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March 18, 2002

Mrs. Blanca S. Bayó
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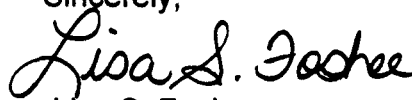
Re: 960786-B-TL (Section 271)

Dear Ms. Bayó:

Enclosed is the original and fifteen copies of BellSouth Telecommunications, Inc.'s Post Workshop Comments and Exhibits which we ask that you file in the captioned docket.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served to the parties by Federal Express as shown on the attached Certificate of Service.

Sincerely,


Lisa S. Foshee
(23)

Enclosures

cc: All Parties of Record
Marshall M. Criser III
Fred J. McCallum

DOCUMENT NUMBER-DATE
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FPSC-COMMISSION CLERK

**CERTIFICATE OF SERVICE
DOCKET NO. 960786-B-TL**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by
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(+) Signed Protective Agreement

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Consideration of BellSouth)
Telecommunications, Inc.'s Entry) Docket No. 960786-TL
Into InterLATA Services Pursuant)
To Section 271 Of The Federal)
Telecommunications Act of 1996)

**POST-WORKSHOP COMMENTS OF
BELLSOUTH TELECOMMUNICATIONS, INC.**

BellSouth Telecommunications, Inc. ("BellSouth") hereby files its Post-Workshop Comments and responds to the requests of the Commission as follows:

DISCUSSION

ISSUE 1: Provide Mr. Ainsworth's back-up data to LSR analyses to the respective ALECs.

RESPONSE:

BellSouth met with and provided Mr. Ainsworth's back-up documentation to both AT&T and FDN. FDN did not raise any questions or concerns about BellSouth's back up data. With respect to AT&T, BellSouth conducted further investigation of the PONs in question after the workshop and provided the revised data analysis to AT&T. Specifically, while BellSouth told the Commission that of the 19 PONs there were 8 errors, after additional analysis BellSouth amended that conclusion to reflect 14 of the 19 having errors. This does not change the fact that the error rate remains less than 1% for the period June 2001 to December 2001. BellSouth met with Network Telephone via telephone on March 11, 2002, and March 15, 2002 and offered to discuss its data analysis, but Network Telephone declined, indicating that they understood the analysis.

ISSUE 2: Address BellSouth's performance for Network Telephone; Covad; KMC and FDN.

RESPONSE:

BellSouth has analyzed the areas of concern raised by these ALECs in the workshop. BellSouth's analysis of its performance is attached hereto as Exhibit 1. As BellSouth's analysis demonstrates, BellSouth's performance provides ALECs a meaningful opportunity to compete in Florida.

ISSUE 3: Address Network Telephone's questions on the Flow Through Report regarding (1) the reliability of the data; and (2) Network Telephone's performance.

RESPONSE:

During the workshop, Network Telephone complained that BellSouth's December 2001 flow through data was not reliable because it showed Network Telephone as having submitted orders via TAG. Network Telephone is incorrect in its conclusion. The Network Telephone LSRs shown as submitted via TAG in the December 2001 flow through report were xDSL LSRs submitted via LENS. In the December report, all xDSL orders not submitted via EDI were shown as having been submitted via TAG rather than being separated out between TAG and LENS. This occurred because LSRs submitted via LENS are actually processed through TAG, and there is a common message created for both LENS and TAG LSRs. While Network Telephone's xDSL orders were shown on the report as having been submitted through TAG, instead of specifying LENS, none of the results were impacted. Thus, there is no question as to the reliability of BellSouth's reported results.

Network Telephone also voiced concerns about its flow through performance. First, the Commission should bear in mind that Network Telephone compared its flow through performance against the aggregate ALEC performance (not BellSouth retail performance as Network Telephone represented at the workshop - BellSouth does not have retail flow through data). Second, the nature of aggregate performance is that some ALECs will have higher individual performance and some will have lower performance - this, in and of itself, does not indicate a problem.

Third, the FCC has stated that flow through is not the key indicator of OSS performance. See Kansas/Oklahoma Order, fn. 397 ("this Commission has not limited its analysis of an ILEC's ordering processes to a review of its flow-through performance data. Instead, the factors that are linked to order flow-through, but are more directly indicative of an ILEC's OSS performance, such as an ILEC's overall ability to return timely FOCs/rejection notices, accurately process manually handled orders, and serve commercial volumes, are the more relevant and probative factors for analyzing an ILEC's ability to provide access to its ordering functions in a nondiscriminatory manner.") BellSouth's performance on FOC and reject intervals for Network Telephone for the period September through November 2001 is excellent. When summarized, BellSouth met the benchmark for every partially mechanized and manual category. This means that when orders do fall out for manual processing, BellSouth is handling them in a timely and efficient manner.

Fourth, BellSouth has done an in-depth analysis of Network Telephone's flow through rates to determine ways that both Network Telephone and BellSouth can work to improve the flow through rates. BellSouth has recently completed this analysis, and will

look forward to meeting with Network Telephone to go over the results of the analysis and create a joint action plan for continued improvement.

ISSUE 4: Explain the process for obtaining a Facilities Reservation Number (“FRN”) and BellSouth’s discussions with Network Telephone on this issue.

RESPONSE:

In the Workshop, Network Telephone alleged that BellSouth does not have an appropriate process whereby ALECs can obtain FRNs to submit DSL orders, and that BellSouth “renewed on [its] commitment” to offer an alternative process. Neither of these allegations is true.

To understand this issue it is important to understand the means by which an ALEC can obtain loop makeup information and FRNs. There are three methods by which an ALEC can obtain loop makeup information, two of which can provide an ALEC with an FRN. The three loop makeup processes are as follows:

- (1) Electronic LMU-Service Inquiry (“SI”);
- (2) Manual LMU-Service Inquiry;
- (3) Firm Order LSR with Service Inquiry

Under the first scenario, the ALEC conducts an electronic LMU-Service Inquiry on its own, through BellSouth’s interfaces, which at the present time is free of charge. If the LMU indicates that there is an acceptable loop for the ALEC’s purposes, the ALEC can obtain an FRN and reserve that facility for its use. Under the second scenario, the ALEC can order a manual LMU-SI pursuant to which BellSouth will perform the loop makeup

inquiry and provide the loop makeup information, including the FRN if appropriate, to the ALEC. Under the third scenario, the ALEC submits a firm order LSR and BellSouth performs the service inquiry for the ALEC. If there is a suitable facility, BellSouth will provision the order. If not, BellSouth will clarify the LSR back indicating that there are no facilities. Under this scenario, BellSouth does not provide the actual LMU information to the ALEC, but rather just handles the transaction on the ALEC's behalf.

