

BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION

In the Matter of

CONSIDERATION OF BELLSOUTH
TELECOMMUNICATIONS, INC.'S
ENTRY INTO INTERLATA SERVICES
PURSUANT TO SECTION 271 OF THE
FEDERAL TELECOMMUNICATIONS ACT
OF 1996. (THIRD PARTY OSS TESTING)

DOCKET NO. 960786B-TP

PETITION OF COMPETITIVE CARRIERS
FOR COMMISSION ACTION TO SUPPORT
LOCAL COMPETITION IN BELLSOUTH
TELECOMMUNICATIONS, INC.'S
SERVICE TERRITORY.

DOCKET NO. 981834-TP

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VOLUME 1

PROCEEDINGS: WORKSHOP

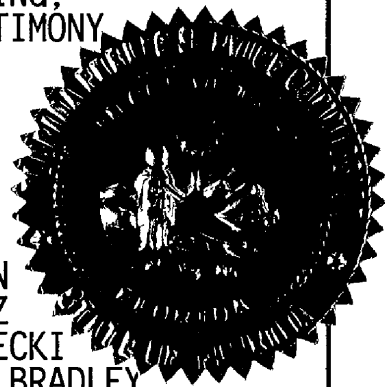
BEFORE: CHAIRMAN LILA A. JABER
 COMMISSIONER J. TERRY DEASON
 COMMISSIONER BRAULIO L. BAEZ
 COMMISSIONER MICHAEL A. PALECKI
 COMMISSIONER RUDOLPH "RUDY" BRADLEY

DATE: Monday, February 18, 2002

TIME: Commenced at 9:30 a.m.
 Concluded at 6:02 p.m.

PLACE: Betty Easley Conference Center
 Room 148
 4075 Esplanade Way
 Tallahassee, Florida

REPORTED BY: JANE FAUROT, RPR
 Chief, Office of Hearing Reporter Services
 FPSC Division of Commission Clerk and
 Administrative Services
 (850) 413-6732



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FPSC-COMMISSION CLERK

1 IN ATTENDANCE:

2 BETH KEATING and FELICIA BANKS, FPSC Division of
3 Legal Services, representing the Florida Public Service
4 Commission.

5 NANCY B. WHITE, JIM MEZA, KEN AINSWORTH, CINDY COX,
6 RON PATE, AL VARNER, DAVID SCOLLARD and LISA FOSHEE,
7 representing BellSouth Telecommunications.

8 MARY CONQUEST, representing ITC DeltaCom.

9 CATHERINE BOONE and COLETTE DAVIS, representing Covad
10 Communications.

11 DONNA McNULTY, DEAN O'ROARK and SHERRY LICHTENBERG,
12 representing MCI WorldCom.

13 KYLE KOPYTCHAK and VERN McMAHAN (phonetic),
14 representing Network Telephone.

15 JAY BRADBURY, DENISE BERGER, K. C. TIMMINS,
16 BERNADETTE SEIGLER, TRACY HATCH and SHARON NORRIS, representing
17 AT&T communications of the Southern States.

18 JOHN McLAUGLIN, MATTHEW FEIL and KEVIN MONROE,
19 representing Florida Digital Network.

20 BRIAN MURDOCK and ANDREW KLEIN, representing KMC
21 Telecom.

22 CHERYL HAINES (phonetic), representing NuVOX
23 Communications.

24 PEGGY RAVINA, (phonetic) representing Z-Tel
25 Communications.

P R O C E E D I N G S

1
2 CHAIRMAN JABER: Ms. Keating, is there a notice to be
3 read for this workshop?

4 MS. KEATING: Yes, Madam Chairman. Pursuant to
5 notice issued January 18th, 2002, this time and place have been
6 set for a Commission Workshop in Dockets Numbers 960786B and
7 981834. The purpose is as set forth in the notice.

8 CHAIRMAN JABER: Thank you, Ms. Keating. Now we
9 should take appearances?

10 MS. KEATING: I guess, Madam Chair, I believe that
11 would be appropriate.

12 CHAIRMAN JABER: Let's start over here with my left.
13 State your name and address.

14 MR. AINSWORTH: Ken Ainsworth, 675 West Peachtree,
15 Atlanta, Georgia, and I am a Director for Local Operations.

16 MS. COX: I am Cindy Cox. My business address is 675
17 West Peachtree Street in Atlanta, Georgia. Senior Director in
18 the State Regulatory Department for BellSouth.

19 MR. PATE: Good morning. I am Ron Pate with
20 BellSouth. My address is 675 West Peachtree in Atlanta,
21 Georgia. I am also a Director with BellSouth
22 Telecommunications in their Network and Interconnection
23 Services.

24 MR. VARNER: Al Varner, at 675 West Peachtree Street,
25 Senior Director, Interconnection Services.

1 MR. SCOLLARD: David Scollard, 600 North 19th
2 Street, Birmingham, Alabama, and I am Manager of Wholesale
3 Billing with BellSouth.

4 MR. MEZA: Jim Meza, Attorney, BellSouth, 150 West
5 Flagler, Miami, Florida. Nancy White is also at that address.

6 MS. FOSHEE: Lisa Foshee on behalf of BellSouth
7 Telecommunications.

8 CHAIRMAN JABER: Thank you.

9 MR. BRADBURY: Jay Bradbury, AT&T. My business
10 address is 1200 Peachtree Street, Atlanta, Georgia. I am a
11 District Manager in AT&T's Law and Government Affairs
12 Department.

13 MS. CONQUEST: I'm Mary Conquest from ITC DeltaCom.
14 I am based in Huntsville, Alabama, 700 South Boulevard. I
15 currently serve both the regulatory arena and the IT arena and
16 I am charged with OSS integrations.

17 COMMISSIONER DEASON: Excuse me, could I have your
18 name again, please.

19 MS. CONQUEST: Yes. Mary Conquest.

20 MS. BOONE: Catherine Boone. I am the Vice-President
21 of External Affairs for Covad Communications. My business
22 address is 10 Glenlake Parkway, Suite 130, Atlanta, Georgia
23 30328.

24 MS. LICHTENBERG: I am Sherry Lichtenberg. I am the
25 Senior Manager for Operational Support System Interfaces and

1 Facilities Development for MCI WorldCom. My business address
2 is 701 South 12th Street, Arlington, Virginia 22202.

3 MR. KOPYTCHAK: Kyle Kopytchak, 815 South Palafox,
4 Pensacola, Florida. I am operational SME for network
5 telephone.

6 CHAIRMAN JABER: Are there any other competitive
7 providers in the audience that need to make an appearance?

8 MS. BERGER: Denise Berger, District Manager for
9 Local Network Services for AT&T.

10 MR. MONROE: Kevin Monroe, Vice-president of Customer
11 Services and Service Delivery with Florida Digital Network, 390
12 North Orange Avenue, Orlando, Florida.

13 CHAIRMAN JABER: Repeat your name for us.

14 MR. MONROE: Kevin Monroe.

15 MR. TIMMINS: My name is K.C. Timmins. I'm
16 Performance Measures Manager for AT&T. My address is 1200
17 Peachtree Street, Atlanta, Georgia 30309.

18 MS. SEIGLER: Good morning. My name is Bernadette
19 Seigler with AT&T. I am a Director for Operational Support
20 Systems. I'm in Atlanta, Georgia, 1200 Peachtree Street.

21 CHAIRMAN JABER: Your last name?

22 MS. SEIGLER: Seigler, S-E-I-G-L-E-R.

23 MR. McLAUGHLIN: Good morning. My name is John
24 McLaughlin with KMC Telecom. I am the Director of Government
25 Affairs. I guess I will give my business address, 755 North

1 Brown Road, Laurenceville, Georgia 30034.

2 MR. HATCH: Tracy Hatch of the law firm of Messer
3 Caparello & Self appearing on behalf of AT&T Communications of
4 the Southern States, Inc., 215 South Monroe Street,
5 Tallahassee, Florida.

6 Ms. McNULTY: Donna McNulty with WorldCom, Inc. My
7 address is 325 John Knox Road, Suite 105, Tallahassee, Florida.
8 And joining me today is Dean O'Roark, and his business address
9 is 6 Concourse Parkway, Suite 3200, Atlanta, Georgia.

10 MR. MURDOCK: I am Brian Murdock with KMC Telecom. I
11 am the Director of Carrier Management. My business address is
12 1755 North Brown Road, Laurenceville, Georgia.

13 MR. KLEIN: Good morning. Andrew Klein of Kelly Dry
14 and Warren, 1200 19th Street Northwest, Washington, D.C. 20036,
15 and I am appearing on behalf of KMC Telecom.

16 MR. FEIL: Matthew Feil, in-house counsel for Florida
17 Digital Network, the same address as Mr. Monroe's.

18 MR. McMAHAN: Vern McMahan (phonetic),
19 Vice-president, Regulatory Governmental Affairs with Network
20 Telephone, 815 South Palafox, Pensacola, Florida.

21 MS. HAINES: I'm Cheryl Haines (phonetic) with NuVox
22 Communications, Executive Director, LEC Carrier Relations;
23 Address 6600 Peachtree Dunwoody Road, Building 600, Suite 200,
24 Atlanta.

25 MS. NORRIS: I'm Sharon Norris with SCN Consulting

1 appearing on behalf of AT&T. My business address is 2419 Piney
2 Grove Road, Loganville, Georgia 30052.

3 MR. RAVINA: I'm Peggy Ravina (phonetic), Regional
4 Vice-president with Z-Tel Communications. My business address
5 is 601 South Harbor Island Boulevard, Suite 220, Tampa, Florida
6 33602.

7 MS. KEATING: And Beth Keating and Felicia Banks
8 appearing on behalf of the Florida Public Service Commission.

9 CHAIRMAN JABER: Thank you, Ms. Keating.

10 MS. BOONE: Madam Chairperson, also appearing on
11 behalf of Covad will be Colette Davis, same address as mine.
12 Thank you.

13 CHAIRMAN JABER: Thank you. And, Ms. Keating, this
14 is an opportunity, as I recall, for the ALECs to comment on
15 their commercial experiences regarding the BellSouth OSS
16 system. And as I understand it, the parties and staff have
17 reached an agreement on the order of comments and the time
18 period associated with that.

19 I would ask the commenters to please make sure you
20 are speaking into the microphone, that we all speak one at a
21 time. That we try not to duplicate each other because we
22 really do want to stay on track today. There is a lot to do.
23 And the Commissioners will be here as long as it takes, but
24 please note that we are currently scheduled to conclude at 5:00
25 p.m. today with a very short lunch break. So let's try to stay

1 on track.

2 Ms. Keating, get us started.

3 MS. KEATING: The first domain that we are talking
4 about this morning is preordering, and first up is the ALEC
5 panel.

6 MS. BOONE: Good morning, Commissioners. My name is
7 Catherine Boone. I work for Covad Communications Company. And
8 the staff asked us to try to organize in the form of domains as
9 you see here, and we have done exactly that. Each panel member
10 will talk briefly about his or her company's personal
11 experience in that domain and will be available to answer any
12 questions you may have.

13 I would like every panel member to tell you just
14 briefly about their company and their role in Florida, so that
15 you will get a sense of what it is like to be in the commercial
16 world here in Florida as an ALEC. Covad Communications is a
17 DSL provider. We have been in Florida since August of 1999.

18 And the first panel is going to talk about
19 preordering functionalities. Now, these are the kinds of
20 functionalities that we use to, for example, validate an
21 address. A DSL provider will use preordering functionalities
22 to look at loop makeup information to see if there are, for
23 example, load coils or some other impediment on the loop that
24 would prevent us from being able to provide digital services on
25 that loop.

1 Other CLECs will use preordering, for example, to
2 check billing records, check other things from the CSR. I'm
3 sorry, the customer service record. You may hear from time to
4 time some overlap. It is very difficult to limit yourself in
5 preordering. There are things about preordering that affect
6 provisioning, and so you may hear about some topics a couple of
7 times. We are not being redundant, it's just that they may
8 touch on a few different issues.

9 Covad has had a series of problems with BellSouth's
10 preordering functionalities, largely through the LENS process.
11 LENS is the GUI that Covad has used to obtain information from
12 LFACS, which is the loop facility and assignment and control
13 system, I believe. Mr. Pate may correct me. That is the
14 database essentially that houses all the information that
15 BellSouth has on loops. One of the things that Covad needs to
16 do, for example, is to look at that information and see if
17 there are load coils on the loop. We have found numerous
18 instances in which the data is simply wrong or not in LFACS.

19 What that means from our perspective is that we
20 submit an order, we do not request conditioning up front, but
21 later on down the provisioning process we find that we have to
22 request conditioning, which is a process of basically removing
23 these impediments from the loop.

24 You may remember from the very exciting cost docket
25 of last year that this Commission recognized that a

1 forward-looking network would not have load coils on loops
2 under 18,000 feet. Therefore, there is no charge associated
3 with the removal of those load coils. As soon as this
4 Commission ruled that way, Covad began instantly ordering loops
5 with conditioning. As a result, we have encountered these
6 problems with preordering. And our solution is simple. What
7 we have asked BellSouth to do is allow us to prequalify and
8 preauthorize conditioning. What that would mean is that on the
9 initial LSR, we submit it, and we say we have already looked at
10 the loop makeup information and we don't see any load coils,
11 but if you find some down the road, we would like you to go
12 ahead and remove them. This is the same process that Covad
13 uses in Qwest and in SBC. And it is very efficient for both
14 the ILEC and the CLEC. Because what happens is right now we
15 have to cancel the order and pay the cancellation charge and
16 then resubmit an order with a request for conditioning. That
17 is our primary preordering difficulty.

18 I would like to pass the baton now. AT&T is going to
19 talk about some of the preordering issues they have
20 encountered.

21 MR. BRADBURY: Thank you. Jay Bradbury with AT&T.
22 I'm going to spend a few minutes today talking about
23 BellSouth's failure at this point in time to deliver a fully
24 functioning parsed customer service record. First, why is a
25 parsed customer service record from BellSouth to the CLECs

1 important? It's important because it is the only way the CLECs
2 can be certain that the information they use in their
3 integration process is accurate from BellSouth's point of view.
4 It is possible for a CLEC to build its own parsing engine to
5 some extent. We have no guarantees when we do that that what
6 we are doing is accurate because we don't --

7 COMMISSIONER DEASON: I'm sorry, build your own what?

8 MR. BRADBURY: Parsing engine, P-A-R-S-I-N-G.

9 COMMISSIONER DEASON: What is that?

10 MR. BRADBURY: It's possible for a CLEC to take
11 information from BellSouth, divide it up into fields and use
12 it, but I don't know whether I have done that the way BellSouth
13 does it, okay? There are some people here who will talk about
14 their experience doing that later.

15 COMMISSIONER DEASON: Okay.

16 MR. BRADBURY: Without a parsed CSR from BellSouth,
17 anytime BellSouth makes a change then, and individual CLECs
18 have built their own parsers, those parsers become instantly
19 useless and you have to start again. So the value of a parsed
20 CSR --

21 COMMISSIONER DEASON: Can you give me an example?
22 What would BellSouth change that would cause problems with the
23 software?

24 MR. BRADBURY: They have changed the number of
25 characters in the field, the definition of the characters in

1 the field, where it falls within the document. They move it
2 within the document that they are sending to you. Any of those
3 things would cause your parsing engine no longer to be
4 accurate. When that happens --

5 COMMISSIONER DEASON: You're talking about not
6 information, but the format of the information.

7 MR. BRADBURY: It could be the information or the
8 format, either way. Anytime that happens, the work that you
9 have done individually is no longer of any value, you have to
10 start again. If you have a common source from BellSouth of a
11 parsed CSR, then you will be in sync at all times going
12 forward. So that's the importance of it.

13 The existing process for BellSouth's parsed CSR, the
14 specifications were delivered late. BellSouth will indicate to
15 you that AT&T and some of the other members of this panel have
16 not yet built to those specifications or tested, and that is
17 accurate. Because they were late we have missed our
18 opportunity to build on our side of the interfaces to meet
19 them. When we reviewed those specifications we had a number of
20 problems with them. We still have a number of problems with
21 them. We have an open inquiry to BellSouth for clarification.
22 We were expecting a response last Friday, we have not received
23 it.

24 Since BellSouth implemented the parsed CSR on January
25 5th, they themselves have indicated that there are at least 24

1 defects in the implementation. Many of them have been
2 corrected beginning back in January, some of them on February
3 2nd, but there are still others that will not be corrected
4 until April or May. If you use BellSouth's parsed CSR as it is
5 today without implementing additional coding and work around
6 changes on your side of the interface, a number of your inputs
7 will reject when you send them in. This is a high impact to
8 CLECs using the parsed CSR. Again, at this point in time we do
9 not have the revised specifications that we would need to
10 operate with the corrections that BellSouth has made and plans
11 to make in the future. And with that, I would move to network
12 telephone.

