEM		
7705933046	7/10/01	8/20/01	41	NDT	8/21/01	NO TROUBLE FOUND		
7702513108	7/6/01	8/20/01	45	NDT	8/21/01	LINE OK NO AUTHORIZATION FOR DPO		
7708140970	6/29/01	8/20/01	52	NDT	8/21/01	DIAL TONE GOOD TO THE NID		
7708894976	6/7/01	8/20/01	74	NDT	8/21/01	FOUND OK OUT		
7704440553	7/3/01	8/21/01	49	NDT	8/21/01	CUSTOMER NO LONGER WITH MCI	8/21/01	0
7709922309	8/16/01	8/21/01	5	NDT	8/21/01	REPAIRED NETWORK TERM WIRE		
7705138737	8/15/01	8/21/01	6	NDT	8/21/01	NO TROUBLE FOUND TO NID		
7704369234	8/4/01	8/21/01	17	NDT	8/21/01	REPLACED RT CHANNEL UNIT		
7704380575	7/27/01	8/21/01	25	NDT	8/21/01	FOUND OK IN CO		
7706911414	7/20/01	8/21/01	32	NDT	8/21/01	NO LONGER WITN MCI MIGRATED TO BSO		
7709393872	7/11/01	8/21/01	41	NDT	8/21/01	REPAIRED CROSS CONNECTION DIAL TONE RESTORED		
6784610105	6/29/01	8/21/01	53	NDT	8/21/01	FOUND OK		
7703854951	6/18/01	8/21/01	64	NDT	8/21/01	AERIAL SERVICE WIRE		
7707613827	6/4/01	8/21/01	78	NDT	8/21/01	TEST OK PER SUBJECT		
7707880196	5/16/01	8/21/01	97	NDT	8/21/01	DIAL TONE GOOD TO NID		
7709440135	8/16/01	8/20/01	4	NDT	8/22/01	ISW TROUBLE		
4043503393	6/19/01	8/20/01	62	NDT	8/22/01	LINE OK		
7703812342	8/16/01	8/21/01	5	NDT	8/22/01	REPLACED NETWORK TERMINAL WIRE		
7709523305	8/15/01	8/21/01	6	NDT	8/22/01	GOOD TO PEDESTAL		
4048151317	8/13/01	8/21/01	8	NDT	8/22/01	PAIR CHANGED		
6783648664	8/9/01	8/21/01	12	NDT	8/22/01	SPLICE CABLE REPAIRED		
6787310169	8/9/01	8/21/01	12	NDT	8/22/01	NETWORK TROUBLE		
7709728670	8/2/01	8/21/01	19	NDT	8/22/01	BURY SERVICE WIRE		
7709609220	7/28/01	8/21/01	24	NDT	8/22/01	CABLE PAIR		
4042886516	7/27/01	8/21/01	25	NDT	8/22/01	INSTALLER AERIAL SERVICE WIRE		
6785679667	7/27/01	8/21/01	25	NDT	8/22/01	REMOVED DANTE FROM FRAME AND REPLACED FIBERCASE		
4046963017	7/6/01	8/21/01	46	NDT	8/22/01	NO TROUBLE FOUND		
7708190330	6/21/01	8/21/01	61	NDT	8/22/01	SPLICE CABLE REPAIRED		
4047586064	6/11/01	8/21/01	71	NDT	8/22/01	NO LONGER WITH MCI		
7704319856	8/7/01	8/22/01	15	NDT	8/22/01	LINE OK NO TROUBLE FOUND	8/24/01	2
7704757936	8/11/01	8/22/01	11	NDT	8/22/01	CABLE PAIR		
7709280779	8/9/01	8/22/01	13	NDT	8/22/01	BURY SERVICE WIRE		
4046369948	8/7/01	8/22/01	15	NDT	8/22/01	TERMINAL		
4042970803	8/3/01	8/22/01	19	NDT	8/22/01	NO LONGER WITH MCI MIGRATED TO BSO		
7703815789	8/2/01	8/22/01	20	NDT	8/22/01	TICKET CANCELED DIAL TONE RESTORED		
7709717486	8/1/01	8/22/01	21	NDT	8/22/01	JUMPER MISSING IN CROSS BOX		
7704751341	7/16/01	8/22/01	37	NDT	8/22/01	REPAIRED A CABLE		
6783636651	7/10/01	8/22/01	43	NDT	8/22/01	PAIR CHANGED		
7707720470	6/4/01	8/22/01	79	NDT	8/22/01	F1 DAMAGED IN CUT		
7709653521	6/1/01	8/22/01	82	NDT	8/22/01	COMMON EQUIPMENT SERVICE CIRCUIT RT REPAIRED		
4043529875	8/20/01	8/20/01	0	NDT	8/23/01	PAIR CHANGED		
4042922932	6/21/01	8/21/01	61	NDT	8/23/01	NO TROUBLE FOUND		
7704494654	8/21/01	8/22/01	1	NDT	8/23/01	CABLE AT CROSS CONNECTION REPLACED		
7705926458	8/18/01	8/22/01	4	NDT	8/23/01	REPLACED EBN		
7706318324	8/13/01	8/22/01	9	NDT	8/23/01	ENCLOSED BURY SERVICE WIRE		
7702799520	8/9/01	8/22/01	13	NDT	8/23/01	REPAIRED BURY SERVICE WIRE		
6784454620	8/2/01	8/22/01	20	NDT	8/23/01	TICKET EXCLUDED ADDRESS CORRECTION REQUESTED		
4044179571	7/28/01	8/22/01	25	NDT	8/23/01	OUTSIDE WIRE		
7709726884	7/24/01	8/22/01	29	NDT	8/23/01	NETWORK TERMINATIONS		
7704981422	6/23/01	8/22/01	60	NDT	8/23/01	CPE TROUBLE		

SYS TELEPHONE NUMBER	MIGRATION COMPLETE	TROUBLE REPORTED	DAYS FROM MIGRATION	TROUBLE REASON	TROUBLE CLOSED	CLOSURE INFORMATION	DATE LLN RECEIVED	DAYS BETWEEN TROUBLE AND LLN
4043552830	6/19/01	8/22/01	64	NDT	8/23/01	REPLACED THE JUMPER		
7706140001	6/5/01	8/22/01	78	NDT	8/23/01	REPLACED CHANNEL UNIT		
7709650622	6/4/01	8/22/01	79	NDT	8/23/01	LINE OK NO TROUBLE FOUND		
7706498561	6/5/01	8/23/01	79	NDT	8/23/01	NO LONGER WITH MCI	9/6/01	14
7705051347	8/22/01	8/23/01	1	NDT	8/23/01	TEST OK OUT		
7708363261	8/22/01	8/23/01	1	NDT	8/23/01	TESTED ISW TROUBLE		
4043557587	8/16/01	8/23/01	7	NDT	8/23/01	CORRECTED ON THE FRAME NOT WIRED CORRECLY		
7705943378	8/15/01	8/23/01	8	NDT	8/23/01	AERIAL DROP WIRE		
7709912829	8/15/01	8/23/01	8	NDT	8/23/01	AERIAL DROP WIRE		
7707395609	8/1/01	8/23/01	22	NDT	8/23/01	REPLACED DOWN CABLE		
7705799645	7/27/01	8/23/01	27	NDT	8/23/01	GOOD TO DMARK		
7704224742	7/26/01	8/23/01	28	NDT	8/23/01	TOOK RECORDING OF THE LINE		
7705097473	7/13/01	8/23/01	41	NDT	8/23/01	REPLACED PROTECTOR COIL AT DMARK		
4047993196	6/25/01	8/23/01	59	NDT	8/23/01	CLOSED PER CUST REQUEST		
7704360184	6/12/01	8/23/01	72	NDT	8/23/01	TEMP DROP WIRE PUT UP		
6789853973	8/2/01	8/20/01	18	NDT	8/24/01	DROP WIRE REPAIRED		
7709729303	8/8/01	8/22/01	14	NDT	8/24/01	LINE OK OUT		
7704667606	8/14/01	8/23/01	9	NDT	8/24/01	LINE OK OUT		
4046966904	8/3/01	8/23/01	20	NDT	8/24/01	REPLACED BROKEN CROSS JUMPER		
4047630306	7/27/01	8/23/01	27	NDT	8/24/01	REPAIRED SERVICE BURY WIRE		
7702333514	6/25/01	8/23/01	59	NDT	8/24/01	AERIAL DROP WIRE		
7705350070	6/25/01	8/23/01	59	NDT	8/24/01	CABLE PAIR		
7709860494	8/2/01	8/24/01	22	NDT	8/24/01	BROKEN JUMPER REPLACE		
7709111048	7/3/01	8/21/01	49	NDT	8/25/01	AERIAL DROP WIRE		
4043771838	8/22/01	8/23/01	1	NDT	8/25/01	AERIAL DROP WIRE		
7705772203	6/29/01	8/23/01	55	NDT	8/25/01	REPAIRED DROP SERVICE WIRE		
7709611048	6/25/01	8/23/01	59	NDT	8/25/01	AERIAL DROP WIRE		
7704239083	8/21/01	8/24/01	3	NDT	8/25/01	REPLACE COLE		
6785859670	8/17/01	8/24/01	7	NDT	8/25/01	CHANGE DEFECTIVE UNDERGROUND CABLE PAIR		
7704640486	8/10/01	8/24/01	14	NDT	8/25/01	CHANGE CABLE PAIR		
6788175740	7/31/01	8/24/01	24	NDT	8/25/01	OPEN F1 2 PAIR FRAME		
7702186288	7/24/01	8/24/01	31	NDT	8/25/01	BURRIED F1 PAIR		
4042887646	7/23/01	8/24/01	32	NDT	8/25/01	REPAIRED AERIAL SERIVCE WIRE		
6783766695	7/20/01	8/24/01	35	NDT	8/25/01	TEST OK AT SWTICH		
7704596795	7/17/01	8/24/01	38	NDT	8/25/01	BROKEN CABLE REPAIRED		
7702270253	7/10/01	8/24/01	45	NDT	8/25/01	BURRIED CABLE		
7705933046	7/9/01	8/24/01	46	NDT	8/25/01	REPLACE AERIOL CABLE PAIR		
7702053096	7/2/01	8/24/01	53	NDT	8/25/01	REPAIRED CUT AND BURRIED WIRE TO THE HOUSE		
7707394110	7/2/01	8/24/01	53	NDT	8/25/01	REMOVED ON DSL COIL		
7704577122	6/29/01	8/24/01	56	NDT	8/25/01	REPLACE SERV BURRIED CABLE W TEMP WIRE		
7703581427	8/21/01	8/25/01	4	NDT	8/25/01	CUST CPE		
7707857874	8/8/01	8/25/01	17	NDT	8/25/01	JACK BAD HAD TO MOVED TO NEW ONE		
7704783842	7/16/01	8/25/01	40	NDT	8/25/01	REPAIRED BURRIED SERV		
7709189081	6/26/01	8/25/01	60	NDT	8/25/01	BAD JACK CHANGE TO NEW ONE		
6789240110	6/21/01	8/25/01	65	NDT	8/25/01	INI NOT WIRE CORRECTLY		
4042480938	6/8/01	8/13/01	66	NDT	8/26/01	DIAL TONE GOOD TO THE NID		
4042862291	8/20/01	8/23/01	3	NDT	8/26/01	NO TROUBLE FOUND OK TO DMARK		
4046961096	8/10/01	8/23/01	13	NDT	8/26/01	CORSS JUMPER REPAIRED		
4042848364	7/24/01	8/25/01	32	NDT	8/26/01	CHANGE PAIR		
6784229824	7/16/01	8/25/01	40	NDT	8/26/01	LINE TEST OK		
7704600516	6/12/01	8/25/01	74	NDT	8/26/01	REPAIRED ISW		
4047586586	7/31/01	8/26/01	26	NDT	8/26/01	NO TROUBLE FOUND	9/5/01	10
6788175740	7/31/01	8/26/01	26	NDT	8/26/01	HAVE DT ON BOTH		
4047615638	7/30/01	8/26/01	27	NDT	8/26/01	REPAIRED AERIOL SERVICE WIRE		
4042563340	6/20/01	8/26/01	67	NDT	8/26/01	JUMPER MISSING WAS REPLACE		

TELEPHONE NUMBER	MIGRATION COMPLETE	TROUBLE REPORTED	DAYS FROM MIGRATION	TROUBLE REASON	TROUBLE CLOSED	CLOSURE INFORMATION	DATE LLN RECEIVED	BETWEEN TROUBLE AND LLN
6782896078	8/16/01	8/22/01	6	NDT	8/27/01	CPE TROUBLE		
7709910535	8/23/01	8/24/01	1	NDT	8/27/01	FOUND EQUITMENT TROUBLE	8/29/01	5
4043666690	8/22/01	8/25/01	3	NDT	8/27/01	AERIOL NETWORD REPAIRED	8/31/01	6
7709473423	8/24/01	8/25/01	1	NDT	8/27/01	SERVICE DENIED		
4042848364	7/24/01	8/25/01	32	NDT	8/27/01	CHANGE F2 PAIR DT OK TO NID		
7703040154	5/22/01	8/25/01	95	NDT	8/27/01	REPAIRED CABLE		
4043666690	8/22/01	8/26/01	4	NDT	8/27/01	CHANGE CABLE PAIR	8/31/01	5
7705078152	8/14/01	8/26/01	12	NDT	8/27/01	CHANGE OE DT OK		
7702298346	8/9/01	8/26/01	17	NDT	8/27/01	REPLACE ELECTRIC CROSS CONNECTOR		
7704748557	8/7/01	8/26/01	19	NDT	8/27/01	DT FOUND OK TO NID		
4047947077	7/31/01	8/26/01	26	NDT	8/27/01	TERMINATING ISW BROKEN IN JACK		
7707860618	6/20/01	8/26/01	67	NDT	8/27/01	REPLACED THE JUMPER		
7707484612	6/14/01	8/26/01	73	NDT	8/27/01	REPLACE DMARK		
7708363261	8/22/01	8/27/01	5	NDT	8/27/01	REPAIRED SERV WIRE		
4043299060	8/21/01	8/27/01	6	NDT	8/27/01	REPAIRED JUMPER		
7704324488	8/20/01	8/27/01	7	NDT	8/27/01	CUST CPE		
4042098317	8/9/01	8/27/01	18	NDT	8/27/01	REPAIRED NETWORD TERMINATED WIRE		
4046369948	8/7/01	8/27/01	20	NDT	8/27/01	CHANGE F1 AND F2 REPAIRED TERMINAL WIRE		
7703799199	7/24/01	8/27/01	34	NDT	8/27/01	TEST OK AT NID/CUST ADVICE		
7704281820	7/24/01	8/27/01	34	NDT	8/27/01	CROSS CONNECTOR WAS WRONG WIRE		
4045212981	6/29/01	8/27/01	59	NDT	8/27/01	REPLACE CUT JUMPER		
7704420168	6/14/01	8/27/01	74	NDT	8/27/01	NO INFORMATION ON ACCT/PER PATSEY		
7709431841	6/23/01	8/13/01	51	NDT	8/28/01	NO TROUBLE FOUND	8/17/01	4
9122321016	8/21/01	8/24/01	3	NDT	8/28/01	REPAIRED F2		
7705747394	8/23/01	8/25/01	2	NDT	8/28/01	SERV ORDER PENDING		
7709879694	8/13/01	8/25/01	12	NDT	8/28/01	AERIOL NETWORD REPAIRED		
7709604954	8/9/01	8/25/01	16	NDT	8/28/01	NETWORD TERMINAL WIRE WAS CROSS		
7704364345	7/2/01	8/25/01	54	NDT	8/28/01	LINE TEST OK		
4047666120	7/27/01	8/26/01	30	NDT	8/28/01	UNABLE TO FIND TK/DWAYNE/		
7702271952	8/2/01	8/27/01	25	NDT	8/28/01	TEST OK TO DMARK/ CUST ADVICE	9/6/01	10
4042888407	8/21/01	8/27/01	6	NDT	8/28/01	REPAIRED CROSS JUMPER		
7705900695	8/21/01	8/27/01	6	NDT	8/28/01	REPAIRED DEFECT CV PAIR&BURRIED WIRE		
7705136556	8/20/01	8/27/01	7	NDT	8/28/01	REPAIRED CABLE		
4047928562	8/14/01	8/27/01	13	NDT	8/28/01	REPAIRED CABLE PAIR		
7708796533	8/14/01	8/27/01	13	NDT	8/28/01	PROBLEM W/ANOTHER CARRIER		
7705833713	8/9/01	8/27/01	18	NDT	8/28/01	REPAIRED DEFECTIVED F1 CABLE		
7705319913	8/8/01	8/27/01	19	NDT	8/28/01	NO TROUBLE FOUND LINE TEST OK		
7707250696	8/3/01	8/27/01	24	NDT	8/28/01	REPLACE AERIOL CABLE PAIR		
7709418792	8/2/01	8/27/01	25	NDT	8/28/01	TEST OK TO NETWORD INTERFACE/ISW ISSUE		
7704562080	7/27/01	8/27/01	31	NDT	8/28/01	REPAIRED CABLE PAIR		
7704748324	7/25/01	8/27/01	33	NDT	8/28/01	LINE WAS OK PER CUST WHEN TECH ARRIVED		
6785746675	7/24/01	8/27/01	34	NDT	8/28/01	CHANGE DEFECTIVED F1 AND F2 PAIR		
7704761096	7/24/01	8/27/01	34	NDT	8/28/01	FOUND OK AT DMARK		
7706711792	7/24/01	8/27/01	34	NDT	8/28/01	NO ACCESS		
4042887646	7/23/01	8/27/01	35	NDT	8/28/01	CHANGE CABLE PAIR		
4046331766	7/10/01	8/27/01	48	NDT	8/28/01	CHANGE DEFECTIVED CABLE PAIR		
7707453414	7/9/01	8/27/01	49	NDT	8/28/01	CHANGE CABLE PAIR		
4042843629	7/2/01	8/27/01	56	NDT	8/28/01	REPLACE DEFECITVED WIRE		
7709650498	6/29/01	8/27/01	59	NDT	8/28/01	FOUND OK WHEN TECH CK/CAUSE BY POWER OUTAGE		
7703580633	6/26/01	8/27/01	62	NDT	8/28/01	REPAIRED AERIOL SERVICE WIRE		
4042861836	6/19/01	8/27/01	69	NDT	8/28/01	REPAIRED SERV WIRE		
6783809665	5/22/01	8/27/01	97	NDT	8/28/01	CHANGE DEFECTIVE CABLE PAIR		
7709641231	5/22/01	8/27/01	97	NDT	8/28/01	NO TROUBLE FOUND		
7704240557	8/27/01	8/28/01	1	NDT	8/28/01	REPLACE AERIOL CABLE PAIR		
7707181468	8/27/01	8/28/01	1	NDT	8/28/01	REPAIRED NETWORD TERMINATED WIRE		

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7705040985	8/24/01	8/28/01	4	NDT	8/28/01	LINE TESTED OK		
4046364107	8/21/01	8/28/01	7	NDT	8/28/01	FIXED CORROCTION AROUND THE NID		
4043038755	8/17/01	8/28/01	11	NDT	8/28/01	DLS WAS REPAIR		
7708086764	8/17/01	8/28/01	11	NDT	8/28/01	REPAIRED CUT WIRE		
4046882864	8/13/01	8/28/01	15	NDT	8/28/01	LINE TESTED OK /NO TROUBLE FOUND.		
7706078032	8/9/01	8/28/01	19	NDT	8/28/01	DT OK TO DMARK		
7704598395	8/7/01	8/28/01	21	NDT	8/28/01	D ORDER AND /N/OR PEND		
7706642764	8/6/01	8/28/01	22	NDT	8/28/01	REPLACE LOST SPEED CARD		
7705049454	7/24/01	8/28/01	35	NDT	8/28/01	REPAIRED BURIED WIRE		
4046343715	6/26/01	8/28/01	63	NDT	8/28/01	CHANGE AERIOL CABLE PAIR		
4048470406	6/12/01	8/28/01	77	NDT	8/28/01	COMMERCIAL POWER RESTORE		
7704590868	6/6/01	8/28/01	83	NDT	8/28/01	CABLE REPAIRED		
4047662149	5/24/01	8/28/01	96	NDT	8/28/01	REPAIRED AERIOL F2		
7709695287	8/14/01	8/27/01	13	NDT	8/29/01	REPAIRED AERIAL SERIVCE WIRE		
4047927314	7/26/01	8/27/01	32	NDT	8/29/01	NO ACCESS TO NID		
7704439480	8/28/01	8/28/01	0	NDT	8/29/01	HAD REPAIRED GROUND PROTECTOR		
4047921432	8/13/01	8/28/01	15	NDT	8/29/01	AERIOL NT REPAIRED		
7702287134	8/13/01	8/28/01	15	NDT	8/29/01	REPLACE CORBON AT TERMINAL		
6783648664	8/9/01	8/28/01	19	NDT	8/29/01	REPLACE CABLE/CABLE FAILURE AFTER REPAIRED COMMIT 09/04/01		
4043491842	8/8/01	8/28/01	20	NDT	8/29/01	DT OK TO DMARK		
7703685800	8/7/01	8/28/01	21	NDT	8/29/01	ISW PROBLEM		
7704248538	8/7/01	8/28/01	21	NDT	8/29/01	CABLE FAILURE		
7709440303	8/7/01	8/28/01	21	NDT	8/29/01	PAIR WAS CHANGE		
6785859739	7/24/01	8/28/01	35	NDT	8/29/01	REPLACE MISSING PROTECTOR		
7704353763	7/11/01	8/28/01	48	NDT	8/29/01	TEST PAIRS/FOUND OK		
7705021827	7/9/01	8/28/01	50	NDT	8/29/01	REPLACE AERIOL SERV PAIR		
7702541500	6/13/01	8/28/01	76	NDT	8/29/01	CUT CABLE WAS REPAIRED		
7703582598	6/8/01	8/28/01	81	NDT	8/29/01	REPAIRED CUT WIRE		
7709720873	5/22/01	8/28/01	98	NDT	8/29/01	JUMPER FIXED AT CENTRAL OFFICE		
7703040349	5/21/01	8/28/01	99	NDT	8/29/01	CUT CABLE WAS REPAIRED		
6784797612	8/28/01	8/29/01	1	NDT	8/29/01	SERV ORDER WAS DUE	8/29/01	0
7702271952	8/2/01	8/29/01	27	NDT	8/29/01	NO TROUBLE IN CENTRAL OFFICE	9/6/01	8
6784420706	8/2/01	8/29/01	27	NDT	8/29/01	FOUND OK	9/12/01	14
7708321338	8/8/01	8/29/01	21	NDT	8/29/01	FOUND OK OUTSIDE	9/22/01	24
7705933232	8/28/01	8/29/01	1	NDT	8/29/01	NO TROUBLE FOUND TEST OK		
7709298263	8/21/01	8/29/01	8	NDT	8/29/01	REPAIRED BURIED SERV WIRE		
6783631642	8/7/01	8/29/01	22	NDT	8/29/01	TESTING CPE		
7704411538	8/7/01	8/29/01	22	NDT	8/29/01	REPAIRED TERMINAL WIRE		
4046278064	7/27/01	8/29/01	33	NDT	8/29/01	CROSS BOX ISSUE		
7703946831	7/19/01	8/29/01	41	NDT	8/29/01	NO TROUBLE FOUND TEST OK		
4047922880	7/17/01	8/29/01	43	NDT	8/29/01	REPAIRED CROSS CONNECTOR		
4047947326	7/15/01	8/29/01	45	NDT	8/29/01	REPAIRED WIRE AT NETWORD INTERFACE		
7703382901	6/28/01	8/29/01	62	NDT	8/29/01	REPAIRED CABLE PAIR		
6788380129	6/26/01	8/29/01	64	NDT	8/29/01	LINE TESTED OK		
4046386218	5/23/01	8/29/01	98	NDT	8/29/01	TESTING OK. CUST CEP		
7709283716	7/28/01	8/17/01	20	NDT	8/30/01	CHANGED DEFECTIVE PAIR	9/21/01	35
7709252337	8/28/01	8/28/01	0	NDT	8/30/01	NO ACCESS	9/1/01	4
7709970371	8/27/01	8/28/01	1	NDT	8/30/01	CHANGE PAIR		
6784459476	8/23/01	8/28/01	5	NDT	8/30/01	REPAIRED AERIAL SERIVCE WIRE		
7704421311	6/12/01	8/29/01	78	NDT	8/30/01	REPAIRED BROKEN CABLE AT TERMINAL	9/18/01	20
7709179612	8/28/01	8/29/01	1	NDT	8/30/01	TEST OK WORKING AT NID		
4045340152	8/27/01	8/29/01	2	NDT	8/30/01	TEST OK PER CUST		
6783774815	8/27/01	8/29/01	2	NDT	8/30/01	REPAIRED AERIOL WIRE/TEST OK TO DMARK		
7703584994	8/22/01	8/29/01	7	NDT	8/30/01	INTERCEPTED REMOVED		
7707888861	8/22/01	8/29/01	7	NDT	8/30/01	CLEARED WHILE TESTING IT		

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7704639744	8/21/01	8/29/01	8	NDT	8/30/01	REPAIRED BURIED SERV WIRE		
7704239579	8/16/01	8/29/01	13	NDT	8/30/01	REPLACE DEFECTIVED BURIED SERV WIRE		
7709799136	8/13/01	8/29/01	16	NDT	8/30/01	REPAIRED CUT AERIOL SERV WIRE		
7709428127	8/8/01	8/29/01	21	NDT	8/30/01	REPAIRED CUT CABLE		
7704657966	8/2/01	8/29/01	27	NDT	8/30/01	SERVICE ORDER ERROR		
7709522520	7/31/01	8/29/01	29	NDT	8/30/01	TEST OK LINE CLEAR WIRE		
7705039665	7/29/01	8/29/01	31.	NDT	8/30/01	REA POWER UNIT RESET		
7705357420	7/17/01	8/29/01	43	NDT	8/30/01	REMOVED AC POWER RESET		
6783449956	7/10/01	8/29/01	50	NDT	8/30/01	CLOSED TO SERV ORDER		
7705772816	7/5/01	8/29/01	55	NDT	8/30/01	REPAIRED CUT CABLE		
7705363258	6/7/01	8/29/01	83	NDT	8/30/01	REMOVED POWER TRIP RESET IT		
7705798976	8/7/01	8/30/01	23	NDT	8/30/01	DT OK TO DMARK	9/6/01	7
7707326059	7/31/01	8/30/01	30	NDT	8/30/01	REPLACE CARBON AT TERMINAL	9/6/01	7
4042529531	8/29/01	8/30/01	1	NDT	8/30/01	CPE		
7703387539	8/29/01	8/30/01	1	NDT	8/30/01	REPLACE DEFECIVED COIL/CPE		
7706506418	8/27/01	8/30/01	3	NDT	8/30/01	TROUBLE PASS DMARK /ISW		
7703999308	8/22/01	8/30/01	8	NDT	8/30/01	CHANGE PAIR		
7705341908	8/22/01	8/30/01	8	NDT	8/30/01	RTAC POWER TRIP RESET		
7709417920	8/17/01	8/30/01	13	NDT	8/30/01	RHO NO AUTH TO DPO		
7705745616	8/9/01	8/30/01	21	NDT	8/30/01	PAST ISW INTERFACE		
7704716482	8/8/01	8/30/01	22	NDT	8/30/01	TOUCH TONE PROGRAM CORRECTLY		
4046369948	8/7/01	8/30/01	23	NDT	8/30/01	REPAIRED NETWORD TERMINATED WIRE		
4046344592	7/17/01	8/30/01	44	NDT	8/30/01	REFFERED TO CHARLETTE VIA FAX.PER CYNTHIA		
4043211446	7/11/01	8/30/01	50	NDT	8/30/01	REWIRED AT NID		
6784826520	7/3/01	8/30/01	58	NDT	8/30/01	FOUND OK CUST CPE		
7709690750	7/26/01	8/17/01	22	NDT	8/31/01	BURY SERVICE WIRE		
6784456952	7/23/01	8/19/01	27	NDT	8/31/01	BURY SERVICE WIRE REPAIRED		
7708360681	8/22/01	8/29/01	7	NDT	8/31/01	NO INFORMATION ON TK PER/ERONE		
7703581448	8/21/01	8/29/01	8	NDT	8/31/01	REPAIRED BURIED SERV WIRE		
4046333198	8/6/01	8/29/01	23	NDT	8/31/01	REPAIRED BURIED SERVICE WIRE		
7704633904	7/31/01	8/29/01	29	NDT	8/31/01	FIVER IN CABLES		
7709190661	7/10/01	8/29/01	50	NDT	8/31/01	TK OPEN DUETO CABLE FAILURE		
7709493138	7/6/01	8/29/01	54	NDT	8/31/01	REPAIRED CUT CABLE		
4047622912	8/29/01	8/30/01	1	NDT	8/31/01	NO ACCESS		
6789249322	8/28/01	8/30/01	2	NDT	8/31/01	CROSS JUMPER IN BURIED CABLE		
7704983879	8/27/01	8/30/01	3	NDT	8/31/01	LINE TESTED OK		
6784219871	8/21/01	8/30/01	9	NDT	8/31/01	REPAIRED CUT FIBER		
4047587647	8/17/01	8/30/01	13	NDT	8/31/01	REPLACE BROKEN JUMPER AT CROSS BOX		
7702420612	8/15/01	8/30/01	15	NDT	8/31/01	PAIR WAS CHANGE		
7706199449	8/10/01	8/30/01	20	NDT	8/31/01	REPAIRED CUT JUMPER IN BOX		
6782890831	8/7/01	8/30/01	23	NDT	8/31/01	DT OK TO DMARK		
7703227616	8/7/01	8/30/01	23	NDT	8/31/01	REPAIRED CUT FIBER		
7705996196	7/26/01	8/30/01	35	NDT	8/31/01	REPALCED A JACK		
7706070389	7/16/01	8/30/01	45	NDT	8/31/01	DAMAGE INSIDE WIRE REPAIRED		
7705373212	7/11/01	8/30/01	50	NDT	8/31/01	REPAIRED B F2		
7702283957	7/10/01	8/30/01	51	NDT	8/31/01	REPLACE SERVICE AERIOL WIRE		
7704833982	7/10/01	8/30/01	51	NDT	8/31/01	REPLACE CORRUCTED CABLE		
4042374580	7/5/01	8/30/01	56	NDT	8/31/01	CROSS CONNECTION FRAME		
7702271021	5/25/01	8/30/01	97	NDT	8/31/01	RESPLICED A P2		
7704130838	5/22/01	8/30/01	100	NDT	8/31/01	CHANGED CABLE PAIR		
6785467827	7/24/01	8/31/01	38	NDT	8/31/01	CABLE PAIR	9/20/01	20
7708979944	8/31/01	8/31/01	0	NDT	8/31/01	NO TROUBLE FOUND		
6785466269	8/20/01	8/31/01	11	NDT	8/31/01	FIBER CUT UNDER CONSTRUCION		
7709469652	8/15/01	8/31/01	16	NDT	8/31/01	CABLE FRAME		
4042949859	8/8/01	8/31/01	23	NDT	8/31/01	FOUND OK IN AT THE CO		

TELEPHONE NUMBER	MIGRATION COMPLETE	TROUBLE REPORTED	DAYS FROM MIGRATION	TROUBLE REASON	TROUBLE CLOSED	CLOSURE INFORMATION	DATE LLN RECEIVED	DAYS BETWEEN TROUBLE AND LLN
6784821855	8/8/01	8/31/01	23	NDT	8/31/01	REPAIRED CUT FIBER		
7708315854	8/8/01	8/31/01	23	NDT	8/31/01	FIBER CUT CAUSED PROBLEM		
7703855702	8/4/01	8/31/01	27	NDT	8/31/01	CABLE PAIR REPAIRED		
7706689015	7/27/01	8/31/01	35	NDT	8/31/01	NO TICKET FOUND		
7707868742	7/15/01	8/31/01	47	NDT	8/31/01	CPE ISW TROUBLE		
7704743584	6/25/01	8/31/01	67	NDT	8/31/01	AERIAL DROP WIRE		
4047650295	6/22/01	8/31/01	70	NDT	8/31/01	REPLACED F2 SPLICE PAIR		
6787950594	6/2/01	8/31/01	90	NDT	8/31/01	CUT DROP REPAIRED		
6783760366	6/18/01	7/31/01	43	NDT	9/1/01	DIAL TONE GOOD TO THE NID		
7705050978	8/3/01	8/30/01	27	NDT	9/1/01	REPAIRED DEFECTIVE CABLE PAIR		
4047528985	7/24/01	8/30/01	37	NDT	9/1/01	TROUBLE TOWARDS STN NO ACCESS		
7709878251	8/20/01	8/31/01	11	NDT	9/1/01	AERIAL DROP WIRE		
6784187317	8/10/01	8/31/01	21	NDT	9/1/01	REPAIRED CUT CABLE PAIR		
7706147559	8/10/01	8/31/01	21	NDT	9/1/01	ISW TROUBLE		
4045597852	8/8/01	8/31/01	23	NDT	9/1/01	REPAIRED OUTSIDE NETWORK INTERFACE		
7705833713	8/7/01	8/31/01	24	NDT	9/1/01	CHANGED BF1		
6782890831	8/3/01	8/31/01	28	NDT	9/1/01	REPAIRED ISW		
6783445300	8/3/01	8/31/01	28	NDT	9/1/01	ILEC FIXED WIRE		
6784189411	7/27/01	8/31/01	35	NDT	9/1/01	CAME CLEAR		
6784744745	7/25/01	8/31/01	37	NDT	9/1/01	DEFECTIVE CARD AT THE CENTRAL OFFICE		
7704668398	7/21/01	8/31/01	41	NDT	9/1/01	SET NOT PLUGGED IN		
7706031969	7/15/01	8/31/01	47	NDT	9/1/01	DIAL TONE RESTORED		
7704737889	7/13/01	8/31/01	49	NDT	9/1/01	REPAIRED TERMINATING WIRE		
7702711592	7/12/01	8/31/01	50	NDT	9/1/01	REPAIRED BY CONSTRUCION CREW BY OUTSIDE PERSON		
4048880753	6/10/01	8/31/01	82	NDT	9/1/01	CHANGED AERIAL F1		
7709463649	6/7/01	8/31/01	85	NDT	9/1/01	CHANGED CABLE PAIR		
7709451863	6/4/01	8/31/01	88	NDT	9/1/01	CUT CABLE DUE TO CONSTRUCION		
6785460858	6/2/01	8/31/01	90	NDT	9/1/01	REPAIRED BY CONSTRUCION CREW BY OUTSIDE PERSON		
7707071863	6/1/01	8/31/01	91	NDT	9/1/01	NO TROUBLE FOUND		
6785460158	5/16/01	8/31/01	107	NDT	9/1/01	REPAIRED BY CONSTRUCION CREW BY OUTSIDE PERSON		
4047629126	8/26/01	9/1/01	6	NDT	9/1/01	AERIAL DROP WIRE	9/18/01	17
6789379466	8/31/01	9/1/01	1	NDT	9/1/01	BURIED SERVICE WIRE, GROUNDED AND REPLACED		
7708363261	8/22/01	9/1/01	10	NDT	9/1/01	NO TROUBLE FOUND		
6789850457	8/20/01	9/1/01	12	NDT	9/1/01	REPLACED CHANNEL UNIT		
6789850457	8/20/01	9/1/01	12	NDT	9/1/01	REPLACED CHANNEL UNIT		
7708987825	8/20/01	9/1/01	12	NDT	9/1/01	NO TICKET FOUND		
7704127157	7/30/01	9/1/01	33	NDT	9/1/01	FOUND OK		
7704127157	7/30/01	9/1/01	33	NDT	9/1/01	FOUND OK		
7708449150	7/17/01	9/1/01	46	NDT	9/1/01	DISCONNECTED NUMBER		
7705399195	8/27/01	8/30/01	3	NDT	9/2/01	REPAIRED AERIAL SERVICE WIRE		
7707070938	8/18/01	9/1/01	14	NDT	9/2/01	LINE OK NO TROUBLE FOUND	9/5/01	4
7704317490	8/24/01	9/1/01	8	NDT	9/2/01	GOOD TO THE NID		
7704317490	8/24/01	9/1/01	8	NDT	9/2/01	GOOD TO THE NID		
4042419898	8/21/01	9/1/01	11	NDT	9/2/01	REPLACED AN AERIAL SERVICE WIRE THAT WAS TORN DOWN BY A TREE LIMB		
4042419898	8/21/01	9/1/01	11	NDT	9/2/01	REPLACED AN AERIAL SERVICE WIRE THAT WAS TORN DOWN BY A TREE LIMB		
6782779534	8/20/01	9/1/01	12	NDT	9/2/01	LINE CAME CLEAR		
6782779534	8/20/01	9/1/01	12	NDT	9/2/01	LINE CAME CLEAR		
7705347797	8/16/01	9/1/01	16	NDT	9/2/01	DEFECTIVE ALARM DIALER		
7705347797	8/16/01	9/1/01	16	NDT	9/2/01	DEFECTIVE ALARM DIALER		
7709342662	7/27/01	9/1/01	36	NDT	9/2/01	ISOLATED TROUBLE TO CPE		
6788175986	7/23/01	9/1/01	40	NDT	9/2/01	ISOLATED TO CPE		
7709190661	7/6/01	9/1/01	57	NDT	9/2/01	OPEN IN RESPLICED CROSS BOX		
7709190661	7/6/01	9/1/01	57	NDT	9/2/01	OPEN IN RESPLICED CROSS BOX		
4048799627	8/15/01	9/2/01	18	NDT	9/2/01	CPE TROUBLE		
6785130444	8/3/01	9/2/01	30	NDT	9/2/01	CAME CLEAR WHILE TESTING THE LINE		

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6784500263	8/26/01	9/1/01	6	NDT	9/3/01	REPAIRED NID		
4047940351	8/25/01	9/1/01	7	NDT	9/3/01	TICKET EXCLUDED NO WIRE TAP		
7706842569	8/20/01	9/1/01	12	NDT	9/3/01	LINE OK NO TROUBLE FOUND		
7706842569	8/20/01	9/1/01	12	NDT	9/3/01	LINE OK NO TROUBLE FOUND		
7702525529	8/2/01	9/2/01	31	NDT	9/3/01	REPAIRED F2 CABLE	9/4/01	2
4045349033	8/16/01	9/2/01	17	NDT	9/3/01	PAIR CHANGE		
4042985087	7/17/01	9/2/01	47	NDT	9/3/01	NO TROUBLE FOUND		
4042985087	7/17/01	9/2/01	47	NDT	9/3/01	NO TROUBLE FOUND		
7707179969	7/12/01	9/2/01	52	NDT	9/3/01	SHORTING OUT CPE TROUBLE		
6783633768	6/28/01	9/2/01	66	NDT	9/3/01	TEST CPE TROUBLE		
4045221685	6/20/01	9/2/01	74	NDT	9/3/01	CHANGED AERIAL CONNECTION CABLE		
4048743666	7/31/01	9/3/01	34	NDT	9/3/01	NO ACCESS	9/18/01	15
7705040985	8/21/01	9/3/01	13	NDT	9/3/01	LINE CAME CLEAR		
6787214323	8/20/01	9/3/01	14	NDT	9/3/01	AERIAL DROP WIRE		
7709874426	8/2/01	9/3/01	32	NDT	9/3/01	DIAL TONE GOOD TO DMARC		
7709874426	8/2/01	9/3/01	32	NDT	9/3/01	DIAL TONE GOOD TO DMARC		
4043700786	6/15/01	9/3/01	80	NDT	9/3/01	REPAIRED SHORT JUMPER		
7703393076	6/6/01	9/3/01	89	NDT	9/3/01	CPE TROUBLE		
4047622912	8/22/01	8/31/01	9	NDT	9/4/01	REPLACED A CROSS CONNECTION		
7709727839	7/17/01	8/31/01	45	NDT	9/4/01	TEST OK TROUBLE CAME CLEAR		
7704435281	8/23/01	9/1/01	9	NDT	9/4/01	AERIAL DROP WIRE		
4049958437	7/9/01	9/1/01	54	NDT	9/4/01	ISW PROBLEM		
4046224574	8/3/01	9/2/01	30	NDT	9/4/01	SERVICE ORDER DENYING SERVICE DATED 8/18/01		
4046363388	8/1/01	9/2/01	32	NDT	9/4/01	BAD PHONE CARD		
7707395095	6/23/01	9/2/01	71	NDT	9/4/01	CABLE PAIR TRANSFER		
7707395095	6/23/01	9/2/01	71	NDT	9/4/01	CABLE PAIR TRANSFER		
7706070053	8/27/01	9/3/01	7	NDT	9/4/01	TEST OK NO TROUBLE FOUND		
7706845865	8/27/01	9/3/01	7	NDT	9/4/01	NO TICKET FOUND		
7706845865	8/27/01	9/3/01	7	NDT	9/4/01	NO TICKET FOUND		
4043038755	8/15/01	9/3/01	19	NDT	9/4/01	REPLACED MISSING JUMPER ON THE FRAME		
7703826110	7/13/01	9/3/01	52	NDT	9/4/01	LINE OK OUT		
6784940489	7/6/01	9/3/01	59	NDT	9/4/01	AERIAL DROP WIRE		
7705345733	6/16/01	9/3/01	79	NDT	9/4/01	BURY CABLE REPAIRED		
7705345733	6/16/01	9/3/01	79	NDT	9/4/01	BURY CABLE REPAIRED		
7709743361	6/8/01	9/3/01	87	NDT	9/4/01	AERIAL CABLE REPAIRED		
7707457871	8/9/01	9/4/01	26	NDT	9/4/01	DIAL TONE GOOD TO THE DMARC	9/20/01	16
4042861670	9/4/01	9/4/01	0	NDT	9/4/01	TERMINAL REPAIRED		
4042861670	9/4/01	9/4/01	0	NDT	9/4/01	TERMINAL REPAIRED		
4046964757	8/29/01	9/4/01	6	NDT	9/4/01	NO ACCESS		
7704329315	8/26/01	9/4/01	9	NDT	9/4/01	WIRE WORNG AT THE NID AND CORRECTED		
4046819657	8/24/01	9/4/01	11	NDT	9/4/01	REPLACED BROKEN BOX JUMPER		
4042625885	8/22/01	9/4/01	13	NDT	9/4/01	ISW TROUBLE DUE TO CPE		
4042625885	8/22/01	9/4/01	13	NDT	9/4/01	ISW TROUBLE DUE TO CPE		
7704289813	8/20/01	9/4/01	15	NDT	9/4/01	DIAL TONE GOOD TO NID REPARED VSM		
7709097681	8/20/01	9/4/01	15	NDT	9/4/01	NO TROUBLE FOUND LINE OK		
7702534756	8/14/01	9/4/01	21	NDT	9/4/01	ISW REPLACED		
4047631758	8/10/01	9/4/01	25	NDT	9/4/01	CABLE PAIR TRANSFER		
4043151242	8/7/01	9/4/01	28	NDT	9/4/01	EXCLUDED DUE TO THE TEST OK POSSIBLE IW OR CPE		
4045845009	8/5/01	9/4/01	30	NDT	9/4/01	BAD RINGER ON THE CUSTOMERS PHONE		
7705174525	8/1/01	9/4/01	34	NDT	9/4/01	CLEARED CROSS IN CABLE		
7705174525	8/1/01	9/4/01	34	NDT	9/4/01	CLEARED CROSS IN CABLE		
7709179486	7/27/01	9/4/01	39	NDT	9/4/01	GOOD TO THE NID		
7709179486	7/27/01	9/4/01	39	NDT	9/4/01	GOOD TO THE NID		
7705917641	7/20/01	9/4/01	46	NDT	9/4/01	DUE TO F2 CABLE PROBLEM		
7705296620	7/17/01	9/4/01	49	NDT	9/4/01	TEST OK WORKING AT THE NID		

