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May 31, 2002

Mrs. Blanca S. Bayó  
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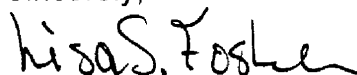
**Re: 960786B-TL & 981834-TP (Section 271)**

Dear Ms. Bayó:

Enclosed is the original and fifteen copies of BellSouth Telecommunications, Inc.'s Post Workshop Supplemental Data in support of its Application for InterLATA Relief Pursuant to Section 271 of the Federal Telecommunications Act of 1996 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 (LA)

Enclosures

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

449046

DOCUMENT NUMBER-EAT-  
05769 MAY 31 2002  
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**CERTIFICATE OF SERVICE**  
**DOCKET NO. 960786-B-TL and 981834-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by  
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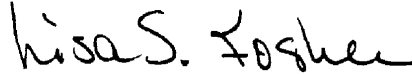
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\_\_\_\_\_  
Lisa S. Foshee (LFA)

**(+) Signed Protective Agreement**

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION


In Re: Consideration of	)	
BellSouth Telecommunications,	)	Docket No. 960786B-TL &
Inc.'s entry into interLATA	)	Docket No. 981834-TP
services pursuant to Section 271	)	Filed: May 31, 2002
of the Federal Telecommunications	)	
Act of 1996	)	
<hr/>		

**POST-WORKSHOP SUPPLEMENTAL DATA**  
**OF BELLSOUTH TELECOMMUNICATIONS, INC.**

BellSouth Telecommunications, Inc. ("BellSouth") hereby files its Post-Workshop Supplemental Data on the attached pages.

Respectfully submitted this 31st day of May, 2002.

BELLSOUTH TELECOMMUNICATIONS, INC.

  
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## List of Issues

### CLEC Commercial Experience Workshop (2/18/02)

#### Billing

Issue	Reply
<p>2. BellSouth billing includes format and other errors that create significant problems for ALECs</p>	<p>From the combined ALEC comments filed in March 2002 it appears that this issue is limited to an MCI claim that the bills are missing the BTNs on 3% of the lines.</p> <p>MCI claims that the invoices are flawed because a billing telephone number (BTN) was not provided on 3% of the lines that were billed. BellSouth's position on this issue has never changed. BellSouth reviewed the OBF specifications for supplying telephone numbers for services provided on UNE bills. The specifications call for BellSouth to indicate which USOCs and charges appear for each telephone number by use of an electronic record providing this information. The specifications do not require that a BTN be placed on each record. On March 4, 2002, representatives of the BellSouth billing team talked with Ms. Cindy West of the MCI billing staff. The parties discussed the industry specifications, and BellSouth explained the exact location within the records where MCI could find the telephone numbers for each line. Ms. West seemed to be satisfied with this information. Ms. Lichtenberg's continued insistence that BellSouth has a problem to "fix" is not correct. Moreover, MCI raised this issue in the GA/LA application, and the FCC still found BellSouth in compliance with Checklist Item 2.</p>
<p>3. Some ALECs continue to receive BellSouth usage records for accounts lost another ALEC or back to BellSouth.</p>	<p>Suppose a CLEC serves a line with UNE-P on Monday but loses the customer effective Tuesday to another UNE-P CLEC. The issue is that until all of the ordering processes have finished (into billing), the first CLEC will continue to receive DUF records (since the billing records have not switched over as yet). This same issue appears when BellSouth has reacquired a customer.</p> <p>How does BellSouth address this:</p> <ol style="list-style-type: none"> <li>1) As shown previously, BellSouth updates the CSR with service order data generally (about 75% of the time) within 1 business day and, therefore, the issue never appears. In the example above, a service order effective on Tuesday to move a line from one LEC to another will be posted to billing on Wednesday in time to direct the DUF records to the new CLEC (or BellSouth).</li> <li>2) On occasion, due to service order errors or when the order is processed around the bill period, additional time will be required to post the CSR. When this occurs, DUF records will be sent to the old CLEC until the order posts in the billing system. However, BellSouth will provide CLECs with a special type of DUF record called a "cancel record" for these cases. The</li> </ol>



Issue	Reply
	<p>cancel records in effect negate the effect of the original record being sent.</p> <p>As an <i>example</i>:</p> <ul style="list-style-type: none"> <li>▪ Suppose a line is served by a CLEC via UNE-P.</li> <li>▪ On Monday, service orders are received to disconnect the UNE-P and to set the line up as a BellSouth retail customer effective Tuesday (the last day the CLEC will serve the customer).</li> <li>▪ On Tuesday, an error is detected on the service order and is not corrected until Thursday.</li> <li>▪ Beginning on Wednesday, all calls originating from the line should be billed by BellSouth to the end user as a retail service and <b><i>no</i></b> DUF should be sent to the CLEC.</li> <li>▪ However, due to the service order error, all of the Wednesday calls are treated as if the CLEC was providing the service via UNE-P (since the order to change the line to BellSouth was still being processed) and DUF records were being provided (on the Wednesday DUF).</li> <li>▪ When the order is posted on Thursday, cancel records are provided to the CLEC on the Thursday DUF for calls originated on Wednesday (and included on the Wednesday DUF improperly).</li> </ul>
<p>4. Usage is billed to the wrong BAN making bill auditing and record tracking difficult.</p>	<p>MCI complains that BellSouth is not using the correct billing number to bill for UNE-P services. MCI explains that accounts established with the 770 area code are actually appearing on a billing account that is set up with area code 678. This is not true. MCI uses two billing numbers in Georgia, one for the Atlanta metropolitan area (with an area code of 770) and another billing account for all of the remaining areas in Georgia (area code 706) to which the charges for UNE-P will be included. The fact is that MCI itself has become confused about what will be on the Atlanta bill. This Atlanta billing account includes UNE-P charges for lines in all area codes in the Atlanta metropolitan area (area codes 404, 770 or 678). In fact, MCI does not have a billing account for UNE-P with an area code of 678. Accounts from a number of area codes (including area code 770) are billed on the account. The other billing account number in Georgia, which contains is a 706 area code may also include lines from multiple area codes outside of Atlanta. This mix of area codes on a single bill is nothing new and is the same manner in which charges for retail services are billed to multi-location business or residence customers. BellSouth has created a document which can assist CLECs better understand the bills provided by BellSouth. The document is called "Understanding Your Bill" and can be found at the following internet address:</p> <p style="text-align: center;"><a href="http://www.interconnection.bellsouth.com/guides/html/billing.html">www.interconnection.bellsouth.com/guides/html/billing.html</a></p> <p>MCI raised this issue in the GA/LA proceeding and the FCC found it wasn't a problem.</p>
<p>5. Manual handling of billing errors leads to double</p>	<p>MCI raises an issue with what is called the "hold file" process. The hold file is a term used to describe an error correction process that is performed on roughly one half of one percent of service orders as error situations are found. This</p>

Issue	Reply
billing>	<p>process is used on all types of orders for retail customers, interexchange carriers and CLECs. The orders are processed using the same systems and processes and the timing of updating the information to the CSRs for all customers is the same. The plain fact is that when errors occur on service orders (for any customer) it will take some amount of time to make the corrections. While some exceptions do occur, the vast majority of service orders that contain these types of errors are corrected in one or two business days. Since these correction activities are performed on retail as well as CLEC orders, the CLECs are provided with an opportunity to compete with BellSouth. MCI raised this issue in the GA/LA proceeding and the FCC found it wasn't a problem.</p> <p>Also, this is tied in with the CSR posting timeliness which was addressed many times before.</p>
6. BellSouth has no mechanism to return and research erroneous usage records to ALECs	<p>MCI raises an issue about a usage process known as outcollects. What MCI is really looking for is a way to submit a usage bill dispute electronically. BellSouth does not provide that capability to any customer, retail CLEC or Interexchange Carrier. BellSouth does, however, provide CLECs with an efficient process to report issues with BellSouth's DUF records. The BellSouth billing documentation (<i>The BellSouth CLEC Billing Guide</i>, Chapter 4 available to all CLECs at <a href="http://www.interconnection.bellsouth.com/guides/html/understanding_bill.html">http://www.interconnection.bellsouth.com/guides/html/understanding_bill.html</a>) contains a form to report such cases and provides that each reported trouble will be acknowledged within 24 hours. MCI contends this method is not effective because the form used to report issues can only be used for single records and not for issues that effect thousands of records. MCI does not understand the process. A CLEC can report a trouble that impacts entire files (containing hundreds of thousands of records), thousands of individual records or, if the CLEC wishes, a single record. MCI's justification of the electronic returns process is that BellSouth would then have the records to be repaired. This makes no sense because BellSouth, as the supplier of the records, already has the records, and another copy is unnecessary. The current process provides an effective means by which a CLEC can report usage problems directly to the subject matter experts at BellSouth who can rapidly respond to any issues that arise. The FCC considered this issue in the GA/LA application and did not find it to be a problem.</p>
7. The number and frequency of bills makes managing timely payment difficult for ALECs.	<p>BellSouth provides billing in the same manner (frequency and number of bills) as that provided to retail or IXC customers.</p> <p>Industry guidelines call for different services to be included on different bill types (resale, local interconnection, UNE-P, loops, etc.).</p> <p>Collocation bills are separated by location (end office). This accounts for the vast majority of bills being provided to COVAD.</p> <p>BellSouth will complete a BAN or bill period consolidation at a customer's</p>

Issue	Reply
	<p>request.</p> <p>BellSouth completed a billing period consolidation for COVAD in January 2002.</p>
<p>8. 0000 Miscellaneous billing amounts are difficult to audit.</p>	<p>The issue here is that COVAD wants BellSouth to detail the charges on the "0000 Invoice".</p> <p>BellSouth provides CLECs with CABS bills with separate "invoices" for each month. So, if the current bill has balances due from prior months, then the balance for each of the months is tracked by invoice number (i.e., unpaid April charges are separate from current charges for May, etc. by use of an invoice number). Once charges get to be 12 months old or older, the system lumps them in under the "0000" invoice and they are not broken out by individual month (we feel enough is enough). COVAD requested a break out of these old charges. BellSouth's position is that these charges were separately identified on the original bills provided by BellSouth (when they were first incurred) and that COVAD should pay for being provided copies of the previous bills.</p>

**RMI #5:**

Issue: BST resolution intervals for account team inquiries are unreasonably long.