In essence, what Network Telephone wants is for BellSouth to provide a manual loop makeup inquiry free of charge. First, Network Telephone utilizes a Scenario One process, which at the present time is free of charge, via LENS. If LENS returns a compatible facility, with a FRN, Network Telephone issues the order via EDI and it is processed without incident. If, however, the LMU indicates that there are no spare facilities, or if the LMU data was not populated, Network Telephone wants to submit a Scenario 3 order whereby BellSouth will perform a manual loop makeup on that same location but Network Telephone does not have to populate the LSR until it learns whether or not there are facilities available.

In an attempt to meet Network Telephone's needs, BellSouth instituted a trial during which Network Telephone only needed to submit a Service Inquiry, without the firm order LSR, in the Scenario 3 method. During the trial, BellSouth performed the Service Inquiry and returned the results to Network Telephone, with the expectation that Network Telephone would then manually submit the firm order LSR to the CRSG (and BellSouth would be compensated for a Scenario 2 ordering process through the non-recurring charge for the loop).

In reality, Network Telephone, upon receiving the results of the Service Inquiry, submitted the order mechanically via EDI (a Scenario 1 process) thereby avoiding the cost of the Service Inquiry. BellSouth deemed the trial unsuccessful because for every location without facilities (which was the vast majority of the locations given that Network Telephone only used the process when its own LMU investigation indicated that no facilities are available) BellSouth was incurring the costs of conducting the Service Inquiry without being compensated for those costs. It is this unsuccessful effort that Network Telephone incorrectly called a “firm commitment” at the workshop. Because this was never a firm commitment, BellSouth did not “renege” on this commitment.

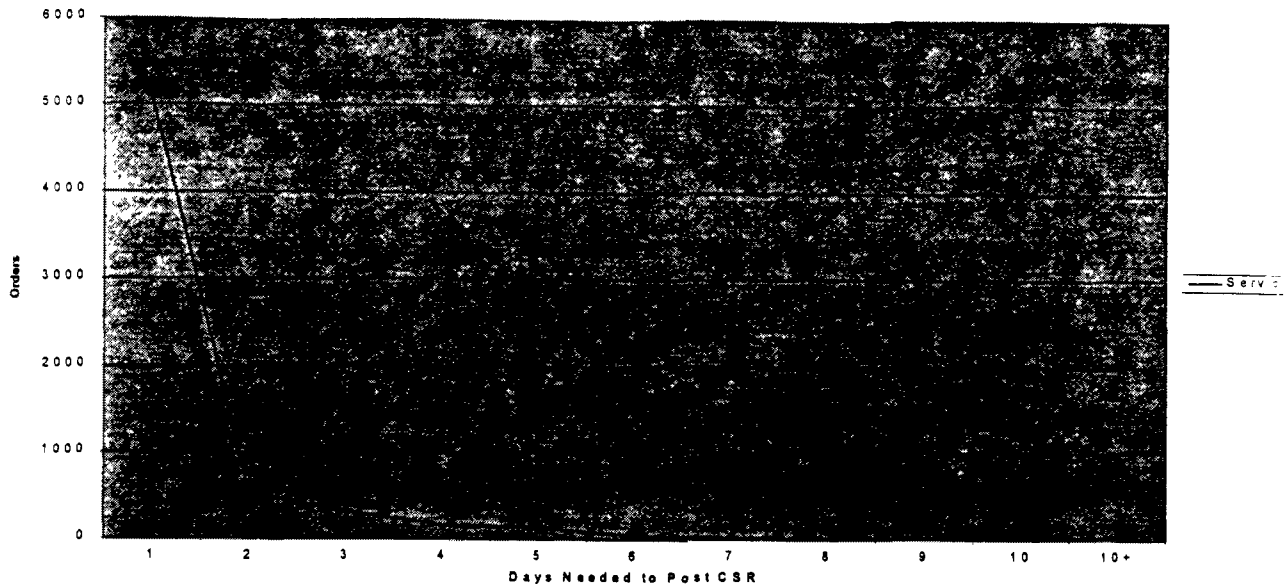
BellSouth incurs costs to conduct manual service inquiries and is entitled to recover those costs. BellSouth will continue to work with Network Telephone to find the most efficient and cost effective process for both parties. If Network Telephone would like BellSouth to pursue changing this process, it should submit a change request via BellSouth’s change Control Process for processing and prioritizing by the ALEC community at large.

ISSUE 5: BellSouth’s CSRs are not updated in a timely manner.

RESPONSE:

To investigate this allegation, BellSouth conducted a study pursuant to which it looked at all the service orders issued by the ALECs represented at the workshop and identified, for each service order, the time required to update the CSR from the date the order was completed in provisioning (i.e. the order sent an Order Completion Notice to the ALEC) until the order posted to the CSR. The results of this study are as follows:

CSR Posting Timeliness



As the graph shows, the vast majority of CSRs (80%) are posted in 1 day with 93% being updated within 3 days and 98% in 5 days. This is consistent with the fact that on occasion service orders will contain errors which need to be resolved prior to updating to the CSR or the fact that the CSR is use to calculate the bills themselves. Both of these situations occur on both wholesale and BellSouth retail bills. In those relatively few cases where service orders are being corrected and therefore delays the CSR posting, BellSouth works diligently to clear any errors in as timely a manner as possible for ALEC orders as well as retail service orders.

In an effort to be responsive to the ALEC community, BellSouth has agreed to support the inclusion of a "records completion notice" feature in the CCP to be prioritized by the ALECs. If the CCP prioritizes this request, the records completion notice will provide the ALECs with additional information as to when service order information has been updated to the CSR.

ISSUE 6: Electronic ordering of Unbundled Copper Loop-Non-Designed (“UCL-ND”).

RESPONSE:

The electronic ordering of UCL-ND is pending in the Change Control Process. In addition, ALECs have several other products, which currently can be ordered electronically, to meet their needs.

- Unbundled ADSL compatible loop – A designed loop tailored to support ADSL services – available for electronic ordering and flow through.
- Unbundled ISDN compatible loop – A designed loop tailored to support ISDN services – available for electronic ordering and flow through.
- Unbundled Universal Digital Circuit / IDSL loop – a designed loop tailored to support an ALEC’s IDSL modem over an ISDN-type loop – available for electronic ordering now, with flow through capability added on May 18, 2002.
- Line Sharing – unbundled access to the high frequency spectrum of an existing BellSouth-provided voice loop capable of support DSL services – available for electronic ordering with flow through.
- Line Splitting – unbundled access to the high frequency spectrum of existing ALEC-provided voice loop capable of support DSL services – available for electronic ordering with flow through.
- Unbundled Copper Loop – Designed – A designed, dedicated 2- or 4-wire UCL/S (Short) or 2- or 4-wire UCL/L (Long) metallic transmission facility from BellSouth’s Main Distribution Frame (MDF) to a customer’s premises (including the NID), exclusive of any intervening equipment such as load coils, repeaters, or

Digital Access Main Lines (“DAMLs”), provisioned with test point and a BellSouth provided Design Layout Record (DLR) – available for electronic ordering and flow through.