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4047533664	7/2/01	9/4/01	64	NDT	9/4/01	BUREID DROP WIRE		
7704583783	6/23/01	9/4/01	73	NDT	9/4/01	DIAL TONE GOOD TO DMARC		
7704583783	6/23/01	9/4/01	73	NDT	9/4/01	DIAL TONE GOOD TO DMARC		
7708342339	6/21/01	9/4/01	75	NDT	9/4/01	FOUND OK CAME CLEAR		
7702540244	5/14/01	9/4/01	113	NDT	9/4/01	DIAL TONE GOOD TO NID		
7709743079	6/14/01	8/8/01	55	NDT	9/5/01	CLOSED DUE TO ACCOUNT CANCELLED		
4042414461	8/15/01	9/1/01	17	NDT	9/5/01	EXCLUDED TROUBLE TO THE SERVICE ORDER		
4042414461	8/15/01	9/1/01	17	NDT	9/5/01	EXCLUDED TROUBLE TO THE SERVICE ORDER		
7709432051	8/23/01	9/3/01	11	NDT	9/5/01	CROSSBOX REPAIRED		
7709432051	8/23/01	9/3/01	11	NDT	9/5/01	CROSSBOX REPAIRED		
7703815045	8/6/01	9/3/01	28	NDT	9/5/01	WIRE REPAIRED		
7703190713	6/8/01	9/3/01	87	NDT	9/5/01	CABLE PAIR TRANSFER		
7708979146	9/5/01	9/4/01	-1	NDT	9/5/01	WIRE TROUBLE REPAIRED		
7704639024	8/28/01	9/4/01	7	NDT	9/5/01	INSIDE WIRE TROUBLE		
4046343409	8/23/01	9/4/01	12	NDT	9/5/01	PAIR RECONSTRUCTED		
7709094565	8/20/01	9/4/01	15	NDT	9/5/01	DIAL TONE GOOD TO DMARC		
7709094565	8/20/01	9/4/01	15	NDT	9/5/01	DIAL TONE GOOD TO DMARC		
4042867162	8/15/01	9/4/01	20	NDT	9/5/01	CPE BAD PHONE		
4042867162	8/15/01	9/4/01	20	NDT	9/5/01	CPE BAD PHONE		
4046699497	8/9/01	9/4/01	26	NDT	9/5/01	REMOVED ALARM CAUSING PROBLEM		
7705908234	8/9/01	9/4/01	26	NDT	9/5/01	PAIR CHANGE		
7705908234	8/9/01	9/4/01	26	NDT	9/5/01	PAIR CHANGE		
7704716482	8/8/01	9/4/01	27	NDT	9/5/01	LINE OK		
6784829757	8/6/01	9/4/01	29	NDT	9/5/01	DIAL TONE GOOD TO THE NID		
7703239430	8/2/01	9/4/01	33	NDT	9/5/01	REPLACED BROKEN JUMPER AT THE CROSS BOX		
4043254133	7/30/01	9/4/01	36	NDT	9/5/01	AERIAL DROP WIRE		
6785130117	7/18/01	9/4/01	48	NDT	9/5/01	ISW TROUBLE		
7709684201	6/27/01	9/4/01	69	NDT	9/5/01	DIAL TONE DMARC ISW TROUBLE		
7709684201	6/27/01	9/4/01	69	NDT	9/5/01	DIAL TONE DMARC ISW TROUBLE		
7709811904	6/19/01	9/4/01	77	NDT	9/5/01	INSIDE WIRE WAS GROUNDED		
7709811904	6/19/01	9/4/01	77	NDT	9/5/01	INSIDE WIRE WAS GROUNDED		
7707920091	8/26/01	9/5/01	10	NDT	9/5/01	CABLE PROBLEM F2 DEFECTIVE AND REPAIRED		
4042414461	8/15/01	9/5/01	21	NDT	9/5/01	CENTRAL OFFICE REPAIR		
4043494791	8/11/01	9/5/01	25	NDT	9/5/01	RECONNECTED CABLE WIRE		
7703030623	8/5/01	9/5/01	31	NDT	9/5/01	REPAIRED CABLE PAIR		
7705991016	8/4/01	9/5/01	32	NDT	9/5/01	FOUND OK LINE TESTING OK		
7709839034	7/17/01	9/5/01	50	NDT	9/5/01	REPAIRED BURIED SERVICE WIRE		
7705991036	5/25/01	9/5/01	103	NDT	9/5/01	REPAIRED CUT IN SCREEN CABLE		
4047586064	7/11/01	8/21/01	41	NDT	9/6/01	NO TROUBLE FOUND		
4048799627	8/15/01	9/4/01	20	NDT	9/6/01	ISW TROUBLE		
7707517329	8/13/01	9/4/01	22	NDT	9/6/01	NID REPAIRED		
4047677719	8/7/01	9/4/01	28	NDT	9/6/01	AERIAL DROP WIRE		
4045881733	8/1/01	9/4/01	34	NDT	9/6/01	LIEN OK TO THE NID		
6784221011	7/27/01	9/4/01	39	NDT	9/6/01	ISW TROUBLE		
4047634289	7/10/01	9/4/01	56	NDT	9/6/01	SPLICE CASE		
7709854370	6/23/01	9/4/01	73	NDT	9/6/01	OUTSIDE PLANT TROUBLE		
7707161364	6/6/01	9/4/01	90	NDT	9/6/01	ISW TROUBLE		
7709930424	8/27/01	9/5/01	9	NDT	9/6/01	CUT OVER MDA WITHOUT PROVISIONING	9/7/01	2
7705990346	8/26/01	9/5/01	10	NDT	9/6/01	TEST OK CUT SCREEN CABLE REPAIRED		
7709221487	8/24/01	9/5/01	12	NDT	9/6/01	AERIAL DROP WIRE		
4048152915	8/22/01	9/5/01	14	NDT	9/6/01	GOOD TO DMARC		
7704980490	8/17/01	9/5/01	19	NDT	9/6/01	CABLE PAIR TRANSFER		
7708309323	8/12/01	9/5/01	24	NDT	9/6/01	REPAIRED AERIAL SERVICE WIRE		
7708224942	7/27/01	9/5/01	40	NDT	9/6/01	REPAIRED BURIED WIRE		
4046812266	7/25/01	9/5/01	42	NDT	9/6/01	REPLACED DEFECTIVE ISW		

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7709436227	7/25/01	9/5/01	42	NDT	9/6/01	TEST OK NO TROUBLE FOUND		
7705990662	6/26/01	9/5/01	71	NDT	9/6/01	REPAIRED CUT CABLE PAIR		
7709611849	6/7/01	9/5/01	90	NDT	9/6/01	REPAIRED RW		
7702221172	5/21/01	9/5/01	107	NDT	9/6/01	REPAIRED DAMAGED CABLE AT THE SITE		
4044729759	8/12/01	9/6/01	25	NDT	9/6/01	AERIAL DROP WIRE	9/21/01	15
4046964727	8/30/01	9/6/01	7	NDT	9/6/01	TERMINAL REPAIRED		
6788670066	8/27/01	9/6/01	10 .	NDT	9/6/01	REPAIRED BROKEN JUMPER		
7709289887	8/27/01	9/6/01	10	NDT	9/6/01	REPLACED A DEFECTIVE COIL		
7704639943	8/20/01	9/6/01	17	NDT	9/6/01	REPLACED A COIL		
7706419561	8/20/01	9/6/01	17	NDT	9/6/01	CROSS CONNECT RESTORED		
7708389183	8/17/01	9/6/01	20	NDT	9/6/01	DAMAGED CABLE REPAIRED		
7707488251	8/8/01	9/6/01	29	NDT	9/6/01	TEST OK PER CUST		
4045057223	8/2/01	9/6/01	35	NDT	9/6/01	DIAL TONE GOOD TO THE DMARC		
6784821132	7/25/01	9/6/01	43	NDT	9/6/01	REPAIRED CUT CABLE		
7703841361	7/10/01	9/6/01	58	NDT	9/6/01	JUMPER REPAIRED		
7704121774	7/9/01	9/6/01	59	NDT	9/6/01	CONNECTED TERMINATED WIRE		
4046088586	6/18/01	9/6/01	80	NDT	9/6/01	REPLACED ISW		
7709382244	6/4/01	9/6/01	94	NDT	9/6/01	TEST OK BUSY SPEECH NO DPO AUTHORIZATION		
7709391742	6/1/01	9/6/01	97	NDT	9/6/01	CHANGED CARBONS IN PROTECTOR		
6783420264	8/27/01	9/3/01	7	NDT	9/7/01	DIAL TONE GOOD TO THE NID		
7704171843	9/5/01	9/5/01	0	NDT	9/7/01	GROUND WIRE		
4043554827	8/8/01	9/5/01	28	NDT	9/7/01	GROUND WIRE		
7709263696	7/15/01	9/5/01	52	NDT	9/7/01	AERIAL DROP WIRE		
7707491712	6/30/01	9/5/01	67	NDT	9/7/01	TICKET NOT FOUND FOR THIS ANI		
4043490911	6/7/01	9/5/01	90	NDT	9/7/01	ISW TROUBLE		
6784177268	9/5/01	9/6/01	1	NDT	9/7/01	CPE ISW TROUBLE		
7702325284	9/5/01	9/6/01	1	NDT	9/7/01	CROSS BOX JUMPER REPAIRED		
7704554108	8/30/01	9/6/01	7	NDT	9/7/01	DIAL TONE GOOT TO DMARC ISW TROUBLE		
7708690770	8/24/01	9/6/01	13	NDT	9/7/01	ISOLATED TROUBLE TO INSIDE WIRING		
4046359259	8/14/01	9/6/01	23	NDT	9/7/01	RECONSTRUCTED AN F2 PAIR		
4048761875	8/11/01	9/6/01	26	NDT	9/7/01	REPAIRED A DAMAGED CABLE		
7706148981	8/11/01	9/6/01	26	NDT	9/7/01	GOOD TO THE NID ISW TROUBLE		
7709988810	8/10/01	9/6/01	27	NDT	9/7/01	INVOLVED IN A CABLE FAILURE REPAIRED		
7706061115	7/26/01	9/6/01	42	NDT	9/7/01	REPAIRED DEFECTIVE DMARC		
4047685389	7/17/01	9/6/01	51	NDT	9/7/01	LINE CAME CLEAR AFTER DISPATCH		
7704527107	7/5/01	9/6/01	63	NDT	9/7/01	SHORT GOING INSIDE		
7704192314	6/19/01	9/6/01	79	NDT	9/7/01	OUTSIDE NID REPAIRED		
7708697224	6/18/01	9/6/01	80	NDT	9/7/01	REPAIRED A CABLE PAIR		
7709148864	9/6/01	9/7/01	1	NDT	9/7/01	CABLE PAIR TRANSFER		
7705339664	8/23/01	9/7/01	15	NDT	9/7/01	CHANGED PAIR		
4042988653	8/20/01	9/7/01	18	NDT	9/7/01	CHANGED F1		
4047927881	8/16/01	9/7/01	22	NDT	9/7/01	AERIAL NT REPAIRED F2 CABLE		
7704691975	8/16/01	9/7/01	22	NDT	9/7/01	CABLE PAIR TRANSFER		
4042849571	8/15/01	9/7/01	23	NDT	9/7/01	NO TROUBLE FOUND IN THE NETWORK DIAL TONE RESTORED		
7706195626	8/14/01	9/7/01	24	NDT	9/7/01	FOUND OK ISW PAST THE DMARC		
7709798528	8/11/01	9/7/01	27	NDT	9/7/01	BURIED JUMPER ON F1 CABLE PAIR		
7704355352	8/9/01	9/7/01	29	NDT	9/7/01	TICKET CLOSED AND A NEW TKT HAS BEEN OPENED DUE TO A CABLE FAILURE		
4043663756	7/5/01	9/7/01	64	NDT	9/7/01	DIAL TONE GOOD TO THE NID		
4047659761	6/30/01	9/7/01	69	NDT	9/7/01	REPAIRED NETWORK TERMINATING WIRE		
7709982136	6/21/01	9/7/01	78	NDT	9/7/01	ISW TROUBLE		
7707881008	6/2/01	9/7/01	97	NDT	9/7/01	AERIAL DROP WIRE		
7705040615	5/20/01	9/7/01	110	NDT	9/7/01	REPAIRED CABLE PAIR		
7702420612	8/14/01	9/3/01	20	NDT	9/8/01	NETWORK TERMINATING WIRE REPAIRED		
6744179007	9/5/01	9/5/01	0	NDT	9/8/01	TROULBE CAME CLEAR AFTER DISPATCH		
4042497127	4-Sep	9/5/01	1	NDT	9/8/01	AERIAL DROP WIRE		

TELEPHONE NUMBER	MIGRATION COMPLETE	TROUBLE REPORTED	DAYS FROM MIGRATION	TROUBLE REASON	TROUBLE CLOSED	CLOSURE INFORMATION	DATE LLN RECEIVED	DAYS BETWEEN TROUBLE AND LLN
7704332266	8/21/01	9/5/01	15	NDT	9/8/01	NO TROUBLE FOUND		
7705326626	8/5/01	9/5/01	31	NDT	9/8/01	CPE ISW TROUBLE		
4047666885	8/28/01	9/6/01	9	NDT	9/8/01	FOUND GOOD TO DMARC		
7708875908	8/22/01	9/6/01	15	NDT	9/8/01	CABLE PAIR TRANSFER		
6784450065	6/2/01	9/6/01	96	NDT	9/8/01	TEST OK TO THE NID		
4044729759	8/11/01	9/7/01	27	NDT	9/8/01	PAIR CHANGE	9/21/01	14
7706846118	9/6/01	9/7/01	1	NDT	9/8/01	REPAIRED BURIED SERVICE WIRE		
7707178807	8/29/01	9/7/01	9	NDT	9/8/01	CABLE PAIR TRANSFER		
4047940452	8/27/01	9/7/01	11	NDT	9/8/01	AERIAL DROP WIRE		
4047633177	8/16/01	9/7/01	22	NDT	9/8/01	REPAIRED I & I		
7706670705	8/8/01	9/7/01	30	NDT	9/8/01	NO ACCESS		
7709638773	8/7/01	9/7/01	31	NDT	9/8/01	REPLACED CHANNEL UNIT		
7703212555	8/6/01	9/7/01	32	NDT	9/8/01	CABLE PAIR REPAIRED		
7704436722	7/28/01	9/7/01	41	NDT	9/8/01	ISW TROUBLE		
4043253910	7/23/01	9/7/01	46	NDT	9/8/01	REPLACED A COIL		
7709311469	7/19/01	9/7/01	50	NDT	9/8/01	CABLE DAMAGE REPAIRED		
6783800164	7/12/01	9/7/01	57	NDT	9/8/01	CORRECTED AT THE CENTRAL OFFICE		
4048851478	7/8/01	9/7/01	61	NDT	9/8/01	REPAIRED DAMAGED CABLE		
4048762129	7/6/01	9/7/01	63	NDT	9/8/01	CONSTRUCION REPAIRED DAMAGED CABLE		
4046859350	6/28/01	9/7/01	71	NDT	9/8/01	RESET IN THE CENTRAL OFFICE DIAL TONE RESTORED		
4042122279	6/26/01	9/7/01	73	NDT	9/8/01	CABLE PAIR TRANSFER		
7704252037	6/19/01	9/7/01	80	NDT	9/8/01	TEST OK NO TROUBLE FOUND		
7702710851	6/13/01	9/7/01	86	NDT	9/8/01	REPAIRED BURIED SERVICE WIRE		
7706074116	6/7/01	9/7/01	92	NDT	9/8/01	CABLE REPAIR		
7709573814	7/30/01	9/8/01	40	NDT	9/8/01	NO LONGER WITH MCI MIGRATED BACK TO BSO	9/18/01	10
4042986411	9/5/01	9/8/01	3	NDT	9/8/01	CPE TROUBLE		
7707300811	8/31/01	9/8/01	8	NDT	9/8/01	AEIRAL DROP WIRE		
7707499427	8/29/01	9/8/01	10	NDT	9/8/01	REPAIRED FACILITY		
4047533521	8/28/01	9/8/01	11	NDT	9/8/01	RECONNECTED NID WIRE		
7702420612	8/23/01	9/8/01	16	NDT	9/8/01	NETWORK WIRE		
4046889101	8/12/01	9/8/01	27	NDT	9/8/01	REPAIRED TERMINATING WIRE		
4043159558	8/8/01	9/8/01	31	NDT	9/8/01	REPLACED PAIRS		
7702229434	8/8/01	9/8/01	31	NDT	9/8/01	AERIAL DROP WIRE		
7709265162	7/30/01	9/8/01	40	NDT	9/8/01	LINE TEST OK POSSIBLE ISW		
4042331907	7/26/01	8/18/01	23	NDT	9/9/01	CROSS WIRE REPAIRED		
2143212173	8/31/01	9/5/01	5	NDT	9/9/01	LINE HAS BEEN RESTORED DT GOOD	7/30/01	-37
4043553291	8/30/01	9/7/01	8	NDT	9/9/01	REPAIRED FACILITIES		
7708796533	8/12/01	9/7/01	26	NDT	9/9/01	REPAIRED DAMAGE SERVICE WIRE		
4047536022	7/14/01	9/8/01	56	NDT	9/9/01	AERIAL SERVICE WIRE	9/12/01	4
4045229561	8/14/01	9/8/01	25	NDT	9/9/01	TROUBLE IS FIXED ON THE LINE	9/17/01	9
4048743666	8/11/01	9/8/01	28	NDT	9/9/01	DIAL TONE GOOD TO THE DMARC	9/18/01	10
7704727943	8/31/01	9/8/01	8	NDT	9/9/01	NO TROUBLE FOUND		
7704098976	8/27/01	9/8/01	12	NDT	9/9/01	TEST OK LINE NO TROUBLE FOUND		
4043670950	8/24/01	9/8/01	15	NDT	9/9/01	CPE ISW TROUBLE		
7704650906	8/23/01	9/8/01	16	NDT	9/9/01	LINE TESTING OK		
4047526130	8/17/01	9/8/01	22	NDT	9/9/01	BROKEN SERVICE WIRE REPAIRED		
7707737822	8/15/01	9/5/01	24	NDT	9/9/01	REPLACED AERIAL SERVICE WIRE		
6783767554	8/9/01	9/8/01	30	NDT	9/9/01	TEST OK NO TROUBLE FOUND		
7704748557	8/4/01	9/8/01	35	NDT	9/9/01	TEST OK NO TROUBLE FOUND		
4046275852	8/3/01	9/8/01	36	NDT	9/9/01	DEFECTIVE ISW EQUIPMENT		
6785743551	7/20/01	9/8/01	50	NDT	9/9/01	CABLE PAIR TRANSFER		
7704191630	6/9/01	9/8/01	91	NDT	9/9/01	CABLE PAIR TRANSFER		
4043490290	6/1/01	9/8/01	99	NDT	9/9/01	NO TROUBLE FOUND		
7703049491	8/22/01	9/9/01	18	NDT	9/9/01	NO TROUBLE FOUND		
7705040536	6/19/01	9/9/01	82	NDT	9/9/01	CPE ISW TROUBLE		

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7704240098	5/24/01	9/9/01	108	NDT	9/9/01	ISW TROUBLE		
4047688802	8/22/01	9/4/01	13	NDT	9/10/01	ISW TROUBLE	9/6/01	2
6785467555	7/2/01	9/6/01	66	NDT	9/10/01	ISW TROUBLE		
7708979944	8/29/01	9/7/01	9	NDT	9/10/01	DIAL TONE GOO TO THE DMARC		
7702713380	8/18/01	9/7/01	20	NDT	9/10/01	RECONNECTED THE DROP		
7702272143	6/5/01	9/7/01	94	NDT	9/10/01	DIAL TONE GOOD TO THE NID		
6789578557	9/7/01	9/8/01	1	NDT	9/10/01	TEST REPAIRED BC		
6783639947	8/23/01	9/8/01	16	NDT	9/10/01	REPLACED A CHANNEL UNIT		
6784188351	8/12/01	9/8/01	27	NDT	9/10/01	CROSS BOX F1 DISCONNECTED		
4043254133	7/30/01	9/8/01	40	NDT	9/10/01	REPAIRED PAIR FACILITY F2		
4048766882	7/25/01	9/8/01	45	NDT	9/10/01	AERIAL TERMINATING CABLE REPAIRED		
4047685389	7/13/01	9/8/01	57	NDT	9/10/01	F1 REPAIRED		
7703394343	7/13/01	9/8/01	57	NDT	9/10/01	RESPLICED AND BURIED SERVICE WIRE		
4045590288	6/25/01	9/8/01	75	NDT	9/10/01	SERVICE WIRE RESPLICED AND REBURIED		
7705791330	8/26/01	9/9/01	14	NDT	9/10/01	ISW CPE TROUBLE	9/17/01	8
4043770238	9/7/01	9/9/01	2	NDT	9/10/01	CROSS CONNECT REPAIRED		
7702329844	9/5/01	9/9/01	4	NDT	9/10/01	MADE ELECTRIC CROSS CONNECTION		
7703967511	8/29/01	9/9/01	11	NDT	9/10/01	REPLACED BRIDGE CROSS CONNECT		
4045894483	8/26/01	9/9/01	14	NDT	9/10/01	F1 NOT CONNECTED TO F2		
6784131725	8/25/01	9/9/01	15	NDT	9/10/01	REPLACED OPEN JUMPER AT THE CROSS BOX		
7704846029	8/25/01	9/9/01	15	NDT	9/10/01	AERIAL SERVICE WIRE		
7704258623	8/20/01	9/9/01	20	NDT	9/10/01	NO TROUBLE FOUND LINE OK		
7704459471	8/15/01	9/9/01	25	NDT	9/10/01	CHANGED CHANNEL UNIT		
7708792896	8/14/01	9/9/01	26	NDT	9/10/01	FRAME HARDWARE		
7709469612	8/9/01	9/9/01	31	NDT	9/10/01	REPAIRED SERVICE WIRE CABLE WAS CUT		
7706452537	7/24/01	9/9/01	47	NDT	9/10/01	REPLACED BAD POWER CARD AT THE CENTRAL OFFICE		
4047527049	7/1/01	9/9/01	70	NDT	9/10/01	ISW TROUBLE		
4045241488	6/14/01	9/9/01	87	NDT	9/10/01	REPAIRED DEFECTIVE PAIR		
7706452904	6/11/01	9/9/01	90	NDT	9/10/01	DIAL TONE GOOD TO DMARC		
4047993176	6/8/01	9/9/01	93	NDT	9/10/01	BROKEN TERMINATING WIRE REPAIRED		
7704430105	8/20/01	9/10/01	21	NDT	9/10/01	FOUND OK NO AUTHORIZATION TO DPO	8/1/01	-40
7708345153	9/7/01	9/10/01	3	NDT	9/10/01	WRONG ADDRESS CLOSED TRACKER	9/12/01	2
4048166066	8/10/01	9/10/01	31	NDT	9/10/01	NO LONGER WITH MCI MIGRATED BACK TO BSO	9/12/01	2
7704136352	8/31/01	9/10/01	10	NDT	9/10/01	ISW TROUBLE		
6784799373	8/29/01	9/10/01	12	NDT	9/10/01	BURIED SERVICE WIRE		
4047660460	8/24/01	9/10/01	17	NDT	9/10/01	CABLE DOWN REPAIRED		
7704741823	8/23/01	9/10/01	18	NDT	9/10/01	ISOLATED TO CPE		
7709652451	8/21/01	9/10/01	20	NDT	9/10/01	DIAL TONE GOOD TO THE NID		
7702282019	6/22/01	9/10/01	80	NDT	9/10/01	FOUND GOOD TO THE DMARC		
7704221810	6/9/01	9/10/01	93	NDT	9/10/01	NO TROUBLE FOUND		
7709394963	8/27/01	9/5/01	9	NDT	9/11/01	REPAIRED ISW ADVISE CUSTOMER OF POSSIBLE CPE TROUBLE		
7705344705	7/28/01	9/8/01	42	NDT	9/11/01	REPAIRED CALE WIRE		
7708344731	8/28/01	9/10/01	13	NDT	9/11/01	CHANGED AN F1	9/22/01	12
6784451487	8/31/01	9/10/01	10	NDT	9/11/01	REPAIRED THE DROP		
4787451371	8/30/01	9/10/01	11	NDT	9/11/01	ISW TROUBLE		
7709972144	8/30/01	9/10/01	11	NDT	9/11/01	WIRE REPAIR MODEM PROBLEM		
4043633991	8/29/01	9/10/01	12	NDT	9/11/01	MADE REPAIRS TO THE NID		
7066822790	8/25/01	9/10/01	16	NDT	9/11/01	REPAIRED CUT WIRE		
4047340351	8/24/01	9/10/01	17	NDT	9/11/01	NO TROUBLE FOUND LINE OK		
7706455710	8/24/01	9/10/01	17	NDT	9/11/01	FOUND OK TO THE DMARC		
4049299737	8/23/01	9/10/01	18	NDT	9/11/01	CONNECTED TERMINATING WIRE		
7709839834	8/18/01	9/10/01	23	NDT	9/11/01	NO TROUBLE FOUND		
6784751928	8/15/01	9/10/01	26	NDT	9/11/01	BAD CHANNEL UNIT REPLACED		
7705527007	8/7/01	9/10/01	34	NDT	9/11/01	DIGITAL PAIR GAIN REPAIRED		
7709354693	8/5/01	9/10/01	36	NDT	9/11/01	DIAL TONE GOOD TO THE NID		

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7705136507	8/3/01	9/10/01	38	NDT	9/11/01	FOUND OK AT THE DMARC		
4047613917	8/1/01	9/10/01	40	NDT	9/11/01	CHANGED DEFECTIVE F1 PAIR		
7704632447	7/25/01	9/10/01	47	NDT	9/11/01	AERIAL DROP WIRE		
7704387668	7/18/01	9/10/01	54	NDT	9/11/01	CHANGED AN F2 PAIR		
7707254056	7/6/01	9/10/01	66	NDT	9/11/01	REPAIRED OPEN IN BURIED CABLE		
7709697666	7/6/01	9/10/01	66	NDT	9/11/01	CHANGED F2 DEFECTIVE PAIR		
7704591579	6/23/01	9/10/01	79	NDT	9/11/01	FOUND OK TECH ADVISED THE CUSTOMER		
4046915610	6/21/01	9/10/01	81	NDT	9/11/01	NO TROUBLE FOUND OUT ISW PROBLEM		
7709782072	6/12/01	9/10/01	90	NDT	9/11/01	BURIED SERVICE WIRE		
7706141665	6/2/01	9/10/01	100	NDT	9/11/01	REPAIRED SERVICE WIRE		
4043211044	6/1/01	9/10/01	101	NDT	9/11/01	TEST OK NO TROUBLE FOUND		
7705749219	9/6/01	9/11/01	5	NDT	9/11/01	NO TROUBLE FOUND DIAL TONE GOOD TO THE NID		
6788171069	8/23/01	9/11/01	19	NDT	9/11/01	REPAIRED CUT SERVICE WIRE		
4046226149	8/16/01	9/11/01	26	NDT	9/11/01	WIRE REPAIRED		
6784767955	7/25/01	9/11/01	48	NDT	9/11/01	PAIR CHANGE		
7704651734	7/15/01	9/11/01	58	NDT	9/11/01	NETWORK TERMINAL REPAIRED		
4048431940	8/25/01	9/3/01	9	NDT	9/12/01	NO TROUBLE FOUND		
4048431940	8/25/01	9/3/01	9	NDT	9/12/01	NO TROUBLE FOUND		
7708086795	8/11/01	9/5/01	25	NDT	9/12/01	LINE OK CLEARED WHILE TESTING		
6785859142	8/9/01	9/6/01	28	NDT	9/12/01	TESTING OK TO THE NID		
7704219533	8/5/01	9/6/01	32	NDT	9/12/01	REPAIRED WIRING		
7705510857	6/25/01	9/6/01	73	NDT	9/12/01	CUSTOMER DECLINED DISPATCH		
4042437343	8/1/01	9/7/01	37	NDT	9/12/01	REWIRED DEFECTIVE TERMINATING WIRE		
7706849549	8/27/01	9/9/01	13	NDT	9/12/01	NOT ROUBLE FOUND LINE OK		
7709969613	6/15/01	9/10/01	87	NDT	9/12/01	NO LONGER WITH MCI MIGRATED BACK TO BSO	9/12/01	2
7709795080	9/5/01	9/11/01	6	NDT	9/12/01	DIAL TONE GOOD TO THE NID SHORT GOING IN	9/13/01	2
4047532910	8/28/01	9/11/01	14	NDT	9/12/01	AERIAL DROP WIRE		
7704789549	8/26/01	9/11/01	16	NDT	9/12/01	PAIR CHANGE		
4045251444	8/23/01	9/11/01	19	NDT	9/12/01	DIAL TONE GOOD TO DMARC ISW TROUBLE		
6784826808	8/10/01	9/11/01	32	NDT	9/12/01	AERIAL DROP WIRE		
7704978397	8/8/01	9/11/01	34	NDT	9/12/01	REPAIRED SERVICE BURIED WIRE		
7704285537	7/17/01	9/11/01	56	NDT	9/12/01	DIAL TONE GOOD TO THE NID		
7709171082	6/11/01	9/11/01	92	NDT	9/12/01	REPAIRED BURIED DROP WIRE		
7704481259	9/7/01	9/12/01	5	NDT	9/12/01	PEX JACK MISSING FROM THE JACK		
4043789034	9/6/01	9/12/01	6	NDT	9/12/01	NO TROUBLE FOUND		
7707926752	9/4/01	9/12/01	8	NDT	9/12/01	LINE TRANSLATIONS UNKNOWN		
7705077867	9/2/01	9/12/01	10	NDT	9/12/01	LINE TESTED OK AT THE NID		
7709192943	9/1/01	9/12/01	11	NDT	9/12/01	IDSP REPAIRED BSW		
4045770090	8/31/01	9/12/01	12	NDT	9/12/01	SLIP NOT IN THE FEEDER REPAIRED		
7708326558	8/28/01	9/12/01	15	NDT	9/12/01	GOOD TO THE DMARC		
4046222929	8/20/01	9/12/01	23	NDT	9/12/01	LINE OK NO TROUBLE FOUND		
6784327630	8/15/01	9/12/01	28	NDT	9/12/01	REPAIRED CABLE WIRE		
7709369261	8/14/01	9/12/01	29	NDT	9/12/01	CHANGED AN F2 PAIR		
7702299719	8/1/01	9/12/01	42	NDT	9/12/01	AERIAL DROP WIRE		
7709943580	7/24/01	9/12/01	50	NDT	9/12/01	FIXED CUT CABLE AND BURIED IT		
7709093894	7/9/01	9/12/01	65	NDT	9/12/01	NO TROUBLE FOUND OUT		
7706031969	7/8/01	9/12/01	66	NDT	9/12/01	REPLACED BAD CHANNEL UNIT		
4042315852	8/27/01	9/4/01	8	NDT	9/13/01	TICKET CLOSED DUE TO ANOTHER TKT OPENED FOR THE SAME ISSUE		
4042315852	8/27/01	9/4/01	8	NDT	9/13/01	TICKET CLOSED DUE TO ANOTHER TKT OPENED FOR THE SAME ISSUE		
7709735801	7/14/01	9/6/01	54	NDT	9/13/01	DIAL TONE GOOD TO THE NID	9/20/01	14
7704430105	8/15/01	9/8/01	24	NDT	9/13/01	AEIRAL DROP WIRE	8/1/01	-38
4044999621	8/21/01	9/8/01	18	NDT	9/13/01	BC GOOD TO DMARC BURGLAR ALARM OPEN CAUSING TROUBLE		
6789699263	9/5/01	9/10/01	5	NDT	9/13/01	REPAIRED CABLE PAIR		
7706508083	8/23/01	9/10/01	18	NDT	9/13/01	DIAL TONE GOOD TO THE NID		
4042375446	7/25/01	9/11/01	48	NDT	9/13/01	ISW TROUBLE		

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4045231611	9/1/01	9/12/01	11	NDT	9/13/01	TICKET EXCLUDED CUST NO LONGER WITH MCI	9/14/01	2
4047532505	6/25/01	9/12/01	79	NDT	9/13/01	LINE TEST OK NO TROUBLE FOUND	9/21/01	9
7704601264	9/10/01	9/12/01	2	NDT	9/13/01	DIAL TONE GOOD TO THE NID SHORT GOING IN		
4047632055	9/5/01	9/12/01	7	NDT	9/13/01	INSIDE WIRE TROUBLE		
7707749676	9/5/01	9/12/01	7	NDT	9/13/01	REPAIRED BAD WIRING		
7707875049	9/3/01	9/12/01	9	NDT	9/13/01	REPAIRED SERVICE BURIED WIRE		
7708982678	8/29/01	9/12/01	14	NDT	9/13/01	CABLE PAIR TRANSFER		
7706508083	8/23/01	9/12/01	20	NDT	9/13/01	CABLE PAIR TRANSFER		
7707740441	8/20/01	9/12/01	23	NDT	9/13/01	DIAL TONE GOOD TO THE DMARC		
7704983879	8/13/01	9/12/01	30	NDT	9/13/01	ROUTE CHANNEL UNIT REPLACED		
7704876971	8/10/01	9/12/01	33	NDT	9/13/01	REPAIRED AERIAL SERVICE WIRE		
7706073553	8/9/01	9/12/01	34	NDT	9/13/01	GROUNDED AND BURIED SERVICE WIRE		
7708197549	8/4/01	9/12/01	39	NDT	9/13/01	GOOD TO THE DMARC		
4047611920	7/28/01	9/12/01	46	NDT	9/13/01	DETERMINATING AND BURIED WIRE		
7708547304	7/27/01	9/12/01	47	NDT	9/13/01	AERIAL DROP WIRE		
7703854619	7/26/01	9/12/01	48	NDT	9/13/01	REPAIRED AERIAL SERVICE WIRE		
7703586253	7/20/01	9/12/01	54	NDT	9/13/01	PLACED AN AERIAL SERVICE WIRE		
7704771179	7/10/01	9/12/01	64	NDT	9/13/01	DIAL TONE GOOD TO THE NID ISW TROUBLE		
4043663756	7/5/01	9/12/01	69	NDT	9/13/01	OPEN OUT REPAIRED		
7709830311	5/31/01	9/12/01	104	NDT	9/13/01	ISW TROUBLE		
6783766063	9/1/01	9/13/01	12	NDT	9/13/01	TEST OK NO TROUBLE FOUND		
4043528222	8/28/01	9/13/01	16	NDT	9/13/01	WIRE REPAIRED		
4045410751	8/28/01	9/13/01	16	NDT	9/13/01	REPAIRED BAD WIRING		
7709009463	8/26/01	9/13/01	18	NDT	9/13/01	DEFECTIVE TRUNK AT THE CENTRAL OFFICE		
7706848481	8/22/01	9/13/01	22	NDT	9/13/01	NO TROUBLE FOUND LINE OK		
7702284316	8/21/01	9/13/01	23	NDT	9/13/01	ATTACHED JACK TO ISW		
7706389795	8/21/01	9/13/01	23	NDT	9/13/01	WIRE REPAIRED		
4043159222	8/16/01	9/13/01	28	NDT	9/13/01	CPE ISW TROUBLE		
7709355495	8/16/01	9/13/01	28	NDT	9/13/01	CLEAR AFTER DISPATCH		
7709976764	8/16/01	9/13/01	28	NDT	9/13/01	CABLE PAIR CHANGE WAS REPLACED		
7708308230	8/12/01	9/13/01	32	NDT	9/13/01	REPAIRED CUT SERVICE WIRE		
7709322187	8/1/01	9/13/01	43	NDT	9/13/01	DIGITAL LOOP CARRIER FAILURE		
6784221011	7/22/01	9/13/01	53	NDT	9/13/01	AERIAL DROP WIRE		
7703880148	6/26/01	9/13/01	79	NDT	9/13/01	OPEN PAIR REPAIRED		
7703232617	6/25/01	9/13/01	80	NDT	9/13/01	TROUBLE ON THE INSIDE		
7709217582	6/22/01	9/13/01	83	NDT	9/13/01	NO TICKET FOUND FOR THIS NUMBER		
7707881691	6/2/01	9/13/01	103	NDT	9/13/01	REPAIRED CABLE DAMAGES		
4048166066	8/10/01	9/5/01	26	NDT	9/14/01	REST OK NO TROUBLE FOUND	9/12/01	7
4043280864	8/5/01	9/6/01	32	NDT	9/14/01	CHANGED A DEFECTIVE OE		
4047928783	9/5/01	9/11/01	6	NDT	9/14/01	ISW DOES NOT EXIST AT NID		
7702799139	8/30/01	9/12/01	13	NDT	9/14/01	ISW CPE TROUBLE		
7704325045	8/30/01	9/12/01	13	NDT	9/14/01	TEST OK DIAL TONE GOOD TO THE DMARC		
4047621263	8/26/01	9/12/01	17	NDT	9/14/01	NO LONGER WITH MCI MIGRATED BACK TO BSO		
4043770168	6/25/01	9/12/01	79	NDT	9/14/01	NO TROUBLE FOUND LINE OK		
7703586134	9/12/01	9/13/01	1	NDT	9/14/01	FOUND GOOD TO THE DMARC		
4047945375	9/11/01	9/13/01	2	NDT	9/14/01	REPAIRED NETWORK TERMINAL		
6784451487	8/31/01	9/13/01	13	NDT	9/14/01	REPLACED CARBON		
7067967605	8/29/01	9/13/01	15	NDT	9/14/01	CHANGED DEFECTIVE F1 PAIR		
7702978460	8/26/01	9/13/01	18	NDT	9/14/01	LINE TEST OK		
7705793462	8/23/01	9/13/01	21	NDT	9/14/01	LINE OK ISW TROUBLE		
6788677057	8/20/01	9/13/01	24	NDT	9/14/01	AERIAL DROP WIRE		
7704713161	8/20/01	9/13/01	24	NDT	9/14/01	NO TROUBLE DETECTED CPE PROBLEM		
6788677057	8/16/01	9/13/01	28	NDT	9/14/01	DIAL TONE GOOD TO THE NID		
9129217646	8/14/01	9/13/01	30	NDT	9/14/01	REPLACED AN HC		
4047530875	8/9/01	9/13/01	35	NDT	9/14/01	GROUNDED AND BURIED SERVICE WIRE		

TELEPHONE NUMBER	MIGRATION COMPLETE	TROUBLE REPORTED	DAYS FROM MIGRATION	TROUBLE REASON	TROUBLE CLOSED	CLOSURE INFORMATION	DATE LLN RECEIVED	DAYS BETWEEN TROUBLE AND LLN
7709458369	7/30/01	9/13/01	45	NDT	9/14/01	TEST FOUND OK		
4042443957	7/20/01	9/13/01	55	NDT	9/14/01	REPAIRED SERVICE CUT WIRE		
7704520566	7/3/01	9/13/01	72	NDT	9/14/01	TROUBLE ON THE ISW		
7704571542	6/21/01	9/13/01	84	NDT	9/14/01	AERIAL DROP WIRE		
7709320979	6/9/01	9/13/01	96	NDT	9/14/01	REPLACED 72 CORD AT THE RT		
6783390593	5/31/01	9/13/01	105	NDT	9/14/01	CABLE PAIR REPAIRED		
7709574846	8/24/01	9/14/01	21	NDT	9/14/01	REPLACED CROSS JUMPER		
4043783942	8/22/01	9/14/01	23	NDT	9/14/01	ISW TROUBLE		
4097998941	8/20/01	9/14/01	25	NDT	9/14/01	LINE IS GOOD TO THE NID SHORT INSIDE		
6785465993	8/20/01	9/14/01	25	NDT	9/14/01	PROVISIONED ZZ		
7706069467	8/12/01	9/14/01	33	NDT	9/14/01	WIRE REPARED		
6783426658	8/7/01	9/14/01	38	NDT	9/14/01	REPAIRED AERIAL SERVICE WIRE		
7706071567	8/7/01	9/14/01	38	NDT	9/14/01	REPLACED CROSS JUMPER		
7708868053	8/7/01	9/14/01	38	NDT	9/14/01	REPLACED AND REPAIRED BURIED CABLE		
7704465348	7/27/01	9/14/01	49	NDT	9/14/01	BURIED SERVICE WIRE		
4046966293	7/2/01	9/14/01	74	NDT	9/14/01	LINE TESTING OK		
7704951416	6/29/01	9/14/01	77	NDT	9/14/01	REPLACED COIL		
7705542445	6/14/01	9/14/01	92	NDT	9/14/01	REPLACED ROUTING CHANNEL UNIT		
6784177268	9/5/01	9/7/01	2	NDT	9/15/01	ISW TROUBLE		
7706821269	9/10/01	9/11/01	1	NDT	9/15/01	REPAIRED WIRE		
9123510989	9/15/01	9/12/01	-3	NDT	9/15/01	BURIED SERVICE WIRE		
4046888981	8/13/01	9/12/01	30	NDT	9/15/01	VERIFY DIAL TONE GOOD TO THE NID		
7706718788	9/12/01	9/14/01	2	NDT	9/15/01	LINE FIXED DIAL TONE RESTORED		
7704825397	9/7/01	9/14/01	7	NDT	9/15/01	DIAL TONE GOOD TO THE NID		
7703040281	8/31/01	9/14/01	14	NDT	9/15/01	REPLACED COIL		
7704286916	8/20/01	9/14/01	25	NDT	9/15/01	TEST OK 400 FEET FROM THE DMARC		
7702140760	8/15/01	9/14/01	30	NDT	9/15/01	REPLACED RT CARD		
7704549442	8/9/01	9/14/01	36	NDT	9/15/01	TROUBLE CAME CLEAR AFTER DISPATCH		
4047653993	8/7/01	9/14/01	38	NDT	9/15/01	DIAL TONE GOOD TO THE NID		
7706061929	27-Jul	9/14/01	49	NDT	9/15/01	NO TICKET FOUND FOR THIS NUMBER		
4043774839	7/25/01	9/14/01	51	NDT	9/15/01	DIAL TONE GOOD TO THE NID		
7704358614	7/12/01	9/14/01	64	NDT	9/15/01	LINE OK FIXED		
7707873197	6/11/01	9/14/01	95	NDT	9/15/01	AERIAL DROP WIRE		
7705020112	5/21/01	9/14/01	116	NDT	9/15/01	BURIED CHANNEL UNIT		
6785651165	9/14/01	9/15/01	1	NDT	9/15/01	CPE ISW TROUBLE		
7708989883	8/29/01	9/15/01	17	NDT	9/15/01	CPE ISW TROUBLE		
7709130405	8/28/01	9/15/01	18	NDT	9/15/01	CABLE REPAIRED		
7704868210	8/13/01	9/15/01	33	NDT	9/15/01	REPAIRED AT THE NID		
7705141396	7/25/01	9/15/01	52	NDT	9/15/01	TROUBLE CAME CLEAR		
7708890991	7/18/01	9/15/01	59	NDT	9/15/01	REPAIRED BURIED SERVICE WIRE		
7702330528	6/26/01	9/15/01	81	NDT	9/15/01	TICKET EXCLUDED PER LINE TESTING OK		
7709771421	6/15/01	9/15/01	92	NDT	9/15/01	REPAIRED WET WIRES AT THE NID		
7709913621	6/6/01	9/15/01	101	NDT	9/15/01	LINE FIXED AFTER UNPLUG TEST		
7734456328	5/14/01	9/15/01	124	NDT	9/15/01	OUTPLANT UNKNOWN		
4045776260	7/16/01	9/4/01	50	NDT	9/16/01	TEST OK AT THE NID		
7704618916	7/6/01	9/4/01	60	NDT	9/16/01	ISW TROUBLE		
4042897106	6/10/01	9/13/01	95	NDT	9/16/01	AERIAL DROP WIRE		
6783639345	8/30/01	9/14/01	15	NDT	9/16/01	RESET CHANNEL UNIT		
6783639513	8/28/01	9/14/01	17	NDT	9/16/01	RESET CHANNEL UNIT		
6785661905	8/22/01	9/14/01	23	NDT	9/16/01	LINE GOOD TO THE NID ISW TROUBLE		
9129203194	9/3/01	9/15/01	12	NDT	9/16/01	WORKED ON A CIRCUIT PACKAGE		
4042894501	9/1/01	9/15/01	14	NDT	9/16/01	REPLACED NID AND RECONNECTED TERMINAL WIRE		
7704145241	8/27/01	9/15/01	19	NDT	9/16/01	NO TROUBLE FOUND		
7709698919	8/26/01	9/15/01	20	NDT	9/16/01	REPAIRED CUT BURIED SERVICE WIRE		
7066897852	8/8/01	9/15/01	38	NDT	9/16/01	NO TROUBLE FOUND		