Response: As a standard practice, the Account Team and CLEC Care Team will acknowledge receipt of a CLEC's inquiry within 24 hours. This acknowledgement could include an actual answer to the CLEC's question, but might include a request for additional information or a discussion of the actions required to resolve the CLEC's inquiry. As part of the acknowledgement, the CLEC might be advised to contact the specific group within BellSouth that handles the CLEC's question or concern. Turn around times, however, are not standardized. Instead, the Account Team or CLEC Care Team will determine resolution time frames based upon the nature and complexity of the issue, its urgency, and the projected amount of work and/or research required to return a complete and accurate response. The Account Team and CLEC Care Team will work cooperatively with CLECs in providing reasonable and achievable target dates for resolving both routine and urgent inquiries.

**ORDERING #4**

Issue: In a CLEC to CLEC migration, the acquiring CLEC cannot access the CSR of the losing CLEC.

Response: Due to CPNI restrictions, BellSouth is not permitted to disclose the losing CLEC's account information to the acquiring CLEC.

## **Florida Response to Metrics Issue # 5**

### Issue

L-Coded orders are incorrectly coded and are excluded from the Order Completion Interval Metric.

Covad raised a question about the L-codes applied to its orders for September 2001 for its UDC/IDLC loops (transcript pg 252-253). Covad asserted that BellSouth erroneously excluded orders from the OCI measurement because the orders were improperly L-coded. For the month in question, there was a process issue that should address the discrepancy alleged by Covad. At that point in time, for LSRs that were submitted electronically, the standard interval due date was applied. For some types of orders submitted electronically, that were part of the planned fall out process, as well as those manually submitted LSRs, ALECs were instructed to add one day to the due date interval if the LSR was submitted after 10:00a.m. These instructions were originally intended to apply when BellSouth did not process LSRs until the next business day, which gave the ALEC the opportunity to provide a valid due date to the end user customer while allowing the downstream departments sufficient time to provision the service. These instructions are no longer necessary because BellSouth has improved its speed for processing of orders to comply with the more stringent intervals imposed by the State Public Service Commissions. BellSouth recognized that there was a potential for confusion related to the 10:00a.m. submission time for both the ALECs and BellSouth. To eliminate this issue, BellSouth changed the published interval guide and the business rules to remove the request to add this additional day to the standard due date interval. The standard interval is now used for all LSRs regardless of the method or time the LSR is submitted. BellSouth's interval guide was updated in November 2001 to reflect these changes.

Without having the listing of all orders for this month, BellSouth is unable to provide an exact analysis of these orders. If Covad will supply BellSouth with the data they used to produce this issue, BellSouth will complete a root cause analysis on these orders for the time period in question.

## **Florida Response to Metrics Issue #8**

### Issue

The Bellsouth self-reported ALEC data provided in PMAP for the Average Completion Notice Interval (ACNI) is incomplete.

The exclusion of completion notices for Standalone LNP orders in the ACNI results was limited to "trigger" orders.

## **Florida Response to Metrics Issue # 11**

### Issue

BellSouth is incorrectly reporting UNE-P data for all the ALECs.

The UNE-P data was removed from the UNE Other Non-Design disaggregation category in the MSS in July 2001 because it was already accounted for in the MSS in the Loop Port Combos category. The change was implemented to make the data mutually exclusive in the MSS. In the SQM, the UNE-P data was subsequently removed from the UNE Other Non-Design disaggregation category in December 2001.

## Florida ALEC Experience Additional Information

### RMI:

#### ISSUES 4 and 7:

(4) BST takes too long to classify defects as such, and then to correct them. (Issue from Covad Handout, ITC Deltacom Handout and Transcript pages 218-219, Network Telephone Transcript page 221, and AT&T Handout and Transcript page 215)

(7) BST fails to follow software testing and quality processes, and delivers faulty software. (Issue from AT&T Transcript page 216, various MCI/Covad/ITC Deltacom Transcript references to specific situations)

#### RESPONSE:

These two issues mirror Florida Third Party Test Exceptions 123 and 157. Notwithstanding the current and ongoing status of the two Exceptions, the FCC adequately addressed these complaints together in its Georgia/Louisiana 271 application approval<sup>1</sup>. Based upon information BellSouth provided to the FCC in its application (GALA II, Stacy Supplemental Reply Affidavit filed March 28, 2002, ¶¶ 77-81, Footnote 16, attached hereto as Attachment A), and supported by the Georgia Public Service Commission in its comments (page 26), the Commission rejected “commenters assertions that BellSouth fails to implement

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<sup>1</sup> FCC Order 02-147 at paragraph 195

corrections to defects in a timely manner and that there are unnecessary defects because BellSouth's software implementations are not sufficiently tested before release.” The Commission and BellSouth agree that a reduction of coding defects is beneficial to serving ALECs, and that software releases with numerous defects can inhibit a smooth transition between releases.

Understanding BellSouth's commitment to performance, the Commission found “that BellSouth demonstrates that most of these defects have a very small impact and have been corrected quickly and within the timeframes set by the Change Control Process<sup>2</sup>.” The Commission pointed out that BellSouth had explained that, of the 38 defects outstanding as of March 5, 2002, have been scheduled or targeted for implementation this year<sup>3</sup>. Further, in response to Covad’s specific allegations regarding a so-called “backlog” of 11 defects that impacted Covad directly, the Commission supported BellSouth's showing that one defect had been cancelled, six had been implemented, and the remaining four were scheduled for a release in May 2002<sup>4</sup>. The Commission also stated it was “reassured that new metrics being developed in Georgia will measure how well BellSouth fixes defects within the required timeframes.”<sup>5</sup>

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<sup>2</sup> FCC Order 02-147 at paragraph 195, and at footnote 744.

<sup>3</sup> FCC Order 02-147 at paragraph 195

<sup>4</sup> FCC Order 02-147 at footnote 746.

<sup>5</sup> FCC Order 02-147 at paragraph 195, and at footnote 750. The reference to “new metrics” refers to metric CM-6 which will measure-regionwide-the percent of software defects corrected within the appropriate interval.



In terms of the ALEC complaints regarding adequate testing, the Commission rejected those complaints as well, stating simply that “based on the evidence before us, we find that BellSouth performs adequate internal testing before releasing software.”<sup>6</sup> The quality of and parameters for BellSouth’s internal testing processes are set forth in BellSouth’s response to Florida Exception 157, attached hereto as Attachment B. The Commission further added that it would continue to monitor BellSouth’s performance in this regard. BellSouth welcomes that because it continues to improve its testing environment and processes.

In addition, BellSouth disagrees with KPMG’s interpretation of documents it reviewed to reach its conclusion that BellSouth does insufficient testing. The documents simply provide BellSouth’s vendors’ risk assessment for expedited releases-they in no way make an affirmative statement that BST failed to adequately test. In addition, the evidence shows that BST does adequately test for defects.

As affirmation of its resolve to properly test and implement releases, BellSouth would like to point to the recent testing of Release 10.5. This release contained numerous complex features and defect fixes. All appropriate notifications leading up to the

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<sup>6</sup> Attachment B to these replies is Florida Third Party Test Exception 157. Contained in BellSouth’s response to this exception is a description of BellSouth’s internal software testing process. It outlines, among other steps, the different defect security levels, and explains the parameters upon which BellSouth determines a go/no go status for implementing a software release.

implementation were provided to ALECs, and the release was made available in CAVE for ALEC testing in accordance with CCP testing timeframes. During the intensive internal testing period prior to the scheduled May 18, 2002 implementation, BellSouth discovered certain defects for which there was no possibility for development of fixes or acceptable workarounds by the scheduled date.<sup>7</sup>

Appropriately, BellSouth made the decision to delay – for only two weeks – the release implementation in order to eliminate Severity 1 defects, and to either eliminate, or develop acceptable workarounds for, Severity 2 defects, in accordance with CCP testing processes. Such discoveries are not the result of inadequate testing, but rather the result of extensive and intensive internal testing. ALECs will be better served by the delay in terms of receiving a better release, as well as gaining an additional two weeks of testing their own scenarios.

