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February 5, 2002

Ms. Blanca Bayó, Director  
Division of the Commission Clerk  
& Administrative Services  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850

via Overnight Mail

Re: Docket No. **960786B**-TL – Consideration of BellSouth Telecommunications, Inc.'s entry into InterLATA services pursuant to Section 271 of the Federal Telecommunications Act of 1996 (**OSS Track**)

Dear Ms. Bayó,

Please find enclosed for filing in the above docket an original and seven (7) copies of Florida Digital Network, Inc.'s Comments on Commercial Experience with BellSouth OSS.

If you have any questions regarding the enclosed, please call me at 407-835-0460.

Sincerely,



Matthew Feil  
Florida Digital Network  
General Counsel

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FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Consideration of	)	
BellSouth Telecommunications,	)	Docket No. 960786-TL
Inc.'s entry into interLATA	)	
services pursuant to Section 271	)	
of the Federal Telecommunications	)	
Act of 1996.	)	
_____	)	

**FLORIDA DIGITAL NETWORK, INC.'S COMMENTS ON COMMERCIAL EXPERIENCE WITH BELL SOUTH OSS**

Pursuant to the Notice of Workshop issued in this docket on January 18, 2002, Florida Digital Network, Inc., ("FDN") hereby gives notice that it has provided to BellSouth Telecommunications, Inc., ("BellSouth") pertinent information regarding matters it may address at the Commission workshop on alternative local exchange carrier ("ALEC") commercial experience with BellSouth's Operational Support Systems ("OSS").

FDN intends on addressing five basic issues relative to its real-world experience with BellSouth's OSS. Some of these issues may not be captured by specific service quality measures ("SQMs"), may be considered data or systems integrity concerns, or may simply be anticompetitive behaviors. Regardless of how one might categorize them, these issues represent significant problems in FDN's day-to-day experience with BellSouth's OSS. They have a deleterious impact on FDN's business, and they illustrate why BellSouth's OSS does not meet even a basic standard of quality service so as to justify 271 approval.

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Below, FDN has provided some brief case examples for certain issues. These examples are provided to illustrate the subject OSS problems; their number is not a reflection of recurrence or magnitude. FDN represents that each of these problems occur regularly, the severity of each case varies, but the overall impact of these problems on FDN's business is decidedly negative.

### **ORDERING OSS ISSUES**

Issue No. 1: BellSouth clarifies local service requests ("LSRs") in error.

When an ALEC sends an LSR to BellSouth, BellSouth will either process the LSR or reject it. An order "reject" may take the form of a "clarification," where BellSouth may identify a problem type that would not trigger automatic mechanized "fatal reject" for the LSR. Certain types of orders submitted on a mechanized basis are subject to planned manual fallbacks, e.g. orders for more than 15 loops, orders containing information different from the customer service record ("CSR").

The vast majority of FDN's orders are submitted electronically through the TAG gateway. Certain types of orders FDN submits manually. However, on both electronically and manually submitted orders, FDN has experienced a significant incidence of BellSouth's rejecting the LSR due to a problem that does not exist, i.e. BellSouth rejects/clarifies the LSR in error, or problems that could have been corrected in one attempt. While some erroneous rejects can be expected, BellSouth's erroneous rejects have become more frequent, have reached problematic levels, and require a great

deal of time and effort for FDN to resolve. While these erroneous clarifications are worked through, the customer's desired migration is needlessly stalled.

For example, for purchase order number (PON) 0172166V01S02,<sup>1</sup> FDN attempted to correct a clarification but was asked by different BellSouth LCSC representatives to provide different types of address information. For PONs 0171697V01S01 and 0169857V01S01, BellSouth claimed the LNA codes (line level activity codes) were invalid for the orders submitted. After FDN called, the LCSC admitted the clarifications were in error.

Issue No. 2: BellSouth does not make timely CSR updates to address pending orders.