TELEPHONE NUMBER	MIGRATION COMPLETE	TROUBLE REPORTED	DAYS FROM MIGRATION	TROUBLE REASON	TROUBLE CLOSED	CLOSURE INFORMATION	DATE LLN RECEIVED	BETWEEN TROUBLE AND LLN
7702280343	6/27/01	9/15/01	80	NDT	9/16/01	DROP WIRE FIXED		
7704322262	6/13/01	9/15/01	94	NDT	9/16/01	TROUBLE IN THE CENTRAL OFFICE		
6788420094	9/4/01	9/16/01	12	NDT	9/16/01	CROSS CONNECT MISSING REPLACED		
7702106494	8/22/01	9/16/01	25	NDT	9/16/01	NO TROUBLE FOUND IN THE NID		
7708988875	8/20/01	9/16/01	27	NDT	9/16/01	RE ATTACHED AERIAL SERVICE WIRE		
4043156554	8/12/01	9/16/01	35	NDT	9/16/01	FRAME WIRE ERROR		
7706030203	7/24/01	9/16/01	54	NDT	9/16/01	TICKET CANCELLED DIAL TONE HAS BEEN RESTORED		
6785465915	6/28/01	9/16/01	80	NDT	9/16/01	DONWLOAD SOFTWARE SYSTEM		
6784221011	7/19/01	9/11/01	54	NDT	9/17/01	CPE ISW TROUBLE		
7706821629	9/4/01	9/12/01	8	NDT	9/17/01	NO LONGER WITH MCI MIGRATED BACK TO BSO	9/13/01	1
7705770589	9/5/01	9/12/01	7	NDT	9/17/01	CUSTOMER NO LONGER WITH MCI MIGRATED BACK TO BSO		
7709912829	8/17/01	9/13/01	27	NDT	9/17/01	REPAIRED AT THE CENTRAL OFFICE	9/21/01	7
4047532505	8/21/01	9/14/01	24	NDT	9/17/01	TEST OK NO TROUBLE FOUND		
4047996608	8/31/01	9/14/01	14	NDT	9/17/01	DIAL TONE GOOD TO THE NID		
4046846202	8/30/01	9/15/01	16	NDT	9/17/01	SPLICE CASE REPAIRED		
7709418967	8/15/01	9/15/01	31	NDT	9/17/01	REPAIRED AERIAL SERVICE WIRE		
4045058706	8/4/01	9/15/01	42	NDT	9/17/01	NETWORK INTERFACE FIXED		
7705329297	8/1/01	9/15/01	45	NDT	9/17/01	CPE TROUBLE		
7706148802	8/1/01	9/15/01	45	NDT	9/17/01	REDO CROSS CONNECT DUE TO CENTRAL OFFICE FAILURE		
7704257173	7/7/01	9/15/01	70	NDT	9/17/01	BURIED TERMINAL REPAIRED		
7704823016	9/7/01	9/16/01	9	NDT	9/17/01	REPLACED A COIL		
4045089561	9/5/01	9/16/01	11	NDT	9/17/01	REPLACED JUMPER		
7706842771	8/28/01	9/16/01	19	NDT	9/17/01	SPLICE CASE		
7704765171	8/16/01	9/16/01	31	NDT	9/17/01	CAME CLEAR AFTER DISPATCH		
6787149560	8/15/01	9/16/01	32	NDT	9/17/01	REMOVED TERMINAL WIRE UNIT		
4048748318	8/8/01	9/16/01	39	NDT	9/17/01	REPLACED SLICK CORD		
7704970218	7/7/01	9/16/01	71	NDT	9/17/01	LINE CAME CLEAR		
7709234664	6/27/01	9/16/01	81	NDT	9/17/01	BURIED SERVICE WIRE		
7704521502	5/24/01	9/16/01	115	NDT	9/17/01	FOUND OK OUT		
7709699518	9/8/01	9/17/01	9	NDT	9/17/01	REPLACED A COIL		
7704553670	9/5/01	9/17/01	12	NDT	9/17/01	TICKET CLOSED PER LINE RESTORED ON IT'S OWN		
7707329278	8/29/01	9/17/01	19	NDT	9/17/01	REPAIRED AERIAL DROP		
7707841340	8/28/01	9/17/01	20	NDT	9/17/01	ISW TROUBLE		
4043732946	8/27/01	9/17/01	21	NDT	17-Sep	NO TROULBE FOUND		
7705621797	8/11/01	9/17/01	37	NDT	9/17/01	NO TROUBLE FOUND LINE OK		
7706505632	8/11/01	9/17/01	37	NDT	9/17/01	ONI SHORT ON GREEN AND RED IW		
7708546880	8/7/01	9/17/01	41	NDT	9/17/01	NO TROUBLE FOUND		
6789850686	8/5/01	9/17/01	43	NDT	9/17/01	DIAL TONE GOOD TO THE NID		
7705796376	7/23/01	9/17/01	56	NDT	9/17/01	RETERMINATION TROUBLE		
7703865940	7/21/01	9/17/01	58	NDT	9/17/01	SHORT GOING INSIDE		
4045590247	7/18/01	9/17/01	61	NDT	9/17/01	ISW TROUBLE		
7702975267	7/9/01	9/17/01	70	NDT	9/17/01	DEFECTIVE F1 AT CORNER		
7707754390	7/3/01	9/17/01	76	NDT	9/17/01	FAILURE IN THE SWITCH		
4045253373	6/27/01	9/17/01	82	NDT	9/17/01	NO TROUBLE FOUND		
7707814350	6/25/01	9/17/01	84	NDT	9/17/01	REPLACED BURIED SERVICE WIRE		
7705180495	6/21/01	9/17/01	88	NDT	9/17/01	REPAIRED AN AERIAL SERVICE PAIR		
4042376140	6/18/01	9/17/01	91	NDT	9/17/01	NO ACCESS		
7705990951	6/16/01	9/17/01	93	NDT	9/17/01	BURIED SERVICE WIRE		
4048762259	6/12/01	9/17/01	97	NDT	9/17/01	AERIAL DROP WIRE		
7709654739	6/1/01	9/17/01	108	NDT	9/17/01	REPAIRED AERIAL SERVICE WIRE		
6784450354	7/2/01	9/4/01	64	NDT	9/18/01	AERIAL DROP WIRE		
7706711724	9/3/01	9/11/01	8	NDT	9/18/01	CARRIER TROUBLE FOUND		
7707882823	9/6/01	9/12/01	6	NDT	9/18/01	ELECTRICAL SOFTWARE CONNECT REPAIRED	9/17/01	5
4043529864	8/29/01	9/15/01	17	NDT	9/18/01	NO TICKET FOUND FOR THIS NUMBER		
4047928219	8/12/01	9/16/01	35	NDT	9/18/01	REPLACED A BAD PROTECTOR		

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7709776685	9/11/01	9/17/01	6	NDT	9/18/01	REPLACED A SLICK CORD		
7704659484	9/6/01	9/17/01	11	NDT	9/18/01	FOUND OK PER TECH		
4046859393	9/5/01	9/17/01	12	NDT	9/18/01	REPAIRED JUMPER AT THE CROSSBOX		
6783805583	9/4/01	9/17/01	13	NDT	9/18/01	LINE OK NO TROUBLE FOUND		
4046359901	8/28/01	9/17/01	20	NDT	9/18/01	AERIAL DROP WIRE		
4046919659	8/28/01	9/17/01	20	NDT	9/18/01	CHANGED AN F2 PAIR		
6783420232	8/26/01	9/17/01	22	NDT	9/18/01	SERVICE ORDER PENDING FOR ACTIVATION		
4046961436	8/25/01	9/17/01	23	NDT	9/18/01	FOUND OK OUT DIAL TONE GOOD TO THE DMARC		
6789850457	8/18/01	9/17/01	30	NDT	9/18/01	CLEANED FIBER JUMPER		
7707172389	8/17/01	9/17/01	31	NDT	9/18/01	ISW TROUBLE AND CORRECTED NID		
7709651278	8/10/01	9/17/01	38	NDT	9/18/01	REPLACED CHANNEL UNIT		
7706437974	8/7/01	9/17/01	41	NDT	9/18/01	FOUND OK PER CUST		
7702189267	8/3/01	9/17/01	45	NDT	9/18/01	DEFECTIVE FIBER		
7709933653	7/26/01	9/17/01	53	NDT	9/18/01	LINE OK DIAL TONE RESTORED		
7709814621	7/13/01	9/17/01	66	NDT	9/18/01	BURIED SERVICE WIRE		
7709322187	6/28/01	9/17/01	81	NDT	9/18/01	BURIED SERVICE LINE REPAIRED		
4045591657	6/27/01	9/17/01	82	NDT	9/18/01	REPLACED ONI		
6783091258	6/22/01	9/17/01	87	NDT	9/18/01	REPAIRED BROKEN CONDUCTOR		
7709930072	6/11/01	9/17/01	98	NDT	9/18/01	BURIED NT WHOLE AREA LOST DIAL TONE OK NOW		
7703583040	6/7/01	9/17/01	102	NDT	9/18/01	CABLE TROW		
6785460140	5/22/01	9/17/01	118	NDT	9/18/01	FAILURE IN THE SWITCH		
7702518539	9/17/01	9/18/01	1	NDT	9/18/01	DIAL TONE GOOD TO THE NID		
7702292274	9/13/01	9/18/01	5	NDT	9/18/01	PLACED CROSS CONNECTOR		
7706388248	9/11/01	9/18/01	7	NDT	9/18/01	REPAIRED BURIED SERVICE WIRE		
7709149237	9/1/01	9/18/01	17	NDT	9/18/01	REPLACED 50 FEET OF CABLE		
7709491635	8/31/01	9/18/01	18	NDT	9/18/01	AERIAL DROP WIRE		
7702294725	8/30/01	9/18/01	19	NDT	9/18/01	TROUBLE CLEARED ON IT'S OWN		
6783542403	8/26/01	9/18/01	23	NDT	9/18/01	TEST OK DIAL TONE GOOD TO THE DMARC		
7705651440	8/24/01	9/18/01	25	NDT	9/18/01	REPAIRED BURIED SERVICE WIRE		
7704460801	8/14/01	9/18/01	35	NDT	9/18/01	REPAIRED CUT CABLE		
7704133931	7/27/01	9/18/01	53	NDT	9/18/01	FOUND OK OUT		
7706417035	7/24/01	9/18/01	56	NDT	9/18/01	FOUND OK IN THE CO NO TROUBLE FOUND IN THE NETWORK		
7709318217	7/23/01	9/18/01	57	NDT	9/18/01	CHANGED AN F2 PAIR		
7704288021	7/16/01	9/18/01	64	NDT	9/18/01	FIBER SPLICE CABLE		
7706847190	7/5/01	9/18/01	75	NDT	9/18/01	REPAIRED AN F2 PAIR		
7707873197	6/18/01	9/18/01	92	NDT	9/18/01	PLACED CROSS JUMPER AND CORRECTED F2 FACILITY		
4042882667	6/9/01	9/18/01	101	NDT	9/18/01	CHANGED AN F1		
4047630554	5/17/01	9/18/01	124	NDT	9/18/01	DAMAGED CROSS BOX		
7067909531	5/15/01	9/18/01	126	NDT	9/18/01	AERIAL SERVICE WIRE CONNECTED TO THE WRONG PROTECTOR		
7708987066	7/10/01	9/20/01	72	NDT	9/18/01	REPLACED 50 FEET OF BURIED CABLE		
6784949321	8/1/01	9/9/01	39	NDT	9/19/01	TICKET CANCELLED CUST FIXED HIMSELF		
7707308607	8/17/01	9/17/01	31	NDT	9/19/01	CPE ISW PROBLEM		
7704255671	7/15/01	9/18/01	65	NDT	9/19/01	REPAIRED CABLE SPLICE	9/19/01	1
7704322723	9/18/01	9/18/01	0	NDT	9/19/01	REPAIRED CABLE		
7702514469	9/13/01	9/18/01	5	NDT	9/19/01	REPLACED AERIAL AND CABLE		
7709470922	9/7/01	9/18/01	11	NDT	9/19/01	REPAIRED SERVICE WIRE		
7705091353	8/28/01	9/18/01	21	NDT	9/19/01	REPLACED A COIL		
7704449693	8/9/01	9/18/01	40	NDT	9/19/01	DIAL TONE GOOD TO THE DMARC		
7708442057	8/6/01	9/19/01	44	NDT	9/19/01	CUST NO LONGER WITH MCI	9/19/01	0
7708791661	9/11/01	9/19/01	8	NDT	9/19/01	DIAL TONE REPAIRED GOOD TO THE NID		
7709963136	8/20/01	9/19/01	30	NDT	9/19/01	REPAIRED SERVICE WIRE		
6786241069	8/17/01	9/19/01	33	NDT	9/19/01	CPE ISW TROUBLE		
7709208178	8/16/01	9/19/01	34	NDT	9/19/01	REPLACED A COIL		
7704499320	8/11/01	9/19/01	39	NDT	9/19/01	NO TROUBLE FOUND		
7704589495	8/11/01	9/19/01	39	NDT	9/19/01	LINE OK NO TROUBLE FOUND		

TELEPHONE NUMBER	MIGRATION COMPLETE	TROUBLE REPORTED	DAYS FROM MIGRATION	TROUBLE REASON	TROUBLE CLOSED	CLOSURE INFORMATION	DATE LLN RECEIVED	BETWEEN TROUBLE AND LLN
4045598600	8/5/01	9/19/01	45	NDT	9/19/01	CHANGED AN F2 PAIR		
7702275834	8/4/01	9/19/01	46	NDT	9/19/01	REPLACED A COIL		
7702529763	7/31/01	9/19/01	50	NDT	9/19/01	NO TROUBLE FOUND OK OUT		
7703826999	7/30/01	9/19/01	51	NDT	9/19/01	CABLE REPAIRED		
4042882418	6/25/01	9/19/01	86	NDT	9/19/01	CPE ISW TROUBLE		
7705799914	6/12/01	9/19/01	99	NDT	9/19/01	EXCLUDED TO COMMON CARRIER		
6789470440	6/1/01	9/19/01	110	NDT	9/19/01	CHANGED PAIR TRANSFER		
6783633553	9/6/01	9/20/01	14	NDT	9/19/01	AERIAL DROP WIRE		
7709096930	8/11/01	9/5/01	25	NDT	9/20/01	GOOD TO THE NID NO TROUBLE FOUND		
4042438345	8/15/01	9/6/01	22	NDT	9/20/01	SERVICE GOOD TO THE NID ISW TROUBLE		
4042128750	7/23/01	9/17/01	56	NDT	9/20/01	DIAL TONE GOOD TO THE NID		
4044729101	9/18/01	9/19/01	1	NDT	9/20/01	REPLACED AERIAL DROP CABLE		
7704678494	9/18/01	9/19/01	1	NDT	9/20/01	REPLACED JUMPER IN THE WRONG PAIR IN THE CROSS BOX		
4047617182	9/11/01	9/19/01	8	NDT	9/20/01	AERIAL DROP WIRE		
7703894796	9/10/01	9/19/01	9	NDT	9/20/01	CPE ISW TROUBLE		
7709099463	9/7/01	9/19/01	12	NDT	9/20/01	EXCLUDED TO COMMON CARRIER		
7702279369	8/31/01	9/19/01	19	NDT	9/20/01	TICKET CANCELED PER CUST REQUEST LINE OK		
4044678510	8/27/01	9/19/01	23	NDT	9/20/01	CABLE PAIR TRANSFER		
7709740760	8/18/01	9/19/01	32	NDT	9/20/01	REPAIRED CONDUCTOR		
7705078905	8/13/01	9/19/01	37	NDT	9/20/01	REPLACED DROP WIRE		
7704737439	8/12/01	9/19/01	38	NDT	9/20/01	CABLE PAIR TRANSFER		
7702778066	8/5/01	9/19/01	45	NDT	9/20/01	LINE OK OUT		
7704920626	7/20/01	9/19/01	61	NDT	9/20/01	AERIAL DROP WIRE		
4043496102	7/12/01	9/19/01	69	NDT	9/20/01	AERIAL DROP WIRE		
7708446550	7/3/01	9/19/01	78	NDT	9/20/01	NO TROULBE FOUND LINE OK		
6784130677	9/8/01	9/19/01	11	NDT	9/20/01	CUSTOMER NO LONGER WITH MCI MIGRATED BACK TO BSO	9/19/01	0
7702334585	9/18/01	9/20/01	2	NDT	9/20/01	RESPLICED DAMAGED FIBER CABLE		
4047663276	9/17/01	9/20/01	3	NDT	9/20/01	NO TROUBLE FOUND LINE OK		
6786250366	9/1/01	9/20/01	19	NDT	9/20/01	REPAIRED TERMINAL SERVICE		
7706311480	8/30/01	9/20/01	21	NDT	9/20/01	REPLACED AND FIXED DROP		
7709199374	8/30/01	9/20/01	21	NDT	9/20/01	REPAIRED CONDUCTOR		
7704135863	8/28/01	9/20/01	23	NDT	9/20/01	DIAL TONE GOOD TO THE NID ISW TROUBLE		
7708884185	8/28/01	9/20/01	23	NDT	9/20/01	FRAME HARDWARE		
6784171792	8/27/01	9/20/01	24	NDT	9/20/01	TERMINAL		
7702222807	8/25/01	9/20/01	26	NDT	9/20/01	BURIED WIRE		
7707619211	8/20/01	9/20/01	31	NDT	9/20/01	BAD CPE OR ISW TROUBLE		
4042438345	8/15/01	9/20/01	36	NDT	9/20/01	DIAL TONE REPAIRED GOOD TO THE DMARC		
7704393879	8/15/01	9/20/01	36	NDT	9/20/01	PAIR RECONSTRUCTED		
7703811196	8/14/01	9/20/01	37	NDT	9/20/01	REPAIRED SPLICE CASE		
7707198255	7/27/01	9/20/01	55	NDT	9/20/01	CABLE DAMAGE FOREIGN WORKER		
7704613001	7/20/01	9/20/01	62	NDT	9/20/01	FIXED THE SPLICE IN THE FIBER CABLE		
7704220707	7/17/01	9/20/01	65	NDT	9/20/01	AERIAL DROP WIRE		
7709684201	6/25/01	9/20/01	87	NDT	9/20/01	NO ACCESS		
7707193104	6/19/01	9/20/01	93	NDT	9/20/01	FIXED CABLE		
4043253271	7/27/01	9/14/01	49	NDT	9/21/01	TESTED GOOD TO THE NID		
4043299060	8/18/01	9/18/01	31	NDT	9/21/01	CABLE PAIR TRANSFER		
7702287745	9/18/01	9/20/01	2	NDT	9/21/01	AERIAL DROP WIRE		
7706381095	9/17/01	9/20/01	3	NDT	9/21/01	RETEST LINE OK		
4042992740	9/11/01	9/20/01	9	NDT	9/21/01	DIAL TONE GOOD TO THE NID ISW TROUBLE		
4048859445	8/22/01	9/20/01	29	NDT	9/21/01	DIAL TONE GOOD TO THE NID		
7704999699	8/21/01	9/20/01	30	NDT	9/21/01	REPLACED RJ2		
6782899194	8/15/01	9/20/01	36	NDT	9/21/01	TECH RECONSTRUCTED PAIR		
7707888241	8/13/01	9/20/01	38	NDT	9/21/01	BURIED SERVICE WIRE		
6788171434	8/12/01	9/20/01	39	NDT	9/21/01	RESPLICED DAMAGED FIBER CABLE		
7707886683	8/8/01	9/20/01	43	NDT	9/21/01	CENTRAL OFFICE REPAIR		

TELEPHONE NUMBER	MIGRATION COMPLETE	TROUBLE REPORTED	DAYS FROM MIGRATION	TROUBLE REASON	TROUBLE CLOSED	CLOSURE INFORMATION	DATE LLN RECEIVED	DAYS BETWEEN TROUBLE AND LLN
7708198767	8/2/01	9/20/01	49	NDT	9/21/01	DIAL TONE GOOD TO THE NID		
7704611699	6/25/01	9/20/01	87	NDT	9/21/01	REPLACED DAMAGED FIBER CABLE		
7709631826	6/21/01	9/20/01	91	NDT	9/21/01	REMOVED LOOPING PLUG AT THE CENTRAL OFFIC E		
7707751011	6/15/01	9/20/01	97	NDT	9/21/01	REMOVED AERIAL SERVICE WIRE		
4042882418	6/13/01	9/20/01	99	NDT	9/21/01	CPE ISW TROUBLE		
6787620434	5/16/01	9/20/01	127	NDT	9/21/01	DEFECTIVE CHANNEL UNIT REPAIRED		
7705176728	9/18/01	9/21/01	3	NDT	9/21/01	AERIAL DROP WIRE		
7706077553	9/18/01	9/21/01	3	NDT	9/21/01	NO TROUBLE FOUND		
7709608930	9/14/01	9/21/01	7	NDT	9/21/01	UNKNOWN TROUBLE LINE OK		
7706328977	9/4/01	9/21/01	17	NDT	9/21/01	BURIED DROP WIRE		
7703218789	8/30/01	9/21/01	22	NDT	9/21/01	CUSTOMER NO LONGER WITH MCI MIGRATED BACK TO BSO		
7704450618	8/28/01	9/21/01	24	NDT	9/21/01	WATER COMPANY CUT WIRE DT RESTORED		
4043664228	8/27/01	9/21/01	25	NDT	9/21/01	NO TROUBLE FOUND LINE OK		
7703000575	8/18/01	9/21/01	34	NDT	9/21/01	PAIR CHANGED		
7709097681	8/15/01	9/21/01	37	NDT	9/21/01	ROUTE CHANNEL UNIT		
4044869702	8/7/01	9/21/01	45	NDT	9/21/01	CHANGED AN F1 CABLE		
7709483527	8/1/01	9/21/01	51	NDT	9/21/01	CABLE PAIR REPAIRED		
7707877249	7/23/01	9/21/01	60	NDT	9/21/01	REPLACED CUT FIBER		
7703829410	7/20/01	9/21/01	63	NDT	9/21/01	AERIAL DROP WIRE		
7707865052	7/11/01	9/21/01	72	NDT	9/21/01	FIXED OUTSIDE NID		
7709496193	6/28/01	9/21/01	85	NDT	9/21/01	DIAL TONE GOOD TO THE NID ISW TROUBLE		
7708790506	6/25/01	9/21/01	88	NDT	9/21/01	NO TROUBLE FOUND		
7704454095	6/7/01	9/21/01	106	NDT	9/21/01	REPAIRED CUT FIBER CABLE		
4787507742	8/16/01	9/12/01	27	NDT	9/22/01	LINE TESTING OK		
4046846322	9/4/01	9/19/01	15	NDT	9/22/01	AERIAL DROP WIRE		
4047530480	6/6/01	9/19/01	105	NDT	9/22/01	NO TROUBLE FOUND		
7705910582	9/13/01	9/20/01	7	NDT	9/22/01	OPEN IN CABLE FIXED		
7709208178	8/20/01	9/20/01	31	NDT	9/22/01	REPAIRED TERMINAL SERVICE		
7703894796	9/17/01	9/21/01	4	NDT	9/22/01	AERIAL DROP WIRE		
7705544727	9/6/01	9/21/01	15	NDT	9/22/01	FRAME HARDWARE		
7707748796	9/6/01	9/21/01	15	NDT	9/22/01	PAIR CHANGED		
7709758722	9/6/01	9/21/01	15	NDT	9/22/01	REPAIRED CABLE		
7703225262	8/31/01	9/21/01	21	NDT	9/22/01	AERIAL DROP WIRE		
7705370564	8/31/01	9/21/01	21	NDT	9/22/01	CALLED TRANSLATIONS AND THE LINE IS OK		
4042944028	8/29/01	9/21/01	23	NDT	9/22/01	PAIR RECONSTRUCTED		
7708307730	8/21/01	9/21/01	31	NDT	9/22/01	SHORT GOING INSIDE		
4045084064	8/20/01	9/21/01	32	NDT	9/22/01	REPAIRED ISW ON NID		
7709867872	8/8/01	9/21/01	44	NDT	9/22/01	REPAIRED WIRE AT THE NID		
4047991914	8/6/01	9/21/01	46	NDT	9/22/01	ACCESIBLE PLANT FIXED		
7703879464	8/5/01	9/21/01	47	NDT	9/22/01	LINE OK TO DMARC		
7703810720	8/3/01	9/21/01	49	NDT	9/22/01	LINE GOOD TO THE DMARC		
7709934205	7/31/01	9/21/01	52	NDT	9/22/01	REPAIRED SHORT ON WIRE		
4043737158	7/26/01	9/21/01	57	NDT	9/22/01	CHANGED DEFECTIVE DAMAGED CABLE		
7702296010	7/6/01	9/21/01	77	NDT	9/22/01	REPLACED AERIAL SERVICE WIRE		
7709490955	6/20/01	9/21/01	93	NDT	9/22/01	CABLE PAIR TRANSFER		
7709831336	6/20/01	9/21/01	93	NDT	9/22/01	REPAIRED BURIED SERVICE WIRE		
4046271249	9/20/01	9/22/01	2	NDT	9/22/01	CUSTOMER NO LONGER WITH MCI MIGRATED BACK TO BSO		
7709775868	9/19/01	9/22/01	3	NDT	9/22/01	ACCESIBLE PLANT FIXED		
7707755486	9/17/01	9/22/01	5	NDT	9/22/01	REPLACED A PAIR		
4042430187	9/15/01	9/22/01	7	NDT	9/22/01	LINE TEST OK NO TROUBLE FOUND		
7705910582	9/14/01	9/22/01	8	NDT	9/22/01	PAIR CHANGED		
7703586134	8/27/01	9/22/01	26	NDT	9/22/01	DROP SERVICE CABLE INSTALLED ON THE WRONG LOT POST		
7705069215	8/18/01	9/22/01	35	NDT	9/22/01	NO TROUBLE FOUND ISOLATED TO ISW OR CPE		
7704356565	8/5/01	9/22/01	48	NDT	9/22/01	CROSS CONNECT WORK ERROR		
6783638475	7/27/01	9/22/01	57	NDT	9/22/01	REPAIRED CHANNEL UNIT		

TELEPHONE NUMBER	MIGRATION COMPLETE	TROUBLE REPORTED	DAYS FROM MIGRATION	TROUBLE REASON	TROUBLE CLOSED	CLOSURE INFORMATION	DATE LLN RECEIVED	BETWEEN TROUBLE AND LLN
7704456781	7/25/01	9/22/01	59	NDT	9/22/01	DEFECTIVE CHANNEL UNIT REPLACED		
7709616963	7/14/01	9/22/01	70	NDT	9/22/01	TROUBLE ISOLATED TO BAD PC MODEM		
7704224239	6/15/01	9/22/01	99	NDT	9/22/01	PAIR CHANGED		
7709556811	9/14/01	9/20/01	6	NDT	9/23/01	NETWORK INTERFACE WIRE REPAIRED		
7709570899	9/4/01	9/21/01	17	NDT	9/23/01	FRAME REPAIRED		
7703850890	6/4/01	9/21/01	109	NDT	9/23/01	EXCLUDED PER CUST		
7708326429	9/13/01	9/22/01	9	NDT	9/23/01	SERVICE ORDER HAS COMPLETED LINE OK NOW		
7706387013	8/15/01	9/22/01	38	NDT	9/23/01	LINE OK NO TROUBLE FOUND		
7703198584	8/12/01	9/22/01	41	NDT	9/23/01	RECONSTRUCTED A PAIR		
7707171721	8/5/01	9/22/01	48	NDT	9/23/01	REPAIRED BURIED WIRE		
7709918828	8/5/01	9/22/01	48	NDT	9/23/01	PAIR CHANGED		
6784458704	8/3/01	9/22/01	50	NDT	9/23/01	SHORT GOING IN		
7705176855	7/27/01	9/22/01	57	NDT	9/23/01	REPAIRED A BURIED SERVICE WIRE		
7709412954	6/26/01	9/22/01	88	NDT	9/23/01	REPAIRED AERIAL SERVICE WIRE		
4046386218	5/23/01	9/22/01	122	NDT	9/23/01	NO ACCESS		
7704438983	8/28/01	9/23/01	26	NDT	9/23/01	NO TROUBLE FOUND OK		
7708869821	8/28/01	9/23/01	26	NDT	9/23/01	CENTRAL OFFICE TROUBLE		
6783634566	8/22/01	9/23/01	32	NDT	9/23/01	NO TROUBLE FOUND LINE OK		
7704455647	8/22/01	9/23/01	32	NDT	9/23/01	TEST OK AT THE CENTRAL OFFICE		
7705068260	8/21/01	9/23/01	33	NDT	9/23/01	REMOVED BLOCK FROM THE LINE		
7705546418	7/27/01	9/23/01	58	NDT	9/23/01	TICKET CANCELLED PER DT RESTORED		
7704957918	7/23/01	9/23/01	62	NDT	9/23/01	NO TROUBLE FOUND		
6783630955	6/19/01	9/23/01	96	NDT	9/23/01	DIAL TONE GOOD TO THE NID		
4047998944	8/5/01	9/7/01	33	NDT	9/24/01	EXCLUDED TKT PER LINE OK		
4046960979	7/5/01	9/18/01	75	NDT	9/24/01	DIAL TONE GOOD TO THE NID		
4043559488	8/25/01	9/19/01	25	NDT	9/24/01	FOUND OK OUT		
7706381095	9/17/01	9/21/01	4	NDT	9/24/01	NO TROUBLE FOUND		
7702582390	7/16/01	9/21/01	67	NDT	9/24/01	AERIAL DROP WIRE		
6787620434	5/16/01	9/21/01	128	NDT	9/24/01	NETWORK TERM WIRE REPAIRED		
6785671841	9/21/01	9/22/01	1	NDT	9/24/01	DIAL TONE GOOD TO DMARC		
7706381095	9/17/01	9/22/01	5	NDT	9/24/01	REPAIRED BURIED CABLE		
7703583267	9/15/01	9/22/01	7	NDT	9/24/01	TROUBLE ISOLATED TO ISW OR CPE		
7702142785	9/10/01	9/22/01	12	NDT	9/24/01	DIAL TONE GOOD TO THE NID		
7707256677	8/11/01	9/22/01	42	NDT	9/24/01	REPLACED GROUNDED WIRE		
7702712221	7/16/01	9/22/01	68	NDT	9/24/01	PAIR CHANGED		
7703049563	5/23/01	9/22/01	122	NDT	9/24/01	ISW TROUBLE		
7703581064	5/14/01	9/22/01	131	NDT	9/24/01	REPAIRED SHORT AT TERMINAL		
7704638962	9/18/01	9/23/01	5	NDT	9/24/01	PLUG DEFECTIVE ON THE ONI		
7703851283	9/14/01	9/23/01	9	NDT	9/24/01	EXCLUDED ISW TROUBLE		
4042552393	9/11/01	9/23/01	12	NDT	9/24/01	WIRE REPAIRED		
7707369767	8/28/01	9/23/01	26	NDT	9/24/01	REPLACED BURIED WIRE		
7708888056	8/23/01	9/23/01	31	NDT	9/24/01	CABLE FAILURE REPAIRED		
6789570960	8/17/01	9/23/01	37	NDT	9/24/01	TESTING OK		
7703510770	8/1/01	9/23/01	53	NDT	9/24/01	REPAIRED AN F1 AND REBURIED CABLE		
7704957918	7/23/01	9/23/01	62	NDT	9/24/01	CROSS CONNECT REPAIRED		
6789456907	6/28/01	9/23/01	87	NDT	9/24/01	F2 CABLE REPAIRED		
7703580633	6/27/01	9/23/01	88	NDT	9/24/01	REPAIRED F1 CABLE		
7702050267	6/9/01	9/23/01	106	NDT	9/24/01	RESET TRU		
7705176728	9/18/01	9/21/01	3	NDT	9/25/01	LINE TRANSLATIONS UNKNOWN		
7704352908	8/31/01	9/21/01	21	NDT	9/25/01	REPAIRED AN F2 CABLE		
7709972445	6/26/01	9/22/01	88	NDT	9/25/01	TEST OK NO TROUBLE FOUND		
7706455710	8/24/01	9/12/01	19	NDT	9/26/01	CHANGED AN F1 BAD CABLE		
6783422291	8/3/01	9/13/01	41	NDT	9/26/01	NO TROUBLE FOUND LINE OK		
7704436673	7/15/01	9/21/01	68	NDT	9/26/01	AERIAL DROP WIRE		
4045598600	8/5/01	9/14/01	40	NDT	9/27/01	DIAL TONE GOOD TO THE NID		

TELEPHONE NUMBER	MIGRATION COMPLETE	TROUBLE REPORTED	DAYS FROM MIGRATION	TROUBLE REASON	TROUBLE CLOSED	CLOSURE INFORMATION	DATE LLN RECEIVED	DAYS BETWEEN TROUBLE AND LLN
6785469916	9/10/01	9/23/01	13	NDT	9/28/01	DEFECTIVE 72 AND 45		
4042894330	8/4/01	9/23/01	50	NDT	9/28/01	REPLACED AERIAL SERVICE WIRE AT THREE POLES		
4046227147	8/20/01	9/23/01	34	NDT	9/29/01	TEST OK PER CUST		
4043719066	7/20/01	9/21/01	63	NDT	10/2/01	DIAL TONE GOOD TO THE NID ISW TROUBLE		
4787507742	8/2/01	9/22/01	51	NDT	10/4/01	BROKEN CROSS JUMPER REPAIRED		
7703066100	7/17/01	8/24/01	38	NDT	8/24/24	BAD SERVICE WIRE		
7705362329	5/30/01	8/5/01	67	NDT	COMMIT BY 9/7/01			

ATTACHMENT 9

1   STATE OF ALABAMA
2   ALABAMA PUBLIC SERVICE COMMISSION
3   MONTGOMERY, ALABAMA
4
     IN RE: Petition for Approval of a
5   Statement of Generally Available Terms
     and Conditions pursuant to Section 252(f)
6   of the Telecommunications Act of 1996 and
     Notification of Intention to File a
7   Petition for In-Region InterLATA
     Authority with the FCC pursuant to
8   Section 271 of the Telecommunications Act
     of 1996.
9
10
11   DOCKET NO. 25835
12   VOLUME II-A
13   CONTINUATION OF THE PROCEEDINGS
14   taken before the Alabama Public Service
15   Commission in the above-referenced matter
16   on Tuesday, June 26th, 2001, commencing
17   at 8:55 A.M. in the hearing room of the
18   Alabama Public Service Commission, Room
19   904, RSA Union Building, 100 Union
20   Street, Montgomery, Alabama, before Ricky
21   L. Tyler, Certified Shorthand Reporter
22   and Notary Public in and for the State of
23   Alabama at Large.
          MONTGOMERY REPORTING SERVICE
              (334) 262-3331

         MONTGOMERY REPORTING SERVICE
             (334) 262-3331

        MONTGOMERY REPORTING SERVICE
            (334) 262-3331

1   PROCEEDINGS
2
3   JUDGE GARNER: All right. Let's go
4   ahead and go on the record.
5   For the record, we're here this
6   morning of June 26th, 2001 for
7   the continued hearing of
8   25835. Unless there are any
9   preliminary matters, I believe
10   we're ready to resume with the
11   cross-examination of Mr. Pate.
12   MR. HOPKINS: Judge Garner, a
13   preliminary matter, I left the
14   missing page from Exhibit 68 on
15   the ledge and passed it to all
16   counsel in the case.
17   JUDGE GARNER: All right. This is
18   the business detail and the
19   percent of service?
20   MR. HOPKINS: Yes.
21   JUDGE GARNER: It will be included
22   with the exhibit that you
23   mentioned.
         MONTGOMERY REPORTING SERVICE
             (334) 262-3331

1   MR. HOPKINS: Thank you.
2   JUDGE GARNER: Thank you, sir. Any
3   other preliminary? If not,
4   let's proceed with the
5   cross-examination of Mr. Pate.
6   And, Mr. Pate, let me remind
7   you that you are still under
8   oath.   ·
9   MR. PATE: Certainly.
10
11   CROSS-EXAMINATION
12 BY MR. O'ROARK:
13 Q. Good morning, Mr. Pate, I'm De O'Roark
14   with WorldCom. It's good to see you
15   again.
16 A. Good morning.
17 Q. You're aware that MCI launched local
18   residential service in Georgia last
19   month, aren't you?
20 A. Yes, I am.
21 Q. And you're aware that the way we're
22   providing that service is using UNE-P?
23 A. Yes.
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1 Q. And we use TAG for certain pre-ordering
2   functions and then submit the orders
3   using EDI, are you aware of that?
4 A. Yes, it's my understanding.
5 Q. And you are aware that the way we do
6   business is we submit orders for
7   migrations as specified?
8 A. Yes.
9 Q. And just so everyone understands, a
10   migration means that the customer is
11   moving from BellSouth to MCI, and when we
12   say "as specified," that means that
13   whatever combination of features that the
14   customer had before are being changed to
15   whatever feature combination MCI
16   specifies on the order?
17 A. Yes.
18 Q. Let's talk about some of the issues that
19   are starting to arise out of our launch.
20   You're aware that in Ms. Lichtenberg's
21   testimony filed in this case that she's
22   stated that two MCI customers had lost
23   dial tone at or shortly after migration?
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.

1 A. Yes.
2 Q. And I assume by this time you've seen Ms.
3   Lichtenberg's Louisiana affidavit which
4   was filed, I believe, three days later
5   than here on June 6th, 2001, in which she
6   noted that an additional 18 customers had
7   lost dial tone at or shortly after
8   migration and that two more lost the
9   ability to receive calls?
10 A. Yes.
11 Q. And, Mr. Pate, I'll represent to you that
12   Ms. Lichtenberg will be here a little
13   later in the week testifying, and
14   unfortunately her -- I expect that her
15   testimony will be that that problem has
16   continued and that through last Friday we
17   had seen 85 customers who have lost dial
18   tone. And I would like to talk with you
19   about that issue. If Ms. Lichtenberg's
20   information is accurate, can we agree
21   that this appears to be a serious
22   problem?
23 A. I can agree that it appears to be a
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1   problem; whether it's serious or not is
2   another adjective that I just don't have
3   enough data with everything that you've
4   said to me. For example, I don't recall
5   specifically with her Louisiana filing
6   where we are in total numbers of volume.
7   I just don't recall that, I've read so
8   much.
9   So it could be a magnitude --
10   first off, let me say it's serious from
11   BellSouth's perspective any time anybody
12   loses dial tone. What I'm saying,
13   whether it's serious in the way you are
14   describing it, there are some things that
15   just happen as a normal course of doing
16   business, and I haven't done any
17   assessment from that standpoint to see if
18   it's an issue like that. But I will
19   agree with you that it's serious any time
20   anybody loses dial tone.
21 Q. So it's serious for the customer
22   involved, as far as whether it is a
23   serious systemic problem, you would like
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1 to get an idea of how many orders we're
2 talking about and the percentage of times
3 that we're seeing that loss of dial tone
4 problem?
5 A. Yes, that's what I'm trying to say.
6 Thank you.
7 Q. To your knowledge, is BellSouth
8 investigating this problem?
9 A. Yes, most definitely.
10 Q. As you sit here today, do you know
11 whether BellSouth has determined a root
12 cause?
13 A. From what we've determined today, what we
14 did when we went with these UNE-P orders,
15 which is what we're describing, is when
16 you do that migration from a BellSouth
17 customer to CLEC customer, we have to
18 take that order and do a disconnect and a
19 new connect associated with it, that's
20 the way our systems are today in order to
21 be able to process that. What we've
22 found is from an Operations Support
23 Systems electronically, it's not an issue

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1 with our programming in the way that
2 order is being handled, but we have
3 discovered if the order, for any reason,
4 is submitted manually to begin with, or
5 if the order falls out in our centers for
6 whatever reason that could cause it to
7 fall out so that someone in the LCSC has
8 to intervene, we have identified where we
9 had to go back and retrain some of our
10 representatives how to associate those
11 two service orders that that one local
12 service request generates so that one
13 doesn't get worked without the other
14 getting worked. And we've recently had
15 an extensive training effort with those
16 local carrier service representatives and
17 we feel like that has had a significant
18 impact or will have a significant impact
19 on dealing with that issue.
20   And then on top of that we're
21 also taking an action going forward to
22 look at making this, what I refer to as a
23 single C order, which stands for change,

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1 instead of having to do two service
2 orders for that request. And we've done
3 that assessment and we have those
4 requirements almost in finalization and
5 target to have that in place about the
6 first quarter of next year.
7 Q. Okay. Mr. Pate, I would like to hand out
8 some discovery responses that BellSouth
9 provided to me yesterday.
10   MR. O'ROARK: And, counsel, for your
11   information, I talked to Ms.
12   Foshee about this yesterday,
13   there was one interrogatory
14   response with respect to which
15   BellSouth produced confidential
16   information, that information
17   is not included in this
18   exhibit. Judge Garner, I've
19   forgotten what exhibit number
20   we're up to.
21   JUDGE GARNER: 21.
22   MR. O'ROARK: Thank you.
23   JUDGE GARNER: The document will be

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1   so marked.
2   (MCI Exhibit 21 marked for
3   identification.)
4 Q. Mr. Pate, do you have Exhibit 21 in front
5 of you now?
6 A. Yes, I have the total package.
7 Q. And let me just tell you what we've got
8 are BellSouth's responses to
9 interrogatory numbers one through ten and
10 then also 13. Did you assist in
11 preparing these responses?
12 A. I was involved at some level of detail, I
13 think, in just about every one of these
14 as I thumb through it. Some was totally
15 my responsibility; some was worked in
16 conjunction with the people that are over
17 the centers, but I think I touched every
18 one in some capacity.
19 Q. What I'd like to do is use the responses
20 that BellSouth has provided to explore
21 that two order process that you just
22 described. One quick housekeeping point,
23 on the very first page, response to

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1 interrogatory number one, you refer to
2 SOCS a couple of times; the first time
3 it's the Service Order Control System and
4 then a few paragraphs down, two from the
5 bottom, it's the Service Order
6 Communication System. I assume that's
7 just a clerical error?
8 A. Well, it's -- internally a lot of people
9 call it Control System and it is truly
10 Communications System.
11 Q. Well, I've been wrong all this time.
12 Thank you for the clarification. Let's
13 put this two order process in perspective
14 for just a moment, because you talked to
15 Mr. Hopkins for a good while yesterday
16 about the process that CLECs use to
17 submit orders to BellSouth; that is, the
18 CLEC will submit a Local Service Request
19 or LSR that goes through BellSouth's
20 systems, I believe first into something
21 called LEO and then something called
22 LESOG and then finally to SOCS?
23 A. Yes.