The ALEC complaints, as well as the Florida Third Party Exceptions, are based upon situations occurring prior to the development of new CCP language regarding “ALEC-affecting” defects, and revisions to the software testing processes (including additional ALEC testing capabilities in CAVE). BellSouth expects both Exceptions to be successfully closed by the end of June or

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<sup>7</sup> FCC Order 02-147 at paragraph 195.

early July. The Florida Commission is in a prime position to observe the dispensation of both.

**PRE-ORDERING:**

ISSUE 4:

Inaccurate/incomplete data from LENS resulting in higher costs, longer service due dates, and customer dissatisfaction.

RESPONSE:

Covad and Network Telephone utilize the LENS GUI to obtain Loop Makeup information from BellSouth's Loop Facilities Assignment and Control System ("LFACS").(See Transcript at pages 9,14). Network Telephone claims to have problems with the LENS database in obtaining accurate data in order to reserve the loop, complaining of incomplete data in LENS. (See Transcript at pages 13-14) Covad claims that the Loop Makeup data contained in LFACS is often wrong or missing, causing them to cancel the order and resubmit an order with request for conditioning.(See Transcript pages 9-10). Although the ALECs claim that this supposed LFACS deficiency "...causes unforeseen provisioning delays, prevents ALECs from providing timely DSL service, and causes ALECs to incur additional expense" (See ALEC Post-Workshop Comments at page 14), this concern was prioritized sixth out of six by the ALECs. BellSouth's LFACS database is

very accurate, although it certainly is not perfect. It is true that in some instances, some of the LMU information may not be listed in the LFACS database. In those instances, when either BellSouth or an ALEC needs additional information that is not available electronically, both parties would be required to submit a manual LMU request. BellSouth's loop makeup information process operates in a nondiscriminatory manner because any information that is missing for the ALEC is also missing for BellSouth. (See GALA, ¶115.)

Network Telephone claims that the incomplete data in LFACS results in their inability to mechanically obtain a Facility Reservation Number ("FRN") and then send its orders electronically. (See ALEC's Post-Workshop Comments at pages 12-13). Network Telephone alleges that BellSouth has refused to work with Network Telephone on these matters. (See Transcript at page 14). These allegations are untrue, as BellSouth has previously explained in great detail in BellSouth's Post-Workshop Comments at pages 4-6. BellSouth described several alternatives that are offered to ALECs for obtaining loop makeup information. In addition to the alternatives previously addressed, Network Telephone has the option of ordering an Unbundled Copper Loop – Non-Designed ("UCL-ND") that will support DSL services and does not require a FRN. In any case, Network Telephone is not disadvantaged with respect to pre-ordering. It simply appears to be

attempting to circumvent the normal process to avoid the manual service inquiry charge that is necessitated in the circumstances described. BellSouth remains committed to work with Network Telephone to find an efficient and cost effective process for both parties, and suggested that a change request be submitted through the Change Control Process, if Network Telephone wants to change this process.(See BellSouth's Post-Workshop Comments at page 6.) Network Telephone has not submitted such a change request.

Covad's issue relates to a concern about the need to issue two orders when Covad has ordered loops believed to have no impediments (load coils), but discovers during the provisioning process that load coils exist and that conditioning is thus required. (See ALEC's Post-Workshop Comments at page 14). This concern is being addressed. Covad submitted a Change Request on January 17, 2002 to the Flow Through Task Force, CR0622/FTTF-33, requesting that BellSouth allow ALECs to preauthorize loop conditioning on mechanically submitted orders. This request was prioritized 12<sup>th</sup> out of 18 at the April 9, 2002 Flow Through Task Force meeting. This Change Request is currently in Candidate Request status, but is not currently being actively pursued due to its lower priority ranking.

The FCC addressed the issue of nondiscriminatory access to loop makeup information in GALA, ¶ 112, and found ALECs' similar complaints to be without merit by stating, that "[b]ased on the evidence in the record, we find, as did the Georgia and Louisiana Commissions,"<sup>8</sup> that BellSouth provides competitive LECs with access to loop qualification information in a manner consistent with the requirements of the *UNE Remand Order*.<sup>9</sup> Specifically, we find that BellSouth provides competitors with access to all of the same detailed information about the loop that is available to itself and in the same time frame as any of its personnel could obtain it.<sup>10</sup> Thus, any inaccuracies in the ILEC's database are not discriminatory, because they affect the ILEC in the same fashion as competing carriers

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<sup>8</sup> Georgia Commission GALA I Comments at 91-92; Louisiana Commission GALA I Comments at 36-38.

<sup>9</sup> The Commission's rules require BellSouth to provide competitors all available information in its databases or internal records, in the same time intervals that it is available to any BellSouth personnel, regardless of whether BellSouth has access to such information. *See UNE Remand Order*, 15 FCC Rcd at 3885-86, paras. 427-31.

<sup>10</sup> *See Verizon Massachusetts Order*, 15 FCC Rcd at 9016-17, para. 54.

ISSUE 5:

Information cannot be gathered from TAG CSRS that is available from LENS. See ITC-DeltaCom transcript. Ms. Mary Conquest, ITC DeltaCom, on page 20, lines 12-20, of the Transcript Volume 1 –Proceedings/ALEC Experience, states “I can also go to LENS from time to time and pull CSRs that I cannot pull via TAG. BellSouth acknowledges this as a defect.”

RESPONSE:

This issue is the same as submitted to the CCP by ITC DeltaCom on September 24, 2001 and assigned Change Request (“CR”) Number 0498. CR 0498 concerned the inability to view certain CSRs in TAG, and was determined to be a Type 6 Defect with low impact. As a workaround, ALECs were advised to access the affected accounts by using LENS to view CSRs pending resolution. On February 2, 2002, in Release 10.3.1, CR0498 was implemented to correct this defect. Since this date, BellSouth is not aware of any ALEC reporting a problem related to the defect that was addressed in CR 0498. Therefore, BellSouth considers this issue resolved.



As information, and unrelated to ITC DeltaCom's comments in the Workshop, BellSouth is involved with an additional Change Request Number 0127 regarding a request for new pre-ordering functionality in LENS and TAG. Although the ALECs suggested that this was a defect in TAG, it was determined through testing that this was not a defect, and that TAG was operating as "defined in the baselined system requirements," and would therefore be treated as addition of "new" pre-ordering functionality.

Specifically, this Change Request will provide ALECs with indicator(s) on the Customer Service Record ("CSR") whenever a "pending service order" exists for the end-user customer. Such indicator would act to alert the ALEC representative that service order activity is taking place on the end user's service. As stated by Ms. Shamone Stapler, ITC DeltaCom on the Change Request, "This is the only way to let our people know that they will have to hold the next order until the previous order is complete."

BellSouth intends to provide this new functionality and CR0127 was ranked 7 of 26 Pre-Ordering/Ordering activities, by ALECs in the May 22, 2002, Change Review Prioritization meeting. At present, a target date for implementation has not been determined. Efforts will continue to determine or confirm where this new feature falls with relation to other requested ALEC change requests.

**ORDERING:**

ISSUE 1:

The load on the LCSC remains high and the resulting delays in partially mechanized ordering processing have not changed.

(Issues in AT&T handout and Covad Handout)

RESPONSE:

The facts do not support AT&T's allegations made in this workshop.<sup>11</sup> While the total number of LSRs submitted to BellSouth has increased over the period January 2002 – March 2002<sup>12</sup>, the LSRs handled by the LCSC (Local Carrier Service Center) as a percent of total LSRs submitted has actually decreased. This is due in large part to an increase in the number of LSRs submitted electronically – specifically, an increase from 87.2% of total LSR submissions, both manual and electronic, in January 2001 to 93.3% in March 2002. Moreover, a higher percentage of the LSRs handled by the LCSC are due to ALEC errors. That number has almost tripled over the same time period

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<sup>11</sup> See AT&T's Ordering Panel Comments handout – Item 4.

<sup>12</sup> The period used by AT&T in its comments to the FCC. March 2002 is the latest month for which figures are available.

(January 2001 – 6,558 ALEC errors; March 2002 – 19,367 ALEC errors).

BellSouth has also improved its performance in key LCSC measurements of FOC Timeliness and Reject Timeliness for partially mechanized and manual requests as reported via SQM results.

The current benchmark for *partially mechanized* requests is a return of 85% of the FOCs /Rejects within 10 hours. The current benchmark for *manual* requests is a return of 85% of the FOCs/Rejects within 24 hours.<sup>13</sup> The LCSC is meeting the measurement for FOC and Reject timeliness, as indicated by the following chart showing the results of the 1<sup>st</sup> quarter 2002 for these measurements:

<b>FOC</b>	<b>REJECTS</b>
<b>Partially Mechanized:</b>	<b>Partially Mechanized:</b>
January 92.75%	January 93.80%
February 85.91%	February 89.23%
March 89.76%	March 91.65%
<b>Manual:</b>	<b>Manual:</b>
January 99.36%	January 99.11%
February 99.30%	February 99.07%

<sup>13</sup> A recent Florida PSC Order (Docket No. 000121-TP) has specified that these benchmarks will both change to 95%, effective with May 2002 data.