13 MR. KOPYTCHAK: Good morning, Commissioners. My name
14 is Kyle Kopytchak with Network Telephone. While there are
15 numerous issues with the preordering function, we are going to
16 come --

17 COMMISSIONER DEASON: Sorry, you're going to have to
18 speak a little bit louder.

19 MR. KOPYTCHAK: I apologize. Is that better?

20 COMMISSIONER DEASON: Yes. Get real, real close to
21 the microphone. It's not going to bite you.

22 MR. KOPYTCHAK: Great. Thank you. Again, while
23 there are numerous issues with respect to preordering, we are
24 going to come address some of the issues today with respect to
25 FRN, or facilities reservation number. Network Telephone, like

1 Covad has had problems with the LENS database in obtaining
2 accurate data in order to reserve the loop. And as you can see
3 from our slides, the BellSouth internal data is flawed or
4 incomplete. As a result of that, Network Telephone is forced
5 to pay higher end order cost and back office cost and BellSouth
6 has refused to work with Network Telephone on these ends.

7 When Network Telephone goes in and tries to preorder
8 a loop, and the data is incomplete in LENS, we need what is
9 called a reservation ID. When the reservation ID is not
10 provided, the process is then to go to CRSG, the complex resale
11 sales group, and request what is call an FRN, a facilities
12 reservation number. Network Telephone has addressed BellSouth
13 for many, many, many months with respect to the incomplete
14 data.

15 BellSouth then came to us with what they called a
16 test, and they aligned us with a process to deliver the FRN.
17 Within delivering the FRN, we were forced to submit manual
18 orders at higher costs and longer service due dates. When
19 Network Telephone found that we had the ability to take the FRN
20 and send it via EDI, which is mechanized, BellSouth immediately
21 deemed the test unsuccessful and we lost complete back office
22 alignment. For many more months we went without back office
23 alignment.

24 Recently I held a meeting with BellSouth, a
25 conference call that consisted of all of my back office. I got

1 on the call with Cathy Compton, who is a manager with NCRSG,
2 and I said the reason for this call is to align our back
3 office. While I don't agree with the process, I need back
4 office alignment. We aligned back office. My provisioners
5 went back to work, and the very next day we got an E-mail from
6 BellSouth saying they reneged on their commitment and that they
7 sent the issue to the external response team. To date we don't
8 have alignment, and we don't have a process, and we have not
9 heard from BellSouth.

10 CHAIRMAN JABER: What was the reason they gave you
11 for reneging?

12 MR. KOPYTCHAK: They told us on the call that because
13 we were able to utilize the FRN and EDI that they were unable
14 to recoup the costs -- that they were recouping the costs as we
15 sent the manual order. So, in essence, they were forcing us to
16 pay higher costs to correct their flawed data. And as soon as
17 they found out that we were able to send it mechanized, the
18 cost factor was reduced and they deemed it unsuccessful and
19 stopped the process. No documentation, just completely stopped
20 the process.

21 CHAIRMAN JABER: Let me make sure I understand. To
22 get back office alignment you thought you had to go through a
23 manual process, no one told you that you could use the EDI
24 system?

25 MR. KOPYTCHAK: Well, BellSouth came to us with what

1 they deemed was a test, and they explained to us how we would
2 then go forward if we could not get what was called a
3 reservation ID in LENS. And we followed that process. That
4 was to send the order manual at higher cost and longer interval
5 dates. When we figured out as we continued to mechanize our
6 services via EDI that we could actually request the loop via
7 EDI with the FRN, BellSouth then found that the manual charges
8 would not apply and they would not be able to redeem the costs.

9 CHAIRMAN JABER: How did you find out you could use
10 the EDI system?

11 MR. KOPYTCHAK: Basically, we tested it. Basically,
12 we sent it through as we continued to interface through EDI and
13 were successful.

14 CHAIRMAN JABER: Thank you.

15 MR. KOPYTCHAK: That's all. Thank you.

16 COMMISSIONER DEASON: If you were successful, then
17 what was BellSouth's problem?

18 MR. KOPYTCHAK: We don't know. BellSouth deemed the
19 test unsuccessful and we lost complete back office alignment,
20 but we felt that it was successful. We needed to continue.
21 And when I held a meeting with BellSouth in my back office, we
22 requested continuation, and they didn't agree. And at that
23 point I wasn't concerned with the inability to send it
24 mechanized, I was concerned with back office alignment so I
25 could get my orders through. The point is that after we had

1 the conference call and agreed to the process, the very next
2 day they then reneged on the process and we lost all ability
3 again.

4 CHAIRMAN JABER: Is the success measured by the
5 technical ability for the systems to be compatible, or was
6 success measured on the costs you were willing to pay?

7 MR. KOPYTCHAK: At that point success was measured on
8 just my back office having a process that they all understood
9 and could get our orders out. I then was going to take the
10 issue and address it with BellSouth with respect to
11 flow-through and mechanized orders.

12 CHAIRMAN JABER: That's it?

13 MR. KOPYTCHAK: That's it, thank you.

14 CHAIRMAN JABER: Thank you, Mr. Kopytchak.

15 MS. CONQUEST: Good morning. I'm Mary Conquest from
16 ITC DeltaCom. I think it is important that I tell you a little
17 bit about myself, and I'm probably the most famous preorder
18 person sitting at the panel this morning because I am the
19 company who has parsed, and I do have a parsing engine. And
20 that is on record with everyone in my testimony and with the
21 FCC.

22 The thing that I think is important for you guys to
23 understand is what does parsing mean. And I have a little
24 short handout in front of you. To each of us parsing is
25 critical in that we need data that is isolated and fielded in a

1 manner that we can use it in our own back office systems. Now,
2 at ITC DeltaCom we have been in Florida about three years now,
3 we have about 25,000 lines. We serve a mixed market in that I
4 have resale accounts, UNE-P accounts, and facility-based
5 services, as well. So our needs are a little bit unusual, I
6 guess, because of that.

7 We also in our own billing systems, we don't use
8 things called FIDs or USOCs, which is the backbone of the Bell
9 process. So as an ALEC, we would have expected to see data
10 that was fielded and given TAGS like a manual ordering form
11 that I would be able to take a chunk of data from one place and
12 move it to another place. Another conception might have
13 been -- for parsing would be that I saw it in EDI format. In
14 my case I do preordering on a TAG interface, but I do ordering
15 on an EDI platform. These are very different tools. And in
16 those tools if I had been doing EDI preordering, I would have
17 expected to see segments, different parsing rules, those kinds
18 of things.

19 So for us to have built a parsing engine was quite an
20 achievement, and we did it for a specific reason and that was
21 we needed to convert in a very fast manner some resale accounts
22 that were currently our own and we were going to take them to
23 UNE-P for pricing breaks. So in order to do that we expected
24 to execute what we thought would be a transparent conversion.
25 We would take a fixed set of rules, build a few tables, create

1 some orders, and wha-la, we would get the bill and the customer
2 would never know what happened. And later today I will talk
3 about what really happened in that scenario, but the result is
4 that the parsing that we do on our end is very limited. And
5 for BellSouth to imply that we can just parse their CSR and do
6 wonderful things with it is really inaccurate. I have tables
7 that have to be maintained. It was a large coding effort for
8 us. In our very best of controlled circumstances I may achieve
9 something like 70 percent success rate. And we have worked
10 really hard at doing this. It gives us an advantage as far as
11 our people, our head count, our ability to flow orders faster,
12 and it was something that we felt we needed to do and we
13 couldn't wait for BellSouth to do.

14 Now, I will tell you that I am interested in
15 BellSouth's parsed CSR. I, too, like AT&T and some of the
16 other CLECs, were not able to take advantage immediately out of
17 the window because I had other coding efforts that had to be
18 addressed for me to stay in business with BellSouth. The thing
19 about BellSouth's parsed CSR that frightens me is the number of
20 defects that are posted on the website. If I go out and look
21 at their website, I see 25 change requests that are currently
22 logged out there, and that raises a red flag to me. It says
23 that as an ALEC that I can expect the TAG APIs that I run my on
24 to be changing from BellSouth. It means that I would have to
25 do test plans with BellSouth. I would have to certify with

1 BellSouth.

2 I do have to migrate to these new TAG APIs, but in
3 doing this I need to be sure that I am moving to a stable
4 environment. I don't want to create issues in my back office.
5 I don't want to create issues with my contact reps. I
6 basically run on English language. And I would note to you in
7 my handout I have sort of an interesting situation. The
8 BellSouth English language is appended to their USOCs.
9 Occasionally I get things such as unknown, yet if I go out to
10 the website and I call up the USOC manual, I can find those
11 USOC codes and I can see a description.

12 I also can go into LENS from time to time and pull
13 CSRs that I cannot pull via TAG. BellSouth acknowledges that
14 this is a defect. So to say that I have a perfect environment
15 because I have created a parsing engine is a misnomer, and it
16 was an effort that DeltaCom felt that we had to move forward
17 and do. The one thing that I would say to you is that we had
18 the privilege of showing our parsing to some of the staff
19 members from Alabama. I would extend that invitation to you
20 and be happy for you to come to Arab, Alabama and actually see
21 first hand what we have done.

22 Do you have any questions that I might ask or answer
23 for you?

24 CHAIRMAN JABER: We may later.

25 MS. CONQUEST: That will be fine. Thank you for your

1 time.

2 CHAIRMAN JABER: Thank you.

3 MR. MONROE: Good morning. Kevin Monroe with Florida
4 Digital Network. In addition to these issues that have been
5 brought before you this morning, one of the things I would like
6 to discuss in regards to preordering with BellSouth is the
7 issue of pending orders, pending service orders on customer's
8 CSRs, or customer service records. What that does when we are
9 attempting to place an order for our customer to move them from
10 the BellSouth network over to our network and there are pending
11 service orders on the customer's account, it delays the actual
12 conversion process that we have in moving the customer over to
13 our network.

14 In many instances there are issues where the customer
15 will have a pending service order that was done weeks ahead of
16 time. In some cases months ahead of time where they may have
17 changed a feature, added a feature, and that CSR, or customer
18 service record, has not been updated to actually show that that
19 has been added to the customer's account at BellSouth. When we
20 are actually provisioning our order or looking to push our
21 order through to the LCSC at BellSouth, requesting to move that
22 customer to our network, we are rejected or clarified back
23 stating that there are pending service orders against the
24 customer's account.

25 We will then attempt to call the customer and find

1 out what orders there are pending against their account or what
2 they have actually added to their account so that we can
3 process the order. BellSouth will not allow us to process any
4 type of order if there are pending service orders on that
5 customer's account. So, conversely what happens that order is
6 kicked back to us, we are left to tell the customer that until
7 BellSouth cleans their record or clears their CSR we cannot
8 move that customer to our network.

9 And, again, in many instances we have given a
10 customer a commitment time of two weeks or three weeks to
11 actually move that service over to us and we are left with
12 nothing to do but wait for that CSR to be upgraded or customer
13 service record to be upgraded with BellSouth so that we can
14 then begin the process to move that customer to our network.

15 CHAIRMAN JABER: Mr. Monroe, if you are in the
16 process of moving the BellSouth customer onto the FDN network,
17 what would -- give me an example of a pending service order
18 that that customer would still have with BellSouth?

19 MR. MONROE: Madam Chairman, there can be numerous
20 pending service orders against that customer's account. One
21 example is a customer may have added a feature such as hunting
22 to their account, and they may have added that feature a month
23 prior to us even beginning conversation about that customer
24 becoming a Florida Digital customer. So the actual event which
25 added that feature to the customer's account would have been,

1 or would have happened two weeks, three weeks, sometime in the
2 future. But the actual update of the record does not happen
3 for another month or so down the road.

4 CHAIRMAN JABER: Okay. So the customer, the
5 BellSouth customer may have received the service he or she
6 requested, but the computer system hasn't been updated, is that
7 what you are saying?

8 MR. MONROE: You're absolutely correct. And what it
9 shows when we present our order to the provisioning group that
10 we deal with, the LCSC, all it shows is that there is a pending
11 service order against that account. It doesn't state in many
12 times what it is.

13 CHAIRMAN JABER: Do you call BellSouth and request
14 that someone verify with the customer whether, number one, the
15 service has been completed, and then, number two, just have
16 them update -- request that they update their computer system
17 to reflect that the service has been completed?

18 MR. MONROE: Madam Chairman, yes. Not only do we do
19 that, but we also have the customer call back to the retail
20 side of the house of BellSouth. That is the group that
21 actually handles that particular customer and request that they
22 get the service order that actually converted that or added
23 that feature to their account. Then we go back to the division
24 at BellSouth that we deal with, the LCSC, and give them that
25 service order number stating that this is the order that added

1 the hunting, if it was hunting to the customer's account, and
2 this is when it actually completed out. You're still showing
3 it as a pending order, though.

4 COMMISSIONER DEASON: Well, maybe you are the wrong
5 person, and I may put BellSouth on notice and maybe they can
6 answer it if you can't. If a customer of BellSouth makes an
7 order to add hunting or something else, obviously BellSouth
8 wants to comply with that because they want to charge that
9 customer. Do they go ahead and charge customers for services
10 if on their CSR it still says pending?

11 MR. MONROE: Absolutely.

12 COMMISSIONER DEASON: So if they are charging the
13 customer, why can't they update their CSR to show that they are
14 now billing for it and the service order is complete?

15 MR. MONROE: That is the question.

16 COMMISSIONER DEASON: So you don't have the answer,
17 BellSouth needs to answer that?

18 MR. MONROE: Correct.

19 COMMISSIONER DEASON: BellSouth, I need that question
20 answered when your time comes.

21 MS. CONQUEST: Madam Chairman, if I might speak in
22 support of Florida Digital. DeltaCom submitted to BellSouth on
23 August 4th of 2000 a request to have the TAG interface enhanced
24 to add a pending service order indicator. I might also point
25 out that prior the LENS system did have a pending service order

1 indicator, but it is not something that you can use to parse
2 with in preorder.

3 And in Release 9.4 on July 28th, 2001, BellSouth
4 actually broke that indicator and it remained out of service
5 until February the 2nd, 2002. Thank you.

6 CHAIRMAN JABER: Mr. Monroe, did you have any other
7 comments?

8 MR. MONROE: No, ma'am.

9 CHAIRMAN JABER: Ms. Lichtenberg.

10 MS. LICHTENBERG: As this Commission is aware, MCI
11 WorldCom is selling UNE-P service here in Florida and in eight
12 other states throughout the country. We have a lot of
13 experience with a number of operating companies. Preorder is
14 potentially the most critical piece of the entire OSS process.
15 Surprisingly enough, customers really don't know where they
16 live in terms of the BellSouth records. They don't know which
17 of the flavors of caller ID they have, or call waiting, or
18 various other features. So a complete and accurate record kept
19 by the operating company is critical to that customer to know
20 what it is he wants to buy from the new company.

21 One of the key problems in BellSouth, as has been
22 explained by the other parties here, is that those records are
23 not updated regularly. That the customer service record that
24 we obtain doesn't match what BellSouth has done with the
25 customer. And that is not just for pending orders placed on

1 the retail side, but for orders that we have placed where we
2 have received service order completion and now the customer
3 would like to add a feature. Yet because those records aren't
4 updated, and because we don't see a pending order in preorder,
5 that customer has to wait to add that feature because my orders
6 reject over and over again.

7 BellSouth has not done anything to bring their street
8 address guide and their customer records into alignment, and
9 those two databases are still not matching each other. That
10 causes preorder questions, that causes customer rejects. These
11 are issues that ALECs brought to BellSouth sometime ago. And
12 rather than fixing the problem itself, BellSouth has decided
13 not to edit against some of those fields. That is fine the
14 first time I issue the order. But when I issue it again to add
15 something and that CSR isn't updated, or those records are out
16 of sync, then you see other problems down the line. And those
17 problems impact customers, and those customers call the ALEC
18 and the ALEC then spends hours on the phone with BellSouth
19 attempting to help them to understand what problem their own
20 systems have created.

21 We hope that this Commission as part of this third
22 party test will continue to work with BellSouth to attempt to
23 bring this information into alignment so that we can have a
24 smooth preorder process and the other processes that we are
25 going to talk about today.

