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February 4, 2002

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RE: Docket No. 960786B-TL; 981834-TP

Enclosed is a copy of AT&T's list of Commercial Experience topics submitted to BellSouth for discussion at the workshop currently scheduled for February 18, 2002. pursuant to Order No. PSC-01-2287-PCO-TL issued November 20, 2001

Sincerely,

Virginia Tate/sa
Virginia Tate

Enclosures

cc: Parties of Record

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CMP _____
COM _____
CTR _____
ECR _____
GCL _____
OPC _____
MMS _____
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OTH _____

DOCUMENT NUMBER-DATE

01467 FEB-78

FPSC-COMMISSION CLERK



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February 4, 2002

TO: Nancy Sims
BellSouth Telecommunications, Inc.

RE: Docket No. 960786B-TL; 981834-TP

Pursuant to Order No. PSC-01-2287-PCO-TL issued November 20, 2001, AT&T hereby submits its list of Commercial Experience topics and supporting documentation for discussion at the workshop currently scheduled for February 18, 2002.

Sincerely,

A handwritten signature in cursive script that reads "Virginia Tate /so".

Virginia Tate

Enclosures

cc: Parties of Record
Mrs. Blanca S. Bayo, FPSC

DOCUMENT NUMBER-DATE

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FPSC-COMMISSION CLERK

AT&T Commercial Experience Issues
FPSC Docket No.: 960786-B-TL; 981834-TP

<i>Issue No.</i>	<i>Issue Description</i>	<i>Additional Information</i>
Pre-Ordering/Ordering		
1	BellSouth continues to rely excessively on manual processing of ALEC orders.	<p>Approximately 1/3 of all ALEC orders still require manual intervention by the LCSC.</p> <p>Estimated LSR load at the LCSC in November 2001 was 140,404 LSRs - 69% of that load (96,849 LSRs) was fallout from electronically submitted orders - 82% of fallouts (79,562 LSRs) were caused by BellSouth system design and failures. Only 12% of the LCSC load (17,287 LSRs) was related to ALEC input error.</p> <p>In November 2001 combined designed manual fallout and BellSouth system errors were 19.3% for non-LNP orders and 37.7% for LNP orders.</p>
2	Orders that fallout to the LCSC for manual processing encounter delay and increased error rates. This raises ALEC costs and reduces the level of ALEC customer service.	<p>BellSouth's intervals to process partially mechanized rejections and firm order confirmations average 12 to 18 actual hours (1 to 2 business days) versus the 15-minute average for fully mechanized handling.</p> <p>The impact on AT&T's orders is discussed in items 4,5, and 6 below.</p>
3	The Flow Through Task Force and other efforts to improve / reduce the level of manual processing have had no significant impact and appear unlikely to do so in the near future.	<p>23 of 32 FTTF change requests have no scheduled implementation dates.</p> <p>BellSouth's FTTF project manager has stated that as ALECs gain more market share and the volume and mix of order types changes ALECs should expect to encounter more BellSouth errors as they use portions of the software that have not previously experienced high volume usage.</p>
4	AT&T receives clarifications when orders are accurate, resulting in unnecessary processing expense for AT&T and delay for AT&T's customers.	<p>During October and November 2001 AT&T had 203 UNE-P orders or 619 lines impacted. This was done as a result of a USOC conversion (1FB to MFB) in the state of Florida.</p> <p><i>See Attachment 1 for PONs affected.</i></p>

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<i>Issue No.</i>	<i>Issue Description</i>	<i>Additional Information</i>
5	BellSouth's Local Carrier Service Center (LCSC) introduces errors on service requests causing incorrect provisioning of AT&T UNE-P orders.	See Attachment 2: Order Typed in BellSouth System Does not Match Order as Submitted by AT&T for details.
6	BellSouth provides incomplete manual clarifications resulting in serial clarifications that lead to delayed implementation for AT&T customers.	Manual clarifications do not address all issues. Subsequent LSRs are rejected for additional reasons that existed on the original LSR. Example: ZXMIAP0200753 1 ST - Incorrect floor info 2 nd - Invalid Act Type
7	LENS has an unacceptable level of downtime and slow response time.	See LENS System Outage Report available at: www.interconnection.bellsouth.com/markets/lec/ccp/ccp_so_lens.html
8	BellSouth inadequately implements capabilities that would reduce rejection of ALEC orders. BellSouth still has not provided fully functioning parsed CSR and the ability to migrate a customer by telephone number and address.	Complete and usable coding specifications for the parsed CSR were not provided until two weeks before the scheduled implementation date. At least 24 defect change requests have been published by BellSouth since the 1/5/02 "implementation" of the parsed CSR. Many are not scheduled for correction until April and May. When migration by TN and Name was implemented the error/reject rate was greater than 30%. While the limited implementation of migration by TN and House Number as a replacement performed better problems remain: <ul style="list-style-type: none"> • Improper data content in RSAG • Mismatches between RSAG and the CSR • LCSC Training The resulting erroneous rejections can only be corrected by manual intervention at the LCSC.