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1 Q. And so what we're talking about is sort
2 of the back end of the system now. Then
3 is what happens, once the order is
4 received in SOCS, it's accepted, and then
5 it needs to be provisioned?
6 A. Yes.
7 Q. One problem you can have with the two
8 order process, you have the D order, or
9 the disconnect order, and the N order,
10 sometimes called the new order, and if
11 they get out of sequence and that the N
12 order is processed first, then when that
13 D order comes down the pike a day or two
14 later, it can then disconnect the
15 customer's service, is that a problem
16 that you can have?
17 A. Well, if the N order is processed first,
18 you won't get the -- it's when it's just
19 the opposite, if the D was processed
20 first, you would have the problem.
21 Q. Okay. So your understanding is that if
22 the D order gets processed first that the
23 customer's service gets taken down?

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1 A. Yes.
2 Q. And then the N order comes along and puts
3 the customer back in service?
4 A. Yes. But how they should be processed,
5 how it should occur, is the N order
6 really gets processed and then the
7 disconnect, the D order, gets processed.
8 So that you have that -- and it's done in
9 about the same time frame; they are
10 coordinated from the systems handling
11 that. You relate these service orders.
12 This fails to relate them to each other.
13 So they should be processed together and
14 reuse facilities as described in here.
15 What's referred to as an RRSO, to
16 indicate on that order to reuse those
17 facilities and process those together.
18 Q. And in this interrogatory response number
19 one you describe how BellSouth attempts
20 to relate the N order and the D order?
21 A. Yes.
22 Q. And you use some technical terms here,
23 let's go over them briefly. You just

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1 referred to one of them, Reuse Related
2 Service Order Field Identifier. The
3 Field Identifier is sometimes in the
4 trade called a FID?
5 A. Yes.
6 Q. What is a FID?
7 A. It's just an identifier associated with
8 that particular code that just adds
9 further amplification associated with
10 it. To put it in layman's terms, you
11 could have FIDs associated with a USOC,
12 for example. If you were ordering a
13 shirt out of a catalogue, you know, the
14 shirt itself could be the USOC and the
15 FID could be I want this particular
16 color. So it just adds amplification.
17 Q. And what is it that this FID amplifies or
18 clarifies?
19 A. Well, in conjunction with the RRSO, it's
20 saying this is -- essentially you've got
21 this D and N order and we're going to
22 reuse these facilities working together.
23 Q. Because there's not a -- is there a USOC

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1   that this FID is attached to?
2 A. No. There is a USOC for the UNE-P
3   associated with the UNE-P transaction
4   itself, I've forgotten exactly what it
5   is, that identifies this UNE-P that we're
6   setting up.
7 Q. In any case, this Field Identifier is
8   placed on BellSouth's internal
9   provisioning order that is issued from
10   SOCS?
11 A. Yes. And this order is built into SOCS.
12   As I said, if it's submitted
13   electronically, the systems would build
14   these two orders. If it's submitted
15   manually or has intervention by the
16   representative in the Local Carrier
17   Service Center, they would be actually
18   building these orders through DOE or
19   SONGS. It would be SONGS.
20 Q. And as we discussed at the outset, the
21   system that MCI is using in Georgia is
22   the electronic EDI system to submit its
23   orders?

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1 A. Right.   —
2 Q. So unless the order falls out, this
3   process that we're describing with the
4   Field Identifier should be happening
5   electronically?
6 A. Yes.
7 Q. This RRSO Field Identifier is placed on
8   both the D order, the disconnect order,
9   and the N order, or the new order; is
10   that right?
11 A. Yes. That's what we state in our
12   response.
13 Q. And can you tell us in layman's terms,
14   what is this Field Identifier telling
15   BellSouth's systems? It's telling it to
16   reuse the facility?
17 A. Yes. Because I think it's been discussed
18   in some other proceedings and it may come
19   out here, really you're talking about a
20   records change. You're not putting in
21   new facilities, you're reusing the
22   existing facilities that are already in
23   place and just converting it from the

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1   retail facility configuration that was in
2   place for BellSouth to this UNE-P
3   transaction. So we're trying to say from
4   a systems standpoint you don't need any
5   new facilities; you don't have to go look
6   for any new facilities; reuse the
7   existing facilities and convert it from
8   that retail to the UNE-P.
9 Q. And then on the next page of your
10   response to interrogatory number one, you
11   talk about another Field Identifier
12   called the Sequence FID, and that only
13   goes on the N order, I gather?
14 A. Yes.
15 Q. And that is because the N order, you say,
16   should go first, and so if the D order
17   gets there first and it doesn't have that
18   Sequence FID, the system will know that
19   something is wrong?
20 A. That's what it's supposed to be, yes.
21 Q. Well, if the D order gets there first and
22   it doesn't have any special Field
23   Identifier for sequence, how will the

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1   system know that anything is wrong if the
2   D order got there first?
3 A. Well, that's the issue that I described
4   that we were talking about, that -- what
5   we've seen in cases happen, and that has
6   resulted when there's manual intervention
7   that's causing that, because a
8   representative in the center is having to
9   enter that information and they were not
10   capturing those FIDs, the RRSO, as well
11   as the sequence, and that's what we've
12   done the retrain on.
13 Q. Well --
14 A. Just one more time, as I said earlier, we
15   have not been able to identify this as a
16   systems problem if the order flows
17   through. The systems appear to be
18   working correctly.
19 Q. And my question was just trying to
20   understand this as a layman.
21 A. Yes.
22 Q. Assuming that the electronic system works
23   properly, that the Sequence Field

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1   Identifier goes on the N order as it's
2   supposed to, nevertheless the D order
3   gets there first and it doesn't have a
4   Sequence Field Identifier on it, how does
5   the system know that something is amiss,
6   that the D order got there first?
7 A. The only other way it would know is if
8   this RRSO field was helping relate those
9   two service orders, that would be the
10   only other indicator. It would be
11   telling you you're reusing facilities for
12   something, so something is associated
13   with this that's not quite right.
14 Q. In the last paragraph of the response you
15   walk through the flow that the D order
16   and the N order go through. The first
17   stop is something called a Loop Facility
18   Assignment System that is abbreviated
19   LFACS. And you say, BellSouth says, that
20   the reason these orders go to LFACS first
21   is to update the facility information
22   with new information. Can you elaborate
23   on exactly what happens at LFACS?

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1 A. Well, LFACS is just a database that
2   stores the information for loop
3   facilities, the assignment of those
4   loops. So it's just going to be updating
5   that assignment and identifying who
6   that's assigned to, the fact that it's a
7   UNE-P and it belongs to MCI from a
8   records standpoint.
9 Q. So in LFACS I assume there's a cable pair
10   that's assigned to that customer?
11 A. Yes.
12 Q. And that cable pair is going to stay the
13   same, the only change that really has to
14   be made there is that it now belongs --
15   it's being leased by MCI and not used by
16   BellSouth?
17 A. Yes.
18 Q. And I gather it doesn't really matter in
19   LFACS which order goes first? If the D
20   order got there first, would that be a
21   problem?
22 A. LFACS probably cannot recognize either
23   way. And that's part of the problem

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1   we've experienced I would think, but I
2   haven't looked at it from that
3   perspective now that you mention that to
4   me. There should be that -- still that
5   relation of the FIDs and sequence of the
6   FIDs, but LFACS, if it gets that D order,
7   which is the problem that we've
8   acknowledged here, it probably would not
9   recognize something is wrong, that it
10   doesn't have the N order. It's just
11   doing what that specific order tells it
12   to do with that cable and pair
13   assignment.
14 Q. When you say that's part of the problem,
15   is that part of the problem even when MCI
16   submits the order electronically?
17 A. What I said earlier was, from an
18   electronic standpoint, we haven't
19   identified this to be a problem.
20 Q. And that's what I was trying to explore,
21   because that's what I had understood you
22   to say before, and now you're saying part
23   of the problem may be with LFACS with the

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1   N order and the D order getting out of
2   sequence there. But you think that's
3   only a problem if it's submitted
4   manually?
5 A. Yes, from everything that we have been
6   able to assess, that is correct.
7 Q. The next stop that you describe is that
8   the N order and the D order then go to
9   the switch so that the line class code
10   can be changed to change the service from
11   flat rate to measured service?
12 A. Yes.
13 Q. And the same question there, does the
14   sequence of the orders matter at all
15   going into the switch?
16 A. It should. It should, yes, from the
17   switch translation standpoint, because
18   you change those line class codes. It
19   should matter.
20 Q. It should or should not?
21 A. Should.
22 Q. So that's another case where those orders
23   need to be related or we may have a

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1   problem?
2 A. Yes.
3 Q. And then the next step is completion in
4   SOCS?
5 A. Completion in SOCS that drives to the
6   billing updates to CRIS.
7 Q. Which we will talk about in a little
8   bit.
9 A. Okay.
10 Q. And, again, at that completion step, does
11   it matter whether the D order or the N
12   order goes first?
13 A. Well, yes, the way it's designed to
14   process, it most definitely matters. I
15   mean, you want the new connect in place
16   before the disconnect.
17 Q. And what happens if they get out of
18   order?
19 A. Well, it would still show -- if they're
20   out of order, and, of course, they're not
21   related, as we just discussed, then it's
22   going to show a completion for that one
23   order that's being processed, because

1   there's no relationship between the two.
2   That's the issue of why these need to be
3   tied together.
4 Q. So at any of those first three stages, it
5   sounds like if the D order and the N
6   order get out of sequence, the customer
7   could lose dial tone?
8 A. If the D gets processed before the N, if
9   that's what you mean by out of sequence,
10   the potential exists for them to lose
11   dial tone, yes.
12 Q. And then the last step you describe here
13   is that when the order completes, it goes
14   to the Customer Record Information System
15   known as CRIS. At that point do we still
16   have two orders or are we down to one
17   order?
18 A. The main issue there -- it's really
19   processing two orders, but driving one
20   result to CRIS because of the
21   completions. And that result is to put
22   that in as that -- from the flat to
23   measured rate and identifying it as the

1   UNE-P and what those rates are that's
2   charged for you.
3 Q. You lost me there, I think, because a
4   couple of steps back we had said that the
5   D order and the N order go to the
6   switch --
7 A. Uh-huh. (Positive response.)
8 Q. -- where we got the change from the flat
9   rate to the measured service. And I
10   think you just said in CRIS there's a
11   change from flat rate to measured
12   service. Is that happening twice or am I
13   missing something?
14 A. Well, we've got two different places
15   where it happens. The line class code
16   translation in the switch -- and you're
17   getting into an area that you're really
18   getting almost beyond my expertise,
19   because we're now into details in the
20   provisioning. But I can talk high level
21   from the standpoint of the translation of
22   the switch is a line class code, which
23   will still drive the need, based on what

1   we're ordering here, to get the record
2   information correct with what's on that
3   Customer Service Record and what's going
4   to be billed for you. And those drive to
5   the Customer Record Information System
6   where that particular aspect of this
7   whole process ends. That's where it
8   resides.
9 Q. Does Mr. Ainsworth have more expertise on
10   provisioning systems?
11 A. Yes, most definitely. And Mr. Scollard
12   has detailed knowledge of CRIS itself
13   from the billing standpoint.
14 Q. Let's skip over to the response to
15   interrogatory number three. And this is
16   the interrogatory where we asked if
17   BellSouth had experienced any problems in
18   keeping multiple internal orders in
19   sequence, and here BellSouth describes a
20   problem that it did have. And I think
21   this may be what you were describing
22   before concerning orders -- LSRs that are
23   submitted manually or fall out for manual

ATTACHMENT 10

Georgia Public Service Commission

6865

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DEC 2 8 1958

Docket No. 6865-U

EXECUTIVE SECRETARY
G.P.S.C.

ORDER DECIDING COMPLAINT

In Re: Petition of MCImetro for Arbitration of Certain Terms and Conditions of
Proposed Agreement with BellSouth Telecommunications, Inc. Concerning
Interconnection and Resale Under the Telecommunications Act of 1996.

APPEARANCES

BY THE COMMISSION:

This matter comes before the Georgia Public Service Commission on a complaint filed
by MCImetro Access Transmission Services, Inc. ("MCImetro" or "MCIm") against BellSouth
Telecommunications, Inc. ("BellSouth" or "BST"). MCImetro alleged that BellSouth violated
its Interconnection Agreement with MCIm, as well as the federal Telecommunications Act of
1996 (the "Act"), and Georgia's Telecommunications and Competition Development Act of
1995, O.C.G.A. Sections 46-5-160 et seq. (the "Georgia Act"), by refusing to provide parity in
the services that BellSouth has provided to MCImetro and to BST itself.

Specifically, MCImetro asked that the Commission resolve disputes on the issues of
Operations Support Systems ("OSS"), the Regional Street Address Guide, Due Date Intervals,
Customer Service Records, Service Jeopardy Notification, Soft Dial Tone Service, Customer
Switching, Usage Data, Directory Listing Information, and Reciprocal Compensation.

interLATA services (once it gains such authority under Section 271, its reasoning has some applicability here as well. The FCC agreed that BellSouth, during an inbound telephone call, should be allowed to recommend its own long distance affiliate, as long as it contemporaneously states that other carriers also provide long distance service and offers to read a list of all available interexchange carriers in random order. This accords with the FCC's attempts to balance equal access obligations with joint marketing rights under Section 272(g).[44]

Such balance should also apply to this point. BellSouth already agreed to alter its SDS message, and its new message references both BellSouth as well as other providers of local services. Moreover, in order to reach either BellSouth or any other local service provider, the customer must call from another location. Even if the customer wanted to choose BellSouth, he or she cannot do so immediately. This minimizes any possibility that the customer would be unduly influenced, thus providing an offsetting factor similar to the offer to read a random list of long distance providers in the interLATA context. The reference to BellSouth in BellSouth's new SDS message does not appear to rise to the level of an improper practice, nor to violate the MCIm-BellSouth Interconnection Agreement.

Count Seven -- Customer Disconnects During Switching

Positions of Parties

MCImetro asserted that BellSouth failed to provide parity of service to customers switching from BellSouth to MCImetro, and failed to meet the competitive neutrality standard and the requirement that lines not be intentionally or unnecessarily disconnected. MCI referred to the following provision of the Interconnection Agreement:

---

[44] *South Carolina Order* at para. 237.

> BellSouth shall not intentionally or unnecessarily disconnect any subscriber service or existing features at any time during the migration of a Resale subscriber to MCIm service, unless disconnection is required by an MCIm order changing the service type.[45]

MCIm asked the Commission to order BellSouth to fix this problem either by treating customer migration as a billing change only, or by preventing disconnection in some other way.

BellSouth responded that at the time MCImetro filed its complaint, BST's systems required that when MCImetro obtained a BST customer through resale, BST had to submit two orders to change the customer from BST to MCImetro. The first order terminated or disconnected the end user as a BST customer (a "D" order), and the second order connected the end user as a MCImetro customer (an "N" order).

Subsequently, BellSouth developed the "C" order which performs the functions of the "D" and "N" orders in a single step, thereby alleviating any risk of disconnect. BST implemented the "C" order for simple orders in mid-January, and for complex orders in mid-February, 1998.

BellSouth added that it did not intentionally or unnecessarily disconnect migrating customers. According to BellSouth, the disconnects were a necessary albeit unfortunate side effect of BST's old customer migration system. The implementation of the "C" order renders moot MCImetro's complaint about "D" and "N" orders. In addition, BellSouth related that it has experienced the same type of disconnect when customers migrated back to BellSouth,[46] and thus parity has been provided as required by the Act and the Interconnection Agreement.

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[45] Interconnection Agreement, Attachment VIII, § 2.2.2.2.
[46] BST witness Varner, T. at 217.

Discussion and Determination

BellSouth' implementation of the "C" order has alleviated MCIm's concerns regarding this point. Therefore, it appears that BellSouth is in compliance with this portion of the Interconnection Agreement, and MCImetro's complaint on this issue has already been resolved.

Count Eight – Flat-Rate Usage Data

Positions of Parties

MCImetro alleged that BellSouth failed to provide usage data as required by the Interconnection Agreement. According to MCImetro witness Martinez, BellSouth is required under the Agreement to provide flat-rate usage data to the extent it is recorded.[47]

The Agreement defines Recorded Usage Data as including, among other things, information concerning completed calls. MCImetro argued that BellSouth's switches are able to record flat-rate usage data,[48] and the Agreement requires BellSouth to provide all information on completed calls, so BellSouth should be required to provide said information to MCIm.

BellSouth replied that it is not required to provide usage data for all completed calls. Rather, it is only required to provide billable usage data. BellSouth argued that the Agreement cannot reasonably be read to support MCImetro's view that BST is obligated to provide usage data on flat-rate calls. BellSouth argued that Section 4.1.1.3 of the Agreement does not require it to provide usage data for all completed calls.

BellSouth argued that the Agreement's provisions are contrary to MCIm's reading, and that completed calls are simply one category of information included in the usage data that BellSouth provides.

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[47] T. at 989-999.
[48] T. at 350.

ATTACHMENT 11

6

7

8   Q.   STATE YOUR NAME, YOUR BUSINESS ADDRESS, AND YOUR POSITION

9   WITH BELLSOUTH TELECOMMUNICATIONS, INC. ("BELLSOUTH").

10

11   A.   My name is Ken L. Ainsworth. My business address is 675 W. Peachtree Street,

12   Atlanta, Georgia 30305. I am a Director - Interconnection Operations for BellSouth. I

13   have served in my present position since December 1997.

14

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

16

17   A.   Yes. I have previously filed direct testimony in this proceeding on May 16, 2001.

18

19   Q.   WHAT IS THE PURPOSE OF YOUR TESTIMONY TODAY?

20

21   A.   The purpose of my rebuttal testimony is to respond to the testimony filed by various

22   parties in response to BellSouth's May 16, 2001 filing.

23

24   Q.   PLEASE RESPOND TO AT&T TESTIMONY DEALING WITH REASSIGNMENT

25   OF TELEPHONE NUMBERS.

1		restrictions and not USOC information. Additionally, in paragraph 28, she alludes to
2		obtaining ordering information from a stand-alone interconnection agreement, which
3		again is not a document intended to provide detailed ordering information. The correct
4		source for the information is provided in Market Service Descriptions ("MSD"), not
5		only for UNE-P combinations, but also for all UNE products. This information is
6		accessible via the Internet at BellSouth's Interconnection web site. The UNE-P MSD
7		has been available on the web site since October of 2000. BellSouth provides detailed
8		business rules and ordering procedures on this web site.
9		
10		Mr. Fury of NewSouth (page 6) contends that BellSouth provided inaccurate
11		instructions concerning the appropriate USOCs to use when submitting UNE platform
12		orders. Let me reiterate my previous response: the correct source for USOC
13		information is provided in Market Service Descriptions ("MSD") and is accessible via
14		BellSouth's Interconnection web site and not the account team nor the LCSC.
15		
16	Q.	PLEASE DISCUSS THE ISSUE OF ERRONEOUS REJECTS CAUSED BY
17		BELLSOUTH.
18		
19	A.	I will respond to pages 16-17 of Ms. Seigler's testimony and page 5 of
20		Ms. Lichtenberg's testimony in which they discuss rejects and errors caused by
21		BellSouth. This issue was a simple case of what happens when humans are involved.
22		They make mistakes. However, to address this issue, BellSouth has provided additional
23		training to certain LCSC representatives. This issue was brought to the attention of
24		BellSouth in May by both AT&T and MCI. (See time periods mentioned in
25		Ms. Seigler's for AT&T, page 15 and Ms. Lichtenberg for MCI, page 3). BellSouth

ATTACHMENT 12

Record Date	PON	Ver	Query	Telephone #	Reason Fallout/Comments/Notes
09/07/2001	S004288936BSGAPR	00	V	7709289527	CSR had error on zip code
09/07/2001	S004286996BSGAPR	00	V	7709414143	Denied Account
09/07/2001	S004289245BSGAPR	00	V	7709978093	Denied Account
09/07/2001	S004286072BSGAPR	00	V	7704832230	Due Date outside of standard interval offered
08/31/2001	S004199223BSGAPR	00	C	6785859670	Feature conflict -Dupl PON requested NSS removed;PSO for PON S004199191BSGAPR
09/07/2001	S004288248BSGAPR	00	V	7707756505	Feature conflict - CLEC requested NXMCR & HBY; HBY is included in NXMCR
08/31/2001	S003948665BSGAPR	00	N	7703219941	Invalid address- RSAG required directional of NW;CLEC did not populate
08/25/2001	S004120891BSGAPR	00	N	4042498095	Invalid address-SATH left blank;NO MATCH RSAG
08/27/2001	S004135592BSGAPR	00	N	7704635312	Invalid address-SATH left blank
08/27/2001	S004136729BSGAPR	00	N	6789858671	Invalid address-SATH left blank & City does not match RSAG
09/07/2001	S004285687BSGAPR	00	V	7703391067	Invalid address - RSAG required diretional of NW omitted
09/07/2001	S004285884BSGAPR	00	V	7707756739	Invalid address- SATH of ST omitted
09/07/2001	S004286080BSGAPR	00	V	7702221746	Invalid address- SATH=PK should be PKWY
09/07/2001	S004286119BSGAPR	00	V	6783665958	Invalid address-SATH=blank;should be MANOR
09/07/2001	S004286177BSGAPR	00	D	6784230695	Invalid address-SASN=Fayetteville RD Lower;should be Fayetteville only
09/07/2001	S004288246BSGAPR	00	N	7705373786	Invalid address- SATH=blank;RSAG required St/RD/Lane;CLEC did not populate
09/07/2001	S004288551BSGAPR	00	C	4046221620	Invalid address- SATH left blank
09/07/2001	S004288726BSGAPR	00	V	7705917529	Invalid address- no directional in RSAG-clec had NW populated
09/07/2001	S004288788BSGAPR	00	V	7703889597	Invalid address- RSAG required directional of SE;CLEC did not populate
09/07/2001	S004288948BSGAPR	00	V	6783640139	Invalid address- SATH left blank
09/07/2001	S004289063BSGAPR	00	V	7709964991	Invalid address- SATH left blank (RSAG calls for BLVD)
09/07/2001	S004289363BSGAPR	00	V	7702581230	Invalid address- SATH left blank (RSAG calls for CIR)
09/07/2001	S004289568BSGAPR	00	V	6785790802	Invalid address- SATH left blank (RSAG calls for Rd)
09/07/2001	S004289568BSGAPR	00	V	6785790802	Invalid address- SATH=blank, City incorrect;FLR incorrect
09/07/2001	S004282612BSGAPR	00	V	7702104209	ISF - installment billing on BST account
09/07/2001	S004285090BSGAPR	00	V	7705629318	ISF - installment billing on BST account
09/07/2001	S004286279BSGAPR	00	V	4046273047	ISF - installment billing on BST account
09/07/2001	S004286740BSGAPR	00	V	7708795018	ISF - installment billing on BST account
09/07/2001	S004289379BSGAPR	00	V	4046229964	ISF - installment billing on BST account
09/07/2001	S004289381BSGAPR	00	V	7705340402	ISF - installment billing on BST account
08/23/2001	S003753818BSGAPR	00	V	7709572679	LESOG issued order removing RingMaster, yet failed to remove Listing; Serv Rep cleared
08/30/2001	S004179219BSGAPR	00	V	4048179360	LESOG issued order removing RingMaster, yet failed to remove Listing; Serv Rep cleared
09/07/2001	S004286576BSGAPR	00	V	7707750856	LESOG issued order removing RingMaster, yet failed to remove Listing; Serv Rep cleared

Receipt Date	PON	Ver	Type	Telephone #	Reason/Comments
08/25/2001	S004091081BSGAPR	00	V	7704568958	LESOG issued duplicate orders 6:30:04;Serv Rep cancelled second set of orders
08/24/2001	S004096996BSGAPR	00	V	7709347601	LESOG issued duplicate orders 6:03:01;Serv Rep cancelled second set of orders
08/30/2001	S004176267BSGAPR	00	N	6783540926	LESOG issued duplicate orders 6:05:18;Serv Rep cancelled second set of orders
08/30/2001	S004176269BSGAPR	00	N	7705179909	LESOG issued duplicate orders 6:05:18;Serv Rep cancelled second set of orders
08/29/2001	S004164923BSGAPR	00	V	4043200281	LESOG issued order;yet failed to populate usoc for adl listing
08/30/2001	S004177647BSGAPR	00	V	7709189127	LESOG issued order;yet failed to populate usoc for adl listing
09/01/2001	S004208751BSGAPR	00	C	4043619667	Pending Service Order - BST WINBACK
09/04/2001	S004219747BSGAPR	00	N	4045241698	Pending Service Order
09/07/2001	S004286322BSGAPR	00	V	4046847002	Pending Service Order due sm day PON rec'd
09/07/2001	S004287173BSGAPR	00	D	7704661953	Pending Service Order
09/07/2001	S004287346BSGAPR	00	C	4043280515	Pending Service Order
09/07/2001	S004287408BSGAPR	00	V	6784793449	Pending Service Order
09/07/2001	S004287498BSGAPR	00	V	7067243478	Pending Service Order - previous CLEC disconnect order due sm day rec'd
09/07/2001	S004289291BSGAPR	00	V	7704469497	Pending Service Order - BST order to transfer end user pending
09/07/2001	S004287969BSGAPR	00	V	4784056759	Pending Service Order - BST order to add Cl Forwarding due sm day rec'd
09/07/2001	S004191045BSGAPR	02	V	4045349089	Planned fallout - Sup on RRSO orders
09/07/2001	S004229196BSGAPR	01	N	7706844120	Planned fallout - Sup on RRSO orders
09/07/2001	S004229301BSGAPR	02	V	4045349089	Planned fallout - Sup on RRSO orders
09/07/2001	S004264751BSGAPR	01	V	6784130258	Planned fallout - Sup on RRSO orders
09/07/2001	S004267004BSGAPR	01	C	4043737693	Planned fallout - Sup
09/07/2001	S004288464BSGAPR	00	T	6787976286	Planned fallout - Activity T
09/07/2001	S004269052BSGAPR	01	V	7705659266	Planned fallout - Sup on RRSO orders
09/07/2001	S004244772BSGAPR	01	V	7704513223	Planned fallout - Sup on RRSO orders
09/04/2001	S004225193BSGAPR	00	D	6788381535	PSO -C order had not posted when ACT D issued next day
09/07/2001	S004286691BSGAPR	00	C	7705541861	PSO - D order had CPX but not yet posted when this PON rec'd
09/07/2001	S004288166BSGAPR	00	C	7706469584	PSO - N order had not posted when this PON rec'd
09/07/2001	S004288807BSGAPR	00	C	7705653043	PSO - N order had not posted when this PON rec'd
09/07/2001	S004288843BSGAPR	00	C	6785839290	PSO - N order had not posted when this PON rec'd
09/07/2001	S004285475BSGAPR	00	V	7708893253	PSO - C BST order adding Cl Forwarding had not posted when this PON rec'd
08/30/2001	S004176269BSGAPR	00	V	7705179909	LESOG issued duplicate orders 6:30:04;Serv Rep cancelled second set of orders
09/07/2001	S004287748BSGAPR	00	V	7709961624	SPS - located in indent section CSR - BST Promotion Tracking

Receipt date	PON	Ver. Type	Activity Telephone #	Reason/Edit/for manual review
09/07/2001	S004288407BSGAPR	00 V	4047535887	TN working as Quick Serv;can not request ACT of V;ACT of N
09/07/2001	S004287602BSGAPR	00 C	6789570499	Too many digits for DRS USOC-CLEC populated 1-678-957-0457 service Rep corrected;actually should have been clarified
08/24/2001	S003960195BSGAPR	00 N	4046699454	Working Service this address;Is this for ADL?
08/22/2001	S004066863BSGAPR	00 N	4042449403	Working Service this address;Is this for ADL?
08/26/2001	S004127745BSGAPR	00 N	7704729017	Working Service this address;Is this for ADL?
08/27/2001	S004135592BSGAPR	00 N	7704635312	Working Service this address;Is this for ADL?
08/28/2001	S004152149BSGAPR	00 N	4043678673	Working Service this address;Is this for ADL?
08/28/2001	S004155699BSGAPR	00 N	4042419885	Working Service this address;Is this for ADL?
08/30/2001	S004176853BSGAPR	00 N	7704775768	Working Service this address;Is this for ADL?
08/30/2001	S004189839BSGAPR	00 N	4047613236	Working Service this address;Is this for ADL?
08/31/2001	S004199346BSGAPR	00 N	6784948663	Working Service this address;Is this for ADL?
08/31/2001	S004194742BSGAPR	00 N	4046967093	Working Service this address;Is this for ADL?
09/03/2001	S004217557BSGAPR	00 V	7706128577	Working Service this address;clec OMITTED ADL
09/04/2001	S004218628BSGAPR	00 N	6788672167	Working Service this address;Is this for ADL?
09/04/2001	S004218654BSGAPR	00 N	4045590463	Working Service this address;Is this for ADL?
09/07/2001	S004287361BSGAPR	00 D	7705949603	Working Service;CLEC had populated incorrect city
09/04/2001	S004098592BSGAPR	00 N	7704128002	ZLIG error on "D"; enduser did not keep Memory Call or CI Forwarding feature
09/03/2001	S004213642BSGAPR	00 V	4043553040	ZLIG edit required for call forwarding
09/07/2001	S004287445BSGAPR	00 V	7709435741	ZLIG edit required for call forwarding
09/07/2001	S004287931BSGAPR	00 V	7705770591	ZLIG error on "D"; enduser did not keep Memory Call or CI Forwarding feature
09/07/2001	S004288397BSGAPR	00 V	4046690484	ZLIG error on "D"; enduser did not keep Memory Call or CI Forwarding feature
09/07/2001	S004288948BSGAPR	00 V	6783640139	ZLIG error on "D"; enduser did not keep BST Calling Card
09/07/2001	S004289214BSGAPR	00 V	7707491940	ZLIG error on "D"; enduser did not keep CI Forward Busy feature
09/07/2001	S004289259BSGAPR	00 V	7708775931	ZLIG error on "D"; enduser did not keep Memory Call or CI Forwarding feature
09/07/2001	S004289548BSGAPR	00 V	7706848093	ZLIG error on "D"; enduser did not keep Memory Call or CI Forwarding feature

ATTACHMENT 13

Amanda,

See correction to line 82 on attached spreadsheet. When creating,
 I apparently
cut/paste the incorrect telephone number and date sent nad reason
for PON
S004176269BSGAPR. The actual reason for the manual handling was LE
SOG issued
Duplicate orders.

The pon was processed by LESOG at 06.05.52 and again at 06.05.55.
 Two sets of
"N/D" orders were created. Orders N012YND1/DO119H35 and NOOWBWBO/D
OOVPVP2 were
issued within seconds of each other.

Both sets of orders carried the appropriate RRSO and Sequence info
rmation.
However, order NOOWBWBO fell out for manual handling due to duplic
ate. When the
Service Rep claimed the order, it had a "list" error. SOCS could n
ot process
the corresponding disconnect.

The Service Rep canceled N012YND1 and cleared the error on NOOWBWB
O, then
canceled DO119H35. From my previous notes, this is all I can verif
y because the
BST system for archieving service order activity, MOBI, does not m
aintain the
actual "history".

So I am at a lost in verifying the "list" error or the times the D
 and N order
posted. I have verified with Maintenance there have been no troub
le reports on
this account since 4/28/99. Also the CSR has posted for MCI and th
e listing is
in place.

Sorry for the confusion. I will be more careful in the future. I
hate rework
don't you?

Thx,

Kathy

ATTACHMENT 14

August 1st & 2nd Audit Sample Results as of 10/3/01

ANI	Order #	PON	CSOTS Status/days	LENS Updated CSR	Received Loss Line Notification	ORES acct# & Local Status	LSP Status / Date	LLIMS Status / Date	Invc dates with local service	ORES Notes
4046229150	N0C3Y5Q9	S003778291BSGAPR	complete / 62 days	no	no	4BV64882/active	active - 8/2/01	complete/8-2	8/15/01 9/15/01	no notes regarding cancellation
4045082070	NO2NRGV4	S003796319BSGAPR	complete / 61 days	no	no	4IM39771/active	active - 8/2/01	complete/8-3	8/21/01 9/21/01	8/30 4045082070 has been inserted with 10xxx service to support the Local reconciliation project. Per ORES production support
4046337029	NO25X7W9	S003797699BSGAPR	complete / 61 days	no	no	4IT17809/active	deact - 9/27/01	complete/8-3	8/11/01 9/11/01	9/27: EPS cancelled local service on ORES account
4047569114	NO0TQ055	S003803482BSGAPR	complete / 61 days	no	no	4IM69248/active	active - 8/3/01	complete/8-3	8/28/01 9/28/01	no notes regarding cancellation

July 17th & 18 Audit Sample Results as of 10/3/01

ANI	Order #	PON	CSOTS Status/days	LENS Updated CSR	Received Loss Line Notification	ORES acct# & Local Status	LSP Status / Date	LLIMS Status / Date	Invc dates with local service	ORES Notes
4042443563	NOCY2R97	S003600693BSGAPR	complete / 72 days	no	no	4IU00836/active	active - 7/23/01	complete/7-27	7/27/01 8/27/01 9/27/01	7/26. Customer calls states will contact BS to cancel service 8/30. 4042443563 has been inserted with 10xxx service to support the Local reconciliation project. Per ORES production support.
4042619334	NO9RMNN3	S003544083BSGAPR	complete / 78 days	no	no	4BB85058/active	deact-9/13/01-EPS	complete/7-18	8/15/01 9/15/01	9/27: EPS cancelled local service on ORES account
4047667789	NO97C7Q8	S003583890BSGAPR	complete / 75 days	no	no	4IK99437/active	active - 7/20/01	complete/7-20	7/27/01 8/27/01 9/27/01	7/20. Customer was referred to BS to cancel acct 8/30 4047667789 has been inserted with 10xxx service to support the Local reconciliation project. Per ORES production support
4043440696	NO5RTWT4	S003566363BSGAPR	complete / 73 days	no	no	4GS42399/active	active - 7/19/01	complete/7-20	8/11/01 9/11/01	8/30 4043440696 has been inserted with 10xxx service to support the Local reconciliation project. Per ORES production support
4048768041	NO0VQ5F7	S003566952BSGAPR	complete / 73 days	no	no	4IC79132/active	active - 7/19/01	complete/7-20	9/3/01	9/26: Customer called stating she switched back to BellSouth in August; local service has been cancelled in ORES

June 13th & 14th Audit Sample Results as of 10/3/01

ANI	Order #	PON	CSOTS Status/days	LENS Updated CSR	Received Loss Line Notification	ORES acct# & Local Status	LSP Status / Date	LLIMS Status / Date	Invc dates with local service	ORES Notes
4042413169	NO1RFMF5	S003198527BSGAPR	complete / 112 days	no	no	4GF09529/ active	active - 6/13/01	complete/6-13	8/3/01 9/3/01	7/18 4042413169 has been inserted with 10xxx service to support the Local reconciliation project. Per ORES production support.
4043490504	NO5PTVQ5	S003206215BSGAPR	complete / 111 days	no	no	4CI13038/ active	active - 6/14/01	complete/6-14	8/3/01 9/3/01	9/25: egate - Ms Smith called in w/Rene on line from BellSouth / she states she never switched back from MCI to BellSouth. Rene states that customer has been with BellSouth since June. Ms Smith wants to stay w/BellSouth, credit account for 8/01 & 9/01 invoices $103.50. D.Tallyen/GVL/001
"	DOPWF620	"	deactivated / 97 days	"	"	"	"	"	"	"
4043492056	NOFYGRN2	S003219991BSGAPR	cancelled / 103 days	no	no	4HQ15985/ deact	deact - 8/13/01-EPS	complete/6-15	7/24 & 8/24	8/17: per clb. Line no longer on MCI platform, EPS cancelled
4043700252	NOF6WKN2	S003216955BSGAPR	complete / 111 days	no	no	4CT80303/ active	active - 6/14/01	complete/6-14	8/10/01 9/10/01	9/19: Ms Smith called in to get info on why she was billed for account that she cancelled and switched to another carrier...Ms Smith states she is switching back.
4047581258	NOCTQHT4	S003203120BSGAPR	complete / 103 days	no	no	4CJ85943/ active	active - 6/22/01	complete/6-25	8/10/01 9/10/01	no notes regarding cancellation

4047613326	NOD2QHC6	S003214537BSGAPR	complete / 111 days	no	no	4GW81587/ active	deact - 9/3/01-EPS	complete/6-14	8/11/01 9/11/01	9/28: egate • Chevlyn Gaston called in to make sure that her services are deactivated.
4047942712	NO2PFVB9	S003214183BSGAPR	complete / 111 days	no	no	4HF02008/ active	deact - 9/1/01- EPS	complete/6-14	8/3/01 9/3/01	9/18: per escalation request, customer wants services disconnected
6785130298	NP654FY7	S003201811BSGAPR	complete / 111 days	no	no	4IR05773/ active	active - 6/13/01	complete/6-14	7/25/01 8/25/01 9/25/01	10/1: entered LSOF to stop billing....Mrs. Mohar switched back to BellSouth.
6785602452	NO43RHY3	S003216238BSGAPR	complete / 111 days	no	no	4HF05786/ active	active - 6/14/01	complete/6-14	8/8/01 9/8/01	no notes regarding cancellation
"	DOQ7D676	"	eactivated / 110 days	"	"	"	"	"	"	"

ATTACHMENT 15

REDACTED

From: Frances.Alkire@bridge.bellsouth.com
[mailto:Frances.Alkire@bridge.bellsouth.com]
Sent: Tuesday, August 21, 2001 6:05 PM
To: Alhagi.Mbow@wcom.com; debra.whitaker@wcom.com; Michael.Newby@wcom.com
Cc: Cindy.Clark@bridge.bellsouth.com; Yvette.Scott@bridge.bellsouth.com
Subject: UNE-P

Deborah,

Let me define the role that Yvette Scott holds as the point of contact for
you. She will be available to take questions about disputes and either
direct you to the correct group or person or give you a written status of
the disputes in question. Yvette has just recently accepted this assignment
and she is in the process of learning UNE-P. She will therefore not be able
to answer your questions or give you a status without investigation of the
each one.
Hope the above defines Yvette's role for you.
Thanks,

Frances Alkire
Manager - Billing Disputes
404-532-2116

ATTACHMENT 16

-----Original Message-----
From: Frances.Alkire@bridge.bellsouth.com
[mailto:Frances.Alkire@bridge.bellsouth.com]
Sent: Monday, October 01, 2001 2:36 PM
To: alhagi.mbowe@wcom.com; debra.whitaker@wcom.com; Michael.Newby@wcom.com
Cc: Cindy.Clark@bridge.bellsouth.com
Subject: UNE-P

Mike, Alhagi and Deborah,
Wanted to inform you that two of my Service Reps have completed UNE-P
training. As with anything new we will be slow at first, but as experience
is gained will complete your disputes in a timely manner.
We look forward to working with you on UNE-P disputes.
Thanks,

Frances Alkire
Manager - Billing and Collections
404-532-2116

ATTACHMENT 17

RED**ACTED**

-----Original Message-----
From: VanArsdale, Alisha [mailto:Alisha.VanArsdale@BellSouth.com]
Sent: Wednesday, October 03, 2001 2:47 PM
To: 'Pam Shifflett'; VanArsdale, Alisha; 'Nancy Shimer';
Beverly.J.Pool@bridge.bellsouth.com; 'Amanda Hill'; Waters, Shannon; Murphy,
Stephen
Cc: 'Cedric Cox'; 'Regina Frazier'; 'Kathleen Hingle'; 'Doug Lacy'; 'Sherry
Lichtenberg'; Prince, Deloris; 'Ratnavalli Tangirala'; Thomas, Audrey;
'Frances b Trahan'; 'Rick Whisamore'; Smith, Bruce; Pat Wood (E-mail)
Subject: RE: New BST TT # 63736

Pam,

To the best of my knowledge the CSMs do not have a ticketing system.
Opening a ticket with EC Support does not track work done by a CSM.   EC
Supports function is to investigate, track and help resolve system outages
and system connectivity issues.   We do not investigate or track problems
with the data contained within any system or the way a system works
functionally.   Functional issues and data issues are handled by the CSM.   If
there are problems with a CSM there is an escalation process for them.   The
first and second level escalation points are below.   Any problems MCI has
with the CSMs or their process should be directed to your CSM or through a
CSM escalation.
First Level: Marilyn Hyman   404-927-3572
Second Level: Janet Miller- Fields   205-714-0252

I know that things have been difficult for you lately and apologize that
there have been so many time consuming issues to deal with.   If I could help
with the due date problem I would.   Unfortunately, EC Support does not have
the tools or the knowledge to be affective in dealing with this problem.   If
there is anything I can do to help, please let me know.
-----Original Message-----
From: Pam Shifflett [mailto:pam.shifflett@wcom.com]
Sent: Wednesday, October 03, 2001 12:46 PM
To: 'VanArsdale, Alisha'; 'Nancy Shimer';
Beverly.J.Pool@bridge.bellsouth.com; 'Amanda Hill'; 'Waters, Shannon';
      'Murphy, Stephen'
Cc: 'Cedric Cox'; 'Regina Frazier'; 'Kathleen Hingle'; 'Doug Lacy';
      'Sherry Lichtenberg'; 'Prince, Deloris'; 'Ratnavalli Tangirala';
      'Thomas, Audrey'; 'Frances b Trahan'; 'Rick Whisamore'; 'Smith, Bruce';
      Pat Wood (E-mail)
Subject: RE: New BST TT # 63736

So is there some ticketing process that we would use to open these types of
issues so that they are tracked?   We thought the current process was to open
trouble tickets with EC support.   We need to determine what the formal
process is so that these issues can be resolved.   Just calling Kathy
Ragsdale is not going to work.   There are several trouble tickets that she
has been looking at for several weeks. We have not received any feedback.
What is the expected turnaround time for these to be addressed?

1

Thanks!
Pam
-----Original Message-----
From: VanArsdale, Alisha [mailto:Alisha.VanArsdale@BellSouth.com]
Sent: Wednesday, October 03, 2001 1:33 PM
To: 'Nancy Shimer'; Beverly.J.Pool@bridge.bellsouth.com; Amanda Hill;
       Pam Shifflett; VanArsdale, Alisha; Waters, Shannon; Murphy, Stephen
Cc: Cedric Cox; Regina Frazier; Kathleen Hingle; Doug Lacy; Sherry
       Lichtenberg; Prince, Deloris; Ratnavalli Tangirala; Thomas, Audrey;
       Frances b Trahan; Rick Whisamore; Smith, Bruce
Subject: RE: New BST TT # 63736

Nancy,

Shannon Waters has forwarded your email to Kathy Ragsdale your CSM to have ·
this issue investigated. The ticket you opened with Stephen at EC Support -
63736 has been closed. This is not an issue that EC Support or EDI is
equipped to work. The problem should be directed to your CSM and you should
work directly with her to have this issue investigated.

Thank You,

Alisha Van Arsdale
205-733-5393

-----Original Message-----
From: Nancy Shimer [mailto:nancy.shimer@wcom.com]
Sent: Wednesday, October 03, 2001 10:22 AM
To: Beverly.J.Pool@bridge.bellsouth.com; Amanda Hill; Pam Shifflett;
       Alisha VanArsdale; Shannon. Waters; stephen.murphy@bellsouth.com
Cc: Cedric Cox; Regina Frazier; Kathleen Hingle; Doug Lacy; Sherry
       Lichtenberg; Deloris.Prince; Ratnavalli Tangirala; Audrey.B.Thomas;
       Frances b Trahan; Rick Whisamore
Subject: New BST TT # 63736

All,

I opened a new trouble ticket today to have the due date issues
researched; ie..late notifiers and due date changes.

Hopefully, I have enclosed enough detail, if not, please let me
know.

PON	Date Sent	FOC REC'D	REQ'D DUEDATE	FOC DUEDATE	COMP_IN
S004287197BSGAPR	07-SEP-01	07-SEP-01	9/10	9/10	28-SEP-01
S004444841BSGAPR	20-SEP-01	20-SEP-01	9/21	9/20-21	25-SEP-01*
S004462761BSGAPR	22-SEP-01	22-SEP-01	9/25	9/22	25-SEP-01
S004520566BSGAPR	26-Sep-01	26-Sep-01	9/27	9/27	2-OCT-01
S004529157BSGAPR	27-Sep-01	27-SEP-01	10/1	10/1	2-Oct-01**

* This PON rec'd 2 FOC's..one with due date of 9/20 and the other with due
date of 9/21. Completion notice showed completed on 9/20.