Finally, as information to assist the Commission in fully understanding this issue, the UCL-ND product was developed and rolled out in March 2001. As of January 2002, nine months later, there are only a total of 215 UCL-ND loops in service, region-wide, with 32 in Florida. This volume demonstrates that it is reasonable for BellSouth to not have dedicated resources to electronic ordering for this product immediately.

ISSUE 7: Analysis of a sample of 100 of MCI’s orders.

RESPONSE:

In the workshop, MCI alleged that BellSouth had “refused” to conduct an analysis of 100 of MCI’s LSRs at MCI’s request. To the contrary, BellSouth had begun the analysis of November and December 2001 data requested by MCI in advance of the Florida workshop, and provided MCI with an analysis of more than 390 LSRs on February 19, 2002, the day after the workshop. Because BellSouth was not informed of MCI’s allegation in advance of the workshop, Mr. Pate had no way of knowing that the analysis was, in fact, being conducted contrary to Ms. Lichtenberg’s allegations.

Immediately prior to the analysis of November and December data, BellSouth had conducted a similar analysis of October 2001 data at MCI’s request. BellSouth had provided MCI with the results of that analysis prior to the February 18, 2002 workshop.

BellSouth remains committed to working with its ALEC customers to provide them information and customer service. On a going forward basis, BellSouth will look at the top five reasons for errors in the monthly flow through data and use this analysis to

identify training opportunities, process improvements, documentation enhancements and other appropriate corrective measures for both ALEC and BellSouth units. The analysis will focus on ALEC requests that are returned for “auto clarification”, local service requests that fall-out for manual handling due to ALEC reasons, and those that fall out for manual handling due to BellSouth reasons. Each error will be analyzed to explain:

- The specific cause(s) for the auto clarification (where appropriate)
- How to correct the cause for the auto clarification
- Verify that the BellSouth Business Rules are clear and correct
- The specific cause(s) for LSRs falling out for manual handling
- Coordinate BellSouth caused reasons with the Flow Through Task Force
- Coordinate ALEC caused errors with appropriate ALEC representatives
- Determine if BellSouth Business Rules are strengthened where appropriate

BellSouth’s Customer Support Manager will facilitate the analysis and continue until improvements are realized. Analysis for December 2001 and January 2002 have already been completed and discussed with MCI. Future analysis will be exchanged as it becomes available and discussed on either conference calls or meetings. We believe that this plan is in keeping with MCI’s stated objective of decreasing manual handling of its LSRs. To complete this task, BellSouth will dedicate the resources to assist MCI, and other ALECs, with this objective. BellSouth appreciates the opportunity to work with MCI and other ALECs cooperatively to facilitate improvements.

ISSUE 8: ADSL USOC Trial

RESPONSE:

See Response to Issue 14 below.

ISSUE 9: The LCSC Escalation Process

RESPONSE:

The Fleming Island LCSC handles ALEC inquiries quickly and efficiently. As BellSouth discussed at the workshop, BellSouth service representatives are empowered, and in fact expected, to handle ALEC inquiries on the first call. BellSouth service representatives are trained to handle the majority of ALEC issues while the ALEC is on the line. In those instances in which, in the service representative's opinion, issue resolution will take longer than 15 minutes, the service representative will commit to resolve the issue and to provide a follow-up call to the ALEC if requested. The policy is for the service representative to provide a status of the issue to the ALEC within an hour. In addition to handling ALEC inquiries, the service representatives are empowered to receive and handle 1st level escalations from ALEC customers if the ALEC will give them the opportunity to do so.

If the issue is not resolved to the ALEC's satisfaction, there is an escalation process in place pursuant to which the ALEC can, if necessary, reach the Operations Assistant Vice President for the center. The escalation process is documented on the interconnection web site (www.interconnection.bellsouth.com/centers/html/lcsc.html) and a copy is attached hereto as Exhibit 2. ALECs use BellSouth's escalation process, and the LCSC is not aware of any ALEC complaints regarding that process.

In addition, in a continual effort to improve customer service, BellSouth has made recent changes to the LCSC. BellSouth implemented an Escalation Desk in the Fleming

Island LCSC staffed with Escalation Managers who manage escalation issues. The Escalation Managers maintain an ALEC Escalation Log to track and monitor escalated issues. The log is used to coach and develop service representatives to better handle customer issues and thereby minimize escalations.

ISSUE 10: The Verizon CCP Model.

RESPONSE:

At the request of the Commission, BellSouth is in the process of comparing the Verizon Wholesale Network Services OSS Interface Change Management Process (“CMP”) and BellSouth’s Change Control Process (“CCP”). BellSouth has analyzed the published Verizon documentation internally. Because, however, BellSouth’s CCP document is far more comprehensive in scope and detail than the Verizon Plan, in many cases, the Verizon Plan is not detailed enough to assess how the process actually works. Therefore, BellSouth has scheduled a meeting with Verizon personnel on March 22, 2002, to fully understand the process and the way the process operates in practice. After that meeting, BellSouth should be in a position to provide its assessment of the plan.

The more troubling issue of which the Commission should be aware is the fluctuating position of the ALECs themselves. At the workshop, MCI’s representative, speaking on behalf of the ALECs, stated unequivocally that “the ALECs would be more than happy to have the Verizon process in BellSouth.” (Tr. at 243). She further stated that “we [the ALECs] would be in favor of the current process that works in New York, Pennsylvania, Massachusetts, New Jersey, and I believe it is very similar to what is in Verizon Florida.” (Tr. at 244). By these comments, MCI implied that BellSouth simply

was being unreasonable by “refusing” to adopt Verizon. The truth of the matter, however, is that the ALECs cannot decide what they want. Despite being unequivocal in Florida that the ALECs wanted the Verizon Plan, the proposal that the ALECs filed in Georgia (drafted mainly by MCI and AT&T)¹ is different in many respects from the Verizon Plan. When asked about this inconsistency in their position at the February 27, 2002, CCP meeting, the ALECs stated that the Georgia proposal should be the baseline for discussions, not the Verizon Plan. A copy of page 8 of the minutes evidencing this discussion is attached as Exhibit 3. One thing is clear – the ALECs appeared willing to tell the Commission they wanted one thing, while telling BellSouth they want something else, in an unfair attempt to make BellSouth look unreasonable. The Commission should see this tactic for what it is – an attempt to delay real progress for regulatory purposes.