1 CHAIRMAN JABER: Thank you. Are we done with the
2 ALEC panel? Okay, Ms. Boone. We are done with the ALEC panel?

3 MS. BOONE: Yes, Commissioner.

4 CHAIRMAN JABER: All right. The BellSouth panel.

5 MS. COX: Good morning. I'm Cindy Cox. I'm just
6 going to give a very brief introduction and description, if you
7 will, of how we hope to approach the day. What I would like to
8 start with is the message that local competition is strong and
9 growing in Florida and there are a number of indications one
10 from a report issued by this Commission. Why is that important
11 to what we are here to discuss today? It's an indication that
12 the systems we are going to talk about are working and are
13 allowing the ALECs to compete here in Florida.

14 The FCC has in previous 271 decisions recognized, in
15 fact, the importance of actual commercial usage as being really
16 the first indication to look to for system readiness. They
17 recognize that absent such commercial usage you could look at
18 third-party tests, carrier-to-carrier testing, those types of
19 indicators. In Florida we fully expect to have both. You have
20 a third-party test underway, and there will be a lot of
21 commercial usage and performance data for you to evaluate to
22 determine our commercial readiness.

23 And, finally, just one indication of the type of CLEC
24 customer care that we offer. We have a variety of what we call
25 user groups. They are divided really along the interests of

1 the ALEC. We have facility-based user groups; we have about 16
2 ALECs participating in that. We have a UNE-P user group; we
3 have got 58 ALECs participating in that. We have a collocation
4 user group; we have 22 ALECs that participate in that. And we
5 have a resale user group; and we have 11 ALECs participating in
6 that.

7 In addition, we have put extensive documentation on
8 the website, and have a forum, we have conferences every so
9 often to discuss issues with our ALEC customers. As far as
10 today, you will hear from BellSouth on each of the panels a
11 general intro into the topic we are discussing, whether it is
12 preordering, ordering, billing, so on and so forth. And you
13 will hear a response to the concerns that have been raised by
14 the ALEC. You won't hear from each of us on every panel, it
15 will just be the people who need to respond to the particular
16 issues. And we will start off with Mr. Pate.

17 MR. PATE: Good morning, Commissioners. I'm Ron Pate
18 with BellSouth. The first thing that I wanted to just spend a
19 few minutes is giving you some basic information to put this in
20 context when we talk about all of our operational support
21 systems and their operations today. First, as you are well
22 aware of, there is really a two \-step test that the FCC has in
23 place, and that is employing the necessary systems and
24 personnel adequately to assist the competing ALECs to use OSS,
25 and second that demonstrating their operational readiness.

1 From the next slides what I would like to do is just
2 show you some of the commercial volumes that shows that we have
3 employed these systems, and this drives to their operational
4 readiness and performance measures that Mr. Varner may speak to
5 later on. But we have today over 2.5 million preordering
6 transactions on a monthly basis is what we are averaging. As
7 you can see from the slides that I'm presenting, we have a
8 rounded off 1,800 manual loop makeup inquiries that we received
9 last year along with almost 50,000 loop makeup inquiries from
10 an electronic standpoint.

11 When you look at it from an ordering volume on the
12 next slide you will see that we have over 4.6 million LSRs
13 submitted in 2001. This is an increase of approximately 24
14 percent over the prior year. And of those 4.6 million, 4.1
15 million, or roughly 89 percent were submitted electronically.
16 Now, this represents an increase rounded off of 38 percent. So
17 notice that the electronic submission increase is growing at a
18 higher rate than the overall submissions. And the percent of
19 the LSRs submitted electronically was 93 percent for December
20 2001. That was an all-time high. If you look at the fourth
21 quarter as a whole to try to get a perspective you would see
22 that on average 91 percent of the LSRs were submitted
23 electronically.

24 Take a look at the number of ALECs that are using the
25 various systems that we are here talking about today for

1 submission of the preordering and ordering. We have
2 approximately 35 ALECs using TAG, 30 using EDI, and
3 approximately 250 using LENS.

4 The next is just a graphic to show you the growth of
5 the LSR submissions over time, and you can see from this
6 pictorial that the 93.2 percent that we hit, which was a high
7 percentage in December, but you can see overall that you have
8 seen a tremendous growth, a very positive trend in the number
9 of electronic LSRs. This is represented on this chart by that
10 green section. And then the lighter yellow are the manual
11 submissions. The ordering commercial volumes, take a look at
12 it by interface so you can get a perspective of that. In 2001,
13 TAG had over 640,000 LSRs submitted; for EDI 834,000; and if
14 you can see over 2.6 million via LENS.

15 Take a look at the volume of the manual and partially
16 mechanized LSRs, that you may hear a little bit about manual
17 intervention, these are those that end up being processed in
18 the local carrier's service centering, having to be touched
19 there. And on an average month we are seeing about 110,000
20 LSRs based on last year's results.

21 When you look at the mechanized LSRs for UNE-P and
22 xDSL regionwide, that's a growing area of interest. For UNE-P,
23 if you look at all of last year, we had over a million LSRs
24 submitted electronically in some type of transaction associated
25 with UNE-P. For the xDSL you can see that we are having

1 rounded off, 9,400 LSRs submitted electronically. And that is
2 from April, because April was the first month when those could
3 be processed for the year 2001.

4 And just general information on the maintenance and
5 repair. We do offer two systems for the CLECs on maintenance
6 and repair. One is the trouble analysis facilitation
7 interface, that is TAFI, that is the same interface that we use
8 for our retail operations. And then we have an industry
9 standard electronic communications trouble administration, or
10 ECTA. And for general information, 84 ALECs have used TAFI and
11 more than 325,000 trouble reports were submitted via that
12 interface in 2001. We have three ALECs that have established
13 the ECTA interface.

14 Some of the issues raised that I would like to
15 address from the CLECs. Nate, next slide. The CLECs didn't
16 present this to you, but they did have it in their filing, and
17 so I will just quickly go over it. It was the issue that AT&T
18 had raised about getting CFA access or getting the information
19 back on the connecting facility assignments for CFA with use of
20 an access to LFACS. The bottom line to this, the last bullet
21 is the thing we will just point out here that that is scheduled
22 for May 18th, 2002. That is the main thing I would like for
23 the Commission to take away from this. We recognize that we
24 have agreed to do this and we do have it scheduled in Release
25 10.5 for May 18th.

1 Facility reservation number and manual loop makeup.

2 You heard some issues raised here --

3 CHAIRMAN JABER: Can we go back to that previous
4 slide?

5 MR. PATE: Certainly.

6 CHAIRMAN JABER: May 18th, the access to CFA
7 information will not be ready until May 18th, or have you
8 actually started testing it?

9 MR. PATE: They are working on that now,
10 Commissioner, and I don't know the exact phases of their
11 testing, but the release for May is in the works now and
12 obviously has been.

13 CHAIRMAN JABER: If an ALEC was willing to
14 participate in the testing process before May 18th, knowing
15 that the risks -- knowing that the risk would be that perhaps
16 there would be problems, is that something BellSouth would
17 agree to?

18 MR. PATE: Yes, ma'am. We do offer beta testing and
19 do so many times. And if there is a particular ALEC here, for
20 example, AT&T, we would welcome that proposal from them. Plus,
21 I will point out to you that using the CAVE, the CLEC
22 application and verification environment, using that they do
23 have the opportunity to test prior to that release. So that's
24 a tool that at the CLECs request was developed for those very
25 needs.

1 On our next slide it deals with the FRN, or the
2 facility reservation number. You heard some issues raised
3 here. This is a process that goes with manual loop makeup. It
4 is a result of that process by putting the inquiry in for
5 manual loop makeup, that if you get a loop that you find
6 qualifies for your needs, you can get -- you can reserve that
7 loop. And you get an FRN as a result of that. There has been
8 issues discussed about how that process works and what do we
9 need to do. Network Telephone particularly has raised an issue
10 saying they have struggled with this process.

11 I would just like to point out to the Commission that
12 we have conducted five training sessions, free training
13 sessions. We travelled at our expense. One was held here in
14 Florida in Orlando. We also had sessions in New Orleans,
15 Atlanta, and Charlotte, and one at a CLEC forum that we have in
16 Atlanta periodically back last July, and that we offered
17 training to go over this process. How do you use these
18 systems, how do you get this information. We also did two
19 additional training sessions via a conference call on September
20 13th and September 28th, and each of those sessions had a
21 followup call just to give the opportunity to discuss further.

22 Network Telephone raised this issue. They did have
23 seven participants on that very last session on September 28th.
24 And when we came back for their follow-up call on 10/11, they
25 indicated that they had an understanding and that there were no

1 new issues from their perspective. So we deemed that to be
2 successful from their feedback based on that. Plus we had
3 other feedback from other ALECs that essentially said that this
4 training was good, and they found a lot of benefit and
5 improvement in their operations as a result of this.

6 And since November of 2000, just a point for Network
7 Telephone, we have seen one manual loop makeup service inquiry
8 submitted associated with this process. So on the facility
9 reservation number process we feel like we have put a process
10 in place and given thorough training and documentation
11 associated with that. The issue I heard raised from some of
12 the comments was that some of the information they find is not
13 complete or inaccurate in the loops. Well, the information is
14 stored in the LFACS database, loop facility assignment control
15 system.

16 And that information is the same information that
17 would be used for assignment of loops and facilities with
18 BellSouth retail organizations. That information is current
19 and it is accurate as much as our records have it, and we have
20 had major, major efforts to ensure they are current based on
21 using the actual plats which is the main engineering record for
22 the information stored in that.

23 As we have new requests for particular areas where if
24 something is not correct, when that comes to our attention we
25 get that information corrected and we get it in that database

1 so future queries will be receiving that information. But it
2 is the best of the information we have, the records the way it
3 is defined, and that is what will be used for provisioning
4 purposes at the point in time when they actually reserve the
5 facility and submit the order. And from our standpoint we have
6 gone way out of -- our efforts have gone extensive to make sure
7 this database is as accurate as we can get it at this point in
8 time using even for the State of Florida electronic access to
9 the plats records when the information is not in LFACS itself.
10 And we have made tremendous strides here and feel like that
11 process is correcting very well.

12 The CLECs also -- ALECs also raised in their filings,
13 though not mentioned here, some issues with due date
14 calculator. I just want to point out, I have here a little bit
15 of a historic due date calculator just to put it in some
16 perspective so you can see all the way over time and
17 particularly over about the past year the efforts on this
18 particular functionality. The bottom line point is down at the
19 bottom. As of February 9th, which was the last release that we
20 put in that had due date calculator impacts, we are not aware
21 of any known system defects on the due date calculator, so they
22 didn't raise it here as the issue in their comments thus far
23 this morning, so I will just bring that for the Commission's
24 information.

25 Let's spend some time and talk next about parsed CSR.

1 A lot of the information was shared with respect to that from
2 the community. BellSouth has been under a major effort to
3 develop this system to deliver parsed CSR. Now we have always
4 given them the stream of data for the customer service record,
5 and if they so deemed even as they commented here this morning,
6 they have the ability to develop a parsing engine on their side
7 of the interface. ITC DeltaCom has undertaken some of those
8 efforts. But what was requested and what we worked here is to
9 give and deliver to them a parsed CSR. There has been comment
10 made with respect to this, but let's talk about from a historic
11 standpoint a little bit here first some information and maybe I
12 can address some of those comments.

13 The first thing I would like to point out is that
14 from BellSouth's perspective, this effort was successfully
15 implemented on January 25th. We gave a parsed CSR and we were
16 quite pleased with the result. We do acknowledge that at that
17 point in time there were some defects. To be exact, there were
18 23 defects. And those 23 defects, 16 of them were fixed on
19 February 4th, so just a matter of a short period of time later.
20 There still remains open today seven defects. Three of these
21 deal with directory listings, two deal with directory delivery.
22 We have one that deals with the customer code. This is a
23 situation where actually a code shows that the CLECs are really
24 not authorized to look at that account and it's a return of
25 that information. One deals with a trunk group USOC, this is

1 for DID service. And this is dealing with that USOC and
2 feature being deleted for DID service on the blocked numbers
3 all but the first numbers. A little bit of detail there for
4 you.

5 What we do have that we can hand out now or later is
6 I do have detailed information available to the Commission on
7 these seven defects that we will provide to you. I will point
8 out to you that these are based on the change control process
9 criteria. These are qualified as a low impact defect. And
10 what that means is the failure caused inconvenience or
11 annoyance. There are workarounds in place for all of these.
12 We consider these, once again, low. And for these directory
13 listings, for example, if you are submitting a request for a
14 change as is, or switch as is, conversion as is, you have all
15 heard those terms from me before, these aren't even impacted
16 because you are not changing your directory. So it depends on
17 whether there is even an impact at all based on what you have
18 actually submitted.

19 The comment was made that BellSouth delivered the
20 business rules essentially late for parsed CSRs and that
21 impacted the ALECs' ability to actually get their interface
22 working and to test that. And BellSouth has acknowledged that
23 they were late with respect to the criteria as laid out in the
24 change control process. However, at the same time that
25 information was provided in other forums in other documents

1 sufficient for an ALEC to really have developed their system
2 and to be ready to test it. It was provided in a largely --
3 the business rules here was just a restatement. What was
4 provided was some detailed technical requirements that were set
5 forth particularly in the TAG API that was published back in
6 November 19th of 2001.

7 The defects, when you have a chance to look at
8 that -- I'm not going to in the interest of time go into
9 detail -- you will see that they are quite simple, those
10 remaining ones. And that we have targeted those and we have
11 those that are expected to be in the late March time frame,
12 March 23rd at the moment to have those defects fixed, as well.

13 CHAIRMAN JABER: Mr. Pate, there is something I want
14 to make sure I understand. BellSouth acknowledges you were
15 late with respect to providing the criteria to the ALECs, but
16 that information was provided in other formats. What other
17 formats? Did the ALECs know the information was provided in
18 other formats? And then the final question on that point is if
19 it was provided in other formats, then why did you need to
20 establish criteria in yet another format? Help me understand
21 what this information is and --

22 MR. PATE: Certainly. What the ALECs will talk from
23 in their statement, and they are correct, is that we had an
24 obligation to provide them with what is referred to as the
25 business rules. The business rules is the final document that

1 they should be utilizing to develop their programming. And
2 that is the one that we have acknowledged it was late beyond
3 the criteria established by CCP, and we have acknowledged that.
4 The other forums I'm talking about, though, this has been an
5 extensive undertaking as you are well aware of. You have heard
6 it talked about in some other proceedings here. This effort
7 has taken months. Actually it has gone into the years
8 category. So there has been extensive meetings in the change
9 control process discussing this, and information delivered.

10 But specifically the technical document that I think
11 that they would have utilized, has given this information, is
12 the TAG API that was published on the website back on November
13 19th. That was the document that from my viewpoint was the one
14 that had the most detailed information that would have given
15 them what they needed in advance of those business rules to
16 really be developing the interface.

17 CHAIRMAN JABER: Well, if you already had the
18 business rules in some form or fashion on the TAG or EDI
19 system, then why wasn't it as simple as compiling it into one
20 specific area and providing that access to the ALECs? Why was
21 it so hard for you?

22 MR. PATE: I'm not sure that it wasn't so hard, nor
23 was it the overall project and that one particular thing that
24 got delayed, and when it was brought to the individual's
25 attention then they got it developed and put it out there.

1 They should have met it. They didn't, and we are acknowledging
2 that. And that is something that we continue to look at for
3 our efforts because we are committed to that process and the
4 change control to get these business rules out in a time needed
5 for the ALECs to use that information.

6 CHAIRMAN JABER: Okay. And I think you are the right
7 person to ask this as a followup from something Mr. Bradbury
8 said. He said, I think on the same topic, that there was
9 clarification that they needed from you all by last Friday on
10 the parsing CSRs.

11 MR. PATE: Yes, ma'am.

12 CHAIRMAN JABER: And that information that they
13 sought was not provided by last Friday.

14 MR. PATE: I'm not sure specifically what he is
15 referring to. I will be glad to get with Mr. Bradbury and
16 anyone to find out those details, but I'm not specifically
17 familiar with that particular reference he has made.

18 CHAIRMAN JABER: Okay. Well, during a break maybe
19 the two of you can find out a little bit more about that and
20 report back to us.

21 MR. PATE: Certainly.

22 CHAIRMAN JABER: And then with Mr. Kopytchak, he
23 indicated that through their own testing of EDI they found out
24 that electronically they could align their back office systems
25 and BellSouth deemed that unsuccessful and stopped the process.

1 Can you give us some more information on that?

2 MR. PATE: Commissioner, unfortunately I'm not
3 familiar with that situation. He didn't provide any of that
4 that I picked up on his filing with this Commission, so I don't
5 know particularly what he is referring to in that testing.
6 What I do know, and I can only speculate at this point in time,
7 is he is referring to a process that we agreed to, a manual
8 process to do loop makeup and the cost associated with that, as
9 this Commission is well familiar with, is going to be more than
10 if you used the electronic processes. EDI does not have
11 preordering functionality. So there is no way to submit a loop
12 makeup request and, therefore, get a facility reservation
13 number via the EDI process.