When BellSouth's records show a pending BellSouth service order on the customer's CSR, BellSouth will not process a CLEC's LSR for that account. BellSouth rejects/clarifies LSRs for accounts with pending service orders. While in principle, it may be appropriate to reject/clarify LSRs while service orders are pending, the problem is that BellSouth does not clear up pending service orders in a timely manner. Further, even when the pending order is reported as cleared, the CSR may not be updated for a protracted period, so the LSR remains in a reject/clarify state. After 10 days, BellSouth automatically cancels an LSR that has not been accepted. Thus, BellSouth can cancel a CLEC's order because BellSouth has not timely executed a service order or CSR update.

A customer is often not aware of what pending service orders there may be against his/her account, but the customer must contact the BellSouth business office to have the pending service order cleared. This places a burden on the customer, and that

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<sup>1</sup> Additional PONs might pertain to the examples provided herein if multiple LSRs were submitted. The PONs provided here should be sufficient to inform BellSouth of the customer account. If necessary, FDN will provide BellSouth other PONs applicable to the examples provided.

burden is often made worse when the customer has to call several times to clear the CSR. Even after the customer calls the BellSouth business office, the BellSouth representative informs the customer the service order is cleared, and the LCSC verbally confirms this with FDN, FDN has had resubmitted LSR rejected because the CSR does not reflect that the pending service order cleared. Additionally, FDN posits that BellSouth uses these customer contacts and associated delays to inappropriately engage in retention/winback activities.<sup>2</sup>

In one recent case, PON 0156047V01S01, the customer's CSR reflected a pending order since November 30, 2001; by January 7, 2002, it was still pending even though the LCSC reported to FDN on December 13, 2001, that the pending orders were completed and should be cleared. In another case, PON 0150464V01S01, BellSouth clarified/rejected an FDN LSR on November 28, 2001, due to pending service orders on the CSR. As of January 7, 2002, FDN's resubmitted LSR was rejected because the pending service order was not cleared from the CSR.

As a result of the problems with pending service orders and lack of timely CSR updates, CLEC LSRs are unreasonably delayed, the customers become frustrated with the delays and what they must do to cure, and the customers often just give up on the CLEC order.

Issue No. 3: LSRs for voice orders, when xDSL is listed on the customer's record, are delayed.

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<sup>2</sup> The customer can go nowhere but to BellSouth to clear up the CSR problem, and the customer contact is made as a necessary predicate to a pending carrier change. It is wholly inappropriate and anticompetitive for BellSouth to attempt a retention/winback occasioned by customer contacts that would not have been initiated but for the pending carrier change and but for BellSouth's required execution of retail orders and/or CSR updates.

If FDN submits an LSR to BellSouth for a customer who has either BellSouth ADSL on any line or ADSL on the CSR, the order is manually processed and in most cases, unreasonably delayed, often causing FDN to lose the customer.

FDN will submit a partial port LSR where only the non-ADSL voice lines are slated for migration if a customer has ADSL and wants the ADSL line to stay with BellSouth. Occasionally, a customer has ADSL on his/her CSR but is not aware of it or has not been using the service. In any case, however, when the customer calls the BellSouth business office to have ADSL switched from one line to another, to have it cancelled or otherwise removed from the CSR, the same set of problems identified in the prior issue occur. That is, BellSouth is either slow to address the customer request or does not address it at all.

For example, for PON 0146403V01S03, the customer called the BellSouth business office on or about January 9, 2002, to have ADSL removed from one line and the CSR updated. The customer was even given a confirmation number for her request. As of January 30, 2002, ADSL was still on the CSR, and the customer gave up trying to have it removed, so FDN lost the customer.

Similarly, for PON 0149923V01S01, FDN submitted an LSR for a partial port of voice lines. On November 27, the customer reported to FDN that he called BellSouth to have the CSR corrected because the CSR showed ADSL on the main billing telephone number (BTN). However, as of December 5, the CSR still showed ADSL on the BTN. The customer complained to the PSC about the situation shortly thereafter, but as of January 8, ADSL still showed on CSR BTN.

Issue No. 4: BellSouth does not properly execute freeze lifts, thereby delaying CLEC LSRs.

Preferred carrier freezes can be applied to both local and interexchange carrier services. Rule 47 CFR 64.1190(e) provides that, at a minimum, the local exchange carrier administering a freeze must accept a subscriber's written or oral authorization to lift a freeze and must offer a mechanism for a 3-way conference call with the subscriber to lift a freeze. When a freeze lift request is made orally, the administering carrier is required to confirm appropriate verification data with the subscriber and confirm the subscriber's intent to lift the particular freeze.