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<i>Issue No.</i>	<i>Issue Description</i>	<i>Additional Information</i>
9	BellSouth's ability to provide an accurate due date calculator remains uncertain.	<p>BellSouth's due date calculator continues to return improper (longer) intervals for various ReqType / ActType combinations</p> <ul style="list-style-type: none"> • BellSouth has admitted to problems going back to February 2001 • Multiple previous correction attempts have been only partially successful • On 1/31/02 BellSouth delayed its next fix attempt that had been scheduled for 2/2/02.
10	BellSouth issues untimely jeopardy notices for UNE-Loop orders causing provisioning delays and customer relations problems for ALECs	<p>Jeopardy notices are being issued late, and in some cases on the actual day of the cut, not allowing enough time to make arrangements with the customer. Many of these Service requests are sent electronically via EDI but BellSouth is sending jeopardy notices via fax, frequently to the wrong telephone number. Only when AT&T is in the process of confirming a start cut are we learning a jeopardy notice has been issued.</p>
11	Data is not available to analyze BellSouth performance on important order types. BellSouth excludes from raw data LSRs classified as projects.	<p>BellSouth currently does not provide raw data for LSRs classified as projects (see Attachment 3 – September 13, 2001 letter from BellSouth). Although these LSRs may be documented exclusions to the performance measure calculations, these LSRs should still be included in raw data so ALECs can perform their own performance analysis.</p>
12	BellSouth is providing incomplete raw data to the ALECs in PMAP because of the exclusion of dummy FOCs (for FOC Timeliness performance measure)	<p>BellSouth currently does not provide raw data for Dummy FOCs. Dummy FOCs are confirmations of cancelled LSRs. Although these LSRs may be documented exclusions to the FOC Timeliness measure calculations, these LSRs should still be included in raw data so ALECs can perform their own performance analysis.</p>

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<i>Issue No.</i>	<i>Issue Description</i>	<i>Additional Information</i>
13	BellSouth is inaccurately reporting data for Acknowledgment Message Timeliness and Completeness. AT&T compared the LSR volumes in the acknowledgment raw data with the volumes in the Flow Through report and discovered numerous discrepancies.	Attachment 4 (January 21 letter from BellSouth) indicates that EDI returns one Acknowledgment per transmission (or an "envelope"), and a transmission may contain multiple LSRs. The Flow Through report gives detail at the LSR level. According to the explanation, the Acknowledgment raw data may not report an Acknowledgment for each LSR. Therefore, it can be inferred that the volume in the Flow Through report will be greater than or equal to the volume of EDI LSRs that the Acknowledgment raw data shows. This, however, is not true in the October or November 2001 snapshot found in Attachment 5. Additionally, BellSouth states, "TAG returns acknowledgments on messages related to pre-order activity, which are not reflected on the Flow Through report." Further, "LSRs fatally rejected by TAG will receive an acknowledgment and be included in the Acknowledgment raw data files, but will not be counted in the Flow Through report." Both of these explanations suggest that the TAG volume in the Acknowledgment raw data should be significantly greater than the TAG and LENS volume in the Flow Through report. Once again, the October 2001 snapshot reflects just the opposite scenario and the November 2001 data shows little difference between the two data sources.
14	The raw data that BellSouth provides to the ALECs is incomplete for the Flow Through reports. BellSouth does not provide a LSR detail for LNP flow-through report. (Measure O-6).	In Georgia Docket 7892-U, BellSouth indicated that a form of underlying data (different from the LSR detail) was now available upon request. AT&T requested this information on February 4, 2002. AT&T will review this data once it is received from BellSouth.