14 So somehow they were getting that information through
15 this manual service inquiry process, but then using that, if I
16 heard him correctly, to submit the order via EDI. That is what
17 we have in place for functionality used in that interface. And
18 if I understand him correctly his concern was now we can submit
19 the order electronically so we would be charged an electronic
20 rate and not be charged any rate associated with the manual
21 processing. And while I acknowledge maybe to submit the order
22 electronically based on what he discussed there was still a
23 manual process involved for getting that loop makeup
24 information. And that is probably what is at issue here, and
25 that is me saying that without knowingly any further details.

1 CHAIRMAN JABER: But just your speculation is that
2 they would have had to use the manual process first and put
3 that data into the EDI?

4 MR. PATE: Yes, ma'am. That's what I understood him
5 to say.

6 CHAIRMAN JABER: Well, perhaps you could discuss that
7 during the break, too, and report back to us.

8 MR. PATE: Sure. Certainly. We have a little bit
9 more information that I wanted to share with you on the parsed
10 CSR. There has been one issue that has been raised primarily
11 by MCI to refute 19 fields that we are not providing the parsed
12 format. And I have a handout also on this to give you all the
13 details in the interest of time, but in summation these 14
14 fields, there are -- excuse me, 19 fields -- there are 14 that
15 are not defined in what is referred to as an LSOC format.

16 What I mean by the LSOC format, that is the format,
17 the industry format how that information has to be populated on
18 the local service request. And right now the 14 fields are not
19 defined in the LSOC format on our customer service record or
20 that information that is associated with that does not
21 consistently appear somewhere on the customer service record
22 that we can provide and deliver that in a parsed format. There
23 are also two fields in that customer service record dealing
24 with these 19 that they are used only for transaction
25 validation type purposes, and those we don't retain on the

1 customer service record to provide. There are also two other
2 fields that just aren't on the customer service record, they
3 are just not there. There is one here that is really not a
4 valid field at all on the LSOC. But the information with the
5 details of this we will provide in the form of a handout to the
6 Commission here this morning, as well.

7 That is the information I had from here down to talk
8 with on the preordering standpoint. I think some of my other
9 teammates are going to respond to some other issues raised, and
10 I'm also available to answer any other questions for something
11 we have not addressed.

12 CHAIRMAN JABER: Thank you, Mr. Pate.

13 MR. SCOLLARD: Commissioner Deason, in response to
14 your question that you had earlier about what we do or do not
15 bill for on pending service orders, the answer to the question
16 is no, we do not bill a customer for any services being added
17 prior to that service order being updated to the customer
18 service record. So your assumption is true that we do have
19 every incentive to make sure that those service orders are --
20 any errors that are hanging them up are corrected in an
21 expeditious manner so we can begin billing the customer.

22 COMMISSIONER DEASON: Well, it was alleged that there
23 are matters pending for months on a customer service record,
24 some type of a pending order that has not been closed. And my
25 question -- you are representing to me that as long as that is

1 pending on the customer service record that customer is not
2 charged for that service.

3 MR. SCOLLARD: That is true. The billing systems are
4 built to take the CSR as the base for what we bill any
5 customer.

6 CHAIRMAN JABER: So the customer might be receiving
7 free service on a particular feature for quite sometime because
8 you all haven't updated the customer records. That doesn't
9 strike me as being very efficient.

10 MR. SCOLLARD: Well, I'm not sure of all the reasons
11 for why a service order would be pending. It may be that the
12 customer hasn't received that service yet, so I'm not sure who
13 could answer all of those cases on why they are pending. I do
14 know that if there is an error that is being maintained or
15 being generated because the billing system sees a problems with
16 the order, then we are trying to get those completed as fast as
17 possible, generally within one business day, but sometimes
18 referrals back to the center who is handling the order. The
19 LCSC, for example, takes additional time.

20 CHAIRMAN JABER: Well, let's say -- I don't know,
21 give me an example of what might be pending. I think you said
22 hunting, is that right? Hunting? What does that mean?

23 MS. LICHTENBERG: If I may, I can explain hunting to
24 you. If you are a small business you may have two or three
25 telephone lines, when you're busy on line one and the customer

1 calls you, it hunts for the next available line, which could be
2 line two. So clearly a small business would want to have that
3 feature as they begin to grow and add additional lines.

4 CHAIRMAN JABER: Okay. Mr. Scollard, right?

5 MR. SCOLLARD: Yes.

6 CHAIRMAN JABER: Let's say that a BellSouth customer
7 has asked for a service order on hunting. And a week, two
8 weeks after that you have been notified that Covad has received
9 a request from that same customer to have his service switched
10 to Covad. Why would you not immediately put aside the order
11 for hunting because it has been preempted by the customer's
12 request to change service to a different local provider? Is
13 there something I'm missing?

14 MR. SCOLLARD: I really can't answer that because
15 it's not a billing function. Maybe Mr. Ainsworth.

16 MR. AINSWORTH: Let me give that a try. In some of
17 the investigations through the process that we looked at today,
18 even though there is a pending order there, some of the details
19 that the SMEs looked at where there were still process requests
20 going on from a retail customer, even in the process they were
21 negotiating with a CLEC customer. So it is very difficult for
22 us to make that determination of exactly what the situation is,
23 and that's why we don't process that order at least in that
24 circumstance until that order is purged or that pending order
25 is released. So that is one indication of what we have seen at

1 least on the analysis that we have performed at this time.

2 COMMISSIONER DEASON: Well, how do you go about
3 purging it? Do you have to have some type of -- from the
4 customer indicating that he is or she is cancelling that order?

5 MR. AINSWORTH: Normally, the process today, if there
6 is a pending order there, that is correct, we will go back and
7 clarify that so that the CLEC will get with their end user and
8 they will contact the business office and resolve whatever
9 situation is there. And that is the current process, and that
10 is the process as it stands today. So that they will clear
11 that and then we can process this order through the system.
12 That way there is no question that the end user is, in fact,
13 has been processed through whatever retail process is there and
14 they are ready for that migration.

15 CHAIRMAN JABER: In terms of efficiency, isn't there
16 a benefit -- when you are made aware of those situations where
17 there is a pending service order, isn't it more efficient to
18 just put the customer on a conference call with the ALEC with
19 the BellSouth representative and the customer and address it
20 all right then and there?

21 MR. AINSWORTH: There is a three-party call process,
22 but that actually takes place with retail, also. The CLEC
23 retail and the end user. But, again, that is a retail order in
24 that place, not a wholesale order. So we are the recipient of
25 a downstream process. So we are looking for that to be cleared

1 up on the front end.

2 CHAIRMAN JABER: But that retail order from the
3 customer to the BellSouth representative is affecting the CLEC
4 wholesale operations.

5 MR. AINSWORTH: That is correct. But as a business
6 unit, that is something that would be looked at from their
7 standpoint at least at this particular time from their
8 standpoint to resolve that issue up front.

9 CHAIRMAN JABER: Their standpoint; who is their?

10 MR. AINSWORTH: The CLEC, the retail, and the end
11 user. Because the end user is their perspective customer in
12 that situation.

13 COMMISSIONER DEASON: I guess I'm still at a loss.
14 We have the hunting example, and it is probably a good one to
15 stick with. If a customer, a BellSouth customer contacts you
16 and requests some type of implementation of a hunting service,
17 and that order is pending, it has not yet been completed, and
18 sometime subsequent to submitting that order to BellSouth they
19 negotiate with a CLEC and determine that they want to change
20 providers, and the CLEC contacts you on a preordering basis.
21 Is it because it is preordering and not ordering itself, is
22 that why it is held up because there is something pending on
23 the CSR?

24 MR. AINSWORTH: There is an order pending against
25 that CSR, against that service, yes.

1 COMMISSIONER DEASON: But I guess my concern is is
2 that if the customer, the end use customer, and I'm trying to
3 look at it from his or her perspective, if they have placed an
4 order with you and for whatever reason that service has not
5 been implemented, they subsequently negotiate with the CLEC and
6 want their service switched, why doesn't that -- it gets back
7 to the Chairman's question, why doesn't that take precedence?
8 If that is the latest information on what this end use customer
9 desires, why doesn't that take precedence over anything that is
10 pending from a previous discussion with the customer?

11 MR. AINSWORTH: Well, I guess you're talking about
12 whether or not that CLEC would be authorized to take that
13 process in effect. And the fact is that we are looking for
14 that from the retail customer to resolve that issue up front.
15 It may be --

16 COMMISSIONER DEASON: Let me interrupt. Looking for
17 that from the -- you're looking for the retail customer to
18 contact you to cancel an order before they can switch
19 providers?

20 MR. AINSWORTH: I'm looking for the retail customer
21 to contact a retail, not wholesale. I represent the wholesale
22 entity. I want to make sure that they are satisfied that they
23 are being moved properly and that is their desire. So when
24 that process is handled, then we will process that order.

25 COMMISSIONER DEASON: Well, it may be that they are

1 upset with you because it's taking them three weeks or four
2 weeks to get hunting and they want to change providers.

3 MR. AINSWORTH: I agree with that. That could be the
4 case.

5 MR. PATE: Commissioner Deason, if I may offer also,
6 one of the issues here is we have to be very concerned with
7 what is it that they are actually switching, where are they
8 migrating from. In this pending order we are not sure whether
9 that is supposed to be a part of that or not. That's why that
10 issue has to be cleared up. And when in the preordering mode
11 they get the customer service record, they can tell now by an
12 indicator on that record whether there is a pending service
13 order on there.

14 Now it has already been acknowledged by someone that
15 we had an issue in time for just on the TAG I think it was
16 where that wasn't available. But that has been corrected. So
17 getting that information they should now be able to recognize
18 there is a pending service order. Getting that cleared up so
19 that we really understand, particularly if they are doing a
20 migration as is, what exactly is migrating. And we have to ask
21 them to get that cleared up back through our business office on
22 the retail side so we understand what that new account is going
23 to be on behalf of the ALEC.

24 CHAIRMAN JABER: And you are using they to be the
25 ALECs, so the ALECs have to get that cleared up with your --

1 MR. PATE: Well, the ALEC doesn't, it's that end
2 user. They are going to have to go back to the end user.
3 Because the ALEC doesn't contact our business office, our
4 retail business office. But that end user for the particular
5 customer they are representing at that point in time trying to
6 switch would have to make that contact and get that cleared up.

7 CHAIRMAN JABER: Okay. So the end user needs to
8 contact your retail office and clarify for you what service
9 they want switched and to cancel any orders that are pending.
10 Now, how is it the retail end user knows all of that?

11 MR. PATE: They are going to look at the customer
12 service record and the pending orders themselves at that point
13 in time and make sure they have an understanding with that end
14 user what specifically do you want on this account, are you
15 supposed to have this account at this point in time and get
16 that corrected.

17 CHAIRMAN JABER: Now, how does the end user -- my
18 mother. How does my mother know that she needs to contact the
19 BellSouth retail office to cancel pending service orders?

20 MR. PATE: Well, at that point in time the ALEC
21 talking with that end user would advise them of that, to get
22 back in touch with our retail office, our business office as
23 Mr. Ainsworth referred to.

24 CHAIRMAN JABER: Let me tell you how all of that
25 sounds. Covad gets a call from a customer who wants to switch

1 to Covad. Covad calls your wholesale operations and says I'm
2 ready to switch Lila's mom. Your wholesale office says, oh, we
3 can't do that yet because there are pending retail service
4 offerings that this lady has asked for. Call the customer
5 back. So there is some communication between your retail side
6 and your wholesale side. The wholesale knows that there are
7 pending service offers on the retail side. So Covad goes back
8 to my mother and says, I would love to help you, I can't until
9 you call the BellSouth retail office and cancel those pending
10 service offerings that you requested.

11 MR. PATE: Yes, ma'am.

12 CHAIRMAN JABER: So then my mother calls your retail
13 office and says, you can cancel the hunting service that I
14 asked for. And then does your retail office contact the
15 wholesale side and give the okay to migrate that customer on
16 over to Covad?

17 MR. PATE: They would be able to see -- first, let me
18 answer the question. The answer is no. They don't call back
19 to the wholesale. Instead they take the action necessary to
20 clean up that account so that it is in the proper status for
21 that migration. By initiating the cancellation of those orders
22 or whatever they have to do, then you will be able to see when
23 that activity is taken care of, and the business office, the
24 retail business office would tell that end user approximately
25 when that should take place and be done. Then the ALEC could

1 go back, pull that customer service record again and they would
2 see there is no pending service order at that point in time and
3 they can process their transaction for that migration.

4 CHAIRMAN JABER: That sounds completely bureaucratic,
5 inefficient, and lengthy just to put you all on notice.

6 COMMISSIONER PALECKI: Mr. Pate, if you had a
7 situation where when you received the preorder that even if
8 there is a pending service order, you would transfer the
9 service to the CLEC, but also transfer the service order to the
10 CLEC, if that was the case, could the CLEC then do whatever
11 service is necessary? And using the hunting example, could
12 they then provide that customer with the hunting feature?

13 MR. PATE: If I understood your question correct,
14 once that transfer takes place they could do it in addition to
15 providing the hunting for that.

16 COMMISSIONER PALECKI: So a possible solution for
17 this problem might that be if BellSouth receives the order that
18 they simply transfer the customer to the CLEC, and also
19 transfer the request for whatever service they have made a
20 request of BellSouth. And that way it is up to the CLEC to
21 provide whatever additional services that customer would want.

22 MR. PATE: In that scenario you described, if I am
23 understanding correctly, the ALEC would be accepting
24 responsibility for that conversion. And we won't know nor will
25 they know without that input from that individual end user if

1 that is appropriate. That's what I hear you proposing.

2 COMMISSIONER PALECKI: Well, we are looking for
3 solutions here. Can you think of any other possible solution
4 that would allow for the transfer of the customer in a timely
5 manner to the CLEC?

6 MR. PATE: I think that is something we will have to
7 take a look at for alternative solutions. I hear the solution
8 you proposed as being one. Of course, we have discussed our
9 solution, which is to -- the one person that really knows what
10 should be taking place on that account is the end user. That's
11 why we were asking for their involvement for that end user to
12 help us get this straightened out.

13 COMMISSIONER PALECKI: What if the problem is that
14 your customer service record is just not updated? You have
15 already provided the hunting feature, but it's not in your
16 database.

17 MR. PATE: And that's one of the things that we would
18 be trying to determine right up front with the end user. It's
19 not supposed to be on there through that discussion, then we
20 are going to get that straight, get that canceled or whatever
21 the appropriate action. That's what we are trying to have
22 occur so we can get that right. And, unfortunately, we don't
23 know, we really don't know without talking to the end user.

24 COMMISSIONER PALECKI: Well, if you can glean any
25 other additional possible solutions, I don't know if we're

1 going to have written briefs or anything after this?

2 CHAIRMAN JABER: Commissioner, that's one of the
3 things I wanted to talk to all of you about at the very end of
4 this, so how about we play it by ear. Let's see how many
5 questions we have outstanding and reevaluate where we are at
6 the end of the workshop. It may be during the break that a lot
7 of these questions can be answered.

8 COMMISSIONER PALECKI: Because this seems as if it
9 would be a solvable problem. And obviously at least two CLECs
10 have raised this as something that has been a difficulty they
11 have been having. And it just seems as if there should be a
12 way it can be fixed.

13 MR. AINSWORTH: If I could comment, I think we are
14 open for discussion. I think, too, again, I want to make sure
15 that we cover all the bases here. Because even on a pending
16 order situation, I know in conversation listening to CLECs they
17 are looking for a good CSR, they want that CSR updated. And,
18 again, that process in trying to get whatever pending orders
19 are out there completed could impact that.

20 So let's say we are adding the hunting. Let's say
21 it's not there, but the end user wants it. And if that order
22 were to get canceled and not put on there, how do we assure
23 that that end user ultimately gets the service that they want.
24 Now, if we can process that order, if that is the process to
25 complete that, then the CSR gets updated. And if they do a

1 switch as is, it will be there. If they are not interested in
2 carrying that service over, then that order can be canceled and
3 we can process that order. So there is some logic behind the
4 concept of what we're doing, but we will be glad to discuss
5 anything in that process.

6 COMMISSIONER PALECKI: Well, Mr. Ainsworth, would it
7 be logical to say that if this customer has requested to be
8 switched to a CLEC, that that would absolve BellSouth of the
9 responsibility of providing that service?