Despite the ALECs’ apparent unwillingness to negotiate in good faith, BellSouth continues to proceed in a collaborative manner to address ALEC concerns with the CCP. The CCP agreed to establish a drafting team to work on changes to the process (*see* Exhibit 3) outside of the confines of the regularly-scheduled CCP meetings. The meeting is set for March 28.

Finally, despite all of the discussion surrounding modifications to the CCP, it is important for the Commission to bear in mind that the current process satisfies each of the FCC’s criteria for a change control process. BellSouth meets all five of the FCC’s change management guidelines: (1) information relating to the change management process is clearly organized and readily acceptable to competing carriers; (2) competing

¹ At the request of the Georgia Public Service Commission in Docket No. 7892-U, on January 30, 2002, the ALECs filed a “redline” version of the current CCP Document Version 2.7 outlining proposed changes to the current process. On February 15, 2002, BellSouth filed a response to the redline version known as the “greenline” document.

carriers had substantial input in the design and continued operation of the change management process; (3) the change management plan defines a procedure for the timely resolution of change management disputes; (4) the availability of a stable testing environment that mirrors production; and (5) the efficacy of the documentation the BOC makes available for the purpose of building an electronic gateway.² Thus, while BellSouth will continue to work with ALECs to ensure that the process meets ALEC needs, the process as it exists meets the FCC's requirements.

ISSUE 11: Alleged Premature Closing of Trouble Tickets.

RESPONSE:

BellSouth agreed to investigate specific examples of the alleged premature closing of trouble tickets discussed by Network Telephone at the workshop. BellSouth asked Network Telephone on February 20, 2002, and March 11, 2002, for specific examples that BellSouth could investigate. As of today, Network Telephone has not provided any specific examples of the alleged problem for analysis. If Network Telephone provides examples, BellSouth will conduct its investigation and provide the results to Network Telephone as soon as possible.

ISSUE 12: Migration of customers with pending service orders.

RESPONSE:

As was evident from the discussion during the workshop, the issue of migration of end-users with pending service orders is complex. Pending service orders involve not

² FCC Docket No. 00-238, Memorandum Opinion and Order, Application by SBC Communications to Provide In-Region, InterLATA Services in Texas (FCC Docket No. 00-65).

only pending service orders with BellSouth, but also pending service orders with an ALEC. The first concern of all parties involved should be the well-being of the end-user. BellSouth's current process is designed to ensure that the end-user receives the service they want. Under the current process, an LSR that encounters a pending service order will be routed to the LCSC for handling. At the LCSC, the service representative will either process the ALEC LSR or will clarify the LSR back to the ALEC who can then interface with the end-user to resolve the pending service order. This process has two main benefits. First, it allows the LCSC to process the LSRs for which the pending service order has no end-user impact.³ For those pending service orders that will affect the end-user, it gives the ALEC an opportunity to work with the end-user to make sure that the pending service order is resolved to the end-user's satisfaction.

To more fully understand this issue, BellSouth sampled a total of 187 LSRs requesting conversions that fell out for manual handling due to a pending service order. Of these, 133 LSRs were processed by BellSouth and a FOC was returned without the order being clarified. Twenty-nine LSRs, while they dropped out for pending service orders, were clarified back to the ALEC for reasons other than a pending service order. The remaining 25 LSRs were clarified back to the ALEC due to a pending service order that needed the involvement of the end-user to resolve. Of these 25, 15 of them had BellSouth retail orders pending on them, and 10 of them had ALEC orders pending on the accounts.

This data indicates two things. First, the data shows that BellSouth is able to process the vast majority of LSRs for end-user lines on which there is a pending service

³ For example, if the pending service order is for the addition of a feature that will be processed that day, and the LSR is for a conversion with a later due date, the LCSC will process the order because the two requests will not conflict.

order without involvement of the end-user. Second, for those pending service orders that do require the involvement of the end-user, they are both BellSouth retail and ALEC pending service orders. This fact highlights the need for industry consensus on the best way to make this process more efficient.

The complexity of this issue indicates that simply canceling all pending service orders without involvement of the end user, as the Commission suggested, may not always be in the best interest of the end-user. For example, assume a hypothetical in which an end-user placed an order with BellSouth for an additional line. Subsequent to taking that order, BellSouth receives an LSR to convert that end-user to an ALEC. The LSR would not include the additional line because the line was not on the CSR at the time the LSR was submitted. In this situation, there are three things the end-user could have intended: (1) install the new line with BellSouth and migrate the existing lines to the ALEC; (2) cancel the pending service order for the additional line and just migrate the existing lines to the ALEC; or (3) install the new line with BellSouth and then migrate all the lines on the account to the ALEC. Without involving the end-user, BellSouth has a 2/3 chance of processing the order incorrectly.

A second hypothetical demonstrates the complexity of the issue when two different ALECs are involved. Assume BellSouth has a pending service order to migrate an end-user to ALEC A. While that order is being processed, BellSouth receives an LSR to migrate the same end-user to ALEC B. Under BellSouth's current process, BellSouth would clarify the LSR back to ALEC B to resolve the discrepancy with the end-user. If BellSouth simply cancelled the pending service order, the end-user might not receive service from the carrier it intended.

Due to the complexity of the issue, and the significant end-user impact, BellSouth recommends that the ALECs open a change request in the CCP to allow appropriate input from the entire industry on this issue.

ISSUE 13: Alleged invalid clarifications by MCI.

RESPONSE:

The simple answer to this issue is that there is no issue. BellSouth has a high accuracy rate on manual clarifications. In January 2002, for example, MCI received 5,928 clarifications. MCI called the LCSC to challenge the validity of only 289 of those clarifications. Of the 289 clarifications that MCI challenged, only 65 of those were clarified by the LCSC in error. Thus, only 1.09% of the total clarifications were clarified in error. In other words, BellSouth clarified 98.91% of MCI's orders correctly. BellSouth will continue to keep these records to ensure that its performance for MCI, and its other ALEC customers, remains high.

ISSUE 14: Migration of customers with an ADSL USOC on the CSR.