** This PON rec'd Completion on 10/2 with a completion date of
10/2.

Nancy Shimer
MCI LOC
303-390-1354

ATTACHMENT 18

@ *BELLSOUTH*

BellSouth Interconnection Services
675 West Peachtree Street
Atlanta, Georgia 30375

Carrier Notification
SN91082645

Date: October 12, 2001

To: Competitive Local Exchange Carriers (CLECs)

Subject: CLECs – Increase Time Limit to Supplement Local Service Requests (LSR) from
            10 Business Days to 30 Calendar Days Before Cancellation

This letter is in response to the Georgia Public Service Commission's Docket No. 6863-U to
implement Operations Support Systems (OSS) upgrades. LSRs in clarification status will be
canceled for no supplement (no sup) after 30 calendar days instead of the present procedure,
which is after 10 business days. The change will also apply to manual LSRs. The change was
effective for fully mechanized LSRs in Release 10.0a on Saturday, October 6, 2001. The
change for partially mechanized and manual LSRs will be effective on Monday,
October 15, 2001.

Please see the attached table for details of the release.

Please contact your BellSouth account team representative with any questions.

Sincerely,

ORIGINAL SIGNED BY MATEO CAYMOL FOR JIM BRINKLEY

Jim Brinkley – Senior Director
BellSouth Interconnection Services

Attachment

ATTACHMENT 19

BellSouth CLEC Billing and Accounts Receivable Workshop
Thursday, October 11, 2001
Meeting Minutes

Attendee List

Last Name	First Name	COMPANY	*E-mail Address*
Anderson	Andy	KMC Telecom	cander@kmctelecom.com
Bingham	Fred	WorldCom	Fred.Bringham@wcom.com
Bolen	Laura	Adelphia Business Solutions	
Butler	Amanda	BellSouth Interconnection Sales	Amanda.Butler@bellsouth.com
Calhoun	Stephan	Cbeyond Communications	Stephan.calhoun@cbeyond.net
Carter	Joy	BellSouth Telecommunications	Joy.Carter@BellSouth.com
Chia	Brian	Vibrant Solutions	
Connell	Mary	IDS Telecom	
Conquest	Mary	ITC DeltaCom	mconquest@itcdeltacom.com
Danemayer	Albert	Cinergy Comm. Company	
Duffey	John	FLA PSC	JDuffey@PSC.STATE.FL.US
Fisher	Glen	FLA PSC	
Forbes	George	Access Integrated Networks	george.forbes@accesscomm.com
Fountain	Gail	BellSouth Telecommunications	Gail.Fountain@bridge.bellsouth.com
Gena	Jon	KPMG Consulting	
Hardy	Annette	Access Integrated Networks	Annette.hardy@accesscomm.com
Haynes	Cheryl	Nuvox Communications	
Hewitt	Greg	Electric Power Bd. of Chatt.	Hewittgs@epb.net
Hill	Amanda	WorldCom	
Johnson	Deborah	BellSouth Telecommunications	Deborah.Johnson4@bridge. bellsouth.com
Joiner	Torri	BellSouth Telecommunications	Torri.Joiner@bridge.bellsouth.com
Massaquoi	Maxwell	KPMG Consulting	
Mbowe	Alhagi	WorldCom	
Mooreman	Michelle	BST-Interconnection Services	Michelle.Moorman@bridge.bellsouth.com
Murphy	Linda	AT&T	lindam@att.com
McFall	Thomas	BST-Interconnection Services	Thomas.Mcfall1@bridge.bellsouth.com
McMahon	Brent	Network Telephone Inc.	
O'Bryan	Susan	BellSouth Telecommunications	Susan.O'Bryan@bridge.bellsouth.com
Parker	Marilyn	WorldCom	
Pinick	Paul	Birch Telecom	PPinick@birch.com
Rodriguez	Millie	Atlantic.net	
Rull	Kim	Vibrant Solutions	
Sheehan	John	BellSouth Telecommunications	John.Sheehan@bridge.bellsouth.com
Spann	Jackie	BellSouth Telecommunications	Jacquelyn.spann@bridge.bellsouth.com
Stapler	Shamone	ITC DeltaCom	sstapler@itcdeltacom.com
Thomas	Audrey	BellSouth Telecommunications	Audrey.Thomas@bridge.bellsouth.com
Wagner	Mel	Birch Telecom	
Ward	Christina	Atlantic.net	
Whishamore	Rick	MCI	
Wilds	Louise	Access Integrated Networks	Louise.wilds@accesscomm.com
Wright	Bill	Phone Reconnect of America	

Audrey Thomas, Network Services, welcomed all attendees and began with coverage of housekeeping details. She emphasized that a "Parking Lot" would be maintained throughout the meeting to record any questions or issues that were not immediately addressed during the workshop. Audrey then reviewed the remainder of the agenda:

- Overview of Billing and Accounts Receivable Upgrade
- Review of the Potential Difference and Examples
- Potential Process Changes
- Current Implementation Schedule
- Question and Answer Session
- Feedback

Brent McMahan, Networld Telecommunications, questioned why the changes being discussed in this meeting were not submitted through Change Control Process. *Fred Bingham* and *Amanda Hill* of WorldCom and *Mel Wagner* of Birch Telecom seconded the question. *Audrey Thomas*, BellSouth Network Services responded that the changes that would be covered are primarily to BellSouth's Billing Infrastructure, and would not impact the way we do business with our customers. *Susan O'Bryan* added that these infrastructure changes are specific to BellSouth's Billing Systems and will have no impact on the way UNE orders are issued by the CLECs. This issue was boarded for follow-up with CCP management.

Fred Bingham further questioned who was invited to this workshop and if the CCP distribution list was used to send notice regarding this meeting to the CLECs. *Audrey Thomas* responded that the distribution list maintained by BellSouth Interconnection Services Marketing and had been used for the BellSouth CLEC Inforum this summer was the list that had been used for the invitation to this workshop. In addition, CLEC account team management was copied on this invitation to ensure appropriate coverage. The CCP distribution list will be obtained and added to the current distribution list for dissemination of minutes and responses to issues. Also, the materials distributed in Workshop will be sent to this combined distribution list.

The question was asked if the Change Control Process will be used for future CBOS changes. Susan O'Bryan responded that CBOS changes are governed through OBF and will continue to be handled in that manner. Existing notification processes associated with CBOS releases will continue to apply.

Overview of Billing and Accounts Receivable Upgrade
Susan O'Bryan, BellSouth Billing Incorporated (BBI), conducted an overview of the planned upgrade to BellSouth's UNE (Unbundled Network Elements) Billing Infrastructure. She shared that the planned upgrades will result in a system that remains compliant to all standards that BellSouth is subject to today and that is equal to what CLECs have today.
She began with a review of the applications and products and services that will be included in this upgrade. These upgrades impact UNE's currently billed through CRIS. This includes unbundled switch ports, port/loop combinations (including UNE-P) and unbundled loops (Service level 1 only). There are no changes for access related services. The question was asked if any USOCs be changed. *Susan O'Bryan* answered that no USOCs will be changed as a result of the upgrades to the Billing and Accounts Receivable systems.

There are three major areas of this upgrade. The Billing applications that are being upgraded are the rating application for calculation usage and monthly charges and the Bill formatting and application tool. Additionally, the screens and tools used by the ICS Billing and Collections Centers Service Representatives to log, track and manage adjustments will be upgraded. There are no changes on the account/order issuance side of the process.

Bill day processing will be upgraded by the replacement of the current BIBS application for processing and rating of usage/call detail records. After the upgrade is complete, the messages will be sent via DUF identical to current process. CLECs will receive the same J and N Bill formats. Service Orders will flow as today and update to the current Accounts Database. However, rated usage events will be summarized with "like" charges and stored until bill day. This will create greater processing efficiency and reduce overall run time for bill processing. Usage will be rerated as today based on service order activity and changes affecting guiding. CSR details (from the Accounts Database) will be used to apply monthly and fractional charges and payments and adjustments made since the prior bill will be received and used for

calculating invoice specific balance due. Taxes and late payments charges will be calculated as appropriate.

A new GUI will be available for BellSouth staff to enter contract and price list rate information when appropriate to override the tariff rates. This change will result in contract rates being made effective in a faster timeframe and thus reducing the overall number of adjustments required by today's process. The net result is better service to BellSouth's customers. The **retroactive rate change** process will be modified to simplify and handle "as negotiated" amounts. This is an added benefit of table driven rates vs. this information remaining hard-coded as it is today.

A new formatting tool will be used to map bill content (specific charges, credits and miscellaneous items) to the printed page. CBOS standard bill formats will be delivered. Bill Data Transmissions will comply with standards as well. Customer Service Record (CSR) details will be provided from Accounts Database as today for inclusion with both the paper bill image and BDT files. Bill images will be updated to ICABS like today for viewing by BellSouth Service Representatives.

Invoice details will be maintained in an Oracle Accounts Receivable database for use by the Billing & Collection Service Representatives. New GUIs for BellSouth staff will be available for creating and managing deposits and adjustments. BellSouth user maintained tables will be available for establishing late payment charge and collection /treatment parameters and rules. Invoice numbers will be assigned and used when directing payments and adjustments to be applied to specific balances.

Benefits of Planned UNE Billing Upgrade
The primary benefit of the planed upgrades is to ensure that BellSouth systems and applications are prepared for CLEC UNE growth. This includes increases in the number of subscribers, requests for single bill cycle, growth across the nine state region and end user usage volumes. By implementing these improvements, BellSouth will be adding more table driven flexibility for implementing new products. contracts and bill formats, enabling the BST to accommodate these service changes faster and more effectively. These changes will also provide the tools that will better enable BellSouth Service Reps to respond to billing questions and inquires. The question was asked "Can BellSouth Bill all states accounts in the same billing cycle?" *Susan O'Bryan* responded that this is possible, but advised the CLECs to negotiate this type of arrangement through their respective account teams. There may be constraints that would not allow the use of a specific bill period, such as a large account already billing there.

Potential Differences and Examples
Additional Data to be Populate/Provided on BDT and Paper Bills/CSRs
Jackie Spann, BBI, presented an overview of the potential differences of the current system and the upgraded system. She provided examples to illustrate what the customer would see on a bill or CSR. The invoice number will be added for J and N bills. This will facilitate the correct application of payments and reduce the number of adjustments. "From" and "Thru" dates will always be fielded in OC&C records. The display of this information has been changed to make it easier to locate. Service outage OC&C will no longer contain the BellSouth internal "Z" service order number. Circuit outages will contain the WFA number and TN outages will contain the LMOS tracking number in the purchase order number (PON) field. *Mary Conquest*, ITC DeltaCom, asked if the customer will be able to track the CMS number to the WFA/LMOS tracking number for service outages. BellSouth placed this question in the parking lot for follow-up. OCL, CKL and CKLT data will be passed in OC&Cs and other applicable records. A zone indicator will be passed when BellSouth begins mechanized zone pricing (a post Billing changes implementation is planned).

The question was asked, "How will OC&Cs be charged for Retroactive Rate Changes?" Jackie Spann responded that BellSouth Interconnection Services is working with the Account Teams on contract effective dates and associated rates. The cost of rating retroactively is not favorable for the CLEC or BellSouth. The account teams are happy to discuss settlement issues with the customers. Process for

providing details to the CLECs for retroactive rate changes needs to be defined and communicated to the CLECs. BellSouth placed this issue in the parking lot for follow-up.

Bill/CSR Display & Standard Phrase Codes
Refunds of deposits will appear in the OC&C section rather than adjustment section of the bill. BDT service order records will not be generated for deposit interest and deposit refund OC&Cs. This change is to better align the presentation of this information with the standards. There will be a transition to more standardized phrase codes. Some phase codes will be locally defined. Examples are:
Z11 – "One time charge for _____"
Z13 – "One time credit for _____"
ZBC – "Credit for Miscellaneous Activity"
ZBD – "Charge for Miscellaneous Activity"
ZIA – Additional credit for interruption of service"
ZIB – "Reduction in credit for interruption of service"
The Service Order history section will show "Tapestry" rather than today's rate change verbiage. This will only be seen on a Service Orders when there is a rate change.

Rating Differences or Changes
Taxing of usage charges based on effective date of jurisdiction changes (rather than based on taxability on bill day). Cross boundary usage billed based on stated of billing account rather than the state of the CLLI (recording location). A request was made by *Mary Conquest*, ITC DeltaCom asked to receive a complete list of Cross Boundary Billing RAO's. BellSouth placed this request in the parking lot for follow-up. Contract usage rating defaults to LEC LIDB if not specified in contract (current default is foreign LIDB). Rounding differences may occur on USOCs with quantity greater than one and a discount applicable. An example of the difference in this calculation was provided. Calculation of fractional charges based on exact number of days during the period rather than always assuming 30 days per month. *Mel Wagner* of Birch Telecom questioned the justification for BellSouth going to the exact number of days for the calculation of fractional charges. He challenged if this was in compliance with industry standard. His information indicated that the industry standard was 30 days. BellSouth placed this question in the parking lot for follow-up.

Interim Issues
Minimum Period Charges will not be calculated or billed initially. There is still work to be done to fully develop the process for the calculation of Minimum Period Charges in the upgraded Billing system. Until that process is completed, BellSouth will not bill Minimum Period Charges.
Usage quantity and MOU will not be passed initially when a detailed usage adjustment is made, i.e. retroactive rate changes - a separate list or spreadsheet of details will be made available. *Mel Wagner* of Birch Telecom raised the question why the minutes of usage (MOUs) for a retroactive rate change will not be passed by the upgraded system. *Susan O'Bryan* responded that the MOUs only applies to retroactive rate changes and BellSouth is attempting to simplify that process. BellSouth will provide the CLECs with a spreadsheet that provides this detail. *Mel Wagner* then asked why that information could not be sent as detail with the BDT. *Susan O'Bryan* advised that it could not be sent, but would be provided separately. BellSouth will define the process for sending the MOU information to the CLECs. A further question was raised of how the CLECs will be notified when Minimum Period Charges will be billed. *Susan O'Bryan* responded that all appropriate notification procedures will be observed when a process is development and implemented.

Potential Process Changes
The invoice number will be added to the remittance document and available for use in application of payments, adjustments and disputes. If an invoice number is not used, payments, lump sum adjustments and good will adjustments will be prorated across all outstanding invoices. *Linda Murphy*, AT&T asked if payments will be posted to their bill number. Her company currently does not use invoice numbers within their system. *Joy Carter*, BBI committed to meet with *Linda* off-line to go over the possible impact of these changes for AT&T.

Current Implementation Schedule

The final area covered was the planned implementation schedule:

October
- Complete BellSouth Testing
- Provide BDT Test Tapes to Specific CLECs, beginning 10/12. A question was raised as to when the Test tapes would be received. Test tapes for those CLECs who have contractual agreement for the tapes to be provided. Mississippi tapes will be distributed first, with delivery expected on or about Oct 16, 2001.

November
- Upgrade applications in Mississippi-11/9
- Upgrade applications in Georgia-11/30

December
- Upgrade applications in Flordia-12/14
- Establish 2002 schedule for remaining states

Mel Wagner of Birch Telecom asked how do the implementation dates relate to customer Bill cycles. The planned dates are shown above is state specific. The relationship will be based on the bill date in a specific site.

Parking Lot issues were recapped. Audrey Thomas notified this audience that if there were any issues that were unclear about the planned upgrade, that a subsequent session would be planned. There was no request from the CLEC body to do so at this time.

Parking Lot issues will be responded to and sent along with minutes to the combined distribution list.

The meeting was adjourned.

BellSouth Billing and Accounts Receivable Upgrade CLEC Workshop
October 11, 2001

"Parking Lot" Issues

The following items were recorded during the BellSouth Billing and Accounts Receivable Upgrade CLEC Workshop. Below are the responses:

Inquirer	Parking Lot Issue /Question	Assigned To	Response
Mary Conquest, ITC DeltaCom	Will the CLECs be able to track the CMS number to the WFA/LMOS tracking number for service outages?	Jackie Spann, BBI	The WFA ticket number is assigned locally by WFA when the outage is reported. As such, it probably cannot be associated with any number internally defined by your company. Likewise, the LMOS tracking number is assigned locally by LMOS when the outage is reported. As such, it probably cannot be associated with any number internally defined by your company either.
Mary Conquest, ITC DeltaCom	Is there a Cross Boundary Locations list and can a copy be provided to the CLEC?	Jackie Spann, BBI	A copy of the list of Cross Boundary NPAs/NXXs with RAO codes was provided to Mary Conquest on 10/12/01. That list is attached to this distribution. See attachment named "XBOUNDNXX.DOC"
	How and when will the CLECs be notified that BellSouth will begin Minimum Period Charges	Susan O'Bryan, BBI	Process to address this issue is under development. Standard BellSouth notification procedures will be followed.
Linda Murphy, AT&T	Will payments be posted to the CLECs bill number? What will be the impact if the CLEC's system only recognizes bill numbers and not invoice numbers.	Joy Carter, BBI	Prior to the conclusion of the workshop, Linda Murphy reported that she had confirmed with her organization that AT&T does recognize the invoice number. On 10/15/01 Joy Carter sent an e-mail, extending the option to meet with Linda Murphy to address any further concerns around this issue.
Mel Wagner, Birch Telecom	Why is BellSouth changing to using the exact number of days in a bill period for the calculation of fractional charges? He understands 30 days is the industry standard.	Jackie Spann, BBI	Our research has indicated that there are no industry-defined standards for this calculation. This includes TRG, OBF and GSST Tariff.
	The process for providing details to the CLECs for retroactive rate changes needs to be defined and communicated to the CLECs	Susan O'Bryan, Jackie Spann, BBI	Process to address this issue is under development. Standard BellSouth notification procedures will be followed.

| Mel Wagner, Birch Tel., Brent McMahan, Network Tel., Fred Bingham, Amanda Hill, WorldCom | The CLECs questioned why these changes being discussed in this meeting were not submitted through Change Control Process. | Audrey Thomas, Deborah Johnson, BST | In the BellSouth Change Control process Billing is not specified as in-scope. The CCP document states the following in the Introduction: Objectives of the Change Control Process: "- Support the Industry guidelines that impact Electronic Interfaces and manual processes relative to order, pre-order, maintenance, and billing as appropriate. " At this time, CCP is not addressing Billing related changes. |

ATTACHMENT 20

BST/MCI CAVE KICKOFF CALL

Date of Call: Sept 7, 2001
Time of Call: 3:30 pm

Attendees:	BST	MCI
	Pamela Reynolds	Fred Brigham
	Venkatesan Subramanian	Patricia Woods
	Tammy Higgins	Tyra Hush
	Torrance Sanford	Micki Jones
	Joe Laszlo	
	Brenda Thomas	
	Sharon Daniels	

BST/MCI introduced attendees on the call
MCI advised BST problems with some of the test cases
     -BST advised this could be discussed on this call with test manager
WorldCom requested explanation of the BST Testing process and how changes to the testing dates are handled.
     -BST advised that the BST test agreement process requires that all testing must be performed within the agreed upon dates within each phase.
     -All changes must be re-negotiated, requiring an addendum and new signatures from both BST and WorldCom representatives.
     -The purpose of the BST Test Kick-Off meeting is primarily to agree on the dates for testing, finalize the testing agreement document and review EDI Functionality to be tested. In addition, contact information is provided during this meeting.
MCI/BST agreed on all dates for test agreement with the exception of close date of Oct 5 and the PVT date. WorldCom prefers to send shake-out tests (PVT) on Oct 6. However, due to the fact that BST does not support testing on the week-end, this date was not acceptable to BST.
     -MCI advised BST the end test date needs to be extended to Oct 12, MCI also advised VP escalation in progress to have BST extend CAVE testing to the above date
     -BST/MCI agreed to send out test agreement with close date of Oct 5 and an addendum would be made to test agreement with the BST approval of close date of Oct 12
     -BST test manager will send test agreement on Sept 10, 2001
          -MCI will review and return test agreement on same day
MCI/BST discussed problem with test cases data
     -BST advised that they only provide test data for required fields. They did not realize from our test plan, that additional test data was being requested for optional fields.
     -MCI indicated on test case number 8, the service address information was not clearly stated and this is needed

-BST agreed to provide service address field information by COB (or earlier) on Sept 10, 2001

-MCI inquired about TNS and EATN on test cases 2 and 11

-MCI indicated BST provided duplicate telephone numbers

-BST clarified that the TNS number and the EATN are different

-MCI satisfied with clarification given by BST

-Test Case #11 (2 line move) -- WorldCom inquired about the TN for the second line.

-BST advised that only one TN is required on a move order. so that is the only data they provided.

-WorldCom is satisfied with the clarification provided by BST.

MCI inquired why CCNA and CC on the test cases provided by BST is not the actual production data

-MCI stated this causes internal issues and manual intervention

-MCI systems not built for false CCNA and CC (non-production data) and this information should be real

-BST stated when customer is testing in CAVE, BST provides required field information and TNs

-MCI stated the understanding of CAVE is to mimic production and the CCNA and CC do not belong to MCI and therefore CAVE is not allowing MCI to mimic production

-BST CAVE product manager gave technical and functional explanation about CCNA and CC

-BST stated that CAVE is a front-end ordering process with interfaces with the BST back-end production systems. CAVE is designed to mimic production functionality and is integrated into their production systems.

-BST stated the CC is used by BST to track the test order through the CAVE production systems so it does not go to production billing.

-BST stated that the difference between CAVE and the traditional testing environment is

- CAVE, BST provides the test data
- traditional testing environment. CLEC must provide "friendly" production accounts.

-MCI stated, based on the BST explanation, CAVE is not a stand-alone test environment and does not mimic production

MCI inquired if CAVE is available for testing on weekends

-BST verified there are no resources to monitor testing on weekends, MCI can send test data during weekend, but BST will pickup monitoring on Monday mornings

-BST recommended that WorldCom NOT send test cases on the week-ends, as they could not guarantee that they would be processed properly.

MCI stated testing to verify if MCI systems are flowing correctly and MCI wants to test as close to live production as possible

-MCI re-stated BST's explanation of CAVE ias a front end-ordering piece

-BST stated CAVE is exact replicate of the BST front end ordering systems which interfaces with BST ~~of production that rely on~~ production OSS systems

-MCI asked what does BST do with orders after transaction are sent

-BST stated CAVE orders are tracked by the test manager

MCI inquired about the flow thru of transactions with CAVE ~~versus production~~, what orders flow electronically or fall for manual handling

-BST account team advised manual-handling issue is being addressed on the weekly UNE-P conference call

-BST stated CLEC community was provided documentation and walk through of CAVE early in the year

-MCI requested copy of documentation

-BST agreed to provide documentation (WHEN?)

MCI requested weekly call for testing

-BST advised that BST will send a daily status summary of test cases at the end of each day.

-BST advised that special cases will require additional handling

-BST test manager advised she is available at all times to MCI

-BST/MCI agree to conduct 30 minute call every Wednesday at 10:00am to discuss status of testing

-BST will provide bridge information (WHEN?)

BST test manager request MCI sends 5 orders ~~on Monday~~ each day

-MCI agreed to send 5 ~~on Monday~~ each day when possible, but stated there may be delays on sending others

-MCI still requesting to send transactions on weekends

-BST test manager will investigate request

-BST advised that WorldCom can send PVT test cases on the week-end. However, there will not be BST test team support on the weekends. WorldCom is free to handle any problems through the normal help-desk process.

BST test manager provided office number to MCI

-MCI accepted and requested pager number

-BST test manager will provide to MCI (WHEN?)

-BST test manager request MCI allow BST time to respond to call

MCI request PVT date on agreement to remain Oct 6 (Saturday)

-BST will note a test agreement MCI will send production on Saturday, Oct 6 and BST will place PVT date of Oct 8 on test agreement

BST/MCI CAVE KICKOFF CALL

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Time of Call: 3:30 pm

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                    Venkatesan Subramanian   Patricia Woods
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                    Torrance Sanford   Micki Jones
                    Joe Laszlo
                    Brenda Thomas
                    Sharon Daniels

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~~-MCI stated the understanding of CAVE is to mimic production and the CCNA and CC do not belong to MCI and therefore CAVE is not allowing MCI to mimic production~~

-BST CAVE product manager gave technical and functional explanation about CCNA and CC

-BST stated that CAVE is a front-end ordering process with interfaces with the BST back-end production systems. CAVE is designed to mimic production functionality and is integrated into their production systems.

-BST stated the CC is used by BST to track the test order through the ~~CAVE~~ production systems so it does not go to production billing.

-BST stated that the difference between CAVE and the traditional testing environment is

- CAVE, BST provides the test data
- traditional testing environment, CLEC must provide "friendly" production accounts.

-MCI stated, based on the BST explanation, CAVE is not a stand-alone test environment and does not mimic production

MCI inquired if CAVE is available for testing on weekends

-BST verified there are no resources to monitor testing on weekends, MCI can send test data during weekend, but BST will pickup monitoring on Monday mornings

-BST recommended that WorldCom NOT send test cases on the week-ends, as they could not guarantee that they would be processed properly.

MCI stated testing to verifiy if MCI systems are flowing correctly and MCI wants to test as close to live production as possible

-MCI re-stated BST's explanation of CAVE ias a front end-ordering piece

-BST stated CAVE is exact replicate of the BST front end ordering
systems which interfaces with BST ~~of production that rely on~~ production
OSS systems
-MCI asked what does BST do with orders after transaction are sent
-BST stated CAVE orders are tracked by the test manager
MCI inquired about the flow thru of transactions with CAVE ~~versus production~~, what
orders flow electronically or fall for manual handling
-BST account team advised manual-handling issue is being addressed on the
weekly UNE-P conference call
-BST stated CLEC community was provided documentation and walk through of
CAVE early in the year
-MCI requested copy of documentation
-BST agreed to provide documentation (WHEN?)
MCI requested weekly call for testing
-BST advised that BST will send a daily status summary of test cases at the end of
each day.
-BST advised that special cases will require additional handling
-BST test manager advised she is available at all times to MCI
-BST/MCI agree to conduct 30 minute call every Wednesday at 10:00am to
discuss status of testing
-BST will provide bridge information (WHEN?)
BST test manager request MCI sends 5 orders ~~on Monday~~ each day
-MCI agreed to send 5 ~~on Monday~~ each day when possible, but stated there may
be delays on sending others
-MCI still requesting to send transactions on weekends
-BST test manager will investigate request
-BST advised that WorldCom can send PVT test cases on the week-end.
However, there will not be BST test team support on the weekends.
WorldCom is free to handle any problems through the normal help-desk
process.
BST test manager provided office number to MCI
-MCI accepted and requested pager number
-BST test manager will provide to MCI (WHEN?)
-BST test manager request MCI allow BST time to respond to call
MCI request PVT date on agreement to remain Oct 6 (Saturday)
-BST will note a test agreement MCI will send production on Saturday, Oct 6 and
BST will place PVT date of Oct 8 on test agreement

ATTACHMENT 21

```
REPORT NAME:      CLEC LSR Information
REPORT PERIOD:    08/01/2001 to 08/31/2001
CLEC:             7229 --
```

NOTES FOR REPORT ON CLEC LSR INFORMATION

This report contains information on all mechanically submitted, non-LNP LSRs that BellSouth processed for your company during the period noted above.

For the purpose of this report, an LSR is a distinct cc/pon/ver combination.

The data presented has several lines per LSR and where more than one line is needed to determine the status of an LSR (e.g., an LSR flows through when certain conditions are found/not found on three lines), it's still counted as one LSR.

Each different version of a particular PON is considered a separate LSR within BellSouth. Below, you will find explanations for each column and its contents.

CC -- Your company code.

PON -- Your purchase order number as received on the LSR.

VER -- The LSR version.

TIMESTAMP -- Timestamp of note or error posting in LEO database.

TYPE -- Notes type. See explanations of each type in the next section.

ERR# -- ENCORE error number. Please refer to your LEO Implementation Guide for complete explanations of each error number.

NOTE OR ERROR DESCRIPTION -- Actual text of the note or error as found in the LEO database.

When comparing the results of this LSR information file with the flow through aggregate report, please note that

this LSR Information file contains LSR data for all
submission types, (LENS, EDI, TAG), but are separated by cc
while there's a separate line for each submission type on
the aggregate report, the intent of this LSR information
file is for the reconciliation for all LSRs submitted
regardless of submission type.

NOTES TYPES EXPLAINED

There are several different types of notes, each with its
own unique identifier. Many of these are internal to
BellSouth, and will not be useful to you. Others will tell
you immediately the type of note that you are viewing. For
example, a type of 'C280' refers to an internal BellSouth
program which generated the note text, and 'ERR' means that
the note text contains an actual error message.
    Please note that each LSR may receive multiple errors and
messages. All errors and messages must be taken into
account in order to determine the treatment for that
particular LSR.

    TYPE   EXPLANATION

    C###   Refers to the actual BellSouth program that
generated the note text
    CANC   Automatically cancelled by system due to
inactivity
    CLAR   Clarification message
    CLM   LSR has been claimed
    CRR   Mechanically generated order has been corrected
    ERR   The notes field contains an error message, and
the ERR# field is populated
    FCCN   Manual FOC send
    ISS   Manually issued order
    LOAD   Successful change in the LEO database
    MECH   Means that the LSR in question was received via a
mechanized method
    NAVI   Navigation message -- where the LSR was sent at
that time
    RETF   Return feed
    SRET   SOCS return message
    SGNT   LSR has been inserted to TSIGNOUT queue and is
waiting to be claimed
    WEB   Message is posted to the web (LENS)

FLOWTHROUGH LOGIC

This section contains an explanation of the process by which BellSouth determines whether or not an LSR has flowed through the system. Please note the following: as each of the flowthrough steps is executed, LSRs that meet that step's criteria are removed from the base pool of LSRs, and are not included in any further calculations. For example, an LSR with both an auto clarification and a MANUALP fallout condition will be counted only once in the flow through calculation. In this example, the LSR will appear in the planned manual 'bucket' since the manual fallout step is executed before the auto clarification step. In addition, an LSR with more than one error of the same type, e.g., auto clarification, will be counted only once in the flow through calculation. A list of all errors by error code and quantity can be found in the Flow Through Error Analysis report.

The steps for determining flowthrough are as follows (in order):

FATAL REJECTS

Finds all fatal reject records. A fatal reject is a record the system identifies as having severe CLEC errors that prohibit further processing and is returned to the CLEC. Fatal rejects are identified by looking for a note containing 'LSR REJECTED' and a note type of 'RETF' or 'C475', both of which indicate an LSR was rejected by the system. A fatally rejected LSR does not retain its initiating source system ID (i.e., LENS, EDI, TAG); therefore, it is impossible to determine the source of a fatal reject. Please note that fatal rejects are not a part of the flow through calculation and are NOT identified in this report.

AUTO CLARIFICATIONS

Finds all auto clarification records. An auto clarification record is a record the system identifies as having a CLEC error and returns the record to the CLEC with no further processing. All auto clarification LSRs contain the words 'AUTO CLARIFICATION' in the notes field.

PLANNED MANUALS

Finds all planned manual and manual clarification records. A planned manual LSR is an LSR that the system is not designed to handle mechanically due to its complexity. As a result, the LSR falls out for manual handling so that processing can be completed. A planned manual LSR will have the text 'MANUALP' as the first seven characters of the notes field.

FLOWTHROUGH LSRs

Finds all records that have had service orders issued in SOCS, i.e., all records that flowed through the system. An LSR is defined as having flowed through if the following logic is true:

* The note contains the text 'FOC STAGED FOR LSR' ***OR*** 'FOC AND CN STAGED FOR LSR'

AND

* The note contains the text 'ORDER NUM' ***OR*** 'INFO-ORDER' ***OR*** 'CANCELLED'

SYSTEM FALLOUT

Any LSRs that did not flow through the systems and were not planned manuals, fatal rejects, or auto clarifications are defined as system fallout.

CLEC CAUSED FALLOUT

CLEC caused fallout is defined as those LSRs with clarifications returned and/or clarifications posted.

CLARIFICATIONS RETURNED

Find all clarification returned LSRs. A clarification returned designation indicates that an LSR was received and was LESOG eligible, but could not flow through because additional information was required in order to process the LSR. The LSR requires a Bellsouth representative to review it; if the error is determined to be a CLEC error, the LSR is clarified back to the CLEC. This LSR contains the text 'CLARIFICATIONS RETURNED' in the notes field.

CLARIFICATIONS POSTED

Finds all clarifications posted LSRs. A clarification posted is identical to a clarification returned except that the clarification is posted to the web (LENS) rather than being sent to the CLEC via EDI or TAG. A clarification posted LSR contains the text 'CLARIFICATIONS POSTED' in the notes field.

BST CAUSED FALLOUT

All other LSRs that fall out of the system are counted, by default, as 'BST Caused Fallout'.

PENDING (Z) STATUS LSRS

There is no specific identifier in the tables which indicates that a LSR has received a 'Z' status. When a supplemental LSR is received before the original LSR has reached FOC status, the original LSR is marked with a 'Z' status. LSRs that receive this 'Z' status are excluded from the flowthrough calculation.

LSRS AND ASSOCIATED MESSAGES FOR THIS PERIOD

LIST OF LSRS WITH ACTIVITY DURING THE MONTH THAT WERE INCLUDED IN THIS MONTH'S FLOW THROUGH CALCULATION.

The following is a list of the LSRs originated this month and included in the flow through calculation, and all messages associated with each LSR received. Again, please remember that you must take into account all the messages and errors for each LSR to determine its treatment.

ATTACHMENT 22

PON	VER	DATE	TIME	TYPE	ERR#	NOTES
S003753818BSGAPR	0	8/23/01	11:55:33	BB18		LSR LOADED AS MECHANIZED
S003753818BSGAPR	0	8/23/01	11:55:33	C070		DATA SENT TO DDC
S003753818BSGAPR	0	8/23/01	11:55:55	C040		LSR HAS BEEN SENT TO LESOG
S003753818BSGAPR	0	8/23/01	11:58:10	B050		PROCESSING OF SERVICE ORDER NO8
S003753818BSGAPR	0	8/23/01	12:00:29	C020		INFO-ORDER NUM: DO87B531
S003753818BSGAPR	0	8/23/01	12:00:29	C020		SERVICE ORDER UPDATE PLACED BY L
S003753818BSGAPR	0	8/23/01	12:00:29	C020		INFO-ORDER NUM: NO8C6WV0
S003753818BSGAPR	0	8/23/01	12:00:48	B050		8#5 FOC STAGED FOR LSR, LEO STATU
S003753818BSGAPR	0	8/23/01	12:00:50	B025		855 ISSUED RETURN-FEED # 0001 FOC
S003753818BSGAPR	0	8/29/01	14:43:50	B050		PREVIOUS FOC HAS BEEN SENT, NO A
S003753818BSGAPR	0	8/29/01	14:43:50	B050		FOC, POS OR JEP WAS APPLIED TO LSR
S003753818BSGAPR	0	8/30/01	9:00:28	SGNT		DB09A030 INSERTED TO TSIGNOUT
S003753818BSGAPR	0	8/30/01	9:00:28	ERR	1000	TN 898-1586 IS ALREADY WORKING ON
S003753818BSGAPR	0	8/30/01	9:00:31	CLAR		Clarify Requested for VER-9
S003753818BSGAPR	0	8/30/01	9:00:31	SGNT		DB09A030 DELETED FROM TSIGNOUT
S003753818BSGAPR	0	8/30/01	9:00:32	B025		CLARIFICATIONS RETURNED- 1000
S003753818BSGAPR	0	8/30/01	9:00:32	B025		855 ISSUED RETURN-FEED # 0002 CLAR
S003753818BSGAPR	0	8/30/01	9:01:01	B050		PREVIOUS FOC HAS BEEN SENT, NO A
S003753818BSGAPR	0	8/30/01	9:01:01	B050		FOC, POS OR JEP WAS APPLIED TO LSR
S004096996BSGAPR	0	8/24/01	23:35:11	BB18		LSR LOADED AS MECHANIZED
S004096996BSGAPR	0	8/24/01	23:35:12	C070		DATA SENT TO DDC
S004096996BSGAPR	0	8/24/01	23:35:28	C040		LSR HAS BEEN SENT TO LESOG
S004096996BSGAPR	0	8/25/01	5:45:06	B035		LSR RESENT - NOT YET RESOLVED IN L
S004096996BSGAPR	0	8/25/01	5:45:07	C040		LSR HAS BEEN SENT TO LESOG
S004096996BSGAPR	0	8/25/01	6:02:49	B050		PROCESSING OF SERVICE ORDER NO1
S004096996BSGAPR	0	8/25/01	6:03:01	B050		PROCESSING OF SERVICE ORDER NO1
S004096996BSGAPR	0	8/25/01	6:03:34	B050		PROCESSING OF SERVICE ORDER NO3
S004096996BSGAPR	0	8/25/01	6:03:43	B050		PROCESSING OF SERVICE ORDER NO3
S004096996BSGAPR	0	8/25/01	6:04:25	C020		INFO-ORDER NUM: DO1XDLT4
S004096996BSGAPR	0	8/25/01	6:04:25	C020		SERVICE ORDER UPDATE PLACED BY L
S004096996BSGAPR	0	8/25/01	6:04:25	C020		INFO-ORDER NUM: NO1Y7VF8
S004096996BSGAPR	0	8/25/01	6:06:19	C020		INFO-ORDER NUM: DO3KHT34
S004096996BSGAPR	0	8/25/01	6:06:19	C020		SERVICE ORDER UPDATE PLACED BY L
S004096996BSGAPR	0	8/25/01	6:06:19	C020		INFO-ORDER NUM: NO3RG7R4
S004096996BSGAPR	0	8/25/01	6:30:05	B050		8#5 FOC STAGED FOR LSR, LEO STATU
S004096996BSGAPR	0	8/25/01	6:30:05	B025		855 ISSUED RETURN-FEED # 0001 FOC
S004096996BSGAPR	0	8/25/01	6:30:05	B025		POS ISSUED, SOCS STATUS - PD P
S004096996BSGAPR	0	8/25/01	6:30:06	B025		POS ISSUED, SOCS STATUS - PD P
S004096996BSGAPR	0	8/25/01	6:30:07	B025		POS ISSUED, SOCS STATUS - PD P
S004096996BSGAPR	0	8/28/01	16:51:21	B050		PREVIOUS FOC HAS BEEN SENT, NO A
S004096996BSGAPR	0	8/28/01	16:51:21	B050		FOC, POS OR JEP WAS APPLIED TO LSR
S004096996BSGAPR	0	8/28/01	16:51:24	B050		PREVIOUS FOC HAS BEEN SENT, NO A
S004096996BSGAPR	0	8/28/01	16:51:24	B050		FOC, POS OR JEP WAS APPLIED TO LSR
S004096996BSGAPR	0	8/31/01	17:25:30	B050		865 COMPLETION STAGED FOR LSR, LE
S004096996BSGAPR	0	8/31/01	17:25:30	B025		865 ISSUED RETURN-FEED # 0005 COM
S004176269BSGAPR	0	8/29/01	23:30:23	BB18		LSR LOADED AS MECHANIZED
S004176269BSGAPR	0	8/29/01	23:30:23	C070		DATA SENT TO DDC
S004176269BSGAPR	0	8/29/01	23:30:28	C040		LSR HAS BEEN SENT TO LESOG
S004176269BSGAPR	0	8/30/01	5:45:02	B035		LSR RESENT - NOT YET RESOLVED IN L
S004176269BSGAPR	0	8/30/01	5:45:03	C040		LSR HAS BEEN SENT TO LESOG
S004176269BSGAPR	0	8/30/01	6:05:31	B050		PROCESSING OF SERVICE ORDER NO1
S004176269BSGAPR	0	8/30/01	6:05:53	B050		PROCESSING OF SERVICE ORDER NO0
S004176269BSGAPR	0	8/30/01	6:05:55	B050		PROCESSING OF SERVICE ORDER NO1
S004176269BSGAPR	0	8/30/01	6:06:58	C020		INFO-ORDER NUM: DO119H35

S004176269BSGAPR	0	8/30/01	6:06:58	C020	SERVICE ORDER UPDATE PLACED BY L
S004176269BSGAPR	0	8/30/01	6:06:58	C020	INFO-ORDER NUM: NO12YND1
S004176269BSGAPR	0	8/30/01	6:07:01	C020	INFO-OUT TO SOER
S004176269BSGAPR	0	8/30/01	6:07:01	C020	SERVICE ORDER UPDATE PLACED BY L
S004176269BSGAPR	0	8/30/01	6:07:01	C020	INFO-ORDER NUM: DO0VPVP2
S004176269BSGAPR	0	8/30/01	6:07:01	C020	INFO-ORDER NUM: NO0WBWB0
S004176269BSGAPR	0	8/30/01	6:30:12	B050	8#5 FOC STAGED FOR LSR, LEO STATU
S004176269BSGAPR	0	8/30/01	6:30:12	B050	PREVIOUS FOC HAS BEEN SENT, NO A
S004176269BSGAPR	0	8/30/01	6:30:12	B050	FOC, POS OR JEP WAS APPLIED TO LSR
S004176269BSGAPR	0	8/30/01	6:30:14	B025	855 ISSUED RETURN-FEED # 0001 FOC
S004176269BSGAPR	0	8/30/01	6:30:14	B025	POS ISSUED, SOCS STATUS - PD P
S004176269BSGAPR	0	8/30/01	13:37:37	B050	PREVIOUS FOC HAS BEEN SENT, NO A
S004176269BSGAPR	0	8/30/01	13:37:37	B050	FOC, POS OR JEP WAS APPLIED TO LSR

C6WV0 IN STATUS AO DELAYED: WAITING FOR LESOG RESPONSE

ESOG

S CHANGED TO "F"
SENT
ACTION TAKEN.
R NO RETFD

ANOTHER ACC, PLS SUBMIT NEW DRS TN. JSM

IFICATION REQUESTED
ACTION TAKEN.
R NO RETFD

ESOG

Y7VF8 IN STATUS AO DELAYED: WAITING FOR LESOG RESPONSE
Y7VF8 IN STATUS PD DELAYED: WAITING FOR LESOG RESPONSE
RG7R4 IN STATUS AO DELAYED: WAITING FOR LESOG RESPONSE
RG7R4 IN STATUS PD DELAYED: WAITING FOR LESOG RESPONSE

ESOG

ESOG

S CHANGED TO "F"
SENT
 ENDING ORDER
 ENDING ORDER
 ENDING ORDER
ACTION TAKEN.
R NO RETFD
ACTION TAKEN.
R NO RETFD
 O STATUS CHANGED TO "P"
PLETION SENT

ESOG

2YND1 IN STATUS AO DELAYED: WAITING FOR LESOG RESPONSE
WBWB0 IN STATUS AO DELAYED: WAITING FOR LESOG RESPONSE
2YND1 IN STATUS PD DELAYED: WAITING FOR LESOG RESPONSE

ESOG

ESOG

 S CHANGED TO "F"
ACTION TAKEN.
R NO RETFD
 SENT
 ENDING ORDER
ACTION TAKEN.
R NO RETFD

ATTACHMENT 23

BellSouth Interconnection Services

1960 West Exchange Place
Suite 420
Tucker, Georgia 30084

October 17, 2001

Ms. Amanda Hill
Manager - Carrier Management
WorldCom
Two Northwinds Center
2520 Northwinds Parkway
Suite 500
Alpharetta, Georgia 30004

Dear Amanda:

This is in response to your e-mails dated August 14 and September 6, 2001, requesting that BellSouth investigate 10 MCImetro (MCIm) telephone numbers to determine the reason they did not appear in BellSouth's line loss notifications that are provided to MCIm via BellSouth's Network Data Mover (NDM). These particular reports serve as notification to the Competitive Local Exchange Carrier (CLEC) community that a customer has switched to a different local service provider.