10 MR. AINSWORTH: It would. And that statement, that
11 would be a true statement up to the point that it may absolve
12 BellSouth. But, in fact, if the end user doesn't get what they
13 ultimately want then it could be perceived that we didn't
14 process that transfer properly and that could come back in the
15 form of a complaint to us, even though the CLEC were involved.
16 And I guess the whole idea is we are trying to get that process
17 and that order as clean as we possibly can before we process
18 it. It's not just a black and white issue. We are really
19 trying to process it efficiently and effectively.

20 CHAIRMAN JABER: That goes back to my question of if
21 you are trying to get that confirmation, which I understand
22 that, if you are trying to get that confirmation from the end
23 user, you get on the phone with the end user with the CLEC and
24 you make sure that there is a meeting of the minds. And you
25 document that the consumer said, I have canceled my order on

1 hunting or I did receive the feature I requested.

2 COMMISSIONER BAEZ: Madam Chairman, I just have a
3 couple of questions, and I guess it is to anyone. One question
4 from the CLECs. This may go back to something that
5 Commissioner Palecki was mentioning earlier, and I just want to
6 understand the process. When a CLEC is speaking to an end
7 user, do they have the customer service record before them
8 realtime?

9 MS. LICHTENBERG: Let me speak for MCI WorldCom,
10 since we deal primarily with residential consumers. We attempt
11 to pull up the CSR to our desktop so that we can see it. Until
12 the parsed CSR was available, we had no way to really do that
13 and to see it, and with the outstanding defects we are still
14 looking at how to do that. We order what is called migrate as
15 specified, and in that case we review with the customer what
16 they want. The pending order that is being discussed here is
17 generally, in our experience, and I have an example here, very
18 often an order that we issued for that customer and that
19 BellSouth has not completed the migration. And the reason for
20 that is that they haven't updated their billing system.

21 We know it is our customer, yet our order gets
22 rejected. If that customer calls back to BellSouth retail, one
23 of two things is going to happen. Either BellSouth retail will
24 say, no, I'm sorry, we cannot help you here. You are an MCI
25 customer and we will look very stupid, or BellSouth will use

1 that opportunity to say if this is a problem, why don't you
2 come back to us.

3 MCI has proposed a solution to this called a billing
4 completion notification. We requested it through change
5 control and BellSouth turned us down. It exists in other
6 operating companies, Verizon and SBC to name two. It would
7 tell us, at least on the orders that we placed, when that
8 customer has migrated to us and the billing change has
9 completed. Without a billing completion notifier we would know
10 the order was pending and we would be able to deal with it.

11 We see as CLECs on both our own wholesale side where
12 BellSouth has some database mismatch that we cannot identify a
13 significant number of rejects for these pending orders. With
14 the BCN at least we would know our own orders were completed.

15 COMMISSIONER BAEZ: You are creating a whole
16 different scenario than the example we have been talking about
17 here.

18 MS. LICHTENBERG: Well, I think this is the scenario
19 of your mother. She migrated to me, and for all intents and
20 purposes, the migration is done. I've got a completion notice.
21 But BellSouth didn't finish the work in their billing system.

22 COMMISSIONER BAEZ: No, now you are tripping over
23 your -- now you are just tripping over your own order. Your
24 own order is keeping you from being able to migrate.

25 MS. LICHTENBERG: Right. But just as your previous

1 order when you ordered from BellSouth, my order is getting the
2 same issue from BellSouth and there is no way I can fix that
3 one.

4 COMMISSIONER BAEZ: Okay. But back up a second.
5 Hang on. Hang on. Back up a second. My original question was
6 when you're talking to the end customer, can you see -- do you
7 have any information before you that says there is a pending
8 service order against this record?

9 MS. LICHTENBERG: No. And in this particular case,
10 if we were to say to the customer do you have any pending
11 orders, they would say no. And we have seen that a number of
12 times, because --

13 COMMISSIONER BAEZ: So the only point at which a
14 pending order against a customer account arises is after you
15 place an order for migration?

16 MS. LICHTENBERG: That is correct. And the order
17 rejects and the reject code says pending order.

18 COMMISSIONER BAEZ: Now a question for BellSouth.
19 And maybe I'm oversimplifying here, but when I want to change
20 my long distance carrier, I give the new long distance carrier
21 permission to talk to the local company in order to switch my
22 PIC. Why does that kind of system -- why does that kind of
23 process not work in this instance?

24 MR. PATE: Commissioner, to answer your question,
25 that hasn't been the process we have put in place because we at

1 that point in time are not going to be talking to that end user
2 because we don't view them, since it is being switched to an
3 ALEC, as our customer. We view them -- the customer from our
4 perspective is the ALEC and their customer is that end user.
5 And I would be willing to say that really the ALECs don't want
6 us talking to their customer, at least not without them being
7 on that phone with us at that point in time.

8 COMMISSIONER BAEZ: But the process that exists now,
9 or the different hoops a customer has to jump in right now as
10 you all have described, you do have to come in contact with
11 that customer. The end use has to call you and say, you know
12 what, I am migrating; it's okay to take that pending order off.
13 So, I mean, that's the way it exists now, and I guess I'm
14 asking why can't the process be that once I am sold on a new
15 service, I'm switching service, I can hand over authority. In
16 essence, however they verify it. I mean, again, going back to
17 the long distance scenario.

18 Why can't I just as a customer say, yes, I like you,
19 I will switch to you, you guys handle it and here is whatever
20 authority you need in order for you to deal with it. And part
21 of it can be you have authority to cancel whatever pending
22 orders I have with my current provider or you have authority to
23 inherit those pending orders from my existing provider. Why
24 can't that solution -- you know, why can't it be as simple as
25 that for a customer instead of my having to mediate between the

1 two providers involved?

2 MR. PATE: Well, as Mr. Ainsworth already said, we
3 are welcome to look at different approaches like that. Our
4 interest frankly is in protecting that consumer, that end user
5 to make sure that what is on their account is what they are
6 authorized.

7 COMMISSIONER BAEZ: No, and I appreciate that. I
8 guess I'm trying to think of how do we simplify it, because I
9 have counted at least three different volleys back and forth in
10 order to change a customer over based solely on the fact that I
11 may have changed my mind, as a customer I may have changed my
12 mind two weeks later that maybe I don't want BellSouth's
13 service.

14 MR. PATE: Certainly.

15 COMMISSIONER BAEZ: Whether it includes hunting or
16 not. I don't want it, I have made a decision to switch. Why
17 can't that be my end decision? Now, all of a sudden I've got
18 to follow it. It can't be as simple as changing your mind or
19 accepting that there is a better deal or another preference out
20 there.

21 MR. PATE: And, once again, we will be welcome to sit
22 down with the community and look at such other options. I've
23 got to make one point here to make sure that it is clear. I
24 heard what Ms. Lichtenberg said about she did not have any
25 means to look at a customer service record prior to BellSouth

1 having the parsed CSR in place and that is just not an accurate
2 statement. They could use the LENS as it was and actually call
3 that up using the LENS system and see it right there while they
4 are talking to their end user if they so desired. So that is
5 available to look at so that it can be recognized up front that
6 there is a pending service order and start to deal with it
7 right then and there so it doesn't become an issue.

8 COMMISSIONER BAEZ: So what you are saying is that
9 there is an opportunity for the ALEC to have information on
10 pending orders, meaning something that would be a barrier right
11 now to be able to switch cleanly, that that information is
12 available now and you are suggesting that they are looking at
13 the wrong -- they are accessing the wrong database?

14 MR. PATE: Well, I'm not suggesting they are
15 accessing the wrong database, I'm just suggesting that Ms.
16 Lichtenberg said she did not have the ability to do that until
17 BellSouth delivered the parsed CSR, and I'm saying that is not
18 an accurate statement. What I did also point out earlier,
19 there was a point where we had a defect and the pending service
20 order was not appearing. That defect is corrected today and
21 working properly, as well, also. So to say that you don't have
22 it is not an accurate statement. It is available and it is
23 available now. And whether you used a parsed CSR format or you
24 query via LENS getting the unparsed format, or even using TAG
25 getting the unparsed format, it's there.

1 I also want to point out, too, that I'm hearing two
2 things getting mixed up here. I'm hearing one dealing with
3 migration of a customer from the retail side to the wholesale,
4 and that's how this conversation initially started. But there
5 also is the issue here recently raised where they say, I think
6 Ms. Lichtenberg was describing it, if she already had a
7 migration in place and then there was a pending service order.

8 Well, now we are talking about a different scenario.
9 We're talking about that we had those transactions go to our
10 local carrier service center where there is a pending service
11 order account and you submit another order. It's to look at it
12 to make sure we don't have duplicate orders, we are trying to
13 process properly here. To me that is a whole different
14 scenario, and I didn't want to get that confused here.
15 Actually, an ALEC should know what their pending service orders
16 are in those cases and should be on top of that.

17 CHAIRMAN JABER: Mr. Pate, I think the Commissioners
18 recognize that that was a whole different scenario.

19 MR. PATE: All right.

20 CHAIRMAN JABER: Then in an effort to move this
21 along, let me just say, though, that whether the ALEC can pull
22 up the information on the LENS system or not doesn't take away
23 from the fact that the Commissioners have counted at least
24 three volleys in the steps. So even if the ALEC pulls up the
25 information on the LENS, it doesn't eliminate the delay in

1 switching that customer. And, again, in an effort to move it
2 along, I think, Commissioners, Mr. Criser is sitting in the
3 audience and I'm sure he senses the Commission's desire to
4 solve this problem that we have identified.

5 Ordering.

6 MR. AINSWORTH: Commissioners, could I take just one
7 quick second? I'm sorry. There is two issues that were
8 covered in Mr. Pate's I would just like to comment on briefly,
9 if I could.

10 CHAIRMAN JABER: Quickly.

11 MR. AINSWORTH: Quickly. One is Covad mentioned on
12 the preconditioning. I just wanted to make note that we will
13 be meeting with them and discussing that issue further. And I
14 believe that was in the process of conditioning the line once
15 the order had taken place, and we are going to be listening to
16 more or having more conversation in that particular area.

17 And the other one was on the CFA that Mr. Pate
18 presented about being able to utilize a release that was going
19 in for that. I also wanted to make you aware there is a CFA
20 website out there that CLECs can use now to identify their
21 facility assignments into the collocation. So briefly I just
22 wanted to add those two comments.

23 MS. BOONE: Network Telephone will actually be
24 leading the ordering plan for the CLECs, ALECs.

25 CHAIRMAN JABER: Thank you, Ms. Boone.

1 MR. KOPYTCHAK: Thank you, Commissioner. Before I
2 get started, I would just like to say that Network Telephone is
3 based in Florida. We have 65,000 lines serving small and
4 mid-sized businesses in eight of BellSouth's states, and we are
5 doing that with a voice over DSL platform.

6 I will quickly at a high level go through what you
7 see on the screen as flowthrough, total system fallout,
8 BellSouth internal system errors, invalid clarifications, and
9 ADSL USOCs. What you are seeing before you here is the
10 disparate flowthrough treatment that BellSouth has against
11 Network Telephone. And I won't belabor this, but if you just
12 look at April and then drop all the way down to December's
13 repost, you will see that BellSouth's flowthrough is 88 percent
14 while Network Telephone is 58 percent. And if you go all the
15 way down to the December repost, you will see that it is the
16 same, 87 to 72 percent. You have from 30 percent to 15 percent
17 disparate treatment for the last seven, eight, or nine months.

18 COMMISSIONER PALECKI: Could you explain real world
19 what that disparity results in?

20 MR. KOPYTCHAK: Yes, Commissioner. Sure. This is
21 with respect to the electronic flowthrough of mechanized LSRs
22 that we send in, and we have requested BellSouth identify and
23 assist us in clearing up some of this flowthrough for the
24 rejected orders once they flowthrough if they for some reason
25 get kicked out and they do not flowthrough the system without

1 manual handling. So, the bottom numbers that you see with
2 BellSouth is actual BellSouth aggregates, and the top numbers
3 that you see in yellow are Network Telephone's numbers. And
4 BellSouth has been unable to address with us exactly why our
5 flowthrough is the way it is.

6 Is it clear for you? The next slide here -- and,
7 again, I won't belabor the busy slide -- but what we are seeing
8 here is the total mechanized LSRs from April to December, and
9 then the fourth column from the left, the total system fallout.
10 As you can see for Network Telephone, and we will start with
11 April and then we will just go all the way down to December.
12 But in April there was 444 orders that fell out; 357 were
13 BellSouth's fault, or 79 percent, and then 90 were Network
14 Telephone's fault.

15 So, while BellSouth is affecting 26 percent of our
16 total LSRs, they are affecting 79 percent of the overall
17 fallout. And that has been since April since I started
18 tracking. This is PMAP data. Any questions there?

19 What this next slide shows is that in April of 2001,
20 BellSouth identified the six following area codes as BellSouth
21 internal errors. To date those errors have remained or
22 actually gotten worse. And what the next slide shows is that
23 those are the -- to the far left those are the six area codes
24 that I have identified. And if you see when the April task
25 force took them over, two of the errors that affect us mostly

1 are the 8820s and the 8825s, which are the bottom, in April
2 there was 156 errors. To date there is 10,758. The 8825s, in
3 April there was 12,000. To date there is 17,592, just down
4 from 22,000. So, in essence, the flowthrough task force has
5 not improved these internal system errors that BellSouth has
6 identified and that are affecting our orders.

7 COMMISSIONER PALECKI: Whose numbers are these?

8 MR. KOPYTCHAK: These are out of the PMAP system
9 website.

10 COMMISSIONER PALECKI: So would these be BellSouth?

11 MR. KOPYTCHAK: BellSouth. These are BellSouth
12 numbers, yes. And the next slide is the actual errors that are
13 affecting our orders. So combining the error codes that
14 BellSouth has identified as internal system errors with respect
15 to our total mechanized LSRs, you can see that the last three
16 months, October, November, and December from 30 percent to 25
17 percent of BellSouth's errors are affecting our orders.

18 One of the problems that we are having is invalid
19 clarifications. And invalid clarifications are when BellSouth
20 queries questionable entries on the local service requests. So
21 when we send in an order, the order has to be valid or correct.
22 If it is incorrect for whatever reason it is sent back to us.
23 As a result of the Fleming island and the Birmingham LCSC
24 centers we believe BellSouth is sending the orders back with
25 invalid clarifications. To address these issues our back

1 office has to spend hours and hours, sometimes days on the
2 phone trying to get these aligned.

3 The effort that is involved in clearing up invalid
4 clarifications are tremendous. And what we have noticed is
5 that about 30 percent -- and I only have January's data before
6 you, but about 30 percent of total overall clarifications are
7 actually invalid. So when BellSouth comes to you and deals
8 with the actual error codes, notwithstanding the six that they
9 have identified as internal, these will be clearly affected by
10 the 1,000 error codes with respect to -- and in the PMAP
11 database they will suggest that 97 and 99 percent of the 1,000
12 error codes are the cause of the CLEC. But if you adjust for
13 the invalid clarifications that number with respect to CLEC
14 responsibility will far decrease, so your overall flowthrough
15 will actually even be lower.

16 And just to let you know exactly how some of these
17 invalid clarifications have affected some of our back office, I
18 will introduce you to Chubby. And Chubby had a little problem
19 with some of our back office clarifications, so as you can see
20 he took up smoking and we had to kind of move on around in
21 invalid clarifications.

22 With respect to the ADSL USOC, the ADSL USOC is
23 almost an issue that we were just speaking about with pending
24 service orders. It is almost in alignment with that. There is
25 several different matrixes of scenarios with respect to the

1 ADSL USOC and pending service orders. When the ADSL USOC or
2 AD111 is on the CSR, the CLEC is blocked from transferring the
3 service. We have tried to deal with BellSouth on several
4 occasions and, again, don't have back office alignment in this
5 area.

6 Removing the ADSL USOC, at some points the customer
7 does not have ADSL, but the pending service order is on the CSR
8 which prohibits us from transferring the service. Other times
9 when we want to transfer the entire service the customer has to
10 call and request that the ADSL be brought down, so they lose
11 that window or that time period that they have to bring it down
12 because they have to contact BellSouth to bring it down, then
13 we have to bring the loop up. So whatever transfer time is
14 involved, the customer will actually lose their ADSL service
15 and that has been a large issue.

16 Those are just some of the areas within the specifics
17 that we have dealt with. And I just threw those in there to
18 give you some of the specifics in all of the states on the
19 service that has affected our transfer. And that's all I have
20 for that area.

21 CHAIRMAN JABER: Thank you.

22 MS. BOONE: Commissioners, I would like to take a
23 moment -- my name is Cathy Boone with COVAD Communications --
24 just to step back and tell you a little bit what it's like to
25 be Covad here in Florida. If you will turn to slide six of the

1 Covad handout you will see a pie chart that represents how many
2 of our orders -- we order three types of loops. We order line
3 sharing, which is analogous to what the BellSouth retail
4 service is; we order ADSL loops, which are a plain copper
5 second line for customers; and then we order the IDSL loop.