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<i>Issue No.</i>	<i>Issue Description</i>	<i>Additional Information</i>
15	ALECs cannot replicate FOC and reject intervals from raw data provided by BellSouth	BellSouth provides raw data for the FOC Timeliness and Reject Interval performance measures. This data contains the LSR received date, LSR FOC/reject date, and FOC/reject interval. The interval is reported in hours and minutes, but BellSouth only provides the dates of the endpoints, but not the dates <i>and times</i> . Because BellSouth does not provide dates and times that the LSR was received and FOC'd/rejected, the ALECs are unable to replicate the FOC Timeliness and Reject Interval performance data. For examples, see Attachment 6, Part A.
16	ALECs cannot replicate FOC and reject intervals from PMAP raw data for LSRs that are submitted in one month, but FOC'd/rejected in different month.	BellSouth provides raw data for the FOC Timeliness and Reject Interval performance measures. Within the raw data, there are two records for each LSR. One record contains the received date of the LSR. The other record contains the FOC or reject/clarification date of the LSR. If the LSR was received in one month, but FOC'd or rejected/clarified back to the ALEC in the next month, then the ALEC is unable to replicate the reject interval being calculated by BellSouth. BellSouth is excluding the record that contains the date when BellSouth received the LSR. BellSouth is providing the ALEC with only one of the endpoints that are used to calculate the appropriate FOC/reject duration. For examples, see Attachment 6, Parts B and C.
Provisioning		
17	AT&T's UNE-P customers are experiencing service outages in conjunction with their migration to AT&T. Contributing factors are "premature disconnects" also referred to as "New & Disconnect—N&D" issue.	See Attachment 2: Premature Disconnect due to Unrelated "N" and "D" Orders

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<i>Issue No.</i>	<i>Issue Description</i>	<i>Additional Information</i>
18	AT&T's UNE-P customers experience deterioration in service in conjunction with their migration to AT&T.	See Attachment 2: BellSouth Technician Implements Wrong Translations
19	BellSouth does not always re-use facilities for UNE-P orders, which cause an unnecessary disruption of the customer's service.	See Attachment 2
20	BellSouth is not providing the circuit identification on the FOC returned to AT&T on EDI orders.	When no circuit identification is on the FOC cause potential errors in database and mismatch between the two companies as well as delays in customer orders that follow. <i>For Examples: See PONs</i> ZXATLP0100195A ZXATLP0100430 ZXATLP0100695 ZXATLP0101066A
21	BellSouth has not provided AT&T access to LFACS despite a contractual obligation to do so. AT&T orders are being rejected following the issuance of a Firm Order Confirmation because of incorrect facilities assignments. To prevent this problem BellSouth agreed to provide AT&T access to LFACS.	AT&T receives a significant number of rejections of its service requests due to "busy pair" or facilities that appear as in use in BellSouth's records. This causes extra expense for AT&T's work centers and a delay in the customer's request for service. Access to this database would allow AT&T to check BellSouth's records and prevent these service requests from being rejected. The COSMOS report offered by BellSouth does not deliver the information that AT&T needs to deliver timely and accurate service to AT&T customers. In addition to being difficult to use, the COSMOS report does not link busy pairs as indicated in the BellSouth database with a specific customer location, telephone number or purchase order number. This makes it impractical as a tool to pre-check facilities or to reconcile the databases.

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<i>Issue No.</i>	<i>Issue Description</i>	<i>Additional Information</i>
22	<p>The BellSouth self-reported ALEC data provided in PMAP for Average Completion Notice Interval (ACNI) is incomplete because of the following exclusions:</p> <ul style="list-style-type: none"> • Completion notices for orders completed in one month, but notice provided in a different month are excluded from the measure calculation and raw data. • Orders submitted directly into SOCS do not receive completion notices. • Null/blank values in the notice interval field are being excluded from the ACNI measure calculation and raw data. • Completion Notices for Standalone LNP orders are being excluded from the ACNI measure and raw data. • Completion Notices for LSRs classified as projects are being excluded from the ACNI measure and raw data. 	<p>Attachment 7, a September 27, 2001 letter from BellSouth, documents the first three exclusions. Attachment 4, a January 21, 2002 letter from BellSouth has admissions of the final two exclusions. These exclusions are not documented in the SQM for the ACNI measure, and therefore are unauthorized exclusions. Without these completion notices the ALEC data is incomplete and ACNI timeliness being reported by BellSouth is incorrect.</p>
23	<p>The BellSouth self-reported ALEC data provided in PMAP for Average Completion Notice Interval (ACNI) is incorrect because multiple entries are being recorded for the same completion notice and applied in the calculations.</p>	<p>Looking at November 2001 Completion Notice raw data for AT&T after all proper exclusions have been completed, there are 932 completion notices from Florida incorrectly being counted twice in the Average Completion Notice Interval Measure (see Attachment 8).</p>
24	<p>The BellSouth self-reported ALEC data provided in PMAP for Jeopardy Notice Interval is incorrect.</p>	<p>In Georgia Docket 7892-U, BellSouth stated that this was corrected with October data but a review of the November results does not agree. For example, the average jeopardy notice interval for UNE-P ALEC Aggregate in Florida was 124.8 hours or 5.2 days.</p>