March 99.46%	March 99.02%
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In conclusion, the LCSC is actually handling fewer partially mechanized and manual requests as a percentage of total LSRs submitted by the ALECs, and the SQM results have improved, showing that BellSouth consistently exceeds the established performance benchmarks established for the categories in question.

ISSUE 8:

System outages continue to reduce ALEC operating efficiency and effectiveness.

See AT&T Exhibit 1, Ordering System Outages. Ms. Bernadette Seigler, on page 81, lines 8-14, of the Transcript Volume 1 – Proceedings/ALEC Experience, states BellSouth system outages are reported. Further, Ms. Seigler stated that stability and dependability are critical factors for AT&T to be successful.

RESPONSE:

The FCC stated in GALA, ¶118, that “[w]e also find unpersuasive comments by AT&T and US LEC/XO claiming that LENS, TAG, and EDI outages interfere with their ability to provide service.<sup>14</sup> While we share the Department of Justice’s concern that severe interface outages can impact a competing carrier’s ability to successfully compete, commenters do not demonstrate that the few outages they mention have caused competitive harm sufficient to warrant a finding of checklist noncompliance. Moreover, BellSouth’s performance data indicate that these situations are not significant. “

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<sup>14</sup> AT&T GALA II Seigler Decl. at para. 17; US LEC/XO GALA II Comments at 33.

To elaborate on the basis for the FCC's finding, BellSouth provides the following response to the Florida Commission's consideration. In previous state and federal 271 proceedings, the ALECs have complained about system outages and availability, most often, those unplanned system outages related to LENS and TAG. BellSouth's recent performance, however, on the monthly interface availability measurement has been excellent. In fact, since December 2000, BellSouth has regularly met the measure of 99.50% for TAG, EDI, and LENS in all nine states. The interface availability measure is defined as the percent of time applications are functionally available as compared to scheduled availability. The interface availability schedule for each OSS is listed on the BellSouth Interconnection Web Site.<sup>15</sup> Only full outages are calculated for this measure.

Despite BellSouth's best efforts, unplanned outages do occur. When unplanned system outages occur, BellSouth notifies ALECs real-time via email and web postings. This notification process is in keeping with the Change Control Process guidelines established for Type 1 System Outages. Either BellSouth or an ALEC may initiate a change request to address the problem. Type 1 System Outages are processed on an expedited basis.

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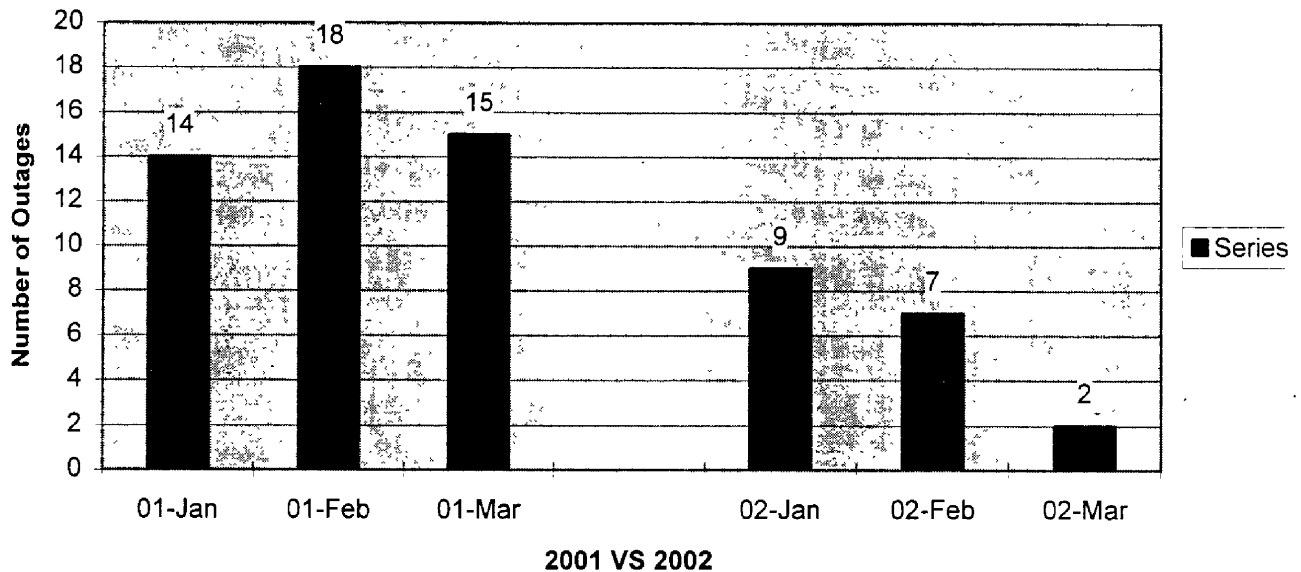
<sup>15</sup> [http://www.interconnection.bellsouth.com/oss/oss\\_hour.html](http://www.interconnection.bellsouth.com/oss/oss_hour.html)

Type I System Outages are reported as one of the following items. There is a No Outage (N) condition that may occur for several reasons. First, the investigation finds that no problem actually existed. Second, the problem may be determined to have occurred on the customer side. Third, the investigation was unable to confirm that an outage actually occurred. And finally, the reported outage actually occurred during a previously announced scheduled downtime. Next, there is a Degraded Outage. A Degraded Outage (D) means that an application is processing less than normal capacity or is providing slow responses. This degraded condition may also impact one or more customers. Then, there is Loss of Functionality (“LOF”). Loss of Functionality is incurred when a function normally provided by an application is unavailable to any customer. This may also impact one or more customers. And, finally, there is a Full (F) Outage that occurs when an application is down or is totally inoperative to one or more ALECS.

It is important to note that even though an outage is posted to the website, in many cases it may impact only some of the ALECs. As described above, even a Full Outage may impact only one customer. However, the posting of the outages to the web serves as a useful tool. It allows us to alert all of our customers that a problem has been reported and that each of those problems are actively being investigated by BellSouth.

A review of the LENS Type 1 System Outages posted to the Interconnection Web site for the months January 2002 through March 2002 as compared to the same period last year, reveals outages are decreasing. The table below highlights this dramatic decline.

### LENS System 1 Outages



In conclusion, BellSouth meets state approved performance measures for OSS availability. In fact, during the three-month period January 2002 through March 2002, EDI was available more than 99.7% of the time; both TAG and LENS exceeded the monthly benchmark. Moreover, the FCC's approval of the Georgia and Louisiana 271 application reaffirms BellSouth's position that under current standards, BellSouth meets its obligation to provide ALEC's with nondiscriminatory access to its OSS.



ISSUE 12:

Defects in ordering Hunting cause delays and customer dissatisfaction. Ms. Conquest of ITC states in the transcript at p. 94, line 11 that ITC has been having numerous problems with orders that include hunting.

RESPONSE:

BellSouth addressed the issues surrounding Parsed CSR-Hunting in Change Request CR0651, which was implemented in Release 10.4 on March 23, 2002. Due to technical issues, BellSouth was not able to provide all the fields, requested by the ALECs, in the parsed format – that is, extract information directly from the CSR in response to a pre-order query and return it in LSOG 4 format.<sup>16</sup> As a result, BellSouth continued to investigate ways to translate information from the CSR, which it could then translate into LSOG 4 format and provide to the ALECs. As a result, BellSouth developed a means to translate the hunting fields, as reflected in CR0651, and successfully implemented that functionality in Release 10.4 on March 23, 2002. The User Requirements for Hunting (CR0651), as provided in Release 10.4. Accordingly, as to Parsed CSR-Hunting, the FCC stated in GALA, ¶130, “we note

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<sup>16</sup> See the discussion in ¶¶ 80-85 of the Joint Affidavit of February 14, 2002, attached hereto as Attachment C.

that parsed hunting information, claimed by AT&T to be valuable in competing for business customers, was implemented on March 23.<sup>17</sup> Accordingly, we find BellSouth provides competing carriers with the tools necessary to integrate their ordering and pre-ordering functions, both with and without a parsed CSR.”<sup>18</sup>

For all other matters regarding Hunting, BellSouth has been working with ITC to address those issues. BellSouth’s customer service manager worked with ITC in mid-December 2001, when some of the issues Ms. Conquest raises did exist. (See Transcript, p. 94, beginning with line 11.) These incidences occurred when Hunting was dropped off of a CSR after the order was completed. When BellSouth was alerted to this, BellSouth personnel monitored ITC’s orders and the LCSC to ensure that Hunting was working on the customer’s records. The necessity for this type of monitoring ended by end of March 2002. In its investigation to resolve this issue, BellSouth discovered a defect with Hunting in LESOG. BellSouth immediately submitted Change Request 0706 with a high impact level on March 15, 2002. Change Request 0706 was implemented in Release 10.4 on March 23, 2002. Subsequent to that implementation, 2 production defects were identified regarding hunting and were corrected in Emergency Maintenance Release 10.4.1 on March 28, 2002. Carrier

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<sup>17</sup> BellSouth GALA II Stacy Reply Aff. at para. 132, attached as Attachment D.