6 Now, as you will see from this pie chart, over the
7 past six months 43 percent of our orders in Florida were IDSL,
8 and BellSouth has no electronic interface for ordering those
9 and that means we have to fax the orders to BellSouth. Once
10 they get to BellSouth, they are retyped into the BellSouth
11 systems. Then they flow through the BellSouth systems and
12 then, for example, any notification we get telling us when they
13 are going to deliver the loop, or telling us that there is a
14 problem, a pending facilities problem, or jeopardy, all of that
15 has to come back in a manual format. We think of it as like
16 the ghetto of manual processing, because once you're in it, you
17 can't ever get out of it.

18 Now, I understand from BellSouth today that there was
19 a release last week which may address our IDSL problem. It is
20 going to allow us to put in an order on the front end that then
21 falls out manually in the LCSC and then later on sometime in
22 September we may get a full flowthrough. But, as of today with
23 Covad this is a huge issue.

24 Now, I would like to also tell you that if you look
25 at the line sharing percentage, BellSouth estimates that about

1 20 percent of its loops will require conditioning. You have
2 heard me talk about conditioning. It's one of my favorite
3 topics. So 20 percent of these line share orders we are going
4 to ask BellSouth to do some conditioning on. Now, when we
5 request that, that order cannot be submitted manually. So, it
6 is another piece of that line sharing pie that has to go
7 through the fax machine.

8 Then you look over here at the ADSL loop. That is
9 about 30 percent of our orders. Again, when we request
10 conditioning on those loops, about 20 percent of them, we will
11 have to submit that order via facsimile, as well, because
12 BellSouth does not have an electronic interface to accept any
13 conditioning orders.

14 I also want to add that BellSouth has a new
15 nondesigned loop product called the unbundled copper loop
16 nondesigned. That is the UCL-ND. That is a product that we
17 are moving to for the second line service which is basically
18 just, you know, we wanted a copper loop without the bells and
19 whistles, and this is the copper loop without the bells and
20 whistles. The difference in Florida in price is the ADSL loop
21 is \$112 nonrecurring, and the UCL-ND is 44. So that is a big
22 improvement for Covad. The downside is there is no electronic
23 means to order it. So if we want to go for the cheaper loop,
24 then we are going to incur higher manual ordering costs and we
25 are going to lose efficiency that way. It's kind of like one

1 step forward and two steps back.

2 If you turn to the next page, I just want to
3 highlight some of the difficulties we have found with the
4 manual processing. First of all, the ordering charge is
5 different. It's 3.50 versus \$10 here. In other states, like
6 North Carolina, the difference is 3.50 to \$26, so you can see
7 that right off the bat a manual process is very, very
8 difficult, making it very difficult for us to compete here.

9 As I said, once you start with the manual process,
10 everything down the road is manual. The FOCs, the changes, the
11 jeopardies, disconnects, everything. And also a manual process
12 BellSouth has allowed a longer period of time to return the
13 FOC, that results in a longer delivery interval for our
14 customer. And manual processes are just labor intensive on
15 both sides.

16 The next slide, Slide 8 lists the different types of
17 loop products that there is no electronic ordering for. And I
18 just want to be clear that BellSouth is the outlier, they are
19 the only incumbent carrier in the country that does not allow
20 us to order the IDSL loop electronically, conditioned loops
21 electronically. Also BellSouth has a retail product that is a
22 business DSL product on which they do condition loops. And
23 that, according to my understanding, is also able to be ordered
24 electronically on the retail side.

25 I just want to say that I don't believe BellSouth got

1 600,000 DSL customers in this region last year by faxing
2 orders. So we are in a position where we are competing with a
3 company that has a full flowthrough electronic ordering system
4 and we simply do not.

5 The next page, Slide 9 is a quote from the KPMG
6 report in Georgia. When KPMG first evaluated DSL ordering in
7 Georgia, it looked at just this plain old xDSL loop, the ADSL
8 loop, for example. And what they concluded at the time they
9 did the evaluation was that if we had to order via facsimile
10 while BellSouth could order mechanically, that was
11 discriminatory, period. That was all there was to it.

12 Now, they later closed that exception because
13 BellSouth rolled out electronic ordering for the ADSL loop.
14 They didn't do any testing on how that works in the Georgia
15 test, but I just think it's important to note that their
16 initial analysis of a retail process that was electronic versus
17 a wholesale process that was manual concluded that that was
18 discriminatory. And KPMG in Florida has opened a number of
19 exceptions on manual problems, everything from problems with
20 the LCSC to volume responses. Slide 10 talks about the
21 different exceptions that are currently open in this test that
22 have to do with the inherent difficulties and the inherent
23 discrimination when there are manual processes versus
24 electronic.

25 CHAIRMAN JABER: How did Georgia address Exception

1 108?

2 MS. BOONE: Well, as I mentioned, the exception was
3 closed on the basis of the presentation of documentation from
4 BellSouth that electronic ordering for that loop type was
5 available. That was it. It was based on documentation and
6 nothing else. So they did not -- actually it's kind of a long
7 story, but the Georgia test, the scope did not include
8 electronic ordering of DSL because at the time they wrote the
9 scope there wasn't any electronic ordering. So basically they
10 were looking at just the process evaluation.

11 You know, that is by far our largest ordering problem
12 is the manual versus mechanized, but I also have a slide in
13 here, Slide 11 that details what we experienced last summer
14 when we moved into the LENS viewing (phonetic) system for the
15 two types that we could order electronically, and that is line
16 sharing and ADSL. You know, there was no test environment at
17 that time so we were submitting live orders. What we found was
18 a series of defects, some of which were known to BellSouth.
19 That we couldn't supplement orders, for example, in a certain
20 status. That was a known defect. And there were other defects
21 that BellSouth wasn't aware of which leads us to question what
22 kind of testing had been done on line sharing and ADSL orders
23 prior to saying it was ready for CLEC ordering.

24 One thing we are concerned about is that we have not
25 seen exceptions from KPMG that revealed this. This went on for

1 a period of the entire summer last year. Trial and error.
2 Sending in changes, BellSouth making changes with business
3 rules and other things. We filed in this docket a huge set of
4 E-mails and a big chart chronicling the problems that we have
5 had with LENS. And I believe at that time KPMG was supposedly
6 submitting orders for line sharing and ADSL through all the
7 interfaces and we did not see these come up. So that sort of
8 raises the question to us, you know, because in that sense the
9 test did not reflect the commercial experience that we had.

10 That's all I have unless you have some questions.

11 Thank you.

12 CHAIRMAN JABER: Thank you, Ms. Boone. Who is next
13 on your panel?

14 MR. BRADBURY: Jay Bradbury, AT&T. Our portion has
15 two parts. I'm going to talk first about BellSouth's continued
16 reliance on manual processing and that impact on the industry.
17 Bernadette Seigler will follow me with the impact on AT&T. You
18 should have a 13-page set of comments from me. There are a few
19 charts in there that I will refer to briefly. My
20 presentation -- both of the folks in front me have touched on
21 some of this, so I will try to present only new information.

22 CHAIRMAN JABER: You know, Mr. Bradbury, I was
23 looking for your comments earlier. Maybe the Commissioners do
24 have copies, but I don't. Do you have an extra one?

25 MR. BRADBURY: We will make sure that you get one.

1 CHAIRMAN JABER: Wait, I take it back. That would be
2 the cover page that has your symbol clearly marked on the
3 right-hand side.

4 MR. BRADBURY: Okay. The overall percentage of ALEC
5 LSRs that actually result in the creation of a fully mechanized
6 service order by BellSouth hasn't changed significantly since
7 March of 2000. It was 55 percent then, it is 57 percent now.
8 I've got what I call pie charts at Pages 4 to 6 that depict
9 that information in more detail.

10 BellSouth will tell you, well, that's not quite fair
11 because there is CLEC contribution to that, and that's true.
12 So the other information that we will show you later will take
13 that out. The percentage of ALEC electronically submitted
14 orders has also not changed. The November results are typical,
15 and I've got a chart we will show you. In November, the
16 combination of BellSouth's designed fallout where they have
17 made the conscious decision to have an order submitted
18 electronically but not processed electronically, and BellSouth
19 system errors where the system is designed to process it, but
20 fails to do so was 19 percent for non-LNP orders and about 38
21 percent for LNP orders.

22 In total today one-third of all ALEC orders still
23 receive manual processing at the LCSC whether we submit them
24 manually or electronically. The flowthrough task force really
25 has not had any impact on this this year, and is unlikely to do

1 so in the future. I've got what I call snake charts on Pages 7
2 to 10 that depict this. On Page 7, you will see a chart. This
3 is the non-LNP data. And, again, all of this data is directly
4 from BellSouth's reports. You can see -- and if I start, you
5 know, beginning of the year and look at the end of the year,
6 there has been no improvement in any of the three methods by
7 which you might measure BellSouth's performance.

8 On the bottom actual percentage of service orders,
9 which is the real customer impact, it's what the customer sees
10 regardless of who is responsible. In the middle you see the
11 line for achieved flowthrough. This is a measurement that
12 takes out the CLEC's errors. It does not penalize BellSouth
13 for the CLEC's errors. Then on the top is a measure that
14 BellSouth produces that they now call flowthrough. They used
15 to call it CLEC error excluded. The big thing it does is it
16 takes out BellSouth's unilateral design decisions not to allow
17 things to flowthrough. There was no improvement this year.

18 Page 8. The primary reason there was no improvement,
19 there was no improvement in the two components that BellSouth
20 is totally responsible for, their design decisions and their
21 operation of the system. The next two pages simply show you
22 the same data for the LNP type orders. You have got a much
23 broader spread because BellSouth's design decisions here cause
24 a much larger percentage of LNP orders to fall out for manual
25 processing.

1 COMMISSIONER PALECKI: On the charts on Pages 7 and
2 8, what happened in July?

3 MR. BRADBURY: In June, July, and August of last
4 year, BellSouth went through a series of changes to the
5 methodology they used to report the data. I don't consider the
6 data for June, July, and August to be accurate. However, I
7 have reported it as they reported it in their revised filings
8 to the FCC.

9 Again, the flowthrough task force manager for
10 BellSouth has indicated on two occasions recently that the
11 CLECs can simply expect to see more of the same as we grow our
12 market share and use portions of BellSouth software that
13 apparently have not been tested or subjected to high usage in
14 the past. What happens? All of this stuff goes to the LCSC.
15 The load on the LCSC remains high and most of that load is from
16 the fallout from electronic ordering. In fact, 69 percent of
17 the load at the LCSC is fallout from electronic ordering, and
18 BellSouth is responsible for 82 percent of that 69 percent.

19 What happens? We get longer intervals. We now have
20 an order that we submitted electronically, it has arrived at
21 the LCSC. It is now called a partially mechanized order.
22 Whereas on a fully mechanized order I will get a FOC or a
23 rejection on average within 15 minutes, on a partially
24 mechanized order that average is 18 actual clock hours.
25 BellSouth now reports that in business hours, and they take

1 exception with how I arrive at the current average. But I will
2 tell you they have the data for the actual, but they have never
3 presented it since they stopped reporting it last year. And at
4 that point I will tell the rest of the presentation over to
5 Bernadette Seigler.

6 MS. SIEGLER: Hello. My name is Bernadette Seigler,
7 and I haven't spoken to you before, so just to give you a brief
8 history, I am responsible for operating support systems with
9 AT&T, making sure that we can order and interconnect with
10 BellSouth. And so I am very involved in preordering, ordering.
11 I also participate in change control and some user groups.

12 Some of the additional issues that AT&T has been
13 impacted by with these manual processes, they definitely impact
14 and increase our operating expenses in conducting work with
15 BellSouth. For example, in October and November of last year,
16 we received invalid clarifications, we had 619 customer lines
17 that were negatively impacted because there was a wrong entry
18 in a table at BellSouth that caused these orders to fall out,
19 and it delayed our ability to bring the customer to AT&T.

20 When these orders get to the LCSC, they have the
21 opportunity to introduce errors to the orders. They manually
22 type the orders in, but they do not always match what we sent
23 on our order. So creating customer problems, they don't get
24 the features they requested or they don't work right, and can
25 even end of delaying the service to the customer.

1 BellSouth provides manual clarification -- excuse me,
2 incomplete manual clarifications, and we call it serial
3 clarifications whereby you get an order clarified, only one
4 error is mentioned. You correct that, send it back to
5 BellSouth, and then you get another error. And that error
6 existed on the previous version of the order. And so it is a
7 serial clarification. I believe BellSouth has even used that
8 term in our last visit to the LCSC to describe that experience.
9 It just absolutely increases the operating costs and delays the
10 customer's desire to get to AT&T.

11 AT&T has experienced the challenge that Kyle
12 Kopytchak talked about with Network Telephone about the ADSL,
13 the USOC appearing on customer records. We have participated
14 in the UNE-P user group forum, and have brought that issue up
15 there. We have got -- a process was provided to us, a number
16 to call at BellSouth, the DSL services group. We are supposed
17 to call them to find out who the DSL provider is to that
18 customer, even though the customer tells us he doesn't have
19 DSL. When we go through this process, the people that answer
20 the phone there at BellSouth, they don't have any of the
21 answers to the questions that we were told they would have.
22 And so this is something that is currently open and we are
23 waiting additional explanation from BellSouth as to how do we
24 handle the circumstance when the USOC is on the account, but
25 the customer says they don't have it.

1 BellSouth has provided some tools that are supposed
2 to help improve the ordering process, but when they are
3 delivered in a poor manner when it is defective code, we don't
4 get the benefit of what that tool was supposed to bring in the
5 beginning. Migration by TN and name. It was implemented, but
6 there were problems. The reject rate was about 30 percent.
7 You know, BellSouth stated up front that that was going to
8 cause problems and it wasn't going to work. 64 percent to 99
9 percent were going to run into problems and it did. I'm just
10 looking to make sure I don't repeat other issues.

11 CHAIRMAN JABER: Ms. Seigler, there are situations I
12 would hope in a true competitive market where you are migrating
13 a customer from Covad, Florida Digital Network, whoever to
14 AT&T. What do you do in the situation where there might be
15 pending service orders there and also when a customer account
16 shows something on it that the customer says they don't have?

17 MS. SIEGLER: That's a really good question and I
18 don't have a direct answer for that. There is another person
19 at AT&T that has responsibility for that interaction, so I'm
20 sorry, that's outside of my scope.

21 CHAIRMAN JABER: Well, the ALECs collectively, if you
22 will after lunch tell me how you address those sorts of
23 concerns with each other in migrating customers. Because it
24 occurs to me that we are not just changing the customer from
25 BellSouth to your company, but you are also changing the

1 customer from ALEC-to-ALEC, so I would like to know how those
2 processes work.

3 MS. SIEGLER: Okay. BellSouth had had a problem with
4 the Dudek calculator (phonetic), and as I had stated that code
5 was finally delivered on February 9th, but there are still some
6 issues with that. UNE-P was affected, but there are some
7 issues related to resale orders, so that issue still exists.

8 And, in general, BellSouth has system outages and
9 they are reported. In January, for example, there were nine
10 system outages in LENS, TAG had four, EDI had two, and CSOTs
11 had five, the different systems that we use to interact with
12 BellSouth. And stability and dependability are critical
13 factors for us to be successful, and these challenges are just
14 additional obstacles for us to overcome.

15 Do you have any other questions?

16 CHAIRMAN JABER: Thank you.

17 MS. LICHTENBERG: Let me tie this up by talking a bit
18 about the customer experience. And, Madam Chairman, I will try
19 to answer your CLEC-to-CLEC migration question, as well.

20 CHAIRMAN JABER: Thank you.

21 MS. LICHTENBERG: MCI sends all its orders via
22 electronic data interchange. That's what we call EDI. We
23 don't send orders manually, we do not use LENS because that
24 would require our sales reps to have multiple terminals on
25 their desk. Type over here, type over here, and get confused

1 in between. So, we use the TAG system to try to do address
2 validation, and we don't use LENS unless we are going back in
3 to try to figure out what happened with one of our
4 clarifications.

5 BellSouth uses the term clarification to mean what
6 other ILECs call rejects. I send an order and BellSouth says
7 no, that one is no good, you can't have it. Try again later.
8 We see that a significant number of what we have said -- of
9 orders that we have sent manually -- I'm sorry, sent
10 electronically fall to manual in the local service center and
11 we receive what we call invalid clarifications. That is, even
12 though BellSouth has finally agreed to do migrate by telephone
13 number and house number, we get a clarification back because we
14 spelled Sherrie with an I-E instead of a Y. It's not something
15 they are supposed to edit on. Or because the community name is
16 missing. It is not something they are supposed to edit on.
17 Getting that clarification back requires that I redo and resend
18 the order. Of course, if it falls to manual again, these
19 untrained reps will probably reject it one more time.