RESPONSE:

In the workshop, various ALECs alleged that BellSouth is using a DSL USOC to impede ALECs' ability to migrate a customer from BellSouth to the ALEC using UNE-P.⁴ This allegation is baseless. To put this issue in perspective, it is important to understand the chronology of events. Up until November 3, 2001, when an ALEC submitted an LSR to convert an end-user to the ALEC via UNE-P, BellSouth would

⁴ In conjunction with this issue, BellSouth agreed to answer certain questions about the ADSL USOC posed by Network Telephone. Copies of those questions, and BellSouth's responses, are attached hereto as Exhibit 4.

manually strip the DSL USOC from the Customer Service Record so that the customer could be converted to the ALEC. Unfortunately, this process caused some end-users unintentionally to lose DSL service from their ISP, without ALEC, ISP or end-user notification.

On May 14, 2001, WorldCom submitted change request CR0399. This change request sought to have BellSouth clarify UNE-P conversion orders for end-users with DSL USOCs on their CSRs back to the ALEC, instead of BellSouth's current process of automatically stripping the USOC. The intent was for the ALECs to work with their end-users prior to the cut to the ALEC to ensure advance knowledge about the potential loss of DSL service.

BellSouth implemented WorldCom's process on November 3, 2001. The clarification process introduced multiple steps which are as follows:

- (1) ALEC submits the LSR for end-user with DSL USOC on the end-user's line
- (2) BellSouth clarifies the LSR back to the ALEC with note about the DSL USOC
- (3) ALEC contacts end-user to have end-user cancel DSL service with their ISP
- (4) ISP accepts disconnect request from the end-user and processes a disconnect order with BellSouth
- (5) BellSouth processes the disconnect order from the ISP, and removes the DSL USOC from the end-user's line
- (6) ALEC resubmits the LSR, converting the end-user's voice service to the ALEC.

Each of the ALECs' specific complaints about this process is without merit. First, ALECs complain that BellSouth is "prequalifying" customer lines for DSL service and indicating that pre-qualification with an ADSL USOC. This is not correct. BellSouth

places the ADSL USOC on the end-user's line upon the order from the NSP. BellSouth does not place a USOC on the end-user's line unless and until the NSP requests an order be processed via the BellSouth Service Order Entry Gateway (SOEG).

Second, ALECs complain that BellSouth will clarify an LSR back on the grounds that there is a DSL USOC on the line, and the end-user will tell the ALEC they don't have DSL (the so-called "phantom" USOC issue). This scenario is easily explained. It can arise for two different reasons. The first situation is one in which the NSP orders DSL from BellSouth, but the end-user, for whatever reason, never activates the DSL. In this situation, BellSouth provisions the DSL to the NSP, places the DSL USOC on the end-user's line, and begins billing the NSP. Thus, from BellSouth's perspective, there is DSL on the line. From the end-user's perspective, however, there is no DSL on the line because the end-user never activated it and is not being billed for it by their NSP.

The second situation is one in which the end-user has disconnected their DSL service via their NSP, and the NSP has placed the disconnect order with BellSouth, but the disconnect order has not been fully processed through BellSouth's systems at the time the LSR is submitted. In this situation, the end-user believes they have disconnected their DSL, but that disconnect has not worked its way to the CSR on the BellSouth side of the transaction. Thus, the end-user states that they don't have DSL, but the BellSouth records indicate that the customer does have DSL.

Both of these scenarios occur on a very limited basis. Based on BellSouth's analysis, approximately 0.3% of UNE-P conversion LSRs in January 2002 were affected by either of the two scenarios described above.

BellSouth and the ALEC community are working together to develop the most efficient process possible and resolve this situation even in the limited numbers that it occurs. On January 27, 2002, Birch Telephone submitted change request CR0625. The ALEC is requesting the ability to drop ADL11 on conversion orders without getting an auto clarification. The request goes on to request to remove ADL11 on conversion orders with an LNA V without clarification and the ability to issue with LNA G that would automatically clarify back to the ALEC. This request is being reviewed as well as other concerns on DSL, and is scheduled for prioritization by the CLECs in the April/May timeframe.

In the interim, BellSouth is beginning a trial utilizing an interim manual process with Birch to remove DSL USOCs that are not attached to active DSL accounts (and thereby resolve concerns associated with the two scenarios discussed above). Pursuant to this process, when BellSouth clarifies a conversion order back to the ALEC for DSL service, and the end-user tells the ALEC they don't have DSL service, the ALEC will call a dedicated group in the Local Carrier Service Center (LCSC) and the dedicated group will input the service order to remove the DSL USOC from the CSR. The parties are hopeful that this process will provide the ALECs with a simple, streamlined method to get the DSL USOC off the CSR if the end-user believes that they do not have DSL. If the trial is successful with Birch, BellSouth will roll this process out to all the ALECs.

These explanations and processes should resolve any and all concerns raised by the ALECs at the workshop.

ISSUE 15: Local Preferred Carrier Freeze

RESPONSE:

The question asked by the Commission was how the migration process for removing the Local/PC Freeze from end user accounts can be simplified. When analyzing this issue, it is imperative to recall that preferred carrier freezes were implemented to protect end-users from unauthorized account transfers without their knowledge or permission. In other words, when end users agree to a Local/PC freeze on their accounts, they are agreeing to a certain loss of flexibility in exchange for protection against unauthorized migration.

In response to the Commission's inquiry, BellSouth reviewed the current process, which requires the end-user to initiate the removal of preferred carrier freezes to their account and allow local service provider changes. The migration of an end-user with a Local/PC freeze on their account is governed by specific FCC rules. BellSouth's current process is in compliance with the FCC slamming rules (47 CFR Part 64; CC Docket 94-129; FCC 00-255, and FCC 01-67) that describe the allowable procedures to remove preferred carrier freezes. Paragraph 65 of the above mentioned docket states in relevant part "as we stated in the Section 258 Order,...we concluded that LECs administering a preferred carrier freeze program must accept the subscriber's authorization, either oral or written and signed, stating an intent to lift a preferred carrier freeze. We determined that LECs also must permit a submitting carrier to conduct a three-way conference call with the LEC and the subscriber in order to lift a freeze. Our rules do not, however, prohibit LECs from requiring submitting carriers to use separate methods for lifting a preferred carrier freeze and submitting a carrier change request." As the Order demonstrates, the

options available to providers are limited to heighten the protection against unauthorized migrations. To ensure that ALECs understand BellSouth's process, BellSouth recently issued a ALEC notification that reiterates the process to successfully migrate an end-users local service with a preferred carrier freeze. A copy of this Notification is attached hereto as Exhibit 5.