BellSouth researched the NDM transmission history, and found that the line loss notification reports have been sent in a timely manner. However, in reviewing the NDM files it was determined that of the 10 telephone numbers MCIm provided, 5 telephone numbers did not appear on NDM reports because of service order issuance errors by BellSouth, which prevented the telephone numbers from transmitting to the NDM file. BellSouth has covered the Business Office service representatives regarding the importance of using correct disconnect identifiers and information when issuing service orders of this nature so that the telephone numbers will post to your NDM line loss report.

The other 5 telephone numbers are not considered losses that would be reflected on the NDM loss notification reports. 3 of the telephone numbers were claimed by the end users to be unauthorized changes of service to MCIm. Accounts disconnected due to claims of unauthorized change of service are not listed on the NDM loss report. MCIm cancelled the Purchase Order Number (PON) for 1 telephone number. Thus, the service/customer was never switched to MCIm. The remaining telephone number is still an MCIm account according to our records. Please refer to the attached matrix for the details for each telephone number involved.

As you are aware, in addition to providing the line loss notification information via the NDM to MCIm, BellSouth provides a Line Loss Report, which is posted to the BellSouth Interconnection Services' Web site at:

https://clec.bellsouth.com

This report is a bit different from the NDM report, as losses due to claims of slamming are included on the Web site report. Also, the identifier that causes the order to post to the NDM report is not necessary for the telephone number to appear on the Web site report. Thus, 8 of the 10 telephone numbers you provided were included in the Line Loss Reports. This information remains on the BellSouth Interconnection Services' Web site for seven calendar days.

I trust that the above information satisfies your concerns regarding this matter. Please feel free to call me at 770-492-7543, if you have additional questions.

Sincerely,

Pamela D. Reynolds
Industrial Specialist

Attachment

cc: Shannon Waters

Account Number	CC	MAN	Posted to	BellSouth Response
404 241-3169		7229 error	Interconnection Website only	MAN FID error prevented transmitting to NDM file
404 349-0504		7229	7229 Interconnection Website only	Remark section error prevented transmitting to NDM file
404 349-2056				MCI request cancel PON, Acct belongs to BST
404 370-0252		7229 error	Interconnection Website only	MAN FID error prevented transmitting to NDM file
404 758-1258		7229	7229 Interconnection Website only	Remark section error prevented transmitting to NDM file
404 761-3326		7229	7229 Interconnection Website only	Remark section error prevented transmitting to NDM file
404 792-0664				Account belongs to MCI, no Line Loss Report needed
404 794-2712		7229	Interconnection Website only	Disconnect reason of SE (switched in error) prevented transmitting to NDM file
678 513-0298		7229	7229 Interconnection Website only	Disconnect reason of SE (switched in error) prevented transmitting to NDM file
678 560-2452		7229	7229 Interconnection Website only	Disconnect reason of SE (switched in error) prevented transmitting to NDM file

ATTACHMENT 24

CRUCIAL SHORTCOMINGS OF THE "BALANCING CRITICAL VALUE" APPROACH TO PERFORMANCE APPRAISAL

by
John D Jackson, Professor of Economics,
Auburn University, Auburn, AL 36830

I. Introduction

Section 271 of the Telecommunication Act of 1996 provided for ILEC entry into the long distance telephone service market if CLECs were allowed to enter the various local telephone services markets. This CLEC entry, in turn, is predicated upon the CLECs' ability to purchase from the ILEC various services crucial to their ability to compete in the local market. Consequently, the Act further requires that the ILEC provide these services to the CLECs at a quality level *at least equal* to that they provide to their own customers or affiliates. Thus, the evaluation of parity in local service provision has become a central issue in all proceedings concerning ILECs' 271 approval. Statistical means difference tests, typically based on (some version of) the LCUG Z statistic, have become the cornerstone in the evaluation of service quality provision. Indeed, test results are not only used to determine whether the ILEC has discriminated against the CLEC in service quality provision, they also enter into the determination of the magnitude of the penalty involved according to several performance assurance plans (such as those proposed by SBT, BST, and AT&T). It is this latter use that has led to the development of a "balancing critical values" approach to parity testing and performance appraisal.

When one makes a decision concerning the presence or absence of parity in service provision based on a statistical test, he or she can err in one of two possible ways. They could conclude that discrimination in service provision exists when in fact it does not, or they could conclude that discrimination does not exist when in fact it does. Because the null hypothesis of the test assumes "no discrimination," the former error involves the rejection of a true null. It is called a type I error, and the probability (or risk) of committing such an error is called α. The latter error involves the acceptance of a false null. It is called a type II error, and the probability (or risk) of committing such an error is called β. The BCV approach to parity testing amounts to determining a critical value of the test statistic called a balancing critical value (BCV), that equates α with β. This principle was first enunciated by LCUG in the early (pre 1998) stages of parity testing discussions, but the current version is the result of joint efforts of BST's statistical discussions from Ernst and Young and AT&T's (now retired) statistical expert Colin Mallows. Indeed, a BCV has become an integral part of both AT&T and BST's Performance Assurance Plans (PAPs).

In principle, an equal chance of error approach is attractive for (at least) two reasons. First, it remedies a number of difficulties encountered by the alternative approach. A number of PAPs, e.g., SBT's Texas plan, employ a fixed critical value of the test statistic and a K-table in lieu of BCV. Without going into a detailed criticism, the K-table corrects for random variation in the test statistic by allowing the ILEC to fail "k" tests per month without penalty. Many CLECs object to this approach because the table is

derived based on an unrealistic alternative (that the ILEC always provides parity service) and because it ignores type II errors. The BCV approach avoids these criticisms (and handles the random variation problem) by employing a critical value of the test statistic that equates the probabilities of committing type I and type II errors.

Second, the BCV approach dovetails neatly with the objective of unbiased penalty assessment. An optimal statistical decision would be one that equates the costs of making a type I error with the costs of making a type II error. ILEC representatives are typically more than willing to disclose how much a type I error costs them. CLECs, on the other hand, have a more difficult time determining how much a type II error costs them. These costs involve not only the foregone penalty payment and the cost to their reputation; they also entail the cost to society of having to continue monopolistic service provision while losing the benefits of competition. Since these costs are difficult to calculate, it is not reasonable to expect an optimal statistical decision. The BCV, however, accomplishes the next best thing. Since, the probability that the ILEC would have to pay a fine when it is not discriminating is equal to the probability that it will not have to pay a fine when it is discriminating, the long run expected value of inappropriate net penalty payments is zero.

It is indisputable that the BCV approach has a definite allure for parity testing and performance appraisal. Unfortunately, operationalizing the BCV approach, putting the principle into practice, exposes a major flaw which can open Pandora's Box in terms of allowing the ILEC to thwart meaningful CLEC competition at the local level. The problem relates to the key role played by a parameter δ in determining what critical values of the test statistic will lead to the rejection of parity. The flaw is that the value given to δ is arbitrarily determined; Pandora's Box is opened when δ is set equal to "large" values; and all the evidence suggests that ILECs are intent on pursuing exactly this strategy.

II. The Importance of Specifying Delta

To apply the BCV approach, one must (a) determine an expression for the value of α assuming the null hypothesis is true, (b) determine an expression for the value of β assuming the alternative hypothesis is true, and (c) set these two expressions equal to each other so as to solve for the balancing critical value (BCV) of the test statistic that equates α and β. Step (a) is easy because the CLEC and ILEC population means are assumed to be equal -- it does not matter what value they are equal to, just that they are equal to each other. The procedure becomes problematic at step (b) because we must have a specific value for the difference between the CLEC and ILEC population means in order to compute β. This is the point in the argument at which statisticians typically cop out. Ideally, we would like to compute β based on a means difference that is only just large enough to be marginally "competitively significant." Statisticians argue that they are in no position to gauge how large means differences should be in order to be marginally competitive significant, this matter should be left to "telephony experts." But given a measure of this difference, they can easily compute the BCV and hence implement an equal probability of Type I and Type II errors. The AT&T/BST statisticians capsulize the problem as follows:

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$$H_0: \mu_c = \mu_i ; \sigma_c^2 = \sigma_i^2 \tag{1}$$

$$H_A: \mu_c = \mu_i + \delta * \sigma_i ; \sigma_i^2 = \lambda \sigma_c^2$$

(Clearly, parity service provision requires both equality of means and equality of variances. The second set of equalities in H_0 and H_A above allow for discrimination in the form of the CLEC variance exceeding the ILEC variance by a multiplicative factor λ, $\lambda > 1$; i.e., the ILEC provides the CLEC more variable service than it provides itself. While this is certainly an important source of discrimination, it is of only tangential importance to the problem at hand. Thus, in what follows, the variances are assumed to be equal; i.e., $\lambda = 1$.) In this view, the CLEC and ILEC means are equal under H_0 and differ by an amount equal to $\delta * \sigma_i$ under H_A. Analytically, under these assumptions, steps (a), (b), and (c) lead to the formula

$$BCV = \frac{\text{Expected Value of Test Statistic Asserting Means Differ by } \delta \cdot \sigma_i - \text{Expected Value of Test Statistic Assuming Means do not Differ}}{\text{Variance of Test Statistic Assuming Means Differ by } \delta \cdot \sigma_i + \text{Expected Value of Test Statistic Assuming Means do not Differ}} \tag{2}$$

Thus δ is a measure, in units of the ILEC standard deviation, of the extent to which the ILEC mean exceeds the CLEC mean (or, conversely). As such, specifying δ specifies the difference between the CLEC and ILEC means that would be marginally competitively significant in affecting local service competition. Further, specifying delta is integral to determining the BCV. It follows immediately that, since parity is rejected if the computed value of the test statistic "exceeds" the BCV, the value chosen for δ can determine the outcome of the test.

While the statistician may not be in a position to accurately specify δ, he or she is certainly able to evaluate the impact of choosing a particular δ on parity testing. Before turning to this question, however, let us examine briefly the ability of "telephony experts" to specify δ. In the past, BST "experts" have suggested that δ should equal 1; more recently (in the Florida Strawman proposal) a value of 0.5 has been put forward. No explanation has been offered as to how these numbers were derived. The following scenario is not out of the question: One day the chief ILEC negotiator phones one of his engineers and asks, "Hey Joe, suppose our average service provision was about one standard deviation better than what we provide the CLECs on average. Would that difference be competitively significant?" Joe thinks for a minute and responds, "Yeah, it probably would be, but let me check with Bill to see what he thinks. Hey, Bill..." To make a long story short, let's suppose that Bill and whoever else he consults concur. The value of δ has now been established, in the ILEC's mind, as 1. Admittedly, there is no real evidence to support this conjecture; but equally, there is no real evidence refuting it, either. That is one of the problems, ILECs provide no evidence from their "telephony experts" at all.

Charitably, the ILEC may simply have asked its experts the wrong question. It is probably true that selecting $\delta = 1$, produces a means difference, $1 * \sigma$, that is competitively significant. But the important question is whether this is the least possible means difference that would be competitively significant. If one is willing to accept values of δ that lead to inframarginal differences in competitive significance, then there is an infinity of equally legitimate values that δ could take on. For example, if $\delta = 1$ results in a competitively significant means difference ($1 * \sigma$), then so would values of $\delta = 2, 3, 4, \ldots$, because they would lead to larger means differences than that given by $\delta = 1$ (i.e., $2 * \sigma$,

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$3*\sigma$, $4*\sigma$, ...). Thus, specifying inframarginal values for δ becomes completely arbitrary, so that such values can contribute nothing to the solution of parity testing problems. The real question is how *small* can δ be made and the resulting means difference be competitively significant. Is it possible for means differences resulting from δ values of 0.5, 0.25, or 0.1 to be competitively significant differences? It is the value of δ that leads to the marginally competitively significant means difference that we require, because it is the only unique, unambiguous, meaningful value to assign to δ if competitive significance is to be the criterion by which we determine Type II error. *For this reason, establishing the δ that leads to marginally competitively significant means difference should be the subject of considerable research on the part of economists and statisticians as well as engineers and other "telephony experts."* The CLECs are aware of no models that have been estimated, no experiments that have been conducted by the ILECs. Indeed, the ILEC is typically in a uniquely poor position to conduct tests and experiments to establish the extent of marginally competitively significant differences in the provision of local telephone service because, generally speaking, it does not "compete" in local markets. In fact, a sound argument can be made that it is not possible at this time to accurately establish such values, because up to now, local telephone markets in the U.S. have not seen vigorous competition between the CLECs and the ILEC. Until such competition is the rule of the day, determining "competitive significance" can be based on nothing but conjecture.

III.   The Statistical Consequences of Choosing a δ That is "Too Large"

Now consider the impact on parity testing of the ILEC's choice of $\delta=1$ rather than some, more appropriate, smaller number. The answer, in a nutshell, is this: the larger δ, the more extensive is the ILEC's carte blanche to thwart local competition. The rationale is as follows: (i) Larger values of δ indicate larger differences in SQM means. (ii) The larger the means difference, the less likely the commission of a type II error, i.e., the lower is β. (iii) Smaller values of β require smaller values of α to balance the two risks. (iv) Since α is not only the probability of committing a type I error but also the level of significance of the test, smaller values of α imply larger critical values of the test statistic. (v) Since larger means differences imply greater discrimination and since larger critical values of the test statistic make rejection of parity less likely, larger values of δ permit greater discrimination by the ILEC without its incurring a penalty. To see points (i)-(iv) more clearly, consider the Figure 1. The figure contains three sets of graphs with two graphs in each set. For each set, the upper graph can be considered as the distribution of ILEC sample means and the lower graph, as the distribution of CLEC sample means. The service being analyzed is assumed to be one in which larger numbers mean worse performance. Thus, in accordance with equations 1, the mean of the ILEC distribution is μ and the mean of the CLEC distribution is $\mu+\delta*\sigma$. In the upper set of graphs, $\delta=1$, in the middle set, $\delta=0.5$, and in the lowest set, $\delta=0.25$.

Graphically, determining the balancing critical value is easy. The probability of a type I error is simply the area under the ILEC curve to the right of X^* (ILEC sample means so large that they give the appearance of non-parity when parity is in fact the case), and the probability of a Type II error is the area under the CLEC curve to the left

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of X* (CLEC sample means so small that they give the appearance of parity when it is not truly the case). Determining the balancing critical value simply amounts to adjusting the dashed vertical line -- the one labeled BCV and the one that defines X* -- so as to equalize these two areas. Also note that even though the distributions are not normalized, it still follows that larger α (=β) areas imply smaller (in absolute value) critical values, and conversely.

Now consider the upper set of graphs which have been constructed under the hypothesis that δ=1. Here, the CLEC mean is a relatively large distance above the ILEC mean. Thus the BCV will determine α and β errors that are relatively small, indicating that the BCV itself will be relatively large in absolute value. Intuitively, since the CLEC mean is a relatively large distance above the ILEC mean, we are not very likely to commit a Type II error, that is, β is likely to be small. Consequently, α must also be small to equal β, and small α's correspond to large (in absolute value) critical values of the test statistic.

In comparison, consider the middle set of graphs. All factors are assumed to be the same as in the upper set except that now the CLEC mean is closer to the ILEC mean, δ=0.5 rather than δ=1. Relative to the first case, this increased proximity will lead to an increased β-risk and a BCV that cuts off larger areas in the tails of both distributions. Note that the larger α would correspond to a smaller (in absolute value) critical value of the test statistic.

Finally, note that the lowest set of graphs reinforces these notions. Again, everything is assumed to be the same as in the two earlier cases except that now the CLEC mean is closer still to the ILEC mean, δ=0.25. Again, because of this increased proximity, the α- and β-risks are higher and the resulting BCV lower (in absolute value) than in the previous cases.

This analysis clearly demonstrates that, in general, the larger δ, the larger the critical value of the test statistic associated with the rejection of parity, *ceteris paribus*. Based on this result, it would not be difficult to accept a value of δ of 1 if the α- and β-risks were of a reasonable size; i.e., if the critical values of the test statistic were of reasonable magnitudes. Unfortunately, this is not the case for δ=1, nor even for δ=0.5. *The problem is that the AT&T/BST approach guarantees that, given δ, the α-risk will equal the β-risk, but it has nothing to say about the magnitude of risk at which they will be equal. As a result, many tests have critical values that balance risks, but at infinitesimal risk levels. In fact, these levels of significance are so small as to make a mockery of parity testing.*

Based on the hypothesis test defined in (1)

$$H_0: \mu_C = \mu_I; \sigma_C^2 = \sigma_I^2$$

$$H_A: \mu_C = \mu_I + \delta \cdot \sigma_I; \sigma_I^2 = \lambda \sigma_C^2$$

(1')

Begin by assuming that λ=1. BST has suggested a simplified formula for approximating the BCV for the truncated Z statistic. (It should be noted that what BST calls the truncated Z is in fact a standard normal variate -- the truncated Z minus its mean and divided by its standard deviation -- so that its critical values are those of a traditional Z statistic).

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FIGURE 1
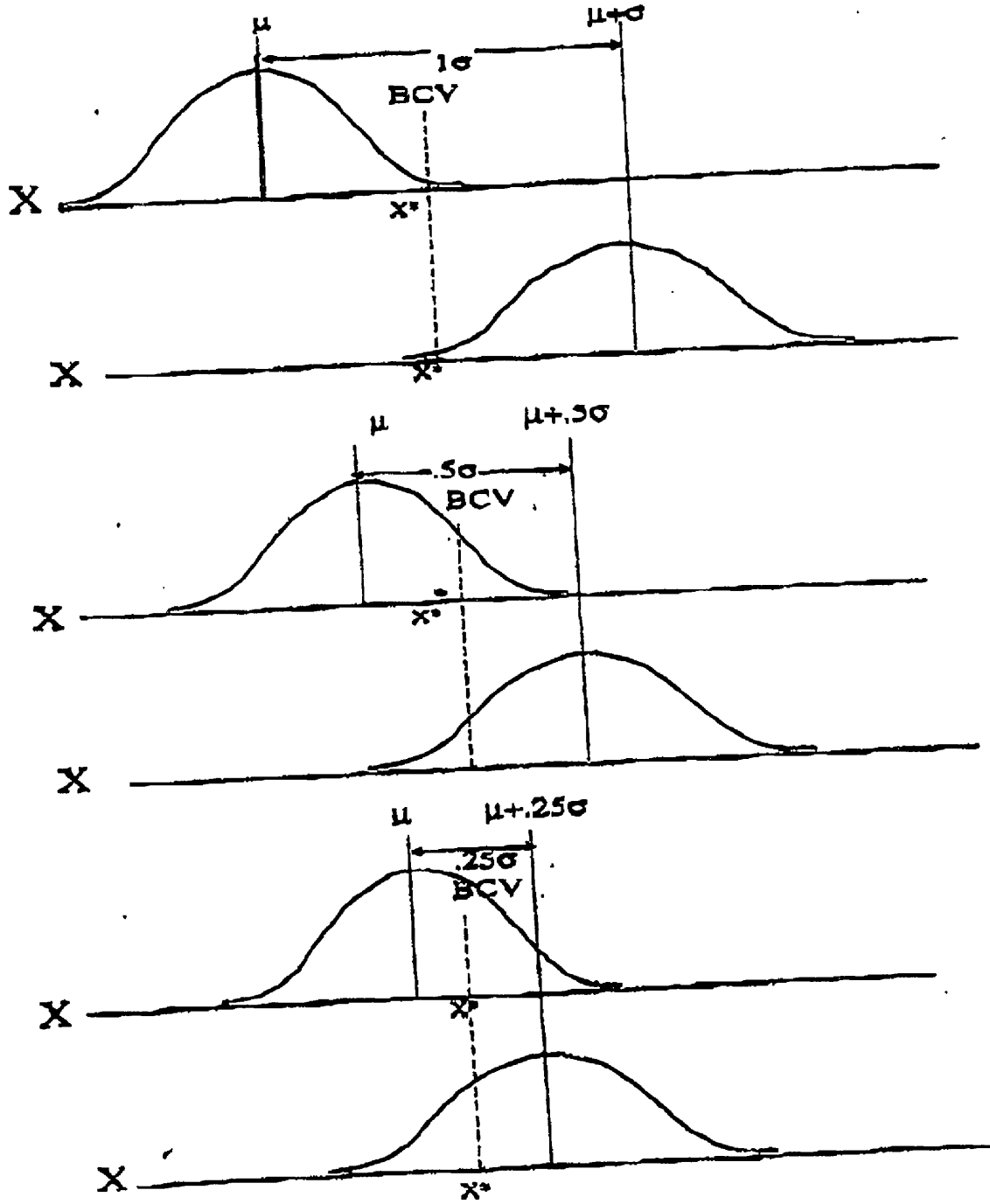
$$BCV = \frac{-\delta}{2\sqrt{\dfrac{1}{n_c} + \dfrac{1}{n_i}}} \qquad\qquad (3)$$

Let us begin by assuming that $\delta=1$, and let us assume that the ILEC sample size is sufficiently large so that the term $(1/n_i)$ in the denominator of (3) can be taken to be zero. Under these assumptions, the BCV depends only on δ and the CLEC sample size. Consider some typical CLEC sample size values, and note the implied values of BCV and the concomitant level of significance α ($=\beta$):

$$n_c = 50 \Rightarrow BCV = -3.54 \Rightarrow \alpha = \beta = .0002$$
$$n_c = 100 \Rightarrow BCV = -5.00 \Rightarrow \alpha = \beta = .0000003$$
$$n_c = 300 \Rightarrow BCV = -8.66 \Rightarrow \alpha = \beta = 2.3*10^{-16}$$
$$n_c = 500 \Rightarrow BCV = -11.18 \Rightarrow \alpha = \beta = 2.5*10^{-28}$$
$$n_c = 1000 \Rightarrow BCV = -15.81 \Rightarrow \alpha = \beta = 1.3*10^{-54}$$

It should be clear that, for very reasonable CLEC sample sizes, when $\delta=1$, the AT&T/BST BCV approach yields unacceptably large (in absolute value) critical values and unacceptably small levels of significance. Put into perspective, the FCC has suggested that $\alpha=0.05$ (CV$=-1.645$) is a reasonable significance level to undertake statistical tests of parity. Some ILEC proposals have suggested $\alpha=0.025$ (CV$=-1.96$) or even $\alpha=0.01$ (CV$=-2.365$). But no *bona fide* statistician could honestly recommend that it would be reasonable to conduct a simple means difference test at anything smaller than the $\alpha=0.01$ level of significance — that is, until now. By requiring $\delta=1$, BST has implicitly required that the level of significance be $1/50^{th}$ of the minimum acceptable level and $1/250^{th}$ of an appropriate level — in their best case scenario ($n_c = 50$). For more reasonable sample sizes, the implications are even more outrageous. And these results are not an artifact of the simplifying assumptions used in the above analysis. BST analyzed 84 parity tests on two SQMs using April 1999 data for the state of Louisiana, with $\delta=1$. They report a minimum BCV of -73 (!) and a median BCV of -3.74, implying that half of the tests were undertaken at a level of significance less than .00009. Indeed, roughly $3/4^{th}$'s of the tests were undertaken at less than the recommended .05 level of significance. These results indicate that, regardless of the opinion of the "telephony experts," the idea that $\delta=1$ can be rejected based on its statistical implications alone.

These same conclusions also obtain in the case of $\delta=0.5$, although to a lesser degree. Recall that this is the value of δ that BST has put forward in their Florida "Strawman" proposal. If we repeat the above experiment with $\delta=0.5$, we find the following:

$$n_c = 50 \Rightarrow BCV = -1.77 \Rightarrow \alpha = \beta = .038$$
$$n_c = 100 \Rightarrow BCV = -2.50 \Rightarrow \alpha = \beta = .0062$$
$$n_c = 300 \Rightarrow BCV = -4.33 \Rightarrow \alpha = \beta = .000007$$
$$n_c = 500 \Rightarrow BCV = -5.59 \Rightarrow \alpha = \beta = .00000001$$
$$n_c = 1000 \Rightarrow BCV = -7.91 \Rightarrow \alpha = \beta = 1.3*10^{-13}$$

Again, except for the $n_c=50$ case, all significance levels are less than the minimum acceptable level, and even for the $n_c=50$ case, the significance level is less than the recommended .05 level. Thus, for the reasons mentioned above, $\delta=0.5$ must be rejected

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on the grounds of its statistical implications as too big. (We acknowledge that these numbers do not dovetail with those in examples found in Appendix D of the BST proposal. They do, however, dovetail with the numbers we compute using that same data but appropriate, exact, formulae from other sources.)

Finally, prior to his retirement, AT&T's Colin Mallows recommended a value of 0.25 for δ. Replicating the above experiment for δ=0.25 yields

$$n_c = 50 \Rightarrow BCV = -0.88 \Rightarrow \alpha = \beta = .19$$
$$n_c = 100 \Rightarrow BCV = -1.25 \Rightarrow \alpha = \beta = .106$$
$$n_c = 300 \Rightarrow BCV = -2.16 \Rightarrow \alpha = \beta = .015$$
$$n_c = 500 \Rightarrow BCV = -2.80 \Rightarrow \alpha = \beta = .0026$$
$$n_c = 1000 \Rightarrow BCV = -3.95 \Rightarrow \alpha = \beta = .00004$$

Judged by the implied level of significance of the test, these results are considerably more credible than the two previous cases. Still, for instances where n_c>100, the levels of significance are just too low. This inference is particularly important since both AT&T and BST plans recommend aggregating the test statistics up through many deep testing categories before comparing them to the BCV, so that large CLEC sample sizes are to be expected. (To illustrate, the relevant sample sizes in the previously mentioned BST examples are in excess of n_c=300.)

IV. Implications for Parity Testing, Performance Appraisal, and the Prospects for Operationalizing Equal Risk

The practical import the above statistical results concerning parity testing should be obvious: The larger the value of δ, the greater the means difference, i.e., the greater the extent of discrimination against the CLEC, permitted the ILEC before it is subject to a penalty payment. An example will illustrate: The ILEC owes a penalty when the computed value of the test statistic exceeds the BCV. For simplicity, assume the test statistic is the LCUG Z and that $n_{ILEC} \rightarrow \infty$. Thus a penalty is owed if

$$\frac{\bar{X}_{CLEC} - \bar{X}_{ILEC}}{\sigma_{ILEC}\sqrt{\frac{1}{n_{CLEC}}}} \geq BCV \qquad (3)$$

Substituting equation (2) for BCV and rearranging terms, a penalty will be owed if

$$\bar{X}_{CLEC} \geq \bar{X}_{ILEC} + 0.5 \cdot \delta \cdot \sigma_{ILEC} \qquad (4)$$

Now suppose the ILEC mean repair interval is, say 3 days with a standard deviation of 8. If δ = 1, the CLEC mean repair interval would have to be *more than 7 days* (as compared to the ILEC's 3 days) before the ILEC would owe a penalty. Indeed, if δ = 0.5, as suggested in the Florida Strawman, the CLEC mean repair interval would have to be *more than 5 days* (as compared to the ILEC's 3 days) before the ILEC would owe a penalty. Interestingly, if δ = 0.15, the implied means difference would be 0.6 days, about the same as that implied by the critical Z value of 1.645 (with n_{CLEC} = 400) suggested by the FCC (0.67 days).

This example should make it clear why ILECs want large values of δ and CLECs want small values of δ. It should also make it clear why δ has become such an important bargaining chip in 271 negotiations. *It is impossible to emphasize strongly enough how*

regrettable this outcome is. The value of δ is not something to be bargained over any more than the value of π is something to be voted on. As pointed out in section II, δ is the difference between mean CLEC and ILEC performance levels, measured in units of the ILEC standard deviation, that would be marginally competitively significant. Ideally, its value for many different SQMs would be the subject of serious study by statisticians, economists, engineers, and industry experts. To make δ subject to negotiation is to destroy the logical underpinnings of parity testing and performance appraisal – to make these underpinnings rest on the relative bargaining power of the participants rather than statistical science. Yet this result is as inevitable as night following day. Because we have not seen at the local level the kind of vigorous competition among providers that would allow an appropriate calculation of δ, the only methods available for specifying δ are conjecture and negotiation, hopefully tempered with a little statistical sanity.

Problems arising from the acceptance or rejection of parity are not the only practical problems arising from attempts to apply the BCV approach. Such problems are magnified when the BCV approach enters into the determination of the magnitude of penalties. Consider for example the penalty structure in the Florida Strawman proposal. In that plan, the computed value of the (truncated) Z (call it Z*) and the BCV (the parity gap) is divided by 4 and the resulting percentage (called the "volume proportion," it cannot be >=1) which is then multiplied by the number of impacted CLECs to determine the "Affected Volume." This number multiplied by the per-occurrence penalty determines the payment to the CLEC for discriminatory service. Since penalties are owed only when Z*>BCV, increases in δ increase the BCV, which decreases the parity gap (for a given Z*), which decreases the volume proportion, which decreases the affected volume (for a given number of impacted CLECs), and hence lowers the penalty payment -- or the likelihood of a penalty being owed. *This means that by manipulating δ, the ILEC can manipulate penalty payments in such a way as to circumvent the intent of even the most adroit state oversight agencies.* Other plans involving δ and the BCV (e.g., AT&T's), while more reasonable, have similar potential of not reflecting the harm of disparity in a real world environment.. CLECs like WorldCom have agreed in joint CLEC remedy proposals to .25 as a generous trial as a BCV individual CLEC results. But WorldCom is becoming increasingly alarmed, as it should well be, that regulators are splitting the difference between ILEC and CLEC proposals for BCV's without any considered analysis of the impact of this "guess" of competitive significance on the marketplace.

V. Can Equal Risk Be Made Operational?

In principle, the BCV approach is indeed a beautiful dream. It eliminates the problem of random variation, and it reduces to zero the expected value of inappropriate penalty payments. Unfortunately, the crucial parameter δ cannot be unambiguously determined, there is an incentive on the part of the ILEC (CLECs) to inflate (deflate) δ, and making the value of δ a bargaining chip destroys the statistical legitimacy of parity testing and performance appraisal. The ILEC cannot be expected to make an enlightened choice of δ because it has scant experience with competition. The CLECs cannot be expected to make an enlightened choice of δ because they have limited experience in terms of contracting with the ILEC and with providing services in the local market. Since the kind of research needed to obtain an enlightened choice of δ is not possible at

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the present time, and since conjecture and negotiation clearly incorporate incentives to game the system, some CLECs (in particular, WorldCom) *worry that a one-size-fits-all BCV can ever be made operational.*

For a moment, let us suspend disbelief and suppose that a BCV -- even with all its potential pitfalls -- is adopted. Would this be a good thing for the CLECs, the ILECs, the state regulatory agencies, or society as a whole? Even ignoring all of the problems brought to light up to now, the answer is still, "No!" Here is why: Suppose that in spite of all the impediments that the various BCV plans place before it, competition still develops. Increased competition implies larger CLEC orders, and larger CLEC orders imply lower probabilities if type II errors, *ceteris paribus*. But lower values of β imply lower balancing values of α, which in turn imply larger BCVs. Consequently, under the BCV approach, increased competition will make it less likely to judge a given means disparity as indicative of discrimination. This consequence is clearly unacceptable. A given difference in the quality of services provided by the ILEC to its own customers versus what it provides to those of the CLEC is either discriminatory or it is not. The extent of CLEC/ILEC competition should have nothing to do with this inference. For this reason, the long run acceptability of BCVs is even more uncertain than its short run acceptability.

It remains but to conclude that implementing a BCV approach is a risky strategy indeed. The CLECs support AT&T's proposal of a BCV approach only to the extent that it's proposed value of $\delta = 0.25$ is taken to be a *maximum* acceptable trial value of that parameter for individual CLEC results. This position is based on statistical sanity; conjecture, bargaining, or further alterations to increase the BCV are not acceptable. If state regulatory commissions find this position too intransigent, then some method other than the BCV approach must be found to deal with random variation and competitive significance.

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ATTACHMENT 25

BellSouth

RELEASE DATE	TOTAL # of CRs	PRIORITIZED CRs					
		TYPE 2	TYPE 4	TYPE 5	TYPE 6		
2000	9	0	2	6	1	0	26
Jan-01	11	0	1	0	0	10	
Feb-01	4	0	0	0	0	4	
Mar-01	2	0	1	0	0	1	
Apr-01	1	0	0	1	0	0	
May-01	0	0	0	0	0	0	
Jun-01	10	0	0	0	0	10	
Jul-01	5	0	0	1	0	4	
Aug-01	0	0	0	0	0	0	
Sep-01	6	0	0	0	0	6	
Oct-01	2	0	0	0	0	2	
Nov-01	3	0	0	2	0	1	
Dec-01	0	0	0	0	0	0	
Jan-02	5	1	1	0	0	3	
TOTALS	58	1	5	10	1	41	26
						67	

Verizon

RELEASE DATE	TOTAL # OF CRs	TYPE 5	TYPE 4	TYPE 3	TYPE 2	TYPE 1
Oct-00	20	3	14	0	3	0
Nov-00	1	0	0	0	1	0
Dec-00	10	0	0	0	10	0
Jan-01	1	0	1	0	0	0
Feb-01	15	3	4	0	8	0
Mar-01	3	0	0	1	2	0
Apr-01	11	0	3	0	7	1
May-01	0	0	0	0	0	0
Jun-01	32	3	3	1	24	1
Jul-01	5	0	1	0	4	0
Aug-01	13	2	2	0	8	1
Sep-01	2	0	0	0	2	0
Oct-01	42	0	4	23	13	2
Nov-01	0	0	0	0	0	0
Dec-01	15	3	3	1	8	0
TOTALS	170	14	35	26	90	5

NOTE: As of 10/09/01, only 1 CR needed to be priortized per the Priotization Working Group.

*There were no non-prioritized CRs implemented by Verizon.

*All Change Requests are voted on and priortized regardless of TYPE.

ATTACHMENT 26

CRITERIA	DESCRIPTION
TYPE OF TEST ENVIRONMENT	DEDICATED - EDI & CORBA
INTERFACES SUPPORTED	PRE ORDER - UBL & UNE-P ORDER - UBL & UNE-P ACCESS xDSL expressTRAK Ordering (New Billing System)
REQUIREMENTS FOR TEST ACCESS	Test plan two weeks prior to test execution date. Review of test plan and approval by Verizon test team prior to execution date.
TEST ACCTS	Verizon provides via test decks and builds based on CLEC request
TEST DECKS	For each release - Provides typical Wholesale Pre-Order and Order scenarios for a given release using the most current LSOG version for Pre-Order and Order. For the Pre-Order scenarios, a sample inbound request and outbound response are provided. For the Order scenarios, the LSR, the inbound request, and the outbound response are provided.
PURPOSE OF CTE	CLEC Testing allows new entrant and new release testing of application to application interfaces. This creates a safe harbor for testing without impacting production. Verizon will use regression test decks to simulate production scenarios. Testing includes help with your: Initial EDI, CORBA business processes. Migration from different access methods or software levels (LSOG verisons) New system releases (impacts to the interface and or business rules between Verizon & CLECs)
SYSTEM HOURS OF AVAILABILITY	New Entrant Testing Monday-Friday 8:00am-8:00pm Eastern New Release Testing Monday-Friday 8:00am-5:00pm Eastern *NOTE: Extended hours are available during release testing and through special request by CLEC. Available for outside of release testing cycles for CLEC regression testing if necessary.
STATES SUPPORTED	Maryland, New York, Pennsylvania, Massachussetts, and New Jersey
FLOW-THROUGH CAPABLE	YES - Mirrors production flow-through NOTE: AVG turnaround time on EDI responses: PRE ORDER = 5-7 seconds ORDER = 3 mins NON -Flowthrough = less than 24 hours

DESCRIPTION
Dedicated Front End Server - Interfaces with Production Servers EDI, RoboTAG, and CONNECT:Direct
Pre Order - UBL & UNE-P Order - UBL & UNE-P
Provide test plan at least two weeks prior CLEC must sign and adhere to separate test agreement document *NOTE: Failure to agree and sign test agreement will result in CLEC not permitted to test.* CLEC must meet with BST Test Team for testing kick off meeting
BST must build and provide based on type of testing conducted NOTE: BST claims that CAVE is not scenario or State specific thus it must run each test scenario in CLECs test plan before test accounts are provided.
NONE
To provide CLECs with an environment to test other than straight production testing
Monday - Friday 8:00 AM - 5:00 PM EST *NOTE: Extended hours are not supported* *CAVE is only available for new release testing ONLY - not intended for regression testing by CLECs outside of release testing cycle.*
NON-State Specific
BST claims it mirrors prodution: PRE ORDER = 5-7 seconds ORDER = 1-2 days for flowthrough orders NON-Flowthrough = 2-3 days *NOTE: Rejects/Clarifications are returned in less than 24 hours.*

ATTACHMENT 27

1   LOUISIANA PUBLIC SERVICE COMMISSION

2   ADMINISTRATIVE HEARINGS DIVISION

3

4 LOUISIANA PUBLIC SERVICE COMMISSION, EX PARTE

5

6   DOCKET NO. U-24714-A

7

8

9 IN RE: FINAL DEAVERAGING OF BELLSOUTH

10 TELECOMMUNICATIONS, INC., UNE RATES PURSUANT

11 TO FCC CC 96-45 9TH REPORT AND ORDER ON 18TH

12 ORDER ON RECONSIDERATION RELEASED 11/2/99.

13

14
      Hearing held in the above-captioned
15 cause on Tuesday, April 24, 2001 before the
    HONORABLE VALERIE MEINERS.
16

17   VOLUME II

18

19

20

21

22 REPORTED BY:

23   BETTY D. GLISSMAN

24   CERTIFIED COURT REPORTER

25   STATE OF LOUISIANA

1   request from the CRSG, this is the time that

2   it takes to get the request and also we are

3   logging them so we can keep track of them

4   because there is always the question as to

5   was it sent? Was it gotten? And then in

6   turn, the time that it takes to get the loop

7   make-up and populate it back to the CRSG.

8   Q.   And how are you getting that

9   information from the CRSG? Is that coming

10   electronically or is that coming in a manual

11   fashion by facsimile?

12   A.   They are moving to an e-mail

13   availability, an e-mail method also for that.

14   Q.   Okay. And does this time reflect

15   the time that it would take for an e-mail or

16   for a manual facsimile?

17   A.   I think this is based upon using an

18   e-mail method.

19   Q.   Is it?

20   A.   I believe it is.

21   Q.   Are you sure?

22   A.   No, because there was some

23   transitions being made. It sometimes depends

24   upon the area. Again, BellSouth has the

25   flexibility within different turfs, different

1   districts, to do things differently. So you

2   have to take into account that volume and

3   other driving factors determine the final

4   methodology of doing things.

5   Q.   Okay. Do BellSouth's individual

6   turf managers then have the authority to do

7   something in a way that is not efficient?

8   A.   Very opposite, they have the

9   authority to do things as they see to be the

10   most efficient for their organization.

11   Q.   Okay. Is there any reason that you

12   can think of that would be more efficient to

13   receive something via facsimile than via

14   e-mail?

15   A.   It could be possible that the

16   volume wasn't there so it didn't suffice to

17   have terminals available to the people to do

18   e-mail. I mean, there are possibilities.

19   Q.   Now this SAC center has electronic

20   terminals already, correct? And those folks

21   are already on e-mail, correct?

22   A.   Don't know if the same clerical

23   people that we are talking about that take

24   this are necessarily. I am just pointing out

25   that it is left to the individual

1   organization to make those determinations.

2   Q.   Well, I am confused. I mean, how

3   many SAC centers are there?

4   A.   Typically one in each turf

5   district.

6   Q.   Okay. And there is a computer in

7   those centers that is connected to BellSouth

8   internal e-mail or not?

9   A.   I don't know.

10   Q.   So then it is possible that there

11   are some SAC centers out there that are

12   not connected in any way electronically to

13   BellSouth?

14   A.   It is possible. I don't know who

15   within the SAC would have it and whether or

16   not the clerical people would have it. Now I

17   am proposing that there are alternative

18   methods based upon volume and need.

19   Q.   Well, should we base our times

20   and the assumptions for task times in this

21   proceeding on a system in which BellSouth may

22   have an outlying SAC center that it is not

23   connected to e-mail that can't receive this

24   information via e-mail, and for whatever

25   reason BellSouth has chosen to do that?

ATTACHMENT 28

Paul E. Patton, Covernor

Ronald B. McCloud, Secretary
Public Protection and
Regulation Cabinet

Thomas M. Dorman
Executive Director
Public Service Commission

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Gary W. Gillis
Commissioner

April 30, 2001
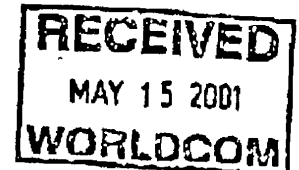
Mr. Creighton E. Mershon, Sr.
BellSouth Telecommunications, Inc.
Post Office Box 32410
Louisville, Kentucky 40232

Re: Case No. 2001-105, RFP for Price Waterhouse Coopers' Audit

Dear Mr. Mershon:

The Commission Staff appreciates your submission of the request for proposal (RFP), which BellSouth issued and which resulted in a contract with Price Waterhouse Coopers (PWC) for an audit of BellSouth's systems and procedures in the Georgia performance measurement testing. The RFP has been filed in the record in Case No. 2001-105.

Commission Staff has reviewed the scope of work performed by PWC and evaluated it in light of information needed by the Commission in order to render an advisory opinion to the FCC regarding BellSouth's provision of non-discriminatory access to its telecommunications network. While the RFP, and presumably the audit report generated pursuant thereto, contains useful information, Staff does not believe that the type of information contained in the audit report will substitute for end-to-end testing and analysis of CLEC orders in Kentucky to ascertain how the SONGS software actually performs.[1]

In short, it is the opinion of Staff that the PWC audit report is not sufficient to enable the Commission to make a reasoned decision about issues on which the Commission will be required to advise the FCC. Staff advises you, as it will advise the Commission, that end-to-end volume testing involving Kentucky-specific software, such as that conducted in Georgia and Florida, involving the software used to access the SOCS systems in those states, is the type of evidence that will enable this Commission to render a decision concerning the sufficiency of BellSouth's OSS in Kentucky.

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[1] In a recent Public Notice by the Federal Communications Commission dated March 23, 2001, at page 5, the FCC discussed the content of Section 271 applications, in particular applications covering multiple states, stating, "[t]he applicant must make state-specific evidentiary showings and separately identify each state's relevant performance data."
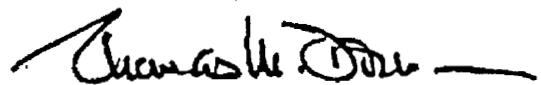
![Education Pays logo]

As a final matter, Staff notes that your filing of April 25, 2001 contains a cover note indicating that certain documents contained in the filing are proprietary. Staff assumes that you wish these documents to be accorded confidential treatment. Accordingly, those documents will not be placed in the public record of his case for 20 days from the date of this letter, pending receipt from you of a Petition for Confidential Treatment filed pursuant to 807 KAR 5:001. If no such petition is filed, the documents will be placed in the public record with the remainder of the filing.

This letter represents the legal opinion of the Commission Staff. This opinion is advisory in nature and not binding upon the Commission should this issue arise in a formal proceeding. If you have further questions, please don't hesitate to contact Deborah Eversole or Bonnie Kittinger of my staff at (502) 564-3940.

Sincerely,

Thomas M. Dorman
Executive Director

cc: All Parties of Record

PAYS

AN EQUAL OPPORTUNITY EMPLOYER M/F/D

In the Matter of	)
	)
Application by BellSouth Corporation,	)
BellSouth Telecommunications, Inc., and	)
BellSouth Long Distance, Inc., for	) CC Docket No. 01-277
Provision of In-Region, InterLATA	)
Services in Georgia and Louisiana	)
	)

REPLY DECLARATION OF SHERRY LICHTENBERG, RENE DESROSIERS, KAREN KINARD & RICHARD CABE

1. We are the same Sherry Lichtenberg, Rene Desrosiers, Karen Kinard, and Richard Cabe who previously filed a declaration in this proceeding. Little has improved since we filed our initial declaration detailing our ongoing difficulties with BellSouth's OSS. However, some difficulties have grown worse since we filed that declaration.