20 We had been sending every week a list of these
21 incorrect clarifications to our account team, but we then
22 discovered that they weren't getting to the LCSC, so we
23 couldn't help the LCSC do their training. We are now sending
24 them directly to the operations assistant vice-president in
25 Atlanta and she is putting additional representatives on to try

1 to correct a problem that we have seen since we launched in
2 Georgia in May.

3 I'm afraid, though, that she said she wasn't hiring
4 additional staff, so I do apologize to my ALEC colleagues.
5 They will be focussing on me, and your invalid clarifications
6 may go up. The point here is that the orders fall to manual,
7 and manual processes are very difficult. Because in the
8 BellSouth world, my EDI transmission turns into two separate
9 service orders in the BellSouth system. A problem we expect to
10 see fixed in the April time frame. And one of them apparently
11 may be correct and the other may not be. And you have
12 representatives who have no idea what EDI is attempting to make
13 correct orders that will result in the customer migrating.

14 But what happens is either the migration doesn't
15 happen because we get in an endless loop, or the customer does
16 migrate, but one order doesn't catch up with the other and
17 there are problems, or the wrong features are put on the order.
18 Important features like blocking of calls to 900 and 976
19 numbers.

20 When there is a pending order past migration, the
21 situation I was talking of before, a CLEC is only aware that we
22 have received a service order completion. But that is only a
23 completion of the physical migration, it is not the completion
24 of the change to that CSR. When a CLEC migrates to another
25 CLEC, if we are talking about UNE-P or about resale, then

1 BellSouth is in the middle and BellSouth is responsible for
2 updating the CSR on both sides of the equation.

3 If I, for instance, have a customer that I am taking
4 from Z-Tel, when I pull the customer service record and get the
5 information and send it in, if there is an order that BellSouth
6 has not completed for Z-Tel, my order will reject. But I need
7 to go to BellSouth to resolve that issue. If a customer is
8 leaving me and going to another ALEC, and I am not informed by
9 BellSouth via a line loss report that the customer has left me,
10 then I generate additional problems because I don't know the
11 customer isn't mine anymore.

12 These are problems that other ILECs have worked
13 through and worked through with the ALEC community. And worked
14 through I must say much faster than we have seen here. The
15 continuing manual fallout isn't improving. And there may be
16 some reasons indeed why orders ought to fall out for manual
17 processing, but the LCSC needs to be trained not to reject back
18 to me orders that I sent correctly in the first place.

19 One more issue that we are seeing, we know that there
20 is manual fallout, and early in our launch we asked BellSouth
21 to work through to take a random sample of 100 orders that we
22 had sent in and to tell us why did they fall to manual. We
23 learned a great deal from that sample both in terms of system
24 flaws on the BellSouth side and on errors we were making.
25 Since this problem has not gotten better, we have asked our

1 account team again to give us 100 random orders, or even 50 if
2 100 were too much work, that fell to manual and to explain why.
3 Last week on our account team conference call they absolutely
4 refused. I don't know why. But only when I can identify what
5 is causing these orders to fall to manual can I attempt to fix
6 the problems.

7 CHAIRMAN JABER: Mr. Monroe.

8 MR. MONROE: Thank you. Kevin Monroe again with
9 Florida Digital Network. BellSouth is going to tell you that
10 they have made interfaces available or that they will soon be
11 making new ordering interfaces available to us. The issue that
12 I have is not so much the order interfaces that they do or do
13 not have, but more importantly the lack of communication, the
14 lack of updates and lack of correct databases on the BellSouth
15 side. We have issues that range anywhere from freezes that are
16 put on accounts to the ADSL USOCs being on accounts. We have
17 got -- excuse me.

18 CHAIRMAN JABER: You know, this may be a good
19 opportunity actually to go ahead and break.

20 MR. MONROE: Okay. Just a quick follow-up.

21 CHAIRMAN JABER: Sure. Finish your thought. I was
22 just trying to give you an opportunity to get some water and
23 give us an opportunity for a break.

24 MR. MONROE: Okay. That's what I was worried about.
25 That's fine if you are ready to break.

1 CHAIRMAN JABER: I think we are. Commissioners, how
2 about we come back at 12:20. We are going to count this as the
3 lunch break, you all. Thank you.

4 (Lunch recess.)

5 CHAIRMAN JABER: Let's go ahead and get started. Mr.
6 Monroe, where we left off you were coughing. Are you ready to
7 get started?

8 MR. MONROE: Yes. Madam Chairman, thank you for
9 allowing me the opportunity to find my speaking voice there. I
10 will be brief. The point I was trying to make or wanted to
11 make before the break there was that regardless or
12 irregardless, I guess, of the changes that BellSouth makes in
13 their ordering interfaces with the ALECs, or already
14 implemented changes that they may have made, the point still
15 remains that unless they continue to focus or put more focus on
16 their internal processes and fixing those, then we are still
17 going to have customers -- customers like George Gonzalez here
18 who has had an ADSL USOC on his BTN which prevents us from
19 migrating that particular telephone number over to our account,
20 over to the Florida Digital side. Mr. Gonzalez from Home
21 Finders says actually tried to move his service over to us back
22 in the November time frame, and to this date there is still no
23 movement on getting the ADSL USOC or ADSL taken off of his BTN,
24 so we are unable to migrate him at this particular point.

25 In addition to that, moving the ADSL USOC off of

1 customers BTN and customers actual service, we also have
2 issues where customers are being clarified in error based on
3 having the ADSL USOC on there. And what I mean by the ADSL
4 USOC, it is a digital subscriber line that basically says that
5 this particular customer has a digital subscriber line on their
6 particular main telephone number, which is their BTN, or on a
7 fax number, or on a number of different telephone numbers that
8 they have on their actual account.

9 And in attempting to get that removed it is very
10 difficult in dealing with BellSouth. This particular customer
11 has actually filed a complaint with the PSC against BellSouth
12 to actually have this removed. And that is CATS Number
13 (phonetic) 422818T, like Texas, where they have gone as far as
14 attempting to resolve the issue with BellSouth by calling
15 directly to the retail side of the house, which is a process
16 that they mentioned earlier that the customer should do, to no
17 avail. The USOC was not removed from the customer's account.
18 In addition to that, again, I mentioned that they did actually
19 file with the state a complaint to have it removed, and as of
20 the 8th of January that still had not been removed from the
21 customer's account.

22 COMMISSIONER DEASON: Mr. Monroe, why is it there to
23 begin with?

24 MR. MONROE: To be honest with you, I'm not certain
25 in this particular instance, because the customer states that

1 they have never actually had DSL service on that account.

2 COMMISSIONER DEASON: Was the customer billed for the
3 service?

4 MR. MONROE: No, the customer was not billed for it.
5 Now, how it actually got put on there, again, anybody's guess
6 is as good as mine. But in trying to get it removed through
7 the different departments of BellSouth and the different hoops
8 that they have to jump through, it has just been ridiculous for
9 the customer to say the least. And to the point where the
10 customer has decided not to even migrate that telephone number
11 over to Florida Digital Network. They felt that they were not
12 getting anywhere in contacting BellSouth, so they just decided
13 to go ahead and keep it there.

14 In addition to migrating ADSL type services which we
15 spoke about, and I won't belabor that point, customers also
16 have what are called local freezes that are on their accounts,
17 as well. Local freezes works in much the same way as a PIC
18 freeze or a freeze to change your long distance service over.
19 It's a freeze that prohibits anyone from converting local
20 service over. And, again, we have numerous examples of
21 customers that have attempted to port their service over to
22 Florida Digital Network only to find that we are being
23 clarified or our orders are being rejected because there is a
24 local freeze standing on the actual account with BellSouth.

25 And, again, the process that we have gone through

1 with the customer, the end user was -- conferenced them up with
2 the retail side at BellSouth in attempts to get that local
3 freeze removed off of there. The customer is given an actual
4 order number to remove that local freeze off of there. We, in
5 turn, go back to the LCSC, our ordering department within Bell,
6 give them the service order number that removes that so that
7 they can see that the customer has done what BellSouth has
8 requested them do, and again it is to no avail. The freeze is
9 still remaining on the account in many situations.

10 COMMISSIONER DEASON: Let me ask a question. Are you
11 indicating that there are freezes being placed without the
12 customer's request, or is your concern that there is a
13 legitimate freeze in place and it will not be removed promptly
14 at the customer's request?

15 MR. MONROE: It is actually both, Commissioner. In
16 some instances there is a legitimate request to freeze the
17 account so that no one can actually move it over except the end
18 user with an LOA from whatever company he is porting over to.
19 And then in other instances the customer or consumer is not at
20 all aware that there is a freeze on the actual account. In
21 either instance, with the proper LOA and proper documentation
22 any ALEC should be afforded the opportunity to move that
23 customer over if that customer is requesting that they switch
24 to that particular ALEC. Again, the LOA process should provide
25 for that so that there is not any type of clarification against

1 the account or any type of delay in moving that account over to
2 the requesting ALEC. Thank you.

3 MS. CONQUEST: Okay. I am Mary Conquest with ITC
4 DeltaCom. My market is really business predominately, small to
5 medium-sized business. I would like to begin by answering your
6 question about the CLEC-to-CLEC experience, if you don't mind.
7 In our scenario, BellSouth in their billing system they have a
8 repository of all of our CSRs, but I'm not authorized to see my
9 friend Covad's, or Network Telephone, or any of the other
10 CLEC's CSRs.

11 For that reason typically when I assume a customer, I
12 choose to return them back to BellSouth. Simply it makes the
13 experience more streamlined and safer for my customer. I have
14 lots of concerns about directory listings. I don't want my
15 business customers omitted from the directory, and I need to
16 insure that doesn't have. So one of my safety nets in doing
17 that is sending the customer back to BellSouth and then I use
18 my usual standard process for migrating them into me. In doing
19 that I do assume some financial responsibility. I do have to
20 pay a month's minimum service and compensate the charges for
21 doing that. But yet it gives me a safer, better customer
22 service, so I am willing to do that.

23 There was some dialogue at one time in the change
24 control group about whether it would be appropriate for us to
25 exchange records with one another, and we were never able to

1 resolve that. There are issues among us about protecting our
2 customer base and what we are marketing and those kinds of
3 issues, so I'm not sure that if I saw a CSR from my friends on
4 the other end of the table that I would even be able to read it
5 or translate it in the manner I need to. So for that reason I
6 choose to send them back to BellSouth and then assume them.

7 CHAIRMAN JABER: Wait. You can't read them and
8 process them because of a technical difference, a
9 system-to-system difference, or --

10 MS. CONQUEST: I don't know what is on their back end
11 systems. As long as I'm picking them up from BellSouth and
12 they are a resale customer and I have a standard format for
13 that record, then I am better able to serve the customer.
14 BellSouth has their documentation about what the data fields
15 are, what the USOC stand for, those kinds of things. Were a
16 CLEC to come to me, let's turn it around and say my friends
17 came to me and asked for a CSR. They would not see anything at
18 all familiar to them. I have no FIDs, I have nothing that
19 flows to the provisioning systems. Instead of USOCs, I have
20 four numerics that flow to my billing system. They would have
21 to understand all of those components of data and it is just
22 too complex to exchange all of that with one another. So since
23 in the resale arena that data already exists in a standard
24 format, it's just a business decision that we choose to send
25 them back to Bell and then assume them.

1 CHAIRMAN JABER: Recognizing that there may be delay
2 in that process.

3 MS. CONQUEST: Right. Exactly. And, of course, you
4 know, we go back to in the ordering scenario there are a lot of
5 issues that can really occur, and you have to be very careful.
6 So you do try to do what is very best for your customer because
7 one of the biggest challenges we have is not only establishing
8 a footprint, but it is establishing our credibility because we
9 are not known. We haven't been around for all of these
10 hundreds of years. So if we can, you know, show to our
11 customers, demonstrate our good faith, then we do have a chance
12 of keeping that customer and doing good service for that
13 customer.

14 COMMISSIONER DEASON: Do you see any irony in that?
15 I mean, you are here complaining about the BellSouth system,
16 but you're saying it's the best system out there.

17 MS. CONQUEST: Well, no, I'm saying it's not the
18 best; I'm saying it's -- what I am geared to you, as I go to
19 other ILECs --

20 COMMISSIONER DEASON: Well, you just said that the
21 system is in place, you are more -- even though you have to pay
22 a month's service charge to do that, it is worth it to you
23 because you have more confidence that it is going to be
24 successful.

25 MS. CONQUEST: No, I can parse it. There is a little

1 different rule there. And I probably misstated that. I can
2 bring it in electronically and work with it is what I'm saying.
3 I can apply business rules that I currently have developed and
4 support and I don't have those business rules and those records
5 available to do that with other carriers' records.

6 CHAIRMAN JABER: So what you are saying is
7 recognizing that the BellSouth system may have faults --

8 MS. CONQUEST: Correct.

9 CHAIRMAN JABER: -- that is still better as a process
10 than competitor-to-competitor switching?

11 MS. CONQUEST: Given today's environment, yes. If we
12 were to ever grow up to be, I think, like more of an access
13 arena and we were consistent in how we tagged our data, and we
14 were consistent in our record format, then I think it would be
15 a doable thing for us to exchange with one another. But given
16 today's standards or lack of standards, it makes it very
17 difficult.

18 CHAIRMAN JABER: Well, what are we going to do
19 like seven years from now when more and more companies become
20 facilities-based, or the dependency on the BellSouth system is
21 weaned away? What is it we do as a state to help you
22 facilitate the migration from competitor-to-competitor?

23 MS. CONQUEST: I think we adopt a standard set of
24 operating or ordering procedures like we have done in the
25 access arena and that we tag those clearly with the data tag

1 and we exchange that information based on those fielded data
2 tags. And then at that point I think we have something that is
3 apples-to-apples.

4 CHAIRMAN JABER: That concludes the ALEC panel on
5 ordering.

6 MS. CONQUEST: No, wait, I have one more thing.
7 Sorry, I have one more thing to talk to you about. If you turn
8 to the second sheet of your handout on the ordering issues, I
9 wanted to -- and I will do this very briefly. I apologize for
10 taking so much time. We have had, I guess, a chronic problem
11 with hunting at ITC DeltaCom. It is something that has been
12 documented and we have been working on for like 11 months.

13 We continue to see that is one of our highest rejects
14 in our ordering scenario, and I was kind of interested when we
15 were talking about your mother in the hunting pending order.
16 We basically continue to have changes in this arena. Most of
17 our programming and support changes have been as a result of
18 things that have been done to hunting. In fact, I will note
19 the second bullet there, if you look BellSouth has recently
20 expedited a feature because negatively impacting the CLECs end
21 users and the bill. This is something that has been going on.
22 We pointed out issues with hunting as early as March in the
23 UNE-P user group, and we are just now getting some resolution
24 to this.

25 It is so bad that we have actually been calling our

1 service manager and giving them lists of orders that had
2 hunting for them to manually walk them into the LCSC to have
3 changes made. So we are just concerned that there are things
4 about hunting that we don't seem to find clearly documented
5 that are difficult for us to work with. And we look forward to
6 BellSouth putting in these changes and improving that
7 relationship.

8 We also are victims on the CSRs in that we frequently
9 see things on the CSR that have either been omitted or added
10 that were not on our original orders. And as a result of the
11 workshop in Louisiana, we had entered into a work-around
12 agreement where each week on Wednesday we sent a list of CSRs
13 that had BellSouth errors over and they actually corrected
14 those for us. Again, we need those CSRs corrected in order to
15 do business with our customers accurately. We were told with
16 the new account team structure that that process was no longer
17 valid, that we would have to call those corrections in to the
18 center, we would no longer be able to send them on a list and
19 we could only call in five at a time. Extremely resource
20 intensive. We have since escalated that and BellSouth has
21 agreed to continue taking our lists, but we have approximately
22 30 percent of our list on CSR corrections or hunting issues.

23 Do you have any questions?

24 CHAIRMAN JABER: I am just really fascinated with
25 what you just said about migrating the customer to BellSouth

1 when you are transferring from ALEC-to-ALEC. You are actually
2 creating an opportunity for the customer to have a conversation
3 with BellSouth in that process, aren't you?

4 MS. CONQUEST: Yes, we are.

5 COMMISSIONER PALECKI: Is the consistency that you
6 mentioned something that you believe this Commission should
7 strive for? Should we put rules in place to -- you mentioned
8 in answer to an earlier question that you would like to see
9 consistent business processes, consistent data tags, is that
10 something that we should strive for through this Commission?