Lastly, while the ALECs portrayed this issue as an extensive problem, the facts state otherwise. BellSouth clarification data for January 2002 indicated that out of over 67,000 electronic clarifications issued by the LCSC, only fifteen ALEC requests for local service transfer were clarified for Local Service Freeze on the end-user account. This data indicates that either the current process is working effectively or local preferred carrier freezes have a very small impact on total ALEC service requests processed. Either way, this is not an issue that is in any way impeding local competition.

Issue 16: Alleged LSRs missing from BellSouth performance data.

Response:

BellSouth has addressed this issue in various forums and explained each time that DeltaCom's data is not missing from BellSouth's performance data. The Commission requested DeltaCom to provide the alleged missing PON numbers to BellSouth for investigation; to BellSouth's knowledge, DeltaCom has not yet provided such PON numbers.

CONCLUSION

In conclusion, as this filing demonstrates, BellSouth will continue to work with its ALEC customers to continue to improve the processes and procedures to best serve the

needs of the ALEC community. This filing also demonstrates, however, that BellSouth currently is meeting the needs of the ALEC community and is providing nondiscriminatory access to its OSS in compliance with the Telecommunications Act. Many of the alleged "issues" are not issues at all, or have not been substantiated by the ALECs. BellSouth respectfully requests that the Commission look at the entire record before it, particularly the extensive commercial usage by ALECs of BellSouth's OSS, in rendering its decision in this docket.

This 18th day of March, 2002.

BELLSOUTH TELECOMMUNICATIONS, INC.

Nancy B. White

NANCY B. WHITE (2X)
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Miami, Florida 33130
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LISA S. FOSHEE
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EXHIBIT 1
--PROPRIETARY--

EXHIBIT 2

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Atlanta LCSC "Normal Hours" Escalation Contact Numbers

Select a Customer Support Center

ACAC, CWINS, CNMS, CRSG, etc...

Atlanta LCSC "Normal Hours" of Operation and "After Hours" Escalation Contact Numbers

(Click the link above to view)

Atlanta LCSC Consumer Resale/Multi-Line/UNE Switched Combos

Escalation Level	Contact	Special Instructions
1st Level: Main Telephone Number 800-872-3116		Select appropriate ACD option to be transferred to Service Representative
2nd Level: Main Telephone Number 800-872-3116		Select appropriate ACD option - Service Representative to arrange for a Center Manager to return the CLEC's call within one hour.
3rd Level: 904-541-8223	Kar Mcleod Center Director	
4th Level: 904-541-8200	Mark Butterworth Operations Assistant Vice-President	

Atlanta LCSC UNE/LNP

Escalation Level	Contact	Special Instructions
1st Level: Main Telephone Number 800-872-3116		Select appropriate ACD option to be transferred to Service Representative
2nd Level: Main Telephone Number 800-872-3116		Select appropriate ACD option - Service Representative to arrange for a Center Manager to return the CLEC's call within one

		hour
3rd Level: 904-541-8216	David Pugh Center Director	
4th Level: 904-541-8200	Mark Butterworth Operations Assistant Vice-President	
Atlanta LCSC Complex		
Escalation Level	Contact	Special Instructions
1st Level: Main Telephone Number 800-872-3116		Select appropriate ACD option to be transferred to Service Representative.
2nd Level: Main Telephone Number 800-872-3116		Select appropriate ACD option - Service Representative to arrange for a Center Manager to return the CLEC's call within one hour
3rd Level: 770-986-2176	Lisa Arrington Operations Director	
4th Level: 770-986-2630	Diane Strickland Operations Assistant Vice-President	

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Birmingham LCSC "Normal Hours" Escalation Contact Numbers

Select a Customer Support Center

ACAC, CWINS, CNMS, CRSG, etc...

Birmingham LCSC "Normal Hours" of Operation and "After Hours" Contacts

(Click the link above to view)

Birmingham LCSC Residential Resale

Escalation Level	Contact	Special Instructions
1st Level: Main Telephone Number 800-773-4967		Select appropriate ACD option to be transferred to Service Representative
2nd Level: Main Telephone Number 800-773-4967		Select appropriate ACD option - Service Representative to arrange for a Center Manager to return the CLEC's call within one hour
3rd Level: 904-541-8223	Kar Mcleod Center Director	
4th Level: 904-541-8200	Mark Butterworth Operations Assistant Vice-President	

Birmingham LCSC Business Resale

Escalation Level	Contact	Special Instructions
1st Level: Main Telephone Number 800-773-4967		Select appropriate ACD option to be transferred to Service Representative
2nd Level: Main Telephone Number 800-773-4967		Select appropriate ACD option - Service Representative to arrange for a Center Manager to return the CLEC's call within one hour
3rd Level: 904-541-8223	Kar Mcleod Center Director	

4th Level: 904-541-8200	Mark Butterworth Operations Assistant Vice-President	
Birmingham LCSC UNE/LNP		
Escalation Level	Contact	Special Instructions
1st Level: Main Telephone Number 800-773-4967		Select appropriate ACD option to be transferred to Service Representative
2nd Level: Main Telephone Number 800-773-4967		Select appropriate ACD option - Service Representative to arrange for a Center Manager to return the CLEC's call within one hour
3rd Level: 205-714-0158	Diane Myers Operations Director	
4th Level: 205-714-0020	Bill Thrasher Operations Assistant Vice-President	
Birmingham LCSC Complex		
Escalation Level	Contact	Special Instructions
1st Level: Main Telephone Number 800-773-4967		Select appropriate ACD option to be transferred to Service Representative
2nd Level: Main Telephone Number 800-773-4967		Select appropriate ACD option - Service Representative to arrange for a Center Manager to return the CLEC's call within one hour
3rd Level: 205-714-0093	Bill Castleberry Operations Director	
4th Level: 205-714-0020	Bill Thrasher Operations Assistant Vice-President	

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EXHIBIT 3

February 27, 2002

CCP Monthly Status/Process Improvement Meeting

MEETING MINUTES

MEETING NAME	MINUTES PREPARED BY:	date prepared
Monthly Status Meeting /Process Improvement Meeting	Cheryl Storey-- Change Management Team	3-1-02

Participants

PARTICIPANT	Company
Valerie Cottingham	BST - CCP
Cheryl Storey	BST - CCP
Brenda Files	BST - CCP
Steve Hancock	BST - CCP
Renaë Stewart	BST - TAG Project Mgr
Dennis Davis	BST - CCP
Peggy Rehm	NightFire
Mary Conquest	ITC Deltacom
Dale Donaldson	epb
Audrey Thomas	BST - New Solutions Delivery
Mel Wagner	Birch Telecom
Lucy Estephanos	BST - Release Mgmt
Tami Swensen	Launch-Now-Accenture
John Duffey	FL-PSC
Gary Romanick	BST-Customer Care
Gary Jones	BST - Flow Through Task Force
Matt Beynon	Tel Excel Partners
Renaë Clark	Espire