AT&T Commercial Experience Issues

<i>Issue No.</i>	<i>Issue Description</i>	<i>Additional Information</i>
Maintenance & Repair		
25	BellSouth maintenance technicians close repair tickets without confirming with AT&T that the problem has been corrected.	<p>BellSouth's maintenance technicians believe that they have completed their work on a given maintenance ticket. However, when they fail to test with AT&T's agents and confirm that the trouble has indeed cleared, new tickets must be opened and work duplicated. This results in customer dissatisfaction and delay in repairing the customer's service.</p> <p><i>For Example see: Ticket #210202195 for 14-305-887-6322. NDT Trouble</i></p>
26	Trouble Tickets are closed when Maintenance Technicians attempt to make after hours repair.	<p>BellSouth maintenance technicians go to the customer premises after hours to fix a problem without making arrangements for access after hours, even when access is required to repair the service, e.g. the demarcation point is inside the premises. Although AT&T specifies on the order that access is available only during regular business hours, BellSouth disregards the comments. The technician then codes the trouble ticket as "no access" or closes out the trouble ticket. This results in customer dissatisfaction and delay in repairing the customer's service.</p>
27	The BellSouth Maintenance Center will not take a report until after 5 pm even though the customer's service has been impaired during migration (e.g. missing feature), even where BellSouth has incorrectly provisioned the order.	See Issue No. 5

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<i>Ordering/Provisioning Maintenance/Repair*</i>		
28	BellSouth excludes directory listing orders from some metrics.	BellSouth responded on its action item list for the December Georgia Performance Measures Workshop that it now includes directory listing orders in the % rejected, reject interval, FOC Timeliness, and FOC and Reject Response measures. Does BellSouth include Directory Listing Orders in the Flow-Through report? And whether or not excluded from the calculation, does BellSouth now include directory listings orders in the raw data for all measures? If not, when, by measure, will BellSouth provide this raw data?
29	BellSouth is inaccurately reporting UNE-P data for the ALECs. BellSouth has duplicate reporting for UNE-P. The data is being reported under the UNE Loop and Port Combo category and the UNE Other Non-Designed disaggregation level.	In Georgia Docket 7892-U, BellSouth indicated that a change request has been entered on this issue.
<i>Change Control Process*</i>		
30	The Change Control Process ("CCP") remains inadequate and does not provide for timely implementation of change requests.	<p>Analysis of the January 22, 2002 change control log reveals back logs of both feature and defect change requests:</p> <ul style="list-style-type: none"> • There was a back log of 90 feature change requests • The published release schedule implements only 24 requests in 2002 • The existing back log will not clear until 2005 • 3 new feature change requests have been generated • There was a back log of 61 defect change requests • 37 had scheduled implementations before 4/7/02

* Although the FPSC requested that ALECs identify issues in specific categories, issues identified in this category cover several areas.

* The Change Control Process impacts all areas of BellSouth's provisioning of services to ALECs.

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		<ul style="list-style-type: none">• 24 had no scheduled implementation dates• 12 new defect change requests have been validated <p>Data filed by BellSouth with the FCC revealed that BellSouth implemented change requests it initiated in 60 days but took 164 days to implement ALEC initiated requests.</p> <p>BellSouth routinely implements faulty software:</p> <ul style="list-style-type: none">• OS/DA Ordering• Loop Make-up Queries• CSR Response Timeliness Improvement• Migration by TN and Name• Parsed CSR <p>The real process is hidden.</p>
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