<sup>18</sup> The Department of Justice states that BellSouth’s provision of a parsed CSR “may facilitate competitive entry by lowering the operating costs of the new entrant. It should also reduce the costs associated with mistakes that are made when [competitive LEC] service representatives are required to retype pre-order information on orders to be sent to BellSouth.” Department of Justice GALA II Evaluation at 9-10.

Notification Letter No. SN9108, was issued to the ALECS on March 26, 2002 that described these defects and explained that they were not detected during pre-release testing by BellSouth and the ALECs.

Ms. Conquest mentioned several Change Requests in her handout under the Pre-Ordering and Ordering sections. Change Request CR0462 was submitted as a high priority with an August 27, 2001 due date. The request stated that "LENS will not pull up the hunting information on an order after a clarification has been made to the order." BellSouth responded on August 22, 2001, that BellSouth's analysis of the PON submitted by ITC indicated that BellSouth's systems clarified the PON correctly and determined this was not a defect. ITC eventually cancelled CR0462 on April 18, 2002. Ms. Conquest also mentions Change Request 0606, which was submitted January 10, 2002. BellSouth accepted this request as an Expedited Feature on January 11, 2002 because it was negatively impacting the ALEC's end-user customer and the bill. This Change Request was scheduled for Release 10.3.1, and on February 2, 2002, prior to the workshop in Florida, CR0606 was implemented as scheduled. Therefore, BellSouth believes it has addressed ITC's issues with Hunting.

ISSUE 14:

Covad complained that there was no test environment for LENS.

(See Transcript page 73 line 16 through Page 74, line 9).

RESPONSE:

BellSouth has continued to expand the capabilities of CAVE, and now allows ALECs to conduct testing in CAVE using the LENS interface. ALECs began beta testing LENS in CAVE in January 2002. On March 25, 2002, BellSouth deployed LENS in CAVE for all ALECs. This issue is resolved.

ISSUE 16:

BST's ability to provide an accurate due date calculator remains uncertain, continually returning improper (longer) intervals for various ReqType/ActType combinations. (See ATT handout, page 3)

RESPONSE:

Please refer to BellSouth witness, Ron Pate's February 18, 2002 Workshop Presentation, p. 10 for BellSouth's response to this issue. BellSouth provided a chronology of the handling of the Due Date Calculator (DDC) issue through February 9, 2002. Subsequent to that presentation, BellSouth has presented its testimony to the Federal Communications Commission (the "FCC"), in its application for approval to provide long distance in Georgia and Louisiana. In the FCC's approval of that application that was issued on May 15, 2002 ("GALA"; ¶131), the FCC stated that, "We find that BellSouth offers nondiscriminatory access to due dates." The FCC elaborates by explaining in GALA, ¶132-133, that:

We find that BellSouth provides reliable due dates to competitors, and in a manner equivalent to what BellSouth provides its retail services.<sup>19</sup>

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<sup>19</sup> BellSouth GALA I Stacy Aff. at para. 209.

[Further, the Commission] reject[s] AT&T's assertion that BellSouth does not provide equivalent access to due dates.<sup>20</sup> Although AT&T complains about the previous state of this functionality, AT&T appears to recognize that BellSouth has implemented software change to fix the problem.<sup>21</sup> Because no other competing carrier raises a new complaint about this same problem, and one of the objectors from the previous application, ...affirmatively now states that the due date calculator problem it experienced is no longer a problem, we are assured that the due date functionality problem has been resolved and that competing carriers have equivalent access to due dates.<sup>22</sup> [Furthermore,] we find that AT&T has not demonstrated that a systemic problem exists with BellSouth's due date calculator that warrants a finding of checklist noncompliance.

In GALA, ¶ 134, the FCC also addressed WorldCom's complaints about supplemental due dates by stating that, "We also reject WorldCom's contention that when it submits a supplemental order to change a due date, BellSouth's OSS improperly sends them a second Firm Order Confirmation (FOC) that does not indicate the new requested due date."<sup>23</sup>

As BellSouth explained to the FCC in its application, BellSouth provides ALECs with due date information in substantially the

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<sup>20</sup> AT&T GALA II Bradbury/Norris Decl. at paras. 77-92.

<sup>21</sup> AT&T GALA II Bradbury/Norris Decl. at para. 92.

<sup>22</sup> Birch GALA II Comments at 24.

<sup>23</sup> WorldCom GALA II Lichtenberg Decl. at para. 11.

same time and manner as it does for itself. Information required to obtain a due date calculation is contained in LENS, TAG, or EDI. ALECs obtain an estimated due date by initiating either a pre-order request in LENS or TAG or a calculated due date by initiating a firm order request in LENS, TAG, or EDI.<sup>24</sup> BellSouth's response to the ALEC provides the due date calculation based upon established timelines governing the provision of the type of service ordered. The ALEC query is submitted through TAG to the Distributed Support Application Program ("DSAP"). DSAP contains the available due dates and dates unavailable due to the provisioning load, special events, or restricted serving areas, etc. DSAP returns an appropriate due date for the product and services requested, based upon all information in DSAP, including the unavailability factors.

Due date intervals are determined by standard "business rules" that have been provided to ALECs through industry letters and the *BellSouth Product and Services Interval Guide* ("Interval Guide") which contains intervals for resale services, complex services, and UNEs. The intervals in the Interval Guide are the same intervals used for BellSouth retail customers, except those for UNEs, which BellSouth does not use in its retail operations. Standard intervals apply, for example, when an existing customer is switching from BellSouth to an ALEC, when the customer orders a new service

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<sup>24</sup> As a reminder, there is no EDI pre-ordering interface. When, however, a firm order is placed using the EDI ordering interface, a due date is calculated.

where facilities are already connected through to the customer's premises, or when a customer requests changes such as adding or changing features to existing service.

However, if a customer is requesting a project or project management of an order, then the due date may have to be negotiated. A project is defined as a customer request for service where the quantity is greater than the BellSouth standard, the request is for non-standard equipment, or the request is for non-standard facilities. Any time a project manager is involved in the negotiation of a service request the request will be identified as a project. This could include negotiation of a due date, or being the single point of contact if problems occur during service order processing or provisioning. ALECs should refer to the BellSouth Products and Services Interval Guide to determine if a service request meets project criteria. Products/services that do not meet project criteria will be considered for project management on an individual case basis upon request to a BellSouth project manager.

As information, in the pre-ordering mode of LENS, ALECs may also view the installation calendar. The installation calendar provides the estimated working schedule of BellSouth's central office specific to the end-user's address. The calendar provides a convenient means of estimating due dates prior to a firm order being placed.



No due date is ever “guaranteed” for ALECs or for BellSouth’s retail units. BellSouth considers the due date satisfied when the orders are provisioned for both the ALEC’s and BellSouth’s retail customers. BellSouth uses its best efforts to meet the due dates. Actual fulfillment of due dates can be affected by many things, including the availability of facilities and workforce, and weather. This is true for ALEC services, just as it is for BellSouth retail services.

## **FLOW-THROUGH**

### **ISSUE 1:**

ALEC flow-through is lower when compared to [BellSouth's] retail, indicating the ordering process is not functioning at parity. (See AT&T handout, page 1, and in Transcript, page 74-79, Network Telephone in Transcript, page 64-66).

### **RESPONSE:**

This assertion is flawed at face value. The comparison of ALEC flow-through rates to those of BellSouth's retail unit is inappropriate for parity purposes. The correct performance standard is to measure BellSouth's flow-through performance for ALEC service requests against Commission-approved benchmarks.

BellSouth recently provided information to the FCC in response to similar complaints by AT&T in the Georgia/Louisiana 271 proceeding. Using the timeframe provided by AT&T in its allegations (January 2001-January 2002), BellSouth not only showed significant improvement in three of the four important measurement segment levels (Business Resale, UNE and LNP),

but the flow-through rate in the remaining segment, Residential Resale, remained nominally stable.

The following results were provided to the FCC, and the numbers reflect the improvement from January 2001 to January 2002:

Business Resale:	64.9% to 74.6%
UNE:	80.9% to 85.5% (Exceeds 85% Benchmark)
LNP:	40.1% to 92.8% (Exceeds 85% Benchmark)

BellSouth explained that the Residential Resale segment's reduction in flow-through rate from 91.4% to 88.6% during this timeframe is justified by the significant shift in ALEC requests for resale products to UNE products. That shift has resulted in a reduction in the number of resale products as a percentage of total ALEC requests issued electronically.

BellSouth further provided a more current view of its performance to the FCC, including the measurements for March 2002 as follows:

Residential Resale:	86.5%
Business Resale:	73.6%
UNE:	83.9%
LNP:	92.3% (Exceeds 85% Benchmark)

There has been a slight decrease in the flow-through performance since January 2002, but that decrease is within acceptable deviation parameters when looking at a single month's performance versus an exceedingly positive trend developed over 15 months (January 2001 to January 2002).

BellSouth has introduced new products and has experienced volume growth in other products (most significantly UNE-P), giving rise to additional LSR scenarios that initially can be ordered electronically, but may not be able to flow through at introduction. It has been proven that, over time and particularly for high-volume request types, BellSouth's ability to electronically generate orders for these types of requests will be developed and implemented in BellSouth's software releases to meet ALEC needs and to sustain the improving trend for flow-through performance. The FCC in its Georgia/Louisiana 271 application approval "reject[ed] arguments that too many orders fall out by design or cannot be ordered electronically," finding "as did the Georgia and Louisiana Commissions, that BellSouth properly designs its systems so that a minimal number of orders cannot be ordered electronically." GALA, ¶ 149.