BellSouth's OSS does not promptly or adequately administer carrier freeze lift situations. On a weekly basis, FDN has LSRs rejected/clarified by BellSouth because a freeze is on the account, but when the customer calls to lift the freeze and FDN afterwards resubmits the LSR, the LSR is again rejected/clarified because of an account freeze. BellSouth has even informed the customer or FDN that the freeze has been lifted but the resubmitted LSR is repeatedly rejected due to an account freeze. There have been cases where this cycle of rejected LSRs has gone on **for months** despite the customer's repeated calls to BellSouth and BellSouth's repeated representations that the freeze has been lifted.

In PON 0150381V01S01, for example, FDN's LSR was rejected due to a freeze as of November 19, 2001. The customer and the customer's office manager were told by two different BellSouth business office representatives on December 7, 2001, that there was no freeze on the account. When FDN contacted the LCSC on December 14

regarding what the customer was told, the LCSC contradicted the BellSouth business office and insisted there was a freeze on the account. After another contact between the customer and BellSouth, the LCSC reported to FDN on December 21 that the freeze had been lifted. FDN resubmitted the LSR a few days later, and that LSR was once again rejected/clarified because of an account freeze.

In the case of PON 102611VER01SUP3, despite repeated calls and faxes to BellSouth to lift the freeze, despite repeated assurances from the BellSouth business office or the LCSC that the local service freeze would be lifted, FDN LSRs submitted from August 2001 through December 2001 were serially rejected/clarified due to a local service freeze on the account.

Whether the cause for this issue stems from BellSouth's failure to update records or from BellSouth's failure to properly distinguish for subscribers the local freeze from the interexchange freeze -- as BellSouth must do -- or from some other reason(s), the results are still the same: CLEC LSRs are needlessly delayed by BellSouth's OSS and that delay inflicts serious competitive harm on the CLECs.

### **MAINTENANCE OSS ISSUES**

Issue No. 5: BellSouth causes a significant number of no-dial tone and trouble situations for ALEC customers and often reports resolutions of these situations as "No Trouble Found."

FDN experiences a significant number of trouble conditions, including no-dial-tones (NTD), which are attributable to BellSouth. When a customer calls in a trouble, FDN conducts a line diagnostic test.<sup>3</sup> If the line diagnostic tests show BellSouth facilities

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<sup>3</sup> FDN's equipment comes with integrated remote test heads that allow FDN access to the circuit at the card level in FDN's bay. For no-dial-tone trouble situations, FDN conducts remote line tests



are the source of the trouble, FDN will call in a trouble ticket to BellSouth. According to FDN's line diagnostic tests, a substantial number of the NTD situations are caused by field pair being pulled or a circuit being open in the central office, causing the customer to experience NTD. If FDN calls in a trouble to BellSouth, BellSouth will check the trouble, contact FDN, FDN will perform a new diagnostic test that often shows facilities must have been altered, but BellSouth frequently closes the tickets as "No Trouble Found" and charges FDN. Correcting BellSouth caused NTDs is critical because the end result for CLECs like FDN is upset customers who, ironically, want to go back to BellSouth.

FDN has apprised BellSouth of this problem some time ago and so far no improvements have been made. FDN has provided numerous examples of these situations to Brandon Hartley and Jim Argo at BellSouth.

BellSouth has argued that since it cannot test FDN's facilities or the customer's facilities, it has no way to prove that the source of these trouble tickets does not lie with those facilities rather than with its own. However, FDN believes this simply evades the issue. FDN's line diagnostics show BellSouth as the cause of a trouble condition. BellSouth has not made efforts to assure CLECs of adequate mapping or marking of facilities dedicated to CLEC use.

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performed from the FDN Test Center located in Orlando. FDN tests resistance, capacitance voltage AC and voltage DC.

RESPECTFULLY SUBMITTED, this 5 day of February 2002.

A handwritten signature in black ink, appearing to read "Matthew Fil". The signature is written in a cursive style with a large, sweeping initial "M".

Matthew Fil  
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