11 MS. CONQUEST: In my opinion it is. It is something
12 the industry needs to strive for. It's one method by which
13 small companies like mine can help control business expenses
14 and maximize our productivity. Otherwise, I mean, it's very
15 difficult.

16 CHAIRMAN JABER: But why would you not start an ALEC
17 collaborative? You know, on the left-hand you're saying it is
18 bad to create opportunities for the customer to talk to
19 BellSouth because of whatever alleged mischief might happen in
20 that conversation, why would the ALECs not band together and
21 find a process that allows you freely to migrate customers
22 amongst each other?

23 MS. CONQUEST: Well, I think most important is in the
24 past there has been a very, very small number of CLEC-to-CLEC
25 migrations. As a rule if the customer becomes disgruntled they

1 have a tendency to go back to the old faithful footprint that
2 they are familiar with. So the volumes are small at this point
3 in time. That's not to say that ten years from now that would
4 be the scenario, but I think it is very important that the
5 service offerings as we go forward I think become more
6 sophisticated. One of the biggest marketing tools that you
7 have as an ALEC is packaging your services. It's how you
8 market to your customers. And so different packaging and
9 different pricing arenas that are going on with one set of
10 services in one CLEC and another set in another, as you go
11 forward they do become very complex to understand. And the
12 customer frequently is really just interested in what you can
13 do for the bottom line, particularly in the economy.

14 CHAIRMAN JABER: I would imagine though the customer
15 would even get more frustrated if all he knows is he is
16 switching from Covad to ITC, we have got to at some point deal
17 with BellSouth. That would just create more confusion for the
18 customer, I would imagine.

19 MS. CONQUEST: We discuss that in our transition with
20 the customer and we try to explain to our customers why we are
21 doing that and the fact that we compensate them for this change
22 and that it is a transparent thing. And we tell them up front,
23 you know, the time frame that we will be doing that is a short
24 time frame. It gives us a chance to do the things we need to
25 do with our systems. You know, in the access side of the house

1 there is a forum called the ordering and billing forum, or the
2 OBF. I think that has probably brought a great deal of
3 consistency to the table. At least that seems to be a good
4 exchange of how to do things. And I think as we mature we will
5 probably find ourselves having if not an ALEC OBF, an OBF of
6 some type that will help us grow to this consistency.

7 MS. LICHTENBERG: Commissioner Palecki, if I could
8 respond to that. This is a problem primarily that we see in
9 the world of true facilities in the world of loop. As I said
10 before, with UNE-P and with resale it is less of an issue
11 because the customer still resides on the BellSouth switch. I
12 think your suggestion is very well taken. And in other
13 markets, such as the Verizon markets, CLECs have worked
14 together to create a CLEC-to-CLEC migration process and have
15 also worked with the local company to put that process into
16 effect because certain things do have to take place, for
17 instance, in terms of the local number portability when you use
18 a loop.

19 It would be very helpful, I think, if this Commission
20 could help the CLECs to put together a forum amongst ourselves
21 where, as we have done in New York, we have contacts to get
22 CSRs from each other and we put them together, not necessarily
23 electronically, because a number of CLECs do not do electronic
24 business, but we are able in New York and we are working on it
25 now in the SBC region to create a format that allows us to

1 share information with each other. We have been so
2 concentrated on trying to get the customer to us in the first
3 place that we do need to start growing up and moving towards
4 that sort of a collaborative world.

5 COMMISSIONER PALECKI: Thank you.

6 MR. MONROE: Just a quick followup, if I may.

7 Representing the facilities-based CLECs, one of the reasons
8 that we do not actually have to migrate the customer back to
9 Bell as some do is because one of the things that we do when
10 you are porting a customer, a facilities-based customer from
11 one facilities-based CLEC to another, one of things that we try
12 to do is reuse the facilities that are out there.

13 The problem we have in doing so, the Bell technician
14 when he goes out there typically goes out there and sees that
15 those particular circuit IDs and facilities are already being
16 used out there, so they just complete their ordering and don't
17 do anything with actually porting the customer over to our
18 service. So the way we get around doing that as opposed to
19 migrating the customer back to BellSouth, what we typically do
20 is go ahead and order brand new loops out there. So if the
21 customer has we will say five telephone number out there and
22 five circuit IDs that are associated with those, or five loops,
23 let's say, we actually go ahead and order five additional loops
24 so that we can actually put the customer -- start the customer
25 out brand new on our service, on our circuit ID so that we

1 don't have to worry about passing the customer back and forth
2 between BellSouth out there. Thank you.

3 CHAIRMAN JABER: Who is doing the BellSouth panel?

4 MR. SCOLLARD: Commissioners, what I would like to
5 propose is since MCI has raised the question of delayed CSR
6 posting in both the preordering and ordering comments, I would
7 like to address that now, although we had planned to do it in
8 the billing section, if that's okay.

9 CHAIRMAN JABER: Go ahead and address it now.

10 MR. SCOLLARD: Okay. And this is the case -- there
11 were a couple of scenarios being discussed in the prior
12 conversations, and this is the case where a service order has
13 completed the physical steps to move the customer from one
14 entity, BellSouth, to a CLEC. And then what happens to that
15 service order and information prior to the time that it
16 actually does post the CSR.

17 I guess the first comment I would like to make is the
18 processes for updating the CSRs for retail and wholesale are
19 the same. The billing systems, CRIS and CABs, take the
20 information that is handed to it from the ordering systems and
21 then formats that information onto the databases and the
22 billing systems, and that serves as the underlying information
23 for the CSR.

24 Generally, an order that has completed the physical
25 processes, it is also error free at the time, will post in the

1 CSR generally within one cycle, and one cycle I mean a business
2 day. Monday through Friday, not including the six holidays
3 that we have. There are a couple of situations that can cause
4 extra time to be taken in posting the CSR. First of all, the
5 systems themselves are batch systems, and by that whatever
6 service orders are ready to be extracted to go into the billing
7 system on the cutoff time on each business day, which is
8 generally in the evening, 5:00 o'clock, 6:00 o'clock, actually
9 come down into the billing systems themselves.

10 The first situation that might cause extra time is
11 those databases underlying the CSR data are also actively
12 involved in pulling the bills for all of our customers, whether
13 they are retail or wholesale. So there are time frames
14 immediately before the bill period activity and immediately
15 after, one day before the bill period day and one day after.

16 And by bill period, let's say an account is in the
17 19th bill period, which would be tomorrow. Well, the activity
18 to produce the bills that are in the 19th bill period are
19 actually starting today using the CSR draining off the
20 information, and extend through Wednesday to finish up all of
21 that processing. So those service orders that are issued in
22 that time frame are going to hold up waiting on all the bill
23 period activities to complete. So it could take as many as
24 three days based on the bill period timing on posting the CSR.

25 The second thing is that the billing system itself

1 could detect an error on that service order for a number of
2 reasons, and there is a group within our organization working
3 on those errors and correcting them as they happen. Generally,
4 those errors happen about a percent to a percent and a half of
5 all the service orders we see in the CLEC world, and that is
6 comparable to what we see in our business customers, because
7 the accounts are large and complex and there is a lot of
8 transactions going on all at one time. So those two situations
9 can add some additional time.

10 If a service order comes down and is not updated on
11 the CSR prior to the accounts bill period, then automatic
12 adjustments are made to generally in this case the retail
13 customer, or the CLEC if it is going CLEC-to-CLEC to take into
14 consideration on the bill the fact that the order is coming
15 through and posting a day or several days later to make sure
16 that the billing is actually effective on the date that the
17 physical work to move that customer was performed.

18 MCI has brought up an issue about a billing
19 completion notice which would be information back to the CLEC
20 on the status or when that order actually is updated to the
21 CSR. One of the concerns BellSouth has is that that issue has
22 not been addressed by OBF to make it more of a standard type of
23 process, although BellSouth is willing to reconsider, you know,
24 the BCN as part of the change control status that we have now.
25 So that is just some information on the CSR posting within the

1 billing systems.

2 COMMISSIONER DEASON: You mentioned change control
3 status. What is that?

4 MR. SCOLLARD: Yes. That request is in the BellSouth
5 change control process.

6 COMMISSIONER DEASON: The request to have billing
7 completion notices?

8 MR. SCOLLARD: Yes.

9 COMMISSIONER DEASON: Okay. So you are reviewing
10 that at the present time?

11 MR. SCOLLARD: Yes.

12 CHAIRMAN JABER: Do you want to pick up from your
13 presentation and go back to some comments that were made on
14 ordering?

15 MR. PATE: Yes, Commissioner. Ron Pate. I would
16 like to add some comments, please.

17 CHAIRMAN JABER: Go ahead.

18 MR. PATE: I'm going to first address it from a
19 presentation approach as we were responding to some of the
20 filed comments by the ALECs, and I think that will also deal
21 with some of their comments today, as well as I will have some
22 additional comments in response to other things that they have
23 brought to our attention.

24 One thing I did want to just share with the
25 Commission is telephone number migration. This is an issue

1 that MCI as well as AT&T had commented on in their prefiled
2 material here, and I wanted to bring just to your attention
3 that the telephone number migration process was successfully
4 implemented on November 3rd of 2001. And with that
5 implementation there was a minor defect and that was fixed on
6 November 17th, just a couple of weeks later. And that defect
7 impacted we estimated about 30 percent of transactions.

8 This is a request where WorldCom was one of the main
9 initiators behind this. They wanted to be able to migrate or
10 switch as is an account just based on the telephone number.
11 They didn't want to have to enter the address information and
12 go through an address validation. So we processed this and
13 accommodated that request and the whole effort was to impact,
14 reduce errors as a result of migration. That benefitted
15 obviously the end user customer and MCI and the other ALECs and
16 it impacted and benefitted our operations, as well.

17 And from what we can tell, the last point I have on
18 this slide is there appears to be having an impact here, as you
19 can see about one-third of decline has resulted in the total
20 reject not of clarification rates. Now, I understand that
21 there are other things in that rate that could impact it
22 besides TN migration, however we think having this in place has
23 had a very positive impact based on these results. So we
24 wanted to share that with the Commission.

25 Another item on the next slide that we have here

1 deals with interactive agent. And I didn't hear any of the
2 ALECs comment on that today, but it was in their prefilings,
3 particularly WorldCom. And they were asking for consideration
4 to have this in place. Interactive agent is a preordering form
5 for EDI, which is what WorldCom uses for their ordering and
6 BellSouth does not have it for preordering today. Just a
7 little bit of historic.

8 Back in 1998 we started working on the development of
9 this with WorldCom, and in February 16th of '99 they asked us
10 to postpone that development of this functionality at that time
11 based on their business reasons and needs. And, of course, we
12 so obliged. And then they reopened this request through the
13 change control process in September of 2000. And the change
14 control process through its process and detail prioritized that
15 as 21 of 36 preordering and ordering change requests at that
16 point in time. That is the reason why today our resources are
17 not working on the development of that. So it's in the change
18 control process. And when the CLEC community as a whole gets
19 it prioritized at the level where it is high we will be working
20 on this. That's just why the response or comments that we
21 haven't put it in place today, that is the logic and where it
22 stands, but it is in the change control process.

23 Next let's talk about manual processing. There has
24 been a lot of statements made about the volume of manual
25 processing and that its excessive is essentially the message

1 being delivered by the ALECs. First off, I want to say that
2 overall from BellSouth's perspective the ALEC orders enter
3 BellSouth's systems, they flow through at a very high rate, and
4 we think that there is actually a minimization of the actual
5 manual handling involved in today's environment. You have seen
6 this issue before. It was dealt with very extensively in
7 arbitration here, and I pointed it out in one of the points
8 here on this slide that particular docket and what you ordered,
9 and essentially you said the change control process, you need
10 to work through this and work as a team on these efforts. And
11 that's where a lot of this -- not a lot of this -- where all of
12 this resides today, through that CCP process. And, of course,
13 there is also the debate on the issue of nondiscriminatory
14 access and what is that right volume of flowthrough, what is
15 that right volume of manual.

16 But as you look at the next slide we have here, I
17 want to point out where it is today. And you have heard me
18 comment earlier that 91 percent of all the local service
19 requests are submitted electronically based on fourth quarter
20 results. Actually if you remember I pointed out in the slide
21 in December we saw our highest rate, it was 93.2 percent. But
22 that 91 percent is a fair way to look at it over a whole
23 quarter. If you look at it just from what that has been
24 submitted electronically, 10.9 percent of these LSRs in the
25 fourth quarter fell out for manual handling. Now, that is by

1 our systems design. So the system is working properly. We
2 were able to submit these, it has identified these as either
3 complex transactions or a transaction -- for example, we talked
4 about pending service orders. Those fall out for review by the
5 representatives in the local carrier service center and further
6 processing. Also, 9.9 percent of the LSRs submitted
7 electronically did incur BellSouth OSS system errors. That is
8 the essence of flowthrough.

9 CHAIRMAN JABER: Mr. Pate, who approves the requests
10 that come into the change control process?

11 MR. PATE: I'm not quite understanding. When you say
12 approves, if you could help me.

13 CHAIRMAN JABER: Well, you were making the point
14 earlier and as a lead into this screen that some of these
15 issues, i.e., that being able to use the BellSouth system
16 electronically is really more appropriate for the CCP, the
17 change control process.

18 MR. PATE: Yes, ma'am.

19 CHAIRMAN JABER: So I guess that would be a request
20 from the ALEC to BellSouth, right? Is that what a CCP is?

21 MR. PATE: Correct. And actually BellSouth can
22 initiate requests themselves. So it could be coming from the
23 ALEC community or it could be coming from BellSouth.

24 CHAIRMAN JABER: Okay. Well, where does the request
25 go?

1 MR. PATE: Well, there is several individuals that
2 would get involved with the validation of that request. There
3 is a whole process that is well documented in the change
4 control process.

5 CHAIRMAN JABER: That is governed by BellSouth?

6 MR. PATE: It is governed by BellSouth. It is a
7 process, of course, that the CLECs participate in, as well.
8 But when you say govern, the BellSouth individuals would look
9 at it from a resource or IP standpoint; it's feasible, we can
10 do it. We have three criteria that we would reject one. One
11 would be based on an industry standard, or it's cost
12 prohibitive, or it has a technical infeasibility. And when we
13 reject those we have an obligation to come back and thoroughly
14 explain that to the community, and as a whole specifically to
15 that ALEC that submitted it.

16 CHAIRMAN JABER: Okay. So let's say Covad says to
17 you, I think I should be able to process that order
18 electronically.

19 MR. PATE: Yes.

20 CHAIRMAN JABER: And they make a formal request
21 through the CCP process. You have people in the IP area that
22 look at that request through the CCP process and determine
23 whether the request is technically feasible?

24 MR. PATE: Correct.

25 CHAIRMAN JABER: Those are just BellSouth people?

1 MR. PATE: That's correct, because they are looking
2 at our systems to process it. So obviously it's the people
3 working with our systems.

4 CHAIRMAN JABER: Right. And the CCP people contact
5 Covad back and say we believe based on our experience that that
6 is not -- that's not a request that is technically feasible.

7 MR. PATE: That is correct.

8 CHAIRMAN JABER: What recourse does an ALEC have
9 through that CCP process?

10 MR. PATE: The recourse is to -- first off, they can
11 go internally. There is an internal process for escalation for
12 review. If they are not satisfied with that, documented in the
13 change control process is a dispute resolution process that
14 leads all the way up to taking it before a public service
15 commission or some sort of mediation approach or a ruling
16 through that.

17 CHAIRMAN JABER: So can we go back to the previous
18 slide, then?

19 MR. PATE: Certainly. Nate, if you can go back to
20 the previous slide.

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1 STATE OF FLORIDA)

2 : CERTIFICATE OF REPORTER

3 COUNTY OF LEON)

4

5 I, JANE FAUROT, RPR, Chief, Office of Hearing Reporter
6 Services, FPSC Division of Commission Clerk and Administrative
7 Services, do hereby certify that the foregoing proceeding was
8 heard at the time and place herein stated.

9

10 IT IS FURTHER CERTIFIED that I stenographically
11 reported the said proceedings; that the same has been
12 transcribed under my direct supervision; and that this
13 transcript constitutes a true transcription of my notes of said
14 proceedings.

15

16 I FURTHER CERTIFY that I am not a relative, employee,
17 attorney or counsel of any of the parties, nor am I a relative
18 or employee of any of the parties' attorney or counsel
19 connected with the action, nor am I financially interested in
20 the action.

21


DATED THIS 25TH DAY OF FEBRUARY, 2002.

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JANE FAUROT, RPR
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