Further, BellSouth has incentive to not only sustain those trends that exceed benchmarks, but to improve those that do not currently exceed benchmarks. State commissions have provided substantial penalty sanctions that dissuade BellSouth from accepting marginal performance.

ISSUE 2:

BellSouth-caused fall-out due to system errors causes delays and customer dissatisfaction.

RESPONSE:

BellSouth-caused fall-out due to system errors is the essence of flow-through, according to the accepted definition and measurement supported by the FCC and State commissions, including Florida in the Performance Measurements Docket No. 000121-TP. BellSouth does not disagree with the general concept that a request that does not flow through is somewhat delayed. System anomalies are an inherent characteristic of an electronic environment.

However, the implication that a dependency upon manual handling under these circumstances causes irreparable harm and customer dissatisfaction is unfounded. The FCC recognized in its Georgia/Louisiana 271 application approval that “concerns regarding BellSouth’s level of manual handling [for whatever reason] are addressed by the record evidence demonstrating that BellSouth is capable of flowing through competitive LEC orders, is accurately processing service orders, and is providing timely order confirmation and reject notices.” GALA, ¶ 148. In other words, the FCC recognizes that whether fall-out is due to BellSouth’s

system error, designed fall-out or even ALEC error, BellSouth's manual handling does not represent a systemic problem, nor does it competitively disadvantage ALECs.

In fact, BellSouth's Local Carrier Service Center (LCSC) performance has improved greatly such that undue delays for LSRs that drop to the LCSC are negligible. That is validated by a review of the key performance measurements related to LCSC operations – namely, FOC Timeliness and Reject Timeliness - as outlined in the SQM Performance Results Chart in BellSouth's response to Issue 1 under Ordering.

Further, BellSouth's LCSC has made an effort to work with individual ALECs regarding specific situations related to manual handling for which the ALEC has requested help. Network Telephone was one of those ALECs. At the request of the Florida PSC and at its own expense, BellSouth sent 20 of its managers to Pensacola, Florida to meet with Network Telephone for three days (April 17-19, 2002). The purpose of this meeting was to address any ordering issues Network Telephone presented, as well as BellSouth's presentation of an "Action Plan" to Network Telephone for its input and approval. Network Telephone presented several issues at that meeting, and BellSouth either responded to its issues at the meeting or took an action item to research and respond. BellSouth has subsequently responded to all action items.

The "Action Plan" presented to Network Telephone is a wellness plan for both BellSouth and Network Telephone. It is an ongoing working plan that identifies the top auto-clarification and reject errors made by Network Telephone, and provides recommendations from BellSouth for correction of those errors. Network Telephone is charged with the responsibility to decide what percentage it wants to set as the benchmark for improvement regarding those errors. The plan also lists the top fall-out errors attributed to BellSouth. BellSouth indicated the dates for which corrections are targeted and what estimated percentage improvement those corrections would achieve. Once elimination of the top errors is achieved, the next set of errors becomes the top errors and the focus of attention, and so on. The plan also calls for a monthly status review of performance and resolution. With that focus, the desired result would be improved flow-through as well as a recovery of manpower costs (time and effort), and a reduction in service order delays caused by these errors. Both Network Telephone and BellSouth agreed to meet on quarterly basis to retain the level of partnership formed during this visit.

Moreover, BellSouth is conducting extensive analysis of BellSouth-caused system errors and is working to resolve those errors. In fact, BellSouth implemented a fix for the highest volume BellSouth error, in the May 5, 2002, CRIS Release, that should stop the error as of June 1, 2002, and has scheduled a fix for the second highest volume error in Release 10.5.

ISSUE 3:

BellSouth's implementation of Migration by Telephone Number and Name did not decrease the error/reject rate. (See AT&T handout, Ordering Section, page 3; AT&T, Transcript, at page 80.)

RESPONSE:

BellSouth addressed this issue to the satisfaction of the Georgia Public Service Commission that ordered BellSouth to implement Migration by Telephone Number and Name (known also as TN Migration) as part of its comments in its approval of BellSouth's 271 application<sup>25</sup>. Further, that Commission stated in its reply comments to the FCC<sup>26</sup> "that BellSouth acted appropriately in implementing TN migration consistent with the desires of the CCP." In fact, the change request that was actually implemented was the one issued by AT&T itself, and voted for by the CCP members<sup>27</sup>.

As the GPSC stated (in agreement with the Department of Justice's prior assertion), the purpose of TN migration is to cause reject rates generally, and address-related errors specifically, to decrease. As the GPSC noted, that is precisely what happened after the implementation of the TN

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<sup>25</sup> GPSC Docket No. 6863-U

<sup>26</sup> FCC Docket No. 02-35

<sup>27</sup> AT&T (CR0371) and MCI (CR0133) both submitted change requests for a version of TN Migration. The CCP members voted to accept AT&T's CR, as that version apparently had wider application possibilities within the ALEC community.



migration change request in Release 10.2 on November 3, 2001<sup>28</sup>. Citing the Affidavit of William Stacy in BellSouth's Georgia 271 application, the GPSC noted that the overall reject rate for UNE-P migration requests dropped over 35% from October 2001 to January 2002<sup>29</sup>. In addition, the address-related errors for these same requests have been reduced by over 60% during this same time period. Further, in its recent order granting BellSouth approval for long distance in Georgia and Louisiana<sup>30</sup>, the FCC stated that it "rel[ied] on BellSouth's implementation of TN migration" as part of its determination that BellSouth had met the requirements of integration.

On the issue of TN migration, the GPSC is satisfied, the DOJ is satisfied, and the agreed-upon CCP change request has been satisfied. Now, the FCC is satisfied. Other than its known penchant for complaining, it is unclear why AT&T is not satisfied.

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<sup>28</sup> The GPSC also recognized in its comments that there was a problem with the TN Migration feature implementation affecting an estimated 30% of requests for validation, yet it acknowledged that a fix was implemented 2 weeks later that resolved the problem. So, too, did the FCC in its Order 02-147 at paragraph 125.

<sup>29</sup> The GPSC further stated that BellSouth has since gone beyond the requirements of the TN Migration order by expanding the ALECs' ability to utilize TN Migration to include Resale (non-complex plus Basic Rate ISDN, and PBX) and loops (excluding xDSL).

<sup>30</sup> FCC Order 02-147 at paragraph 125.

ISSUE 4:

The flow-through task force is ineffective. (See AT&T handout, Ordering section, at page 1; Network Handout, at page 9, Transcript at page 66).

RESPONSE:

This has been a constant, yet unfounded, complaint by AT&T since the beginning of the task force a little over a year ago. This complaint has no validity.

The Commission has noted in GALA, ¶ 146 – that, in the course of the year-plus that the task force has existed, BellSouth and the ALECs have identified 36 flow-through improvement features, defects, or errors implemented or targeted through Release 10.6, implemented eight in February and March 2002, and there are 21 more targeted for Release 10.5 in May<sup>31</sup>. There are at least 3 more flow-through impacting features targeted for Release 10.6. Additionally, there are other change requests within the CCP that, upon prioritization and implementation, will improve flow-through. As the FCC noted in GALA, ¶ 146, the FCC “will monitor BellSouth's compliance with its commitment to improve its flow-through performance.” BellSouth welcomes that opportunity.

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<sup>31</sup> As the FCC has been notified, Release 10.5 has been delayed from May 18 until June 1, due to defects found by BellSouth during testing.

request to the Flow-Through Task Force on January 25, 2002. The CCP put this change request in “pending” status on February 22, 2002, and therefore, it is ready to be scheduled for implementation. Because it originated in the Flow-Through Task Force, CR0625 is a Type 2 (regulatory) request and will likely be prioritized by the CLECs during the Flow Through Task Force in early April 2002.

77. In those instances when a release contains a defect, Section 5 of the CCP sets forth the timeframes by which those defects must be corrected, depending upon the type of defect involved as defined in the CCP. Specifically, in the case of a High Impact Defect, BellSouth is required to implement a correction within ten (10) business days; in the case of a Medium Impact Defect, BellSouth has 90 business days within which to implement a correction; for a Low Impact Defect, BellSouth must implement a correction as soon as practicable.<sup>15</sup>
78. The timeframes for the resolution of defects were added to the CCP on September 10, 2001. Since these timeframes were put in place, BellSouth has consistently corrected High and Medium Impact defects within the specified periods. For example, since September 10, 2001, BellSouth has identified 7 High Impact Defects associated with its releases; 4 were corrected within ten (10) business days, and 1 High Impact Defect is scheduled to be corrected within the ten-day period. Although BellSouth missed the ten-day period in correcting 2 High Impact Defects, it did so only by two days in both instances and only to coordinate the correction of the defect with an upcoming release.
79. BellSouth’s performance in correcting Medium Impact Defects has been even more impressive. Since September 10, 2001, BellSouth has identified 16 Medium Impact

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<sup>15</sup> Contrary to the assertion of Mr. Bradbury and Ms. Norris in ¶ 22 of their Joint Supplemental Declaration, there is no requirement under the current CCP that BellSouth correct Low Impact Defects within 120 days. Section 5 of the current CCP states that corrections for Low Impact Defects will be implemented on a “best effort” basis without any specified timeframe for resolution.