PARTICIPANT	company
Bernadette Seigler	AT&T
Sherry Lichtenburg	MCI WorldCom
Heather Thompson	Accenture
Doyle Mote	BST - LCSC - Doc
Shamone Stapler	ITC Deltacom
Graham Watkins	KPMG
Mike Young	Telcordia
Kyle Kopytchak	Network Telephone
Colette Davis	Covad
Meena Masih	BST - Release Mgmt
Jill Williamson	BST - IT
Tyra Hush	Worldcom
Peggy Rubino	ZTel
Sherian Lively	NuVox
Joanne Baxter	Network Telecom
Quan Nguyen	KMC Telecom
Paul Pinick	Birch Telecom

Meeting Information History

date	start time	end time
02/27/02	11:00 AM ET	4:30 PM ET

meeting purpose / AGENDA
Monthly Status / CCP Process Improvement Meeting

February 27, 2002

CCP Monthly Status/Process Improvement Meeting

MEETING MINUTES

<p>9. DISCUSSION ON NEXT STEPS: VERIZON PROCESS, GA CLEC REDLINED DOCUMENT, CR0171</p>	<p>Discussion from the CLEC affecting definition led the committee into a discussion concerning which process document should be used as a working document going forward. Dennis asked the CLEC community which Change Control Process the CCP membership should use for process improvement discussions going forward:</p> <ol style="list-style-type: none">1. The Verizon Change Management Process2. GA CLEC Redlined/Greenlined Document* <p>*Note: GA CLEC Redlined Document was submitted by the CLEC Coalition to the GA PSC on 1/30/02. The Greenlined Document reflects the 2/15/02 BellSouth response.</p> <ol style="list-style-type: none">3. CR0171, plus individual open process issues <p>MCI WorldCom replied that BST should focus on the GA CLEC Redlined Document because it includes the critical pieces of the Verizon process.</p> <p>BST questioned if CR0171 could be canceled since the GA CLEC Redlined/Greenlined Document is being suggested as a replacement to CR0171. CR0171 was opened by AT&T on 9/20/00 and is currently used as the working document within CCP. CLECs indicated that CR0171 should not be canceled. CLECs suggested that a note be added to CR0171 referring to the GA Redlined/Greenlined Document. The GA Redlined/Greenlined Document would be Version 2 of the attachment to CR0171. Dennis suggested that we cancel change requests such as CR0501 and CR0569 since they are included in the GA CLEC Redlined/Greenlined Document. BST will submit suggested language to the CLECs regarding CR0171 and any associated CRs that could be canceled.</p> <p>It was questioned if a separate CR should be submitted for the GA CLEC Redlined/Greenlined Document. BST suggested it may be more manageable if this document were divided into sections. Sherry indicated that this was not acceptable. Mel Wagner (Birch) suggested that CLECs/BST establish a drafting team to address the document. Mel stated that this document should not be addressed during regular meetings, that it should be a joint collaborative effort and no ballot should be required. Dennis agreed to provide possible dates of when CLECs/BST can begin meeting face-to-face to address the proposed changes.</p>
<p>NEW ACTION ITEM: BST to submit suggested language to the CLECs regarding CR0171, adding a reference to the GA Redlined/Greenlined Document and a list of associated CRs.</p>	

EXHIBIT 4

Cox, Cindy

From: Kyle Kopytchak [Kyle.Kopytchak@networktelephone.net]
Sent: Wednesday, February 20, 2002 12:23 PM
To: 'Cindy.Cox@bellsouth.com'
Subject: ADSL USOC issues per FPSC

Ms. Cox

Per the direction of Commissioner Jaber on 2/18/02 please assist Network Telephone in understanding the following questions:

- What does the ADSL USOC signify on the CSR? Is it for BellSouth ADSL customers only? Or does it include both BellSouth, Fast Access and wholesale ADSL to ISP's? Or is it for wholesale customers only?
- Why is the ADSL USOC found on the CSR for customers who have not had any DSL service?
- Does BellSouth place the USOC on the CSR for potential customers who have service in selected areas newly serviced by new BellSouth XDSL placements?
- Does the ADSL USOC remain on the CSR when the customer disconnects the service?
- Does the ADSL USOC block the transfer of all products and services when on the CSR?

Thank you for your prompt attention to this matter.

Kyle Kopytchak
Process Measurement
Network Telephone
KyleK@Networktelephone.net
850.469.9904.1250
888.432.4855.4.1250

3/15/2002

Blake, Kathy

From: Cox, Cindy
Sent: Wednesday, February 27, 2002 3:48 PM
To: 'kyle.kopytchak@networktelephone.net'
Cc: Blake, Kathy; Foshee, Lisa; Sims, Nancy H
Subject: adsl usoc questions

Kyle,

attached are responses to your questions regarding the ADSL USOC. I hope these are helpful.

Thanks

Cindy Cox
BellSouth



adslUSOC.DOC

REQUEST: What does the ADSL USOC signify on the CSR? Is it for BellSouth ADSL customers only? Or does it include both BellSouth, Fast Access and wholesale ADSL to ISP's? Or is it for wholesale customers only?

RESPONSE: The ADSL USOC signifies that a Network Service Provider (NSP) has ordered BellSouth's tariffed wholesale ADSL service on behalf of its end user. The ADSL USOC is put on the CSR after the line is provisioned for ADSL at the request of the NSP.

REQUEST: Why is the ADSL USOC found on the CSR for customers who have not had any DSL service?

RESPONSE: The NSP is the customer of record for the BellSouth's tariffed wholesale DSL service. The ADSL USOC is added to or deleted from an account based on orders submitted by an NSP on behalf of their end users. Any discrepancy regarding the validity of the ADSL USOC is between the NSP, who places orders on behalf of their end users with BellSouth, and the end user, who places orders directly with the NSP.

REQUEST: Does BellSouth place the USOC on the CSR for potential customers who have service in selected areas newly serviced by new BellSouth xDSL placements?

RESPONSE: No. BellSouth only places the ADSL USOC on a CSR when a line has been provisioned for ADSL upon an NSP's request. The NSP must submit an order to BellSouth to activate the provisioning process.

REQUEST: Does the ADSL USOC remain on the CSR when the customer disconnects the service?

RESPONSE: No. When the NSP submits a disconnect order, the service is disconnected and the ADSL USOC is removed from the CSR.