2. We will not repeat our prior discussion. We do, however, want to emphasize that the Department of Justice's conclusion that BellSouth's OSS is not yet adequate to support UNE-P ordering is exactly right. The difficulties discussed by the Department of Justice have been – and remain – significant barriers to MCI's ability to compete effectively in the BellSouth market.

3. Here, we intend simply to provide brief updates on significant changes that have occurred since we filed our prior declaration and to respond to specific claims in BellSouth ex partes or in comments made in the record.

4. The primary change in the weeks since we filed our prior declaration has been BellSouth's effort to implement a process to enable CLECs to migrate UNE-P customers based on their telephone number – an effort BellSouth only undertook based on the order of the

EXHIBIT 2

Georgia Commission. To date, this effort has failed. Not only has this failure substantially increased the rejects received by CLECs, but it also further underscores the problems with BellSouth's change management process. In particular, it demonstrates the complete disconnection at BellSouth between the Information Technology personnel who design software changes, the staff that creates the business rules that CLECs require to make required changes to their interfaces, and the change management personnel who work with CLECs to determine what changes should be made and to implement those changes. Moreover, the change implemented by BellSouth is different than that requested by CLECs and different than that ordered by the Georgia Commission.

Migration By Name and Telephone Number

5.   As we explained in our prior declaration, and as the Department of Justice emphasized, it is vital that CLECs are able to submit orders to migrate UNE-P customers based on the customers' telephone numbers and names only. When a BOC requires CLECs to transmit addresses on a UNE-P migration orders, this generally leads to a vast number of unnecessary rejects. As a result, MCI long ago submitted a change request asking BellSouth to accept UNE-P migration orders based on name and telephone number – as do other BOCs. The Georgia Commission ultimately ordered BellSouth to implement this process. BellSouth provided user requirements for this change on October 19, 2001 even though it intended to implement the change on November 3. BellSouth claimed that it did not have to provide 30 days notice of the change to CLECs as required by the change management process because the change was not

-2-

CLEC-impacting and because regulatory changes are exempt from the documentation timing requirements.

6. Even the written requirements provided on October 19 provided few details of the proposed change. Lichtenberg, Desrosiers, Kinard & Cabe Decl. ¶ 17. They were user requirements, not business rules, and were not designed to enable CLECs to code to the rules. The user requirements, for example, did not mention whether CLECs would have to continue to submit the customer's address or name and did not mention whether BellSouth would edit against that name, against the full address, or against the telephone number only. The rules also were not clear whether CLECs could take advantage of the change if they continued to submit the customers' address or whether CLECs would have to change their interfaces so as not to send the orders with the address. It appeared from the requirements that if CLECs continued to send addresses, BellSouth would edit against the addresses and would continue to reject orders if the addresses were incorrect.

7. In an October 25 meeting, when CLECs asked this question of BellSouth, BellSouth responded that CLECs did have to alter their interfaces and stop transmitting addresses. If CLECs transmitted addresses on their orders, BellSouth would continue to perform edit checks on those addresses and to reject the orders if the addresses contained any errors. (Att. 1, October 25, 2001 Release 10.2 User Requirements Review.) Clearly, this made the change CLEC-impacting, despite BellSouth's assertions otherwise.

8. · Thus, as of October 25, MCI learned for the first time that it had to alter its interfaces if it wished to take advantage of the change that was scheduled to occur on November 3. MCI decided not to attempt to make the change in this short time frame. A key factor was that the CAVE test environment was unavailable to test such a change prior to attempting to implement it in the production environment. Testing is necessary for the CLEC as well as the BOC to ensure that the change will work successfully.

9. On the afternoon of November 2, BellSouth transmitted a carrier notification letter informing CLECs that its internal testing of the migrate by TN release had revealed that the change would not work for 30% of orders. (Att. 2, Carrier Notification Letter, Nov. 2, 2001.) According to BellSouth, 30% of telephone numbers have multiple addresses associated with them in BellSouth's Regional Street Address Guide ("RSAG") database. This has resulted from the fact that, over time, a phone number may have been used at several unrelated addresses. When a customer moves but keeps his or her phone number, both the old and new address will be associated with the phone number in RSAG. In addition, some customers have a phone number that is specially designed to ring at two different addresses. BellSouth stated that in the 30% of cases where two or more addresses exist in RSAG, BellSouth would reject CLEC orders that included only the customer's name and telephone number. BellSouth therefore "encourage[d] CLECs to continue populating the valid address and telephone number on LSRs to ensure the current level of flow-through is maintained and to minimize rejects and clarifications." (Id.)

-4-

10. Thus, one day before BellSouth implemented a significant systems change, BellSouth informed CLECs that they would experience a substantial increase in rejects after the change – unless they continued to transmit addresses on their orders. This was so even though BellSouth had informed CLECs only days earlier that they should alter their systems so that they no longer transmitted addresses to BellSouth. Of course, BellSouth's November 2 notice did not provide CLECs sufficient time to again change their interfaces so that they would continue to transmit addresses. Moreover, the title of the letter was Notification of Interface Downtime and thus many CLECs would not have understood the need to take immediate action based on the letter.

11. In any event, MCI believed that it would not be immediately impacted by the problems that BellSouth had encountered with the migrate by TN release. As we explained above, MCI had decided not to immediately alter its systems to stop transmitting addresses. Thus, fortuitously, MCI's orders were fully compliant with BellSouth's November 2 request that CLECs continue to transmit addresses when BellSouth implemented its systems change on November 3.

12. Nonetheless, after BellSouth implemented its systems change on November 3, MCI began receiving a new type of reject that it had never received previously – "Address/TN Invalid, Due Date Could Not Be Calculated." Between November 3 and November 6, MCI received 936 rejects with this message. This was 47% of the rejects that MCI received in this period.

13. When MCI called BellSouth's Local Carrier Service Center ("LCSC") to discuss these rejects, we received a number of different explanations. Eventually we were told that the rejects were caused by a BellSouth systems defect introduced by the November 3 release and that we should refer to the carrier notification letter BellSouth had transmitted on November 2. The LCSC explained that MCI should be transmitting addresses on its orders. When we responded that we were transmitting addresses on the orders, the LCSC offered no further explanation of the problem. It did say that the LCSC lacked the resources to work these rejects manually if MCI re-submitted the orders. Thus, MCI had no way to correct the rejected orders.

14. In a subsequent meeting on November 7, BellSouth suggested that some of the rejects were unrelated to the November 3 systems change. For the first time, BellSouth included an Information Technology ("IT") expert at the meeting – rather than the personnel BellSouth ordinarily brings, who lack any IT expertise. BellSouth's IT expert explained that many of the rejects MCI received for "Address/TN Invalid, Due Date Could Not Be Calculated" were rejections of suspend orders – orders that MCI transmits to temporarily suspend a customer's service for non-payment. A month earlier, on October 6, MCI had begun transmitting these orders under a different "trading partner ID" than it uses on other orders so that it could more easily track suspend orders to ensure that no one is suspended inappropriately and that restorations occur in a timely manner. MCI followed all of the proper procedures to obtain the separate trading partner ID from BellSouth. MCI did not notice a discernable increase in rejects of suspend orders after it began using the new trading partner ID on October 6.

"15. Nonetheless, in MCI's November 7 meeting with BellSouth, BellSouth claimed that the reason MCI was receiving a high number of rejects on suspend orders was that BellSouth had failed to load the new trading partner ID into its systems. BellSouth further explained that the reason that MCI had not received a high number of rejects on suspend orders prior to November 3 was that LCSC representatives were manually working the suspend orders to ensure they were processed. BellSouth stated that it would now load the trading partner ID into its systems and rejection of suspend orders should significantly decrease.

16. If true, BellSouth's explanation suggests several problems with its OSS. To begin with, after MCI obtained a new trading partner ID, BellSouth should have loaded this ID into its systems promptly. Moreover, if BellSouth was going to perform additional manual work on all of MCI's suspend orders as a result of the new trading partner ID, it should have informed MCI of this fact. Until the November 7 meeting, MCI had no idea that the new trading partner ID was causing any additional manual work – further indicating the difficulty in determining from BellSouth's general pronouncements what is flowing through and what is not.

17. In any event, BellSouth's explanation regarding suspend orders is likely incorrect. If the rejects received by MCI had to do with BellSouth's failure to load a trading partner ID on October 6, there is no reason that the spike in rejects would have occurred after November 3 – in conjunction with BellSouth's migrate by TN release. Moreover, the reject message that MCI received on these suspend orders did not say anything about a trading partner ID – it said that the address/TN was invalid. And MCI did not receive this reject only on suspend orders – it also

-7-

received this reject on 178 migration orders, 25 deactivation orders, 16 maintenance orders and 3 restore orders. It is highly likely that the rejections on suspend orders, like these other orders, were caused by some problem with the November 3 release.

18. In any case, regardless of the explanation for the problem with the suspend orders, there is little doubt that the rejects on migration orders were caused by the November 3 release. At the November 7 meeting with BellSouth, MCI asked why the November 3 release would impact MCI at all if MCI was transmitting addresses on all of its orders. BellSouth informed MCI that even when CLECs transmit addresses on their orders, BellSouth ignores those addresses and acts as if they have not been transmitted. Thus, contrary to the carrier notification letter that BellSouth transmitted on November 2, CLECs could not avoid the harmful effect of BellSouth's November 3 release by continuing to transmit addresses. BellSouth implemented a release that would significantly harm CLECs no matter what steps they took to avoid such harm.

19. Moreover, BellSouth's claim that it would ignore any addresses transmitted on CLEC migration orders was flatly inconsistent with what it had told CLECs in the October 25 change management meeting and also inconsistent with the best reading of the limited written documentation on the November 3 release. In the October 25 meeting, BellSouth had informed CLECs that they would have to change their interfaces to stop transmitting addresses on migration orders if they wished to take advantage of the benefits of migration by TN.

20. BellSouth admitted to MCI on November 7 that its written documentation regarding the November 3 release – as well as its statements at the October 25 meeting – had been

-8-

incorrect. BellSouth explained that the written documentation, like other business rules, was drafted by individuals in its change management group – who had also made the statements at the October 25 meeting – but that these individuals had no connection to the IT personnel who actually wrote the software for BellSouth's systems. The IT personnel do not even review the written documentation. (Att. 3, Nov. 7 Meeting Minutes.) This astonishing statement – that the people who draft the business rule documentation and communicate with CLECs regarding the nature of a change are entirely divorced from the people who actually make the change – further explains why it is so difficult to obtain accurate and helpful information from BellSouth. The reason for this remarkable bifurcation may well be the fact that BellSouth has contracted out its IT functions to third party vendors who are not at all integrated into the processes by which BellSouth communicates to CLECs – another point noted by the Department of Justice.

21. With respect to the particular issue of migration by TN, MCI remains puzzled by the difficulties that BellSouth explained on November 2 would exist as of November 3 if CLECs did not submit addresses on their orders. BellSouth's claim – that multiple addresses are sometimes associated with a single TN in RSAG – may be true but does not explain the difficulties. The fact that multiple addresses are sometimes associated with a single TN in RSAG should not cause BellSouth any difficulty, since BellSouth does not need the address on a migration order at all. It is the TN, not the address, that is loaded into BellSouth's switches. Thus, there is no reason that BellSouth should have to obtain an address from RSAG.

22. BellSouth's explanation for its need to obtain an address is even more puzzling. According to BellSouth's IT expert, BellSouth needs to obtain an address either from the CLEC or from RSAG on migration orders in order to use its due date calculator. And, indeed, the rejects that MCI is receiving say that "Address/TN Invalid, Due Date Could Not Be Calculated," confirming that the address is used in the calculation of a due date. But there is, of course, no reason that a due date should be calculated on a UNE-P migration order. No dispatch is needed on such an order and MCI transmits the standard UNE-P interval on all such orders.

23. When MCI explained this at its November 7 meeting, BellSouth responded that it needed to use the due date calculator to determine if the relevant central office was "open" on the day requested by the CLEC. Again, however, this makes little sense. A migration order should not require that the central office be open. The only reason that the central office would have to be open is if BellSouth needed to physically dispatch to the central office, for example, to disconnect existing circuits and then connect different circuits. UNE-P translations, like all switch translations, are made from remote terminals except in the very unusual instance when the customer is served by a non-electronic switch.[1] MCI hopes that it is not the case that manual work is being performed on every migration. If it is, that would be a substantial problem in and of itself and would perhaps explain why so many MCI customers continue to lose dial tone.

24. BellSouth claims that it will fix the problem caused by the multiple RSAG addresses on November 17. We understand that implementation of migration by TN is relatively simple

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[1] On November 13, BellSouth stated that the central office switch must be open to do line class code changes for UNE-P. This makes even less sense. There is no reason the switch would have to be "open" to make such a change. Moreover, MCI does not use line class codes in ordering UNE-P. That would only be required for

(for it has been accomplished quickly by other BOCs) and thus are hopeful that BellSouth will succeed. We are somewhat skeptical, however, given past events. But even if BellSouth manages to fix this particular problem, it still will not have implemented the functionality requested by MCI in its change request and ordered by the Georgia Commission.

25. What MCI requested in its change request and what was ordered by the Georgia Commission was migration by TN and name. It is important that a BOC perform edit checks to ensure that the name on the LSR matches the TN transmitted. If a BOC performs a migration based only on the TN and a CLEC makes an error in entering the TN, the BOC will migrate the wrong TN. Other BOCs, such as SWBT, Verizon, Pacific Bell and even Qwest perform migrations based on TN and name. As with parsed CSRs, however, BellSouth has decided to ignore the change requested by CLECs and implement its own version of the change. This time, however, BellSouth is also flouting the order of the Georgia Commission. At a minimum, BellSouth must have some way other than address to check that it is migrating the proper TN.

26. When on October 25, BellSouth explained its planned systems change, it stated that it would base migrations on TN only. In subsequent conversations with MCI, BellSouth stated that basing migrations on name and TN would lead to a high number of rejects. BellSouth offered no satisfactory explanation as to why this would be so, however, and this process has not led to a high number of rejects in other states.

27. On November 2 and thereafter, BellSouth began discussing with MCI an alternative to migration by telephone number and name. At a meeting on November 12, BellSouth proposed

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customized routing.

to·CLECs that it would edit on the telephone number and house number (SANO) field of the

customer's address. Thus, CLECs would continue to submit customer addresses but BellSouth

would use the addresses only to obtain the SANO, which it would use to ensure the correct

customer was being migrated. Given BellSouth's unwillingness to implement migration by TN

and name and the need for rapid implementation of the new functionality, MCI and other CLECs

agreed to this different approach. Of course, BellSouth has yet to implement the new approach.

28. Thus, BellSouth certainly has not yet demonstrated that it has implemented the

functionality needed by CLECs to allow for smooth migration of UNE-P customers without

excessive rejection of orders. Even more fundamentally, BellSouth's bungled attempt to

implement this new functionality emphasizes the flaws in BellSouth's change management

process and in its relations with CLECs. BellSouth must provide adequate notice of all changes

– including those that it believes are not CLEC-impacting. When BellSouth provides such

notice, it must also provide complete and clear written documentation. In BellSouth's interaction

with CLECs – both its written and oral interaction – it must include personnel with a full

understanding of BellSouth's systems and changes being made to its systems, even if this

requires participation by the outside vendors to whom BellSouth has contracted most of its IT

functions. Finally, BellSouth must provide a test environment that is available at all times for

testing of all releases — not just those that BellSouth determines to be major releases in the brief

period surrounding implementation of those releases. It is vital that CLECs are able to test a

release and discover problems before that release is implemented and also to discover any

problems on their side of the interface.

29. BellSouth has now promised to make one of these changes. In the November 7

meeting, BellSouth stated that in the future it would include an IT representative on calls with

MCI. Hopefully this will occur and will begin to alleviate the communications problems that

permeate BellSouth's relations with MCI. To date, however, all that MCI has to assess is its

current experience with BellSouth – and that experience has not been positive.

Parsed CSRs and Integration of Pre-ordering and Ordering

30. BellSouth has not yet provided parsed CSRs and has not yet even provided written

specifications for parsed CSRs. All that it has provided is what it provided in September -

sketchy documentation that does not match the requirements agreed upon by CLECs and does

not set forth sufficient details for CLECs to code to even if they choose to code to this diluted

version of parsed CSRs.

31. The Georgia Commission cites BellSouth's claim that a number of CLECs have

successfully integrated pre-ordering and ordering interfaces as a basis for concluding that

BellSouth's OSS is adequate even in the absence of parsed CSRs. Ga. PSC Report at 88. But

one of the CLECs that BellSouth claimed had successfully integrated such interfaces was MCI.

MCI has not integrated its pre-ordering and ordering interfaces in Georgia. MCI is able to obtain

parsed address information through the service address validation function in TAG, a separate

transaction from CSR retrieval, and place that directly into an order. But MCI must type all

additional information onto its orders. MCI representatives look at the CSR and, because it is not

parsed, re-type information such as the customer's name onto the orders. MCI has determined

that this is more efficient than attempting to develop its own parsing routine based on the limited,

inadequate and outdated information that BellSouth has provided to CLECs. MCI does not have

any information that would enable it to parse the CSRs at the field level. Moreover, because

BellSouth has not provided parsed CSRs or migration by telephone number, MCI must use two

pre-order functions – address validation and CSR – on every order, significantly increasing the

time and systems resources required for each order. Finally, as we discussed in our prior

declaration, use of the address validation function has not even enabled MCI to avoid address

rejects in part because BellSouth appears (at least in its manual processing) to edit the addresses

against the CSR, not just RSAG.

32. The Georgia Commission also cites its decision to order BellSouth to provide parsed

CSRs. While welcome, this decision will not be implemented until after the final order is issued

in this docket and, especially given BellSouth's recent experience attempting to implement

migration by telephone number, there is no reason to expect this implementation to proceed

smoothly. Indeed, as we explained previously, it is already clear that the implementation will not

fulfill CLEC needs as the specifications are missing 19 fields agreed to by CLECs. In one phone

call, BellSouth stated that the reason the requirements differed from those agreed upon by

CLECs is that these requirements were never conveyed to its IT developers – further

emphasizing the chasm between its IT developers and change management group

33. BellSouth may claim that the Commission allowed SWBT to enter the long distance market without providing parsed CSRs. But SWBT had shown, in a way that BellSouth has not, that it had enabled CLECs to integrate their pre-ordering and ordering interfaces without parsed CSRs. Moreover, SWBT had not been sitting on a change request for parsed CSRs for years, and had agreed to implement migration by TN shortly after CLECs requested this change.

Rejects

34. MCI's reject rate remains far too high. In October, the reject rate on MCI orders was 28.0%. On migrations, it was 26.7%. Twenty percent of the rejects that MCI received on migration orders were for address errors. Among the address rejects, MCI continues to receive rejects stating that the address does not match the address in the CSR – even though BellSouth claims it checks addresses only against the RSAG database.

35. BellSouth attempts to defend its extremely high reject rate by stating that the reject rate is comparable to the rate of BOCs in several other states in which section 271 applications have been approved. BellSouth November 2 ex parte letter. In those states, however, it was plausible to suggest that the relatively high reject rates were the fault of CLECs and could not be attributed to the BOCs' failure to adopt parsed CSRs or to provide migration by name and telephone numbers. In New York and Massachusetts, Verizon did provide parsed CSRs and migration by name and telephone number. In Missouri, SWBT provided migration by telephone number. And in Texas, although SWBT provided neither parsed CSRs nor migration by telephone number at the time of its application, SWBT adopted migration by name and telephone

number before section 271 authority was granted – and it did so relatively soon after the CLECs

requested this functionality, making it much more difficult to blame SWBT for the absence of

such functionality at an earlier date. In addition, in Texas, the Commission concluded that only a

relatively small percentage of rejects were related to address problems. Texas Order ¶ 178.

36. Here, it is not plausible to claim that the high reject rate is the fault of CLECs.

BellSouth has delayed implementation of parsed CSRs and migration by telephone number for

years despite requests from CLECs that it implement this functionality. In addition, both KPMG

and CLECs have specifically found that BellSouth returns rejects that are simply erroneous –

including, for example, the rejects that BellSouth returned immediately after its November 3

release discussed above. Finally, and most importantly, MCI is able to compare its reject rate in

Georgia with the rate in other states it has entered – including the rate in states such as Illinois

and Michigan that it entered relatively recently. MCI's reject rate in Georgia is approximately

double those in other states it has entered even though MCI uses the same representatives and

same systems to process its orders.

37. It is also important to note that BellSouth's comparison of reject rates presumes that

it is accurately reporting its own reject rate. As we explained in our prior declaration,

BellSouth's reported rate of rejects for MCI differs substantially from MCI's own internal

reports (which MCI maintains in the same manner as it does for other regions of the country it

has entered). This may be because BellSouth excludes fatal rejects from its reports, which as the

Department of Justice points out, may lead BellSouth to substantially understate its reject rate.

-16-

Interactive Agent

38. No progress has been made in MCI's efforts to persuade BellSouth to agree to provide Interactive Agent. BellSouth continues to process orders through a cumbersome third-party Value Added Network ("VAN"), leading to unnecessary delays, missing notifiers, and difficulty in tracking notifiers.

39. In state regulatory proceedings, BellSouth has recently suggested that it has discussed Connect Direct (NDM) with MCI as an alternative to the VAN. BellSouth has never discussed Connect Direct with MCI and MCI did not even learn that BellSouth considered Connect Direct to be an alternative to the VAN until a deposition at the end of September. In any case, Connect Direct is not recognized or approved by the industry as a method for transmitting high volume LSR transactions.

40. BellSouth and an MCI subject matter expert on Interactive Agent have met on numerous occasions to discuss the implementation of Interactive Agent for EDI by BellSouth. To date, however, BellSouth has not communicated or proposed any implementation plans for Interactive Agent with MCI or the CLEC community.

Line Loss Reporting

41. BellSouth still has not produced an acceptable explanation of its failure to include all customers that migrate away from MCI on the line loss reports it transmits to MCI. As we explained previously, MCI uses an arduous process to audit 250 customers per month. Through this process, MCI discovered that some customers who had left MCI had not been included on

-17-

the line loss reports. Although MCI had no way to ascertain how many customers were not

included, its auditing process and other data suggested the problem was likely to be significant.

42. After two months, BellSouth acknowledged that some customers were left off the

line loss reports. It explained that some customers were left off the reports as the result of

manual errors and others were left off because BellSouth does not include on the line loss reports

customers who have been incorrectly transferred to MCI ("slammed") and then have left MCI.

43. Setting aside the fact that it would be vital for a CLEC to know that any customers

who have been "slammed" have left the CLEC so that it can stop billing the customers, and that

BellSouth's IT expert admitted in North Carolina testimony that such customers should be

included in the line loss report, (Att. 4, Pate testimony at 89-90), BellSouth's explanation appears

to be factually incorrect. We checked the third-party verification tapes of the three customers

who BellSouth claimed had been slammed and all of them specifically requested that they be

migrated to MCI. None were slammed. Moreover, we noted in our prior declaration that

BellSouth had not been sending MCI any lists of customers who it alleged had been slammed.

Subsequently, BellSouth provided a list of 14 such customers – although it sent this list to MCI's

billing group, not to the group responsible for working any issues related to slamming. When

MCI looked at the line loss reports, nine of the 14 customers were on the line loss reports –

suggesting that BellSouth is incorrect that any policy regarding customers who BellSouth

believes to have been slammed explains discrepancies in the line loss reports. Once again,

BellSouth personnel assigned to work with MCI do not appear to understand BellSouth's systems.

44. Moreover, BellSouth did not assign any IT personnel to investigate the problem. Indeed, in the November 7 meeting with BellSouth, Linda Tate, BellSouth's IT representative stated that IT was not even aware that MCI had raised any issues concerning a line loss problem – even though MCI first raised this problem in August.

45. It is difficult for MCI to assess the magnitude of the line loss problem because MCI has no way of knowing how many line loss reports it does not receive. It is apparent, however, that the problem is substantial. Since launch, MCI has received more than 1,285 complaints from customers who asserted that they received bills from MCI after transferring to another carrier. It is likely that many more customers were double billed but have not yet called to complain.

Flow-through

46. Little has changed with respect to flow-through since we filed our initial declaration – except that BellSouth has submitted yet more revisions to its flow-through data. To our knowledge, BellSouth has not made any improvements to its flow-through process in recent weeks. It remains the case that when MCI reports its ongoing problems to BellSouth, BellSouth blames many of these problems on manual errors. For example, BellSouth recently attributed remaining missing notifiers to failures in the LCSC to return completion notices on some orders after completing those orders. BellSouth has also attributed line loss problems to manual errors.

47. On October 25, BellSouth filed an ex parte letter in which it again re-stated its flow-through numbers. For UNEs, BellSouth's claimed numbers dropped from 78.33% in June to 70.70%, from 90% in July to 67.36%, and from 93.13% in August to 80.82% – all well below the 85% benchmark. Moreover, these numbers are not BellSouth's "achieved flow-through" numbers but rather its "percent flow-through" numbers. The latter do not count orders as falling out if they are designed to fall out and thus the numbers are misleadingly high. There is no reason that flow-through should not approach 100% once orders designed to fall out are excluded. BellSouth does not present restated numbers for achieved flow-through in its ex parte letter and thus we do not know even what BellSouth currently claims constitutes its achieved flow-through rate (which is a better indicator of true flow through as orders that are planned to fall out are considered manual fall out under this metric).

48. More fundamentally, however, there is simply no reason to trust BellSouth's again-restated numbers. Even just looking at the numbers themselves raises significant questions. For example, there is no explanation for the increase of more than thirteen percentage points in flow-through between July and August (from 67.36% in July to 80.82% in August). Restated numbers BellSouth has provided to MCI show an even more substantial increase for MCI specifically. Yet BellSouth has admitted that only very limited changes were made in BellSouth's systems during this time to increase flow-through.

49. BellSouth certainly has not provided CLECs any ability to determine whether its new calculations are correct. In our prior declaration we explained that after BellSouth analyzed

-20-

89 MCI orders that it had manually processed, we took three of those orders from August, looked at those orders in BellSouth's PMAP database, applied the flow-through logic set forth in that database and determined that each of these orders was considered to be a flow-through order even though BellSouth had specifically told us that the orders had been manually processed. We believe that the reason that this was so is that these orders fell out for manual processing after a FOC was issued back to MCI.

50. We planned to conduct a more extensive analysis to further support our conclusion that BellSouth's flow-through numbers dramatically overstate the number of orders that actually flow through. However, we have not done so because we have no ability to replicate BellSouth's latest calculations. In its October 25 ex parte (p. 6), BellSouth appears to acknowledge that a significant number of orders fail downstream edits after a FOC has been issued and fall out for manual processing. However, BellSouth seems to suggest that it is now counting these orders as non-flow-through orders (although it also suggests that it is entitled to count them as flow-through orders). BellSouth states that it attempted a script change in August to count these orders as flow-through orders, but the script change was inaccurate and has now been removed. This raises two significant issues. To begin with, we have no way of checking BellSouth's claim that the erroneous script change it made in August has now been removed. The logic provided in BellSouth's PMAP database remains the same as when we filed our prior declaration. Thus, as far as we can tell from PMAP, the same orders that counted as flowing through when we filed our prior declaration are still counted as flowing through. BellSouth's purported modifications

are simply unverified and (currently) unverifiable assertions as to what the actual flow-through

numbers are. Second, although BellSouth claims that for now it is counting post-FOC manual

fall out as manual fall out, it implies that in the future it may not do so. BellSouth should not be

permitted to adopt an interpretation of flow-through that allows it to count orders that fall out for

manual processing as flow-through orders.

51. BellSouth suggests its flow-through performance is adequate by comparing its flow-

through numbers to those of other BOCs. November 2 ex parte letter. But it is impossible to

know what BellSouth's flow-through performance actually is since its numbers keep changing,

and BellSouth's changing logic for calculating these numbers is never provided. Moreover,

BellSouth has acknowledged in state proceedings that it does not know how other BOCs

calculate flow-through and thus does not know if its flow-through numbers can be compared to

theirs on an apples-to-apples basis. And the specific comparisons are inapposite in any event.

BellSouth clearly has lower flow-through than existed in Texas at the time of SWBT's section

271 application there according to BellSouth's own chart. The other states on the chart, Kansas,

Oklahoma, and Massachusetts, were all states in which a section 271 application in that region

had already been approved for a different state with a much higher order volume and higher

flow-through rate. In addition, in Massachusetts, as in New York and Pennsylvania, KPMG had

demonstrated that Verizon's OSS was capable of flowing through almost all orders designed to

flow through.

52. The fact is that this Commission has never before approved a section 271 application in a state where it is known that very basic UNE-P order types, such as orders for customers with voice mail or call forwarding do not flow through,[2] where a third-party tester has found flow-through problems that remain unresolved, where the manual processing that does exist has been persistently connected with ongoing problems for CLECs, and where the BOCs' claimed flow-through numbers – already low – are completely unverified and constantly changing. At a minimum, this Commission should await the results of KPMG's test in Florida which is likely to provide real results on flow-through, as well as other important information.

Loss of Dial Tone

53. Loss of dial tone continues to be a significant problem for MCI customers. As of November 2, the number of MCI customers who had lost dial tone within 30 days of the date on which MCI received the completion notice was 1,703.[3] As a percentage of MCI's installed base of customers in Georgia, this is 2.1% of MCI's customers – a significant increase from the 1.8% that existed when MCI last reported the data on September 23, 2001. Lichtenberg, Desrosiers, Kinard & Cabe Decl. 41. Again, we must re-emphasize that this is simply far too many customers losing dial tone within a short period of migration for the problems to be coincidental. While we do not have visibility into the cause of the lost dial tone, it is highly unlikely that

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[2] MCI recently learned of one other cause of manual fallout. When some of MCI's change orders began rejecting after BellSouth's November 3 systems change, BellSouth explained that one reason for this was that MCI was submitting the same addresses on these orders that it had submitted on the original orders. But BellSouth stated that the LCSC had changed the addresses on MCI's original orders before they were completed. MCI does not know why BellSouth would do this, but it is another source of manual processing.
3 MCI has chosen 30 days as the appropriate measure as that it is how BelllSouth reports its performance data.

anywhere near this many customers would have lost dial tone if they had not migrated from

BellSouth.

54. On September 27, MCI submitted a list of 27 customers to BellSouth who had lost

dial tone within 30 days of migration so that BellSouth could perform a root cause analysis. On

November 9, BellSouth responded that one of these customers had lost dial tone as a result of a

"service order error"; three customers had lost dial tone as a result of "switch translation

problems"; four customers lost dial tone, and BellSouth identified a trouble, even though "there

was no trouble found in BellSouth's facilities"; two customers had no trouble that could be

identified by BellSouth; fourteen customers lost dial tone as a result of facility problems; one

customer lost dial tone as a result of an inside wiring problem; one lost dial tone as a result of a

defective network interface; and one lost dial tone as a result of a problem caused by another

utility company with a buried drop.

55. BellSouth's response provides little information beyond that which MCI already has

from trouble ticket closure information. With respect to the fourteen customers who had facility

problems, for example, MCI does not know what these facility problems were or why UNE-P

migration customers would be experiencing such problems. With respect to the four customers

for whom BellSouth identified a trouble but BellSouth then stated that "there was no trouble in

BellSouth's facilities," MCI has no idea what this means. As for the five customers who lost dial

tone as a result of a service order error and switch translation problems, these appear to be

problems associated with migrations but BellSouth has not provided sufficient detail to know for

sure.[4] BellSouth, for example, has not provided the dates the "N" and "D" service orders

completed for each of the 27 customers, which would help determine whether the two service

order process was responsible for the loss of dial tone.

56. Not only did BellSouth fail to provide this information in its initial note but, when

MCI responded to BellSouth by asking for additional information (Att. 5), BellSouth refused to

provide it. BellSouth sent back a note stating that "[t]he account team's research of the cause of

the outages experienced by the 27 customers has been provided." (Att. 6) (emphasis added).

Once again this emphasizes the difficulty in working with BellSouth to obtain information

needed to resolve problems.

57. In any event, at a minimum, BellSouth's explanations seem to support the

conclusion that a significant portion of the customers that have lost dial tone within 30 days of

migration are losing dial tone as a result of problems associated with migration. At a minimum,

the customers who lost dial tone as a result of a service order error and switch translation

problems seem to fall into this category. It remains impossible to determine the exact magnitude

of the problem, however.

58. The Georgia Commission states that of 17,746 UNE-P conversions for three carriers,

only 45 involved a loss of dial tone. And it cites Ms. Lichtenberg's affidavit as admitting that of

3,400 UNE-P orders MCI had submitted as of May 31, 2000 only two had lost dial tone during

the conversion process. But while the Georgia Commission accurately characterizes Ms.

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[4] The two customers for whom trouble could not be found may also have lost dial tone as a result of the N and D
order process but had dial tone restored before BellSouth checked the line

Lichtenberg's first affidavit in the Georgia proceeding, the subsequent affidavits she submitted as MCI gained experience showed far more instances of lost dial tone. As for the Georgia Commission's claim that of 17,746 UNE-P conversions for three carriers only 45 involved a loss of dial tone, we do not know on what this claim is based. We do know, however, that as we have previously explained, thousands of customers have lost dial tone in the 30 days after migration – even when only MCI customers are considered. This is far too high.

Missing Notifiers

59. BellSouth has managed to somewhat reduce the number of missing notifiers since we filed our prior declaration. However, that number has again begun to increase.

60. As we reported in our prior declaration, on October 19, BellSouth informed MCI that it would not again re-flow missing notifiers until November 3 – in conjunction with BellSouth's next systems release. BellSouth subsequently found, however, that it could re-flow notifiers on October 27, in conjunction with a different release of which MCI had previously been unaware. BellSouth did re-flow a substantial number of missing notifiers on October 27. BellSouth has not altered its policy, however, that it will only re-flow notifiers missing in conjunction with a release – with the exception of notifiers that are missing as a result of manual errors in the LCSC. Thus, as systems problems arise, CLECs will be forced to wait weeks or months to obtain re-flows of missing notifiers that will enable them to begin billing their customers and performing maintenance and repair for these customers.

61. In the October 27 re-flow, BellSouth was able to transmit the majority of the

notifiers that had been missing as a result of defects with BellSouth's systems. BellSouth

explained that most of the notifiers that were still missing after October 27 involved orders that

were manually processed by the LCSC. After processing the orders, the LCSC representatives

had forgotten to create the notifiers and transmit them to MCI. For this type of problem,

BellSouth is able to re-flow the notifiers after MCI identifies them without waiting for the next

release. Nonetheless, BellSouth has not proven able to do so quickly. The number of missing

notifiers has again increased from 81 on November 2 to 111 on November 12.

62. Hopefully, the problem will not continue to grow but there is no way to know for

sure. What we do know is that only substantial effort on the part of MCI in conjunction with the

scrutiny attendant to a pending section 271 proceeding has led the number of missing notifiers to

be reduced to present levels. And even that scrutiny has not led BellSouth to agree to adopt

Interactive Agent, which would significantly help with the missing notifier and other problems.

Nor has it persuaded BellSouth to begin re-flowing notifiers that are missing as a result of

systems issues at times other than when a new release is implemented.

Billing

63. BellSouth has not corrected the problems that MCI has experienced with its

wholesale bills. And the problems with the Daily Usage Feed ("DUF") have grown worse.

64. In our prior declaration, we reported that in the previous 90 days, BellSouth had

incorrectly transmitted usage information on 7,280 intraLATA calls to MCI on the daily usage

-27-

feed. It was routing some intraLATA toll calls through its local switches rather than through the switches of the intraLATA carrier. Thus, the intraLATA carrier (often MCI) was not receiving the revenue for these calls and BellSouth was charging MCI to transmit the records for these calls on the DUF.

65. This problem has grown worse. In the past 90 days, BellSouth has erroneously transmitted 28,750 intraLATA call records in the DUF (records for more than 3,000 customers). MCI is not receiving the intraLATA revenue for these calls and is forced to pay to receive information on these calls as part of the DUF.

66. BellSouth still is doing little or nothing to correct the problem. On October 15, BellSouth transmitted an e-mail on the problem that was extremely unclear as to what BellSouth believed the cause of the problem to be. After a phone call to discuss the problem, BellSouth stated that its Network Department would investigate the problem further. Since then, MCI has not received any additional information on the problem or possible fixes – again demonstrating the paucity of support provided by BellSouth. Without such information, MCI is extremely concerned that this growing problem will become severe.

Change Management and Adequate Test Environment

67. No progress has been made in improving the change management process or test environment since we submitted our prior declaration. To the contrary, as we discussed above, BellSouth's debacle in implementing migration by telephone number further demonstrates the

flaws with that process – perhaps the most important flaw of all that exist with BellSouth's OSS

(along with BellSouth's general failure to assist CLECs in addressing their problems).

68. BellSouth does not prioritize and implement CLEC requested changes. BellSouth

does not provide proper notice and documentation for changes that do occur. BellSouth's change

management team is divorced from its IT group. And, as a result, defective interfaces are

implemented and there are far too many Type 6 – systems defect – changes that need to be made.

Indeed, as BellSouth itself pointed out in the October 24 change management meeting, in 2000

and 2001, it has implemented 117 Type 6 changes to address defects that have arisen in

production – almost four times as many as the number of change requests it has implemented to

add functionality requested by CLECs. Moreover, as we previously explained at length,

important change requests to add new functionality are delayed for years or never implemented.

69. We also previously discussed the impact of BellSouth's failure to include changes it

considered were not CLEC-impacting in the change management process – a flaw exemplified by

BellSouth's attempted implementation of migrate by TN. Another example we provided in our

declaration was of BellSouth's planned implementation of a new billing system – the Tapestry

system. In Florida, the Florida Commission and KPMG have decided to include BellSouth's new

Tapestry billing system in the third-party test. They were not convinced by BellSouth's

arguments that this system would not be CLEC-impacting – the same arguments BellSouth made

as a basis for excluding the Tapestry system from change management and failing to provide

CLECs detailed documentation on the change.

70. The Georgia Commission states that the change control process is effective. <u>Ga. PSC</u> <u>Report</u> at 127. But it does not address the fact that the process rarely leads to prioritization and implementation of important changes. Nor does it address the other important problems with the process that we previously documented. The Department of Justice correctly concluded that the change management process must improve and an adequate test environment be implemented.

Regionality

71. Our suspicions that BellSouth's OSS is not entirely regional in nature have been confirmed in recent weeks. In our initial declaration, we explained that some of the addresses that MCI pulls from BellSouth's RSAG database include an asterisk and that MCI removes that asterisk before transmitting its orders. BellSouth initially claimed that some of the address rejects MCI was receiving were the result of its removal of this asterisk. (Att. 7, letter from Pamela Reynolds, October 4, 2001.) We have now been able to show BellSouth that orders we have placed without the asterisk have proceeded through its systems without being rejected. BellSouth has acknowledged that removal of the asterisk will not cause MCI's orders to reject -- another reversal of position by BellSouth.

72. Importantly, however, BellSouth's account team stated that orders without an asterisk would only flow through without being rejected <u>in the former Southern Bell states</u> – including Georgia. (Att. 8, MCI/BellSouth Action Registry Call Meeting Minutes, Nov. 1, 2001.) In the former South Central Bell states including Louisiana, BellSouth explained at a weekly meeting on November 1 that removal of the asterisk from the addresses would cause MCI's orders to reject.
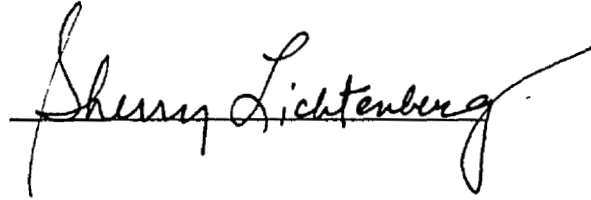
73. We do not know if orders in which the asterisk has been removed would in fact reject in the former South Central Bell states, but we do know that BellSouth's indication that they would demonstrates that its general statements in regulatory proceedings of the sameness of its OSS are incorrect or at least vastly oversimplified. Indeed, the reason BellSouth provided for why asterisks could not be removed in the South Central Bell states was that the OSS was "different" in these states. Thus, the Commission should not simply accept BellSouth's claim that its OSS is entirely regional in nature. BellSouth's – unsuccessful – Georgia experience cannot be the basis for concluding its OSS is ready in Louisiana.

Conclusion

74. This concludes our declaration on behalf of WorldCom, Inc.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on November ___12___, 2001.

Sherry Lichtenberg

I declare under penalty of perjury that the foregoing is true and correct.

Executed on November 12, 2001.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on November ⎽⎽ 1⅔ ⎽⎽, 2001.

□

I declare under penalty of perjury that the foregoing is true and correct.

Executed on November 12 , 2001.

Richard Cabe

ATTACHMENT 1

MEETING NAME	MINUTES PREPARED BY	DATE PREPARED
Release 10.2 User Requirements Review	Cheryl Storey – Change Management Team	10/29/01

Participants/Attendees

PARTICIPANT	COMPANY	PARTICIPANT	COMPANY
Cheryl Storey	BST - CCP	Jane Scott	BST
Valerie Cottingham	BST – CCP	Fred Brigham	WorldCom
Kim Gillette-Hoskins	Quintessent	Lorraine Watson	WorldCom
John Estep	WorldCom	Jean Tyler	BST
Amanda Hill	WorldCom	Tyra Hush	WorldCom
Bill Grant	Telcordia	Karen Schaffner	WorldCom
Rich Robertson	WorldCom	Tami Swenson	Accenture
Claudia Wickersham	Network Telephone	Shamone Stapler	ITC/Deltacom
Peggy Rehm	Nightfire	Mary Conquest	ITC/Deltacom
Rita Andei	WorldCom		

Meeting Information History

DATE	START TIME	END TIME
10/25/01 Conf Bridge	2:00 PM EDT	3:00 PM EDT

MEETING PURPOSE

- Review User Requirements for Release 10.2 – Validation of TN vs Address (REQTYP M-UNE-P)
- Review Action Items & Assign Owners

MEETING MINUTES

Agenda Items	Discussion
1. Introduction	Cheryl Storey (BST-Change Management Team) opened the meeting and stated that the purpose of this meeting was to review the user requirements for Release 10.2 regarding validation of TN vs address. This feature is associated with two change requests, CR0133 (WorldCom's) and CR0371 (AT&T's).
	Cheryl also stated that only the change associated with REQTYP M (UNE-P) would be implemented with Release 10.2 on 11-3-01. The user requirements for REQTYP M are reflected in the ENC14115 document. BellSouth had hoped to be able to implement the remaining REQTYPs on 11-3-01 as well, but due to the testing and time involved needed to deliver a quality product, the remainder of the REQTYPs and applicable ACT types would be implemented in a later release. As soon as the release number and date are available for the remaining REQTYPs, Change Management will communicate this information to the CLEC community. The remaining REQTYPs are reflected in the 20074 user requirements document, which will be reviewed at a later date.
	The BBR-LO will be updated on 11/9/01 to reflect the change of the address fields as optional and/or conditional based on the REQTYP M enhancement.
	CLECs expressed concern that the business rules were not available for this change. Cheryl indicated that BellSouth added this feature to Release 10.2 based on the GA PSC recommendation and was not able to follow the normal intervals for providing supporting documentation. The CLECs indicated that they still needed the business rules in advance of the release date for coding purposes. Fred Brigham (WorldCom) stated that since there was no test window with this release, CLECs have to assume BellSouth is delivering the feature correctly.
	NEW ACTION ITEM: Change Management to investigate if the business rules can be provided to the CLEC community as quickly as possible.
2. Review User Requirements for Release 10.2 – TN vs Address Validation	The following User Requirements for Release 10.2 were discussed:

Agenda Items	Discussion
	<u>Validation of TN vs Address – ENC14115</u> Jane Scott (BST) led the review of the user requirements. <u>Highlights of review/discussion:</u> • Validating an address by the end user account telephone number versus input of the end user address data. • This feature is for non-complex UNE-P. • Applicable to TCIF 9. • REQTYP M, ACT Types C, D, S, B, W, L, Y, V, P and Q • This feature does not impact LENS. • The SASN field is changing to optional. • The EU-City, State and Zip Code fields will be changing to conditional. • Applicable to firm orders. • Rules for ACT=N remain the same. • Order will be rejected if information does not match. • Due Date Calculation will look for address information first; and if this fails, it will look for the TN to validate the address. If still cannot validate, an error message will be returned to the CLEC. • SADLO field will be conditional. If SASN is populated, additional information is needed. Bill Grant (Telcordia) questioned that since the BBR-LO section 9.2.2 states that ATN or AN for REQTYP M, if this would change? BellSouth will verify with the SME when AN would be used with REQTYP M. Tyra Hush (WorldCom) asked Change Management to note that the update to the BBR-LO is dependent upon implementation. Change Management acknowledged that it would note WorldCom's statement. Cheryl indicated that the TAG API for Release 10.2 is TAG 7.6.3 and will be posted to the web site day of production.
3. Review of Action Items	**ACTION ITEM:** Change Management to investigate if the business rules can be provided to the CLEC community as quickly as possible.
	ACTION ITEM: BellSouth to verify with SME when AN, ATN, EATN and EAN would be used with REQTYP M.