- Defects, 7 of which were corrected within 90-business days, and 9 of which are scheduled to be corrected within this 90-business day interval.
80. BellSouth's adherence to the timeframes for correcting defects as set forth in the CCP belies Ms. Lichtenberg's claim at ¶ 143 of her Declaration that "BellSouth often fails quickly to remedy those defects." While Ms. Lichtenberg may believe the timeframes in the current CCP for resolving defects are "too long," BellSouth can hardly be faulted for complying with the current Change Management process. Furthermore, WorldCom's desire to shorten the existing defect correction intervals is an issue best addressed by the Georgia PSC in the event BellSouth and the CLECs are unable to reach agreement on this issue.<sup>16</sup>
81. In connection with the ongoing review of the CCP by the Georgia PSC, BellSouth has agreed to implement a new performance measure (CM-6), which captures whether CLECs receive timely correction of BellSouth software defects. This new measure will allow regulators and CLECs to monitor BellSouth's ongoing compliance with the CCP requirements concerning the timeliness of defect corrections, whatever those requirements ultimately turn out to be.
82. In ¶ 142 of her Declaration, Ms. Lichtenberg of WorldCom suggests that BellSouth's releases have too many defects because BellSouth allegedly fails to follow its software testing and quality processes, pointing to Exception 157 issued by KPMG in connection with the Florida third-party test. BellSouth has investigated KPMG's findings and disagrees. As explained in detail in BellSouth's Response to Exception 157, a copy of which is Exhibit WNS-12, BellSouth follows its software testing and quality processes

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<sup>16</sup> Although there are no deadlines for the correction of Low Impact Defects under the current CCP, BellSouth generally corrects such defects in a timely manner. For example, of the 29 Low Impact Defects that have been implemented since September 20, 2001, 18 (62%) were implemented within one month, and the remaining 11 (38%) were implemented in one to three months. As part of the ongoing review of the CCP by the Georgia PSC and in an attempt to address CLEC concerns about the existing timeframes for correcting defects, BellSouth has proposed to change the current language concerning Low Impact Defects by committing to implementing corrections to such defects "in the next available release."



Florida OSS Test  
Exception 157

March 28, 2002

### EXCEPTION REPORT

An exception has been identified as a result of test activities associated with the documentation and process verification review for Interface Development (PPR5).

#### Exception:

**BellSouth fails to follow its software testing and quality processes. (PPR5).**

#### Background:

BellSouth did not completely test code changes for Releases 10.2 and 10.3 prior to these releases going into production.

During KPMG Consulting's observation of BellSouth's 10.2 and 10.3 releases, it was noted that there were significant defects in the software when the releases were placed into the production environment. Specific defects included:

#### In Release 10.2:

		<b>BellSouth Response</b>	<b>BellSouth Response</b>	<b>BellSouth Response</b>
		<b>Impact</b>	<b>Defect Opened Date</b>	<b>Defect Correction Date</b>
CR 0540	LENS defect – random numbers for a specific NPA are not available on resale change orders	Low	11/5/01	1/5/02
CR 0542	LEO to populate internal TC opt field with AY when submitted TC opt is NO	Med	11/6/01	1/5/02
CR 0547	LMU unable to reserve specific cable and pair	Low	11/15/01	3/23/02
CR 0548	REQTYP M LSR's auto-clarifying on MFB USOC's	High	11/15/01	11/17/01
CR 0556	TAG users not receiving SVC ORD, L ORD and NP ORD on FOC's intermittently	Low	11/20/01	02/02/02
CR 0560	EDI Mercator software application map defect	High	12/4/01	12/15/01
CR 0570	EDI orders are receiving an invalid rejection	Med	12/7/01	1/5/02
CR 0573	Status NA only being returned on DSL FOC	Med	12/12/01	1/5/02

CR 0574	XDSL RESID defect for use of facilities	Low	12/13/01	3/23/02
CR 0580	LENS users are unable to validate Address at a DPA location when issuing a C order.	Low	12/21/01	2/2/02

In Release 10.3:

		BellSouth Response  Impact	BellSouth Response  Defect Opened Date	BellSouth Response  Defect Correction Date
CR 0585	CFA Invalid Auto-Clarification	Low	1/7/02	5/18/02
CR 0588	Parsed CSR	Low	1/9/02	2/2/02
CR 0589	Parsed CSR	Low	1/9/02	2/2/02
CR 0590	Parsed CSR	Low	1/9/02	2/2/02
CR 0591	Parsed CSR	Low	1/9/02	2/2/02
CR 0592	Parsed CSR	Low	1/9/02	2/2/02
CR 0593	Parsed CSR	Low	1/9/02	2/2/02
CR 0594	Parsed CSR	Low	1/9/02	2/2/02
CR 0595	Parsed CSR	Low	1/9/02	2/2/02
CR 0596	Parsed CSR	Low	1/9/02	2/2/02
CR 0597	Parsed CSR	Low	1/9/02	3/23/02
CR 0598	Parsed CSR	Low	1/9/02	2/2/02
CR 0599	Parsed CSR	Low	1/9/02	2/2/02
CR 0600	Parsed CSR	Low	1/9/02	2/2/02
CR 0601	Parsed CSR	Low	1/9/02	2/2/02
CR 0602	Parsed CSR	Low	1/10/02	2/2/02
CR 0610	Parsed CSR	Low	1/16/02	2/2/02
CR 0611	Incorrect error message on auto-clarify	Med	1/16/02	3/23/02
CR 0612	Incorrect notification for XDSL	Med	1/16/02	2/2/02
CR 0618	RESID validation defect for migration of XDSL	Low	1/17/02	5/18/02
CR 0620	LESOG failing to return new DD on FOC	Med	1/17/02	3/23/02
CR 0625	OCN mis-mapping for CSR retrievals in TAG	Med	1/25/02	2/2/02
CR 0627	Jack USOC does not appear on LENS summary and not submit to LEO	Med	1/28/02	3/23/02
CR 0628	LENS is allowing users with expired passwords to enter system	Med	1/28/02	3/23/02
CR 0633	Parsed CSR	Low	1/31/02	3/23/02

CR 0634	Parsed CSR	Low	1/31/02	3/23/02
CR 0635	Parsed CSR	Low	1/31/02	3/23/02
CR 0636	Parsed CSR	Low	1/31/02	3/23/02
CR 0637	Parsed CSR	Low	1/31/02	3/23/02
CR 0638	Parsed CSR	Low	1/31/02	3/23/02
CR 0639	Parsed CSR	Low	1/31/02	3/23/02

BellSouth has identified and published 31 defect Change Requests for the 10.3 release since its January 5, 2002 implementation.

As of January 22, 2002, there was a backlog of 61 defect change requests with only 37 scheduled for the April 7, 2002 release.

BellSouth internal release documentation for the above releases makes mention of the lack of sufficient time for appropriate pre-release testing within the release schedule. While the issue was noted, there was no apparent plan to mitigate the adverse impact of reduced pre-release testing.

**Impact:**

BellSouth's incomplete internal software testing may affect a CLEC's ability to efficiently execute transactions with BellSouth, resulting in CLEC customer dissatisfaction.

**BellSouth Response:**

BellSouth does follow its software testing and quality process. BellSouth's criteria for implementation of an Encore release include the following:

- Completion of at least 98% of System, Performance and Regression testing
- 97% test case pass rate
- No Severity 1 defects outstanding
- No Severity 2 defects outstanding that do not have a path forward for completion and do not have mechanized workarounds.

Our statistics on these objectives for Releases 10.2 and 10.3 were as follows:

Criteria	10.2 Results	10.3 Results
98% test completion	100%	99.9%
97% test cases passed	97.93%	98.66%
# Severity 1 defects outstanding	0	0
# Severity 2 defects outstanding	1	1

There were ten (10) defects cited as having resulted from Release 10.2 testing that were

carried forward into production. Investigation into those specific defects has shown that although these defects were opened after the implementation of Release 10.2 on 11/3/01, most of these actually resulted from features implemented in prior releases as early as 8/30/01, but not detected. As indicated by the matrix below, all defects have been corrected and all were corrected in the intervals defined by the CCP process for the impact type. (See above tables for BellSouth's response to each specific issue associated with the 10.2 and 10.3 Releases.)

Impact	Defects Corrected	Scheduled with 10.4	Scheduled with 10.5	CCP Interval for Correction	Interval Met
High	2			10 business days	2
Medium	3			90 business days	3
Low	5			Best effort	5

There were thirty-one (31) defects cited as having resulted from 10.3 testing that were carried forward into production. Eight (8) of these defects were found in Release 10.3 system testing, all were considered to be of low impact and all were scheduled for correction and were in fact implemented in Release 10.3.1 on 2/2/02. Six (6) of these defects were found in Release 10.3.1 system testing, all were considered to be of low impact, one was corrected before release implementation, and the remaining five (5) are scheduled for implementation in Release 10.4. As indicated by the matrix below, all defects cited have been corrected or are already scheduled and have or will meet the intervals defined by the CCP process for the impact type.