REQUEST: Does the ADSL USOC block the transfer of all products and services when on the CSR?

RESPONSE: No. However when an LSR is submitted to convert an end user's line to UNE-P and the ADSL USOC is on the end user's CSR, the LSR is sent back to the ALEC for clarification. Once this happens, the ALEC can either resubmit the order without the USOC, or submit a new order for a different type of line, such as resale.

REQUEST: Network Telephone has found the ADSL USOC on the CSR attached to TN's in the hunt group, fax lines, and BTN's. Is the ADSL USOC on the CSR attached to TN's other than the actual ADSL circuit?

RESPONSE: The ADSL USOC is only associated to the specific line that the NSP designates when they submit their order to BellSouth. The NSP has the option to order more than one DSL circuit into a location and would indicate the specific line(s) that should be provisioned with the DSL service.

Blake, Kathy

From: Cox, Cindy
Sent: Thursday, February 28, 2002 1:30 PM
To: 'Kyle Kopytchak'
Cc: Blake, Kathy; Foshee, Lisa; Sims, Nancy H; 'lsharvey@psc.state.fl.us'; 'jduffey@psc.state.fl.us'; Brent McMahan
Subject: RE: adsl usoc questions

Kyle,

Sorry if there were additional questions we missed. Regarding your first question - yes, Network Service Provider would include BellSouth in its provision of its retail FastAccess internet access service. I will need to research your second question and get back to you.

Thanks

cindy

-----Original Message-----

From: Kyle Kopytchak [mailto:Kyle.Kopytchak@networktelephone.net]
Sent: Thursday, February 28, 2002 12:51 PM
To: 'Cox, Cindy'
Cc: Blake, Kathy; Foshee, Lisa; Sims, Nancy H; 'lsharvey@psc.state.fl.us'; 'jduffey@psc.state.fl.us'; Brent McMahan
Subject: RE: adsl usoc questions

Cindy,

You did not answer the two primary questions that Network Telephone furnished you and was before the Commission:

- 1) Does a "Network Service Provider (NSP)," as described in your answer of February 27, 2002 include BellSouth's retail broadband entity?
- 2) What percentage of BellSouth's customer CSRs have an ADSL USOC that involves the BellSouth broadband entity?

Thank you for your prompt attention to this matter.

Kyle Kopytchak
Process Measurement
Network Telephone
KyleK@Networktelephone.net
850.469.9904.1250
888.432.4855.4.1250

-----Original Message-----

From: Cox, Cindy [mailto:Cindy.Cox@bellsouth.com]

Sent: Wednesday, February 27, 2002 2:48 PM
To: 'kyle.kopytchak@networktelephone.net'
Cc: Blake, Kathy; Foshee, Lisa; Sims, Nancy H
Subject: adsl usoc questions

Kyle,

attached are responses to your questions regarding the ADSL USOC. I hope these are helpful.

Thanks

Cindy Cox
BellSouth

<<adslUSOC.DOC>>

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Blake, Kathy

From: Cox, Cindy
Sent: Monday, March 04, 2002 5:05 PM
To: 'kyle.kopytchak@networktelephone.net'
Cc: Blake, Kathy; Foshee, Lisa; Sims, Nancy H; 'lsharvey@psc.state.fl.us';
'jduffy@psc.state.fl.us'
Subject: additional question re: adsl usoc

Kyle,

See attached.

Thanks

Cindy Cox
BellSouth



subsequent adsl usoc.doc

BellSouthTelecommunications, Inc.
FPSC Docket No. 960786B-TP
Network Telephone Post Workshop
Issues
March 4, 2002
Subsequent Request
Page 1 of 1

Q. What percentage of BellSouth's customer CSRs have an ADSL USOC that involves the BellSouth broadband entity?

A. Approximately 4% of BellSouth's access lines in Florida have the ADSL USOC. This incorporates all NSPs since the ADSL USOC is the same regardless of the NSP.

EXHIBIT 5

BellSouth Interconnection Services
675 West Peachtree Street
Atlanta, Georgia 30375

Carrier Notification
SN91081506

Date: February 27, 2002

To: Competitive Local Exchange Carriers (CLECs)

Subject: **CLECS - REVISED: Local Service Freeze (Latest revision posted on June 20, 2001)**

This is to advise that effective March 24, 2002, the Local Service Freeze (LSF) option will *also* be made available for **Unbundled Network Elements-Platform (UNE-P) products REQTYPM** in the BellSouth region, except in Georgia, North Carolina, and Tennessee. LSF will allow the end users to "freeze" their local service to the local service providers of their choice. **Orders for LSF can be submitted either electronically or manually.**

The December 1998 Federal Communications Commission (FCC) slamming order provides several options for lifting preferred carrier freezes including:

1. A submitting carrier may conduct a three-way conference call with the carrier administering the freeze and the end user in order to lift the freeze.
2. The end user may submit a verbal request to the carrier administering the freeze.
3. The end user may submit a written request to the carrier administering the freeze.

Please follow the process outlined below if a BellSouth end user wants to switch to a CLEC and the account is currently frozen:

- A) Ask the end user to call in or submit in writing to its current local service provider, the request to remove a LSF or,
- B) Conduct a three-way call with the end user and its current local service provider to have an order issued to remove the freeze.

If the three-way call process is used by a submitting carrier, please follow the steps below:

1. With the end user on the line, call the appropriate BellSouth retail service center to have an order issued to remove the freeze.
2. Advise the BellSouth service representative that the end user wants to switch local service providers and the freeze should be lifted to allow the switch.
3. The BellSouth service representative will issue an order to remove the freeze so the CLEC can submit a Local Service Request (LSR) to migrate the end user's account.

BellSouth retail service representatives will follow similar procedures to request lifting of a CLEC end user freeze. Please inform your contact personnel regarding this process.

The following provides instructions on how CLECs should submit an LSR for adding or deleting LSF:

A) LSF will be valid for REQTYPE and **REQTYPE M** with ACT of N or C, V, P, Q and T. The SPEC field must be formatted with the following entries on a resale or **UNE-P** request:

EU = Add LSF per end user request
LP = Add LSF per local provider request
DE = Delete LSF

B) Valid entries can be 2 to 7 alpha/numeric characters.

C) Local Exchange Navigation System (LENS) users will use a new field "Local Service Freeze Option" with a pull down menu.

Please contact your BellSouth Local Contract Manager, if you have any questions.

Sincerely,

ORIGINAL SIGNED BY MATEO CAYMOL FOR JIM BRINKLEY

Jim Brinkley – Senior Director
BellSouth Interconnection Services