⊕ *BELLSOUTH*

October 25, 2001
Release 10.2 User Requirements Review
MEETING MINUTES

Agenda Items	Discussion
	ACTION ITEM: (CLOSED) Change Management to request that the Flow Through Manager provide additional detail to CR0490 – Correct format of CCON on what change is actually being made.
	Status: Updated CR0490 provided to CLECs on 10-26-01.

ATTACHMENT 2

BellSouth Interconnection Services
675 West Peachtree Street
Atlanta, Georgia 30375

Carrier Notification
SN91082611

Date: November 2, 2001

To: Competitive Local Exchange Carriers (CLECs)

Subject: CLECS - **REVISED** - Electronic Interface Systems Downtime –ENCORE Release
           10.2 (Originally posted on September 17, 2001, and revised on October 16, 2001)

Effective November 3, 2001, BellSouth is implementing Validating (identifying) the End User
Address by Telephone Number based on the valid Activity Types for Unbundled Network
Element-Platform (UNE-P), Req Type M as a part of Release 10.2 via 7.6.3
Telecommunications Access Gateway (TAG) Application Verification Interface (API).

Testing during the week of October 29, 2001, has determined that Local Service Requests
(LSRs) will process correctly when only one address is associated with the provided telephone
number in BellSouth's Regional Street Address Guide (RSAG). Based on a review of actual
orders, BellSouth estimates that approximately 70% of LSRs will fall into this category.
However, when there are 2 or more addresses reflected in RSAG, the LSR will be rejected or
auto clarified back to the CLEC requesting a valid address.

Effective no later than November 17, 2001, BellSouth will begin also processing LSRs when a
working address as well as one or more previous (non-working) address is reflected in RSAG.
Until such time, BellSouth encourages CLECs to continue populating the valid address and
telephone number on LSRs to ensure the current level of flow through is maintained and to
minimize rejects and clarifications.

In addition, there are few instances where a CLEC's LSR requests a telephone number in
conjunction with Req Type M. In those circumstances, a full and valid address is required.

BellSouth appreciates your cooperation and assistance in ensuring quality products/services are
delivered to its clients.

Please see the attached table for details of Release 10.2.

Please contact your BellSouth account team representative with any questions.

Sincerely,

Signed J. Eric McCall for Jim Brinkley

Jim Brinkley – Senior Director
BellSouth Interconnection Services

Attachment

ENCORE Release 10.2		
IMPLEMENTATION DATE	November 3, 2001	
SYSTEM DOWNTIMES	November 3, 2001 7:00 PM EST through November 4, 2001 12:00 PM NOON EST	
ASSOCIATED DOCUMENTATION	11-09-01 BBR-LO Version 9R	
RELEASE SCOPE	CCP CR#	FEATURE
	CR0490	Correct format of CCON on UNE-P Conversion Orders
	CR0133	Migration of UNE-P Notifications
	CR0371	TN vs. Address Validation-REQTYP M only
		DEFECTS
	CR0297	REQTYP MB, EI State being required by TAG, n/a or n/e in BBR-LO
	CR0522	Mechanized LMU Defect- V and H Coordinates
	CR0523	XDSL Firm Order Defect- Inappropriate message returned on validation error for RESID

ATTACHMENT 3

MCI / BELL SOUTH
11-3 Release Errors Call
Meeting Minutes
Nov. 7, 2001

Bridge Information: V-net 475-2634 toll free 888-469-1242 pass code 4717

Meeting Attendees	Company
Rick Whisamore	MCI
Pat Woods	MCI
Sherry Lichtenberg	MCI
Mindy Chapman	MCI
Amanda Hill	MCI
Rene Desrosiers	MCI
Micki Jones	MCI
Matt Walker	MCI
Bryan Green	MCI
Frances Trahan	MCI
Doug Lacy	MCI
Joe Laszlo	BST
Linda Tate	BST
Jill Williamson	BST
Jay Agnew	BST
Kevin Maher	BST

Action Items:

❑ Linda will research the changes that occur at the Central Office that cause the need for due date calculation.

❑ Linda will research reason for reject on 18 PONs provided by Doug Lacy.

❑ Linda will investigate whether BST is changing submitted addresses but not informing CLECs of these changes. This was a concern since WorldCom was getting rejects on subsequent orders when the initial orders received electronic completions indicating a valid address .

❑ Linda will arrange an emergency meeting this Friday or Monday with CLECs and Change Control to recommend that a BellSouth initiated change request be accepted to implement "migrate by TN and SANO" during the 11-17 release.

❑ Carrier Management will arrange a conference call next Tuesday to address the accuracy of the Line Loss Report and logistics of sending test orders before the 11/17 release.

Issue: Reasons for rejects since 11.3
BellSouth Response

Per Linda Tate, WorldCom's Trading Partner ID associated with Suspend and Restore orders was only loaded in EDI Central and not in BellSouth's down stream systems causing a invalid Trading Partner ID problem. Since the implementation of this trading partner ID on 10/06 all orders have been manually process by the LCSC. From 10/6 to 11/3 WorldCom sent 1,209 orders, the low volume masked the problem. When 434 orders were sent on 11/3, the trading partner problem was discovered.

Mindy Chapman clarified that the problem was not an invalid Trading Partner ID but a valid ID that BellSouth had not populated in their systems.

BellSouth further explained that the G9871 reject, a new reject since the 11/3 release, was sent because the BST systems were unable to calculate the due date because the Trading Partner ID problem did not allow communication with some down stream systems. The reject message should have addressed the trading partner ID, that error code has since been corrected. Linda 's team will investigate the reason for the approximately 250 other G 9871 rejects received by WorldCom.

Linda said the Trading Partner ID problem was fixed but during the meeting received a page that another Trading Partner ID problem had been identified and fixed.

Problem - 10.2 Release Documentation stated that CLECs would not need to change their interfaces to use migrate by TN. At the 10/25 requirements meeting, Bellsouth stated that CLECs would need to change their interface to remove the address in order to migrate by TN. CLECs requested but were not given the opportunity to test in CAVE.
BellSouth's response:

Linda Tate described the functions of the release as follows: When a CLEC sends an LSR the address is used in order to get a due date and identify central office availability. If the address is <u>valid,</u> the due date is calculated based on whether the CO is "open". If the address is not valid, the TN is used to pull the address from RSAG. If RSAG shows multiple working or non-working addresses on file, that order would reject to the CLEC for a correct address. This will occur approximately 30% of the time.

Linda said BellSouth's IT group has not been actively involved in the Change Management Process. Since WorldCom stated that the this process defined above was different from the walk through and business rules provided, BellSouth's IT will take a more active role in order to ensure that system functionality is more accurately communicated. Linda agreed to research what changes take place in the Central Office and report findings.

11/17 Release LCSC Communications and Testing
Problem: LCSC told MCI rejects are due to the 11/3 release and can't be fixed until the 11/17 release.

BellSouth's Response
The 11/17 release will eliminate the pulling of non-working addresses. With the retrieval of only working addresses the address reject rate goes from 30% to .01%. Currently of 8 million RSAG records, only 27K have two or more working addresses. The LCSC misstated the problem and has been corrected by BellSouth's IT team. Linda Tate offered to allow MCI to send test cases before the 11-17 release; Carrier Management will coordinate this issue.

Problem: WorldCom identified examples of moves, adds, changes, and disconnects orders rejecting with correct addresses.
BellSouth Response:
BellSouth will investigate any examples sent.

Migrate by Name and TN

Linda advised WorldCom of potential problems with the migrate by TN and Name process based on a comparison of End User name and CSR listed name. A 99.7 mismatch rate was found. BellSouth reformatted the CSR listed name and improved the mismatch to 64%. Parsed CSR, coming January 5, 2002, should further improve the name match although BellSouth has an alternative solution. BellSouth will pull the AT&T CR371, reference the WorldCom CR133, and propose a TN and SANO validation process. BellSouth will try to establish an expedited meeting with the CLEC community on this Friday or Monday in order to add this process to the 11-17 release.

<u>Additional Issues</u>
Carrier Management advised the WorldCom team that Linda Tate was given the last four letters of outstanding issues sent to the Account team. (The Account team has not responded to any of them) The Line Loss Report is a

major concern for WorldCom due to regulatory compliance concerns, Linda agreed to look into this issue and report on Tuesday. WorldCom further emphasized the need for a recovery process when a line loss is not sent via the NDM, that transaction is needed to obtain the date to stop billing.

Follow up IT Support

The IT team agreed to have representation on the BellSouth weekly calls. Linda Tate agreed to participate in bi-weekly IT issue review meetings: Tuesday meetings should work for Linda and Sherry's calendar. Carrier Management will facilitate these calls.

ATTACHMENT 4

IN THE MATTER OF:

Application of BellSouth

Telecommunications

Service

Inc. to Provide in-Region InterLATA

Pursuant to Section 271 of the
Telecommunications act of 1996

VOLUME 4

A P P E A R A N C E S :

FOR BELLSOUTH TELECOMMUNICATIONS, INC.

Edward L. Rankin, III
Andrew D. Shore
BellSouth Telecommunications, Inc.
PO Box 30188
Charlotte, NC 28230-0188

E. Earl (Kip) Edenfield, Jr.
Lisa S. Foshee
R. Douglas Lackey
675 West Peachtree Street, Suite 4300
Atlanta, Georgia 30375-0747
Page 1

NORTH CAROLINA UTILITIES COMMISSION

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2

FOR AT&T:

    Burley B. Mitchell, Jr.
    Timothy G. Barber
    James P. Cooney, III
    Womble Carlyle Sandridge & Rice
    301 South College Street, Suite 3300
    Charlotte, North Carolina 28202-6025

    Tami Lyn Azorsky
    McKenna & Cuneo, LLP
    1900 K Street, NW
    Washington, DC 20006-1108

FOR SPRINT COMMUNICATIONS COMPANY, LP:

    Jack H. Derrick
    Sprint Communications Company
    14111 Capital Boulevard
    Wake Forest, NC 27587-5900

FOR ACCESS INTEGRATED NETWORKS, BROADSLATE
NETWORKS, KMC TELECOM, MPOWER COMMUNICATIONS,
NEWSOUTH COMMUNICATIONS, NUVOX COMMUNICATIONS,
COVAD COMMUNICATIONS COMPANY, TIME WARNER TELECOM
OF NC, LP, USLEC OF NORTH CAROLINA & SOUTHEASTERN
COMPETITIVE CARRIERS ASSOCIATION:

    Henry C. Campen, Jr.
    Parker Poe Adams & Bernstein
    PO Box 389
    Raleigh, NC 27602-0389

FOR COVAD COMMUNICATIONS COMPANY:

    Catherine F. Boone
    Regional Counsel
    Covad Communications Company
    10 Glen Lake Parkway, Suite 650
    Atlanta, Georgia 30328

FOR CAROLINA UTILITY CONSUMERS ASSOCIATION:

    James P. West
    West Law Offices, PC
    434 Fayetteville Street Mall, Suite 1735

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3

FOR TIME WARNER TELECOM OF NC, LP

Marcus Trathen
Brooks Pierce McLendon Humphrey & Leonard
PO Box 1800
Raleigh, NC 27602

FOR KMC TELECOM:

Andrew M. Klein
Kelley Drye & Warren
1200 19th Street, NW, Suite 500
Washington, DC 30026

FOR MCI WORLDCOM COMMUNICATIONS, INC., ET AL.:

Ralph McDonald
Bailey & Dixon
P.O. Box 1351
Raleigh, NC 27602

Dulaney O'Roark
Susan Berlin
MCI WorldCom Communications, Inc.
Six Concourse Parkway, Suite 3200
Atlanta, GA 30328

FOR THE USING AND CONSUMING PUBLIC:

Antoinette R. Wike
Lucy Edmondson
Kendrick Fentress
Public Staff - NC Utilities Commission
4326 Mail Service Center
Raleigh, NC 27699

Kevin Anderson
NC Department of Justice
P.O. Box 629
Raleigh, NC 27602

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uc4.

T A B L E   O F   C O N T E N T S
E X A M I N A T I O N S

T A B L E   O F   C O N T E N T S
E X H I B I T S

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uc4.

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2

3   CHAIR SANFORD: Mr. Pate, I think Mr. Lackey

4   has some information for us.

5   MR. LACKEY: Yes, Madam Chair. You'll recall

6   yesterday, AT&T's Mr. Barber asked for a late-filed

7   exhibit involving the IDS settlement, so--and that

8   I said I would go see what the situation was. And I

9   have now done so. I'm sorry it took me so long.

10   But we resolved with IDS both a complaint in

11   Florida, a complaint in Georgia, and a federal

12   LANAMAC [phonetic] suit that we have brought

13   against IDS. So, there were a number of people

14   involved.

15   I will tell you that if the Commission issues

16   a written order to me, I will produce any and all

17   documents that we have regarding any settlement

18   with IDS to the Commission.

4   identified as Pate WorldCom 8. We'll get to it in

5   just a moment. That's all that line loss reports.

6   One problem with loss of dial tone is that the

7   customer may become dissatisfied with MCI and

8   decide to go back to BellSouth.

9   A. Possibly, you have a big factor on how you handle

10   that, but, yes, I'll--that--potentially they could

11   be dissatisfied and they could go back to BellSouth

12   or they could go back to another CLEC, if you were

13   getting them from that CLEC.

14   Q. And if a customer decides to leave MCI for whatever

15   reason, it's important that MCI receive what's

16   called a line loss report.

17   A. Yes. You need to know that that end user is no

18   longer being serviced by you.

19   Q. And the reason that we need to know that is that if

20   we don't know that the customer's left us we don't

21   know to stop billing the customer.

22   A. Yes.

23   Q. So if we don't get that notice we're going to

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2

1   continue billing the customer, and the customer's

2   now going to be receiving two bills.

3   A. Yes, potentially so.

4   Q. And BellSouth and MCI have agreed that BellSouth

5   will provide line loss reports via something called

6   Network Data Mover, abbreviated NDM; is that right?

7 A. Yes, that's correct.

8 Q. Now, let's take a look at what's been marked as

9   Exhibit 8. You looked at this last week in

10   Kentucky, and I believe you were familiar with it

11   when we discussed it last week.

12 A. Yes.

13 Q. And you'll see that MCI had requested that

14   BellSouth provide us some information on several

15   customers that we believe had left MCI but for whom

16   we had not received line loss reports.

17 A. Yes.

18 Q. And as we look at the second full paragraph, we see

19   that there five of those customers did not appear

20   on the NDM line loss reports because of service

21   order issuance errors by BellSouth.

22 A. Yes. This was specifically--and I don't know the

23   particulars. I never had a chance to talk to

O

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2

1   either one, but it had something to do with being

2   processed by a service representative in our local

3   carrier service center and something was part of

4   that process and did not get it identified

5   properly.

6 Q. And so when that happens, then we've got the double

7   billing situation.

8 A. Yes, potentially so. And the reason I say

9   "potentially so" is you have--you may be able to

10   obtain that information from some other sources to

11   realize that but what we agreed was to give you

12   this line loss and that's what you're using--line

13   loss identification.

14 Q. And because we agreed to it, it's reasonable that

15   MCI would rely on BellSouth to provide those line

16   losses on the report we agreed to; right?

17 A. Yes, it's reasonable.

18 Q. Now the next paragraph, Ms. Reynolds refers to

19   three of the telephone numbers that were claimed by

20   the end users to be unauthorized changes of service

21   to MCI--

22 A. Yes, that's correct.

23 Q. --and essentially what we're being told there is

G

1   DOCKET NO. P-55, SUB 1022   PAGE 89

2

1   that BellSouth suspects that those customers were

2   slammed.

3 A. Yes, and we're basing that on that end user telling

4   us that. Yes, that's the ugly word you can put to

5   it.

6 Q. And, I'll represent to you that the parties had a

7		disagreement on that but let's assume for purposes
8		of these questions that that's what happened.
9	A.	Certainly.
10	Q.	It is BellSouth's position that if a local customer
11		is slammed, BellSouth will not put on the line loss
12		report those customers?
13	A.	No, that's not our position. We are investigating,
14		is that happening? I know the account team working
15		on other issues is working very closely with
16		individuals from MCI so that's being researched to
17		see if that is potentially happening. But that's
18		not out position not to provide that to you.
19	Q.	There's two other orders that are referenced here.
20		One BellSouth says was canceled and the other one,
21		it's on the third paragraph, says, "remaining
22		telephone numbers still on MCI end account."
23	A.	Could I go back and just add one additional

□

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2			
1		information to that question--	
2	Q.	Sure.	
3	A.	--because the thought just hit my mind. In this	
4		letter that you refer to on the second page,	
5		another report which you go on the interconnection	
6		website and get. And I recognize that we agreed to	
7		give you this to you in an electronic version. The	

8   point I wanted to make is, from my understanding,

9   looking at that report, those switched in errors

10   and these slammings, they are captured on that

11   report. It's on the website. So that's why I

12   just--what I wanted to just further say. It's not

13   our position that we're--that we're not willing to

14   give you that information. We're just researching

15   this, and that's being captured under the NDN

16   Report.

17 Q. One of the reasons that we want the NDN Report is

18   so that we can get the information electronically

19   in a form that flow to our own system.

20 A. Yes, I understand you use that to integrate that

21   into your systems.

22 Q. Going to the last point, on the remaining telephone

23   number that was still an MCI account, that

2

1   apparently would have been a customer who is not

2   reflected yet on the CSR as a MCI customer. Is

3   that the way it appears to you?

4   A. Give me a second to read that, will you?

5   Q. Sure.

6   A. Yes. I mean, it appears from my investigation that

7   you canceled that request. It says canceled upon--

8   we're talking about you canceled the Local Service

9   Request for that, so you never--

10 Q. I'm sorry, we're not communicating. I'm talking

11   about the next sentence, where it says the

12   remaining telephone number's still an MCIm account,

13   according to our records.

14 A. I'm sorry. I looked at the wrong line. Yes.

15 Q. And so that's a case where MCI was expecting a line

16   loss report presumably because the CSR didn't show

17   the customer was an MCI customer, and BellSouth is

18   coming back and telling us no, no it's your

19   customer still.

20 A. Yes.

21 Q. And that then gets into the updating of BellSouth's

22   billing records to say that MCI can properly bill

23   its new customer.

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       2

1   A. Yes, potentially so.

2   Q. And that's an area that Mr. Scollard covers.

3   A. Yes it is.

4   MR. O'ROARK: No further questions.

5   CHAIR SANFORD: Thank you.

6   MS. AZORSKY: Good morning, Commissioners. I'm

7   Tami Azorsky for AT&T.

8   CROSS EXAMINATION BY MS. AZORSKY:

9   Q. Good morning, Mr. Pate.

ATTACHMENT 5

-----Original Message-----
From: amanda hill [mailto:amanda.hill@wcom.com]
Sent: Monday, November 12, 2001 3:23 PM
To: Joe. Laszlo (E-mail)
Cc: 'Patricia. B. Woods' (E-mail); Sherry Lichtenberg (E-mail); Rick
Whisamore (E-mail); Calvin W Jung (E-mail); Kathy. Ragsdale (E-mail);
Meredith Little (E-mail); Pamela. Reynolds (E-mail); Shannon. Waters
(E-mail)
Subject: MCI Response: NDT ERT

Joe,

Please provide the details for each of the 27 lines that were studied. The
purpose of this request was to obtain the details for these outages. We
need specific answers to the questions listed below.
1.   Provide the date on which the D order completed and the date on which the
N order completed for each of the 27 lines studied.
2. ' Provide a description of the "translation problems" on the lines where
BST states that the customer lost dial tone as a result of translation
problems.
3.   Provide a root cause analysis of the translation problems.
4.   Provide detailed information on the "service order problem" for
770-832-6429. Provide a root cause for this problem.
5.   Define the "facility problems" for the lines that BST states lost dial
tone for this reason.
6.   How did BST determine that 678-567-1841 lost dial tone as the result of
inside wire problems? Did BellSouth visit the customer? Was MCI billed for
this visit?

Thanks,
Amanda Hill
Carrier Management
770-625-6134

-----Original Message-----
From: amanda hill [mailto:amanda.hill@wcom.com]
Sent: Monday, November 12, 2001 12:01 PM
To: BSTIssues (E-mail)
Cc: Mindy. Chapman (E-mail); Fred. Brigham (E-mail)
Subject: ERT: NDT Response

<< File: NDT.txt >>   << File: NDTERT.DOC >> 1960 West Exchange Place
Suite 420
Tucker, Georgia 30084
November 9, 2001

Ms. Amanda Hill
Carrier Management
WORLDCOM
Two Northwinds Center
2520 Northwinds Parkway
Suite 500
Alpharetta, Georgia 30004

Dear Amanda:
This is in response to your e-mail dated October 9, 2001, requesting
BellSouth to investigate and provide a written explanation regarding
end-users who experienced service outages on September 21 and 22, 2001, due
to a loss of dial tone.
Of the seventy-three telephone numbers submitted for BellSouth to
investigate, twenty-seven of the end users experienced a loss of dial tone
within 30 days of conversion for various reasons. On October 18, 2001,
Sherry Lichtenberg with MCIm, advised that only these twenty-seven telephone
numbers required further review. Following are the results of BellSouth's
investigation:
An inside wiring problem caused the service outage of telephone number
678-567-1841.
A defective Network Interface caused the service outage of telephone number
770-214-2785.
A buried drop was cut by another utility company for telephone number
770-632-8977.
A service order error caused the service outage of telephone number
770-832-6429.
Serce outages experienced by telephone numbers 770-607-7553, 770-537-0564,
and 770-517-6728 were caused by switch translation problems. No trouble was
found on telephone numbers 404-243-0187 and 404-366-4228. For telephone
numbers 404-627-1249, 770-322-5262, 770-358-3267 and 770-960-8930 a trouble
was identified, however there was no trouble found in BellSouth's
facilities.
The remaining phone numbers 404-294-4028, 770-321-8789, 770-358-6134,
770-389-4796, 770-435-2908, 770-445-0618, 770-554-4727, 770-591-0582,
770-638-1095, 770-774-8796, 770-775-5486, 770-957-0899, 770-975-8722 and
770-977-5868 lost dial tone due to facility problems.
In response to your request for BellSouth to determine whether any of the
end users returned to BellSouth and if MCIm received a line loss
notification, please refer to MCIm's line loss notifications and internal
records for the status of these users.
I trust the above information satisfies your concerns regarding this matter.
BellSouth regrets any inconvenience this may have caused MCIm. Please feel
free to call me at 770-492-7598, if you have additional questions.
Sincerely,
Joe Laszlo
Systems Designer

cc: Shannon Waters

-----Original Message-----
From: Joe.Laszlo@bridge.bellsouth.com
[mailto:Joe.Laszlo@bridge.bellsouth.com]
Sent: Friday, November 09, 2001 11:03 AM
To: amanda.hill@wcom.com
Cc: Patricia.B.Woods@wcom.com; Kathy.Ragsdale@bridge.bellsouth.com;
Pamela.Reynolds@bridge.bellsouth.com; Shannon.Waters@bridge.bellsouth.com
Subject: NDT Response

ATTACHMENT 6

-----Original Message-----
From: Joe.Laszlo@bridge.bellsouth.com
[mailto:Joe.Laszlo@bridge.bellsouth.com]
Sent: Monday, November 12, 2001 4:10 PM
To: amanda.hill@wcom.com
Cc: Calvin.Jung2@BellSouth.com; Joe.Laszlo@bridge.bellsouth.com;
Meredith.Little@BellSouth.com; Patricia.B.Woods@wcom.com;
Kathy.Ragsdale@bridge.bellsouth.com; Pamela.Reynolds@bridge.bellsouth.com;
Rick.Whisamore@wcom.com; Sherry.Lichtenberg@wcom.com;
Shannon.Waters@bridge.bellsouth.com
Subject: MCI Response: NDT ERT

Amanda,

Please utilize your internal records, as well as the resources of the LCSC
and the CWINS group if you feel like any additional information is needed.
The account team's research of the cause of the outages experienced by the
27 customers has been provided.
Thanks,
Joe

ATTACHMENT 7

BellSouth Interconnection Services

1960 West Exchange Place
Suite 420
Tucker, Georgia 30084

October 4, 2001

Ms. Amanda Hill
Manager - Carrier Management
WorldCom
Two Northwinds Center
2520 Northwinds Parkway
Suite 500
Alpharetta, Georgia 30004

Dear Amanda:

This is in response to your e-mails dated July 30 and August 23, 2001, regarding BellSouth's use of an asterisk (*) in the Service Address (SA) field of the Customer Service Records (CSR). MCIMetro (MCIm) states that this is causing MCIm to experience internal rejects in its systems when trying to populate Local Service Requests (LSR).

The asterisk is a valid content character within the field of data. Please refer to the BellSouth Business Rules for Local Ordering, Data Element Dictionary, Issue 9O, June 29, 2001, Section 32.4 for details. This document is available at the BellSouth Interconnection Services' Web site at:

http://www.interconnection.bellsouth.com/guides/leo/html/gleoo021/indexf.htm

BellSouth has investigated the following Purchase Order Numbers (PONs) that MCIm provided as examples. BellSouth's investigation revealed that MCIm failed to send the appropriate Street Name or Community Name as it appears in the Regional Street Address Guide (RSAG). RSAG is the source for this information. Please refer to my letter dated September 6, 2001, regarding RSAG information (copy attached). The Status Field below shows the specific part that was in error and how it should have appeared on the LSRs:

Telephone Number	PON	Status
770 914-1577	S003471333BSGAPR	PON Not found
770 914-5884	S003429155BSGAPR	PON not found
770 459-2057	003494086BSGAPR	PON not found

770 459-0948	S003494108BSGAPR	PON not found
770 599-6055	S003494135BSGAPR	Mc*Intosh in street address
770 957-2215	S003494225BSGAPR	PON not found
678 432-7737	S003502734BSGAPR	Mc*D in community name
404 761-2660	S003510429BSGAPR	Mc*Mullin in street name
770 914-9791	S003503425BSGAPR	Mc*D in community name
770 229-5619	S003465745BSGAPR	Mc*Intosh in street name
770 459-2922	S003494286BSGAPR	V*R in community name
678 432-7885	S003504681BSGAPR	Mc*D in community name
770 210-4237	S003503060BSGAPR	Mc*Donough in street address
770 381-7311	S003504605BSGAPR	Mc*Gowan in street address
404 286-3575	S003505288BSGAPR	Mc*Afee in street address
770 456-2096	S003512400BSGAPR	V*R in community name
678 432-3625	S003511297BSGAPR	Mc*D in community name
770 445-1926	S003510404BSGAPR	Mc*Pherson in street name
770 957-1161	S003510417BSGAPR	Mc*D in community name
610 562-5907	S003303908VZPAPR	PON not in BST region, PA region
717 274-9459	S003502250VZPAPR	PON not in BST region, PA region
215 748-6782	S003135622BAPAPR	PON not in BST region, PA region
215 755-4557	S003506106VZPAPR	PON not in BST region, PA region
914 694-5500	S003511149VZNYPR	PON not in BST region, NY region

As you are aware, the BellSouth WorldCom Account Team is facilitating joint discussions between technical experts from both companies to further address MCIm's concerns. These meetings are on going.

Following is BellSouth's response to the questions in your e-mail dated August 23, 2001:

MCIm Question 1: We currently see when we pull CSRs that you have * in the Service Address fields. Why are these *'s present?

BellSouth Response: These are used as content characters in the Service Address Field.

MCIm Question 2: How does BST expect to process a character that is outside of the ANSIx.12 EDI standard?

BellSouth Response: BellSouth is in compliance with the ANSI x.12 standards.

MCIm Question 3: Is there exception logic within the BST systems that will allow their EDI translator to process the *? If this is not the case, should we not be sending the *? If not, then it clearly does not match the CSR address. How should we proceed?

BellSouth Response: BellSouth's RSAG treats the asterisk as a content character within a field. The file transfer system treats the asterisk as one of many valid field delimiters. For example, BellSouth uses a hex character as a field delimiter for many files sent to other companies. As part of the joint discussions, the technical experts will examine valid delimiters and recommend a solution for MCIm. However, BellSouth continues to look for the asterisk as a valid content character since it is returned as part of the pre-ordering validation through RSAG.

MCIm Question 4: What service address should MCI use on its UNE-P orders, the RSAG address (retrieved via TAG) the or CSR service address (retrieved via TAG)?

BellSouth Response: As noted above and in BellSouth's RSAG letter to MCIm, the valid SA that should be sent on the LSR is obtained from RSAG.

I trust the above information satisfies your concerns regarding this matter. Please feel free to call me at 770-492-7543, if you have additional questions.

Sincerely,

Pamela D. Reynolds
Industrial Specialist

Attachment

cc: Shannon Waters

Goldman, Marc A

From:	Rick Whisamore
Sent:	Tuesday, November 13, 2001 10:00 AM
To:	Marc Goldman (E-mail)
Cc:	Sherry Lichtenberg (E-mail)
Subject:	Asterisk info in Southern Bell

Importance: High

Marc,

Attached are the minutes from the 11/1 meeting during which Steve Harris from BST stated that only former Southern Bell states were allowing orders to flow through without the asterisk, contrary to the ERT provided to MCI on 10/4 (also attached).

Thanks,

Rick Whisamore
MCI
(703) 341-6234
Rick.Whisamore@wcom.com

MCI / BELL SOUTH
ACTION REGISTRY CALL
MEETING MINUTES
Nov. 1, 2001

Bridge Information: Vnet: 211-8589 Toll Free: 888-324-5904 Pass Code: 6902
Time: 3:00 PM EST every Thursday

Meeting Attendees	Company
Rick Whisamore	MCI
Caren Schaffner	MCI
Amanda Hill	MCI
John Estep	MCI
Regina Fraiser	MCI
Pam Shifflet	MCI
Rita Andes	MCI
Sandy Tonges	MCI
Doug Lacy	MCI
Matt Walker	MCI
Steve Ramsbacher	MCI
Pat Woods	MCI
Pam Shifflet	MCI
Nancy Shimer	MCI
Steve Harris	BST
Calvin Jung	BST
Pamela Reynolds	BST
Shannon Waters	BST
Meradith Little	BST
Kathy Ragsdale	BST

1.) No Dial Tone (6/18)

ERT continues in the review process. No ETA.

Sherry asked were BST was on the single "C" order process. Pamela did not have a status but said she would check with Gary from the Flow Through Task Force.
PL don't know FTTF working on it.

Next Steps:
Pending ERT. No ETA.
Pamela to get status of the "C" order process

2.) Manual Handling (DSAP)   CLOSED 8/h

3.) Completing orders in the billing system (6/13)

The BST Account Team had previously told MCI that no report was available to BST or MCI that would list TNs in the Hold File or pending billing status. MCI was informed by David Scollard during a 10/10 face to face in FL that a report does exisit and MCI could get that from the Account Team.

MCI will continue to pursue a BCN through CCP

> **Next Steps-**
>
> > **BST to contact David Scollard about report**
> > **MCI will continue to pursue a resolution through CCP.**
> > **This issue will remain open until it is resolved.**

4.) Missing Notifiers (6/18)
Escalated to Sharon Daniels 10/19

BST and MCI have a regularly scheduled call at 10am on Thursday s.
The list of outstanding notifiers is 55.

Sherry asked to confirm that MCI would no longer have to wait for a release date to have missing notifiers reflowed.
Shannon stated that is the process but she could not say there would never be a reason something would not have to be held until a scheduled release.

Sherry asked for a status on the mapping in the back end (SI error)
Shannon had no status yet.
Sherry stated that all pons submitted after the Oct 6 change to aged off pon would mean fewer would be killed.
Shannon agreed.

> **Next Steps-**
>
> > **BST and MCI working the issue daily**

5.)   Missing Notifiers   CLOSED 8/2

6.)   Message Waiting Indicator   CLOSED 8/16

7.)   638 unworkable orders   CLOSED 9/27

8.)   Aged off pons/ Rejects (6/6) CLOSED 11/1

MCI asked if the change covered all states or just Georgia.
Steve Harris said it covered all states.

> **Next Steps-**
> > **Closed**

9.)   CLR TEL NO LCON   CLOSED 7/26

10.)   Due Date Calculator   CLOSED 8/2

11.)   Manual Handling /Special Pricing Plan (6/4)

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16.)   PMAP error message CLOSED 10/17

17.)   Asterisk in address field of a CSR (8/8)

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MCI stated that it has been eight weeks since BST said they covered their reps and MCI has seen no decrease in the number of occurances (70 this week)
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Doug L will send Pamela this weeks list of 70 to help BST identify the reps still incorrectly citing the CSR rather than RSAG.

> Next Steps-
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>> Doug to send new examples to BST

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Escalated to Sharon Daniels 10/19

Sherry stated that MCI's auditing team received a faxed list of 14 TN from the BST slamming center claiming those customers were slammed. MCI researched those TNs and found that of the 14 MCI received line loss reports for 9 of them. This action directly contradicts BST's ERT claming BST does not send line loss reports via NDM for accounts disconnected due to claims of unauthorized change of service.

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Sherry also asked that the account team speak to Mary Henze from BST to get a clear understanding of how BST should interact with MCI to work alleged slamming issues.

Pending ERT to answer MCI's questions from 10/18 about the last ERT. No ETA

MCI requested further details on BSO's reasons for not provided line loss reports for SE customers.
Is the policy to not send SE reports via NDM documented in BSO's business rules?
What is BST's processes for handling potential "slamming" incidents included any form of investigation with the CLEC?
Is the intentional disparity between the two sources (NDM and GUI) documented by BSO?
How would orders being manually handled cause that TN to not post to the NDM report?

> Next Steps-

> Pending ERT. No ETA

20.) Florida (8/9)

> Meredith L. stated that TNs with warn dial do get 911 access
> Caren S. asked if that covered the entire BST footprint
> Meredith said it applied where ever BST offered Quick Service.

> Pam S stated that MCI received the following reject on a test order going to Florida.

> UNE COMBO NOT VALID IN FL WITH RESH 7229 PER CONTRACT
> Pamela R. received the email and is working this issue.
> Sherry said MCI needs an answer to this question ASAP.

> MW service center fell out when they typed the order.
> SL why didn't if flow through

> Next Steps-
> Pending response from BSO

21.) Rejects and problems associated with pons that have aged off. CLOSED 10/04

23.)   BST Test Environment   CLOSED 9/20

24.)   Manual handling/ Retail call waiting and voice mail.   (9/6)

MCI was dissatisfied with the ERT sent by BSO. MCI is considering next steps.

Next Steps-
MCI reviewing ERT.

25.)   Faxed rejects to LD TN (9/20) Escalate

Doug L stated that MCI has a system change request for new fax TN on the LSR
ERT was due 10/19. No new ETA

Next Steps:
Pending ERT.

26.)   Can Not Restore   CLOSED 10/4

27.)   Returning incorrectly formatted DUF records.
Escalated to Sharon Daniels for outcollection POC 10/19

Issue 1 - 60K records with module problems –issue is closed CLOSED 10/18

Issue 2 - 6000 incorrect intraLata toll records -open (9/20)

Steve R. stated that MCI should see toll records in DUF. MCI sent BST 13K to research. Andy looked at 20 examples. Joe L. was going to get help from the network dept. for research.
Shannon W is researching to make sure translation was correct.
Shannon W said BST is not clear that it is translation problem.
Shannon will provide an ETA for their research.
Sherry said MCI will begin the dispute process for these records
Sherry asked if BST wanted MCI to forward new examples of this problem? Shannon asked the BST forward them all.
Sherry asked that Andy Plummer attend the next call or get Andy and Steve on the line together to work this issue.

BSO will send an ERT to respond to MCI's question of who to speak to about developing an out collection process.

Next Steps:
Pending ERT for POC to discuss outcollection process. No ETA.

28.)   Migrate by TN CLOSED 11/1

BST had a CLEC call last week to discuss this issue. That process will replace MCI's questions through the Account Team. MCI feels the documentation provided by BST on that call was not sufficient for clecs to complete coding and is pursuing actions through CCP

29.) Winback process (10/23)

Questions sent to BST on 10/23. Shannon W. is working this issue.
1. How long after a customer migrates to MCI does BellSouth wait before attempting any win back process?
2. From what point in the migration of a customer to MCI does BellSouth consider the clock started on the waiting period before BellSouth would attempt a win back?
3. If an MCI customer calls BellSouth customer service (assuming for some reason other than to migrate back to BellSouth) before the win back process can begin does BellSouth use the at call as a win back opportunity?
4. Are BellSouth customer service reps specifically trained to direct that customer to MCI and not to use that call as a win back opportunity?

>   Next Steps:
>>   Pending response from BST

30.) Incorrect Company Name in Billing Section of CSR (9/6)
Escalated to Sharon Daniels 10/19

Joe's emails closing 1st example of incorrect company in the billing section.
"This is in response to your e-mail dated September 6, 2001, requesting why the billing name for account 404-209-7836 appeared to be Supra Telecom instead of MCIm. Following are the results of BellSouth's investigation: Upon review of BellSouth's records, order N09KBGY6 was issued with an incorrect billing name for Supra Telecom even though the Billing Telephone Number (BTN) and Operating Company Number (OCN) were correct for MCIm. As a result, the account billed correctly, but showed the incorrect billing name.
The billing records have been corrected."
Joe's 10/11 email
"There is no further analysis that can be conducted. This was an isolated incident which was corrected once MCI contacted the LCSC. I believe a more prudent use of resources would be to try to correct a pattern of such errors. If you can provide to me more examples that involved this type of error we can work to correct it. But there is not anymore to say about 404-209-7836."

This response did not answer MCI's questions about the cause or fix of the problem. MCI provided a second example to BST on 10/11.

BST stated that the ERT for this issue is completed.

>   Next Steps:
>>   BST sent the ERT on 11/2. Pending MCI review.

31.) Account Team Information Package requested on 10/15 (10/31)

In Florida Observation 115 cites the "Account Tem Information Package" as having documented customer contact timeframes. The SLA the observation specifically mentions is a 24 hour response to emails and voice mails. Do you have a copy of this document? I would be interested in understanding all the SLAs it outlines for the BST account team.

Pamela was not aware of this document outlining Account Team SLAs. BST will continue to research.

>   Next Steps:
>>   Pending response from BST.

32.) Invalid Reject BCS (10/31)

MCI / BELL SOUTH
ACTION REGISTRY CALL
MEETING MINUTES
Nov. 1, 2001

MCI has been receiving rejects of "Pls add BCS and Line Class of Service" from BST and need some additional clarification regarding the rules surrounding LNECLS SVC and BCS. If this is something that's required, we need to know where it is stating that in their documentation.

Their BBRLO states that:
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BCS is only used for Resale, therefore we do not have this field for Platform. So we're a bit perplexed as to why this reject message is being returned and exactly what they are expecting. Rita Andes

Kathy R. researched the 6 examples sent by MCI. MCI is correct that BCS and Line Class of Service is not required and this appears to be a rep error.
Of the 6 examples 3 were from the same rep. BST is pushing for rep cover but requested the additional examples.

Kathy stated that the 6 orders fell out for valid error or other reason. BST will get correct clarifications to MCI.

Next Steps:

> **Matt sent the list of 70 TNs to BST on 11/2/01**
> **Pending BST resolution**

BST and MCI agreed to not hold this call on Thanksgiving day.

ATTACHMENT 8

MCI / BELL SOUTH
ACTION REGISTRY CALL
MEETING MINUTES
Nov. 1, 2001

Bridge Information: Vnet: 211-8589 Toll Free: 888-324-5904 Pass Code: 6902
Time: 3:00 PM EST every Thursday

Meeting Attendees	Company
Rick Whisamore	MCI
Caren Schaffner	MCI
Amanda Hill	MCI
John Estep	MCI
Regina Fraiser	MCI
Pam Shifflet	MCI
Rita Andes	MCI
Sandy Tonges	MCI
Doug Lacy	MCI
Matt Walker	MCI
Steve Ramsbacher	MCI
Pat Woods	MCI
Pam Shifflet	MCI
Nancy Shimer	MCI
Steve Harris	BST
Calvin Jung	BST
Pamela Reynolds	BST
Shannon Waters	BST
Meradith Little	BST
Kathy Ragsdale	BST

1.) No Dial Tone (6/18)

ERT continues in the review process. No ETA.

Sherry asked were BST was on the single "C" order process. Pamela did not have a status but said she would check with Gary from the Flow Through Task Force.
PL don't know FTTF working on it.

> **Next Steps:**
>> Pending ERT. No ETA.
>> Pamela to get status of the "C" order process

2.) Manual Handling (OSAP)

3.) Completing orders in the billing system (6/13)

The BST Account Team had previously told MCI that no report was available to BST or MCI that would list TNs in the Hold File or pending billing status. MCI was informed by David Scollard during a 10/10 face to face in FL that a report does exisit and MCI could get that from the Account Team.

MCI will continue to pursue a BCN through CCP

Next Steps-

BST to contact David Scollard about report
MCI will continue to pursue a resolution through CCP.
This issue will remain open until it is resolved.

4.) Missing Notifiers (6/18)
Escalated to Sharon Daniels 10/19

BST and MCI have a regularly scheduled call at 10am on Thursday s.
The list of outstanding notifiers is 55.

Sherry asked to confirm that MCI would no longer have to wait for a release date to have missing notifiers reflowed.
Shannon stated that is the process but she could not say there would never be a reason something would not have to be held until a scheduled release.

Sherry asked for a status on the mapping in the back end (SI error)
Shannon had no status yet.
Sherry stated that all pons submitted after the Oct 6 change to aged off pon would mean fewer would be killed.
Shannon agreed.

Next Steps-

BST and MCI working the issue daily

5.)	Missing Notifiers	CLOSED 8/2
6.)	Message Waiting Indicator	CLOSED 8/16
7.)	638 unworkable orders	CLOSED 9/27
8.)	Aged off pons/ Reject (info)	CLOSED 11/1

MCI asked if the change covered all states or just Georgia.
Steve Harris said it covered all states.

Next Steps-
Closed

9.)	CLR TEL NO LCON	CLOSED 7/26
10.)	Due Date Calculator	CLOSED 8/2

11.) Manual Handling /Special Pricing Plan (6/4)

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Kathy stated BST receives many (202 in one day) rejects for this reason. She stated in order for MCI to fix the problem the Working Serivice On Primise (WSOP) should be populated by MCI. Also, ADL should be floated behind class of service on the activity page.

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