Impact	Defects Corrected	Scheduled with 10.4	Scheduled with 10.5	CCP Interval for Correction	Interval Met
High	0			10 business days	
Medium	2	4		90 business days	6
Low	15	8	2	Best effort	25

BellSouth's goal is to allow sufficient time for appropriate pre-release testing within the release schedule. BellSouth's testing cycle includes unit/product testing, system/integration testing, performance testing, regression testing and user acceptance testing. Due to the number and/or complexity of features implemented in our Encore releases, testing is always a challenge. The amount of time required for testing increases with each major release. As an example, Release 10.2 tested 823 new feature test cases and 2,126 regression test cases. Release 10.3 tested 1,938 new feature test cases and 3,062 regression test cases - an increase of 2,051 test cases. BellSouth mitigates these risks in a variety of ways, including more test case automation and, where required, an increase in trained testing personnel. In addition, lessons learned from each of our releases are being implemented, such as the sharing of test cases between vendors and a two-phased approach to performance testing as technology changes, are introduced.

KPMG also cites a backlog of sixty-one (61) defect change requests as of January 22, 2002. A March 5, 2002 analysis reveals a backlog of only thirty-eight (38) system defects and twenty-two (22) documentation defects as shown in the matrix below:



<b>System Defects</b>	
Scheduled for Implementation	23
Targeted by Release 10.6	8
New	4
Pending Clarification	3
<b>Documentation Defects</b>	
Scheduled	21
Targeted by Release 10.6	1

BellSouth is committed to providing our customers with new functionality in our applications in a timely manner with high quality standards.

**BellSouth Amended Response:**

An updated analysis, shown in the matrix below, reveals that BellSouth has already implemented the documentation defect that was indicated as "Targeted by Release 10.6."

<b>System Defects</b>	
Scheduled for Implementation	23
Targeted by Release 10.6	8
New	4
Pending Clarification	3
<b>Documentation Defects</b>	
Scheduled	21

- returns eighty-seven (87) of the one hundred and six (106) fields requested by the CLECs. As stated previously in this affidavit, BellSouth provides more fields parsed than Verizon currently does. Based on BellSouth's review of Verizon's documentation, BellSouth parses and returns 87 fields; Verizon currently parses and returns 74 fields.
79. In questions submitted to BellSouth's Change Control on September 17, 2001, WorldCom disputed nineteen fields as being valid LSOG 4 format fields that BellSouth does not parse. BellSouth originally responded to WorldCom's questions on September 20, 2001. In the following discussion, we will address these nineteen disputed fields. WorldCom disputed one (1) field that is not a valid field in the LSOG 4 document and is not supported by BellSouth. The BellSouth CSR does not have corresponding LSOG 4 format fields for two (2) of the disputed fields. However, there are fourteen (14) fields of information that are valid on the BellSouth LSR which BellSouth has not parsed and which are identified as required, conditional or optional fields. Lastly, WorldCom disputed two (2) fields that are included in the validation transaction messages that BellSouth receives from the CLECs. Explanations for each of these "unparsed" fields is provided in the discussion following.
80. The BellSouth Business Rules for Local Ordering ("BBR-LO") identify the fields of information utilized on the BellSouth LSR as being required, conditional, or optional ("R/C/O").
- *Required* means the field must be populated.
  - *Conditional* means the field is dependent upon the relationship to another entry as specified in the usage statement and is dependent upon the presence, absence, or combination of other data entries.
  - *Optional* means the field may or may not be populated.
81. One (1) of the fields of information disputed by WorldCom, FEATDES – Feature Description, is not supported in the LSOG 4 document as a valid field. Furthermore,

BellSouth does not support this field. The field is not found in the LSOG 4 document, in the BellSouth LSR or in the BellSouth CSR. This means there is no information contained in the CSR for parsing.

82. The following disputed fields are valid entries on the BellSouth LSR for some types of services. However, BellSouth is unable to provide the parsed information requested by the CLEC. These fields can be divided into two groups.
83. Group One – Even though these fields are supported on the BellSouth LSR, there are no corresponding fields in the BellSouth CSR. Thus, these fields are not in the BellSouth CSR to be parsed.

Field Name	Field Description	LSOG4 Definition	R/C/O on BST LSR	Field Retained on BST CSR	Parsed
DDADLO	Delivery Address Descriptive Location	Identifies additional location information about the delivery address, (e.g. the trailer behind the gas station).	Conditional Optional	No	No
LTXNUM	Line of Text Reference Number	Identifies each line of information with a unique number.	Conditional	No	No

84. Group Two – There are fourteen (14) fields of information for which the related fields on the BellSouth CSR are not in LSOG 4 format, and, therefore, are not “parsed” into a LSOG 4 format field. “Parsed” format has been defined as “[E]ach separate piece of information is identified by a particular code that can be matched to a field on the LSR” Texas Order ¶ 152 n 412. Therefore, if the BellSouth CSR contains a piece(s) of information that cannot be matched to a field on the LSOG 4 pre-ordering field list, BellSouth has not “parsed” that field.

Field Name	Field Description	LSOG4 Definition	R/C/O on BST LSR	Field Retained on BST CSR	Parsed
TOS*	Type of Service	Identifies the type of service. The type of service identifies the end user account as business, residential, or government.	Required	No	No
NAME*	End User Name	Identifies the name of the end user. The name is not intended to be used for directory services.	Required	No	No
<sup>6</sup> NC	Network Channel Code	Identifies the network channel code for the circuit(s) involved. The network channel code describes the channel being requested.	Required	No	No
<sup>7</sup> NCI	Network Channel Interface Code	Identifies the electrical conditions on the circuit at the ACTL[Access Customer Terminal Location]/Primary Location.	Required	No	No
<sup>8</sup> SECNCI	Secondary Network Channel Interface Code	Identifies the electrical conditions on the circuit at the secondary ACTL or end user location.	Required	No	No
LST	Local Service Termination	Identifies the CLLI code of the end office switch from which service is being provided.	Required Optional (manual orders only for service types for which field is optional)	No	No
DGOUT*	DID Digits Out	Indicates the number of digits out pulsed from the central office to the customer's equipment.	Required Conditional (manual orders only both R/C)	No	No
<sup>9</sup> HNTYP*	Hunting Type Code	Identifies the type of hunting involved.	Required	No	No
<sup>10</sup> HTSEQ*	Hunting Sequence	Identifies the sequence of numbers in the hunt group.	Required	No	No
SGNL*	Signaling	Identifies the type of signaling requested.	Optional or Required	No	No
STYC*	Style Code	Identifies whether the listing is straight line, caption header, etc.	Required	No	No
TOA*	Type of Account	Identifies the type of account for this listing.	Required	No	No
LNPL*	Listing Name Placement	Identifies the placement of the listing based on the LNLN field.	Conditional	No	No
BRO*	Business/Residence Placement Override	Identifies an override of the normal placement of business or residence listings.	Conditional Optional	No	No

\* The relevant information for these fields may be obtained from the parsed and/or unparsed fields contained on the CSR.

<sup>6</sup> This field is not found on BellSouth accounts billed via CRIS. Accordingly, this information is not included in the CSR, since the record is generated from the information contained in the CRIS database.

<sup>7</sup> See footnote above.

<sup>8</sup> See footnote above.

<sup>9</sup> The valid data entries for HNTYP and HTSEQ on BellSouth's CSR vary widely based on the central office type being used to provide the service. As a result, there is no readily available methodology to parse this information in a consistent format. However, BellSouth is attempting to develop a method of translating the Hunting Type Code and the Hunting Sequence information. This enhancement is targeted for a Release during March of 2002. BellSouth has made a series of training classes and documents available to the CLEC to assist them in: (1) understanding the layout of the hunting related information on the CSR, (2) translating this information to the input fields required for the LSR; and (3) modifying the LSR information to change the end user's hunting patterns. This information is specifically included in the first day of the Complex Products Service Ordering class, and is covered in detail in the BellSouth Business Rules for Local Ordering, Section 7.4, and Data Dictionary, Section 2.3. The fact that CLECs have been able to acquire a significant portion of the BellSouth Retail small business market (the largest group using hunting) is evidence in itself that the CLECs are very capable of using the existing CSR hunting information and successfully migrating end users to their service. See Exhibit SVA-63.

<sup>10</sup> See footnote above.

85. WorldCom also disputed two (2) fields that are included in the validation transaction messages that BellSouth receives from the CLEC. But, BellSouth does not transmit a response back to the CLEC for these fields. Therefore, the CLEC would never receive a reject for these fields.

Field Name	Field Description	LSOG4 Definition	R/C/O on BST LSR	Field Retained on BST CSR	Parsed
CC	Company Code	Identifies the Exchange Carrier generating the inquiry.	Required	No	No
AGAATH	Agency Authorization Status	Indicates that the customer is acting as an end user's agent and has authorization on file.	Optional (manual orders only)	No	No

86. The lack of a parsed CSR in the past would not have prevented any CLEC from submitting an LSR to BellSouth. With parsed CSR implementation, the CLECs can obtain the information necessary to populate the appropriate fields on the BellSouth LSR from the parsed and/or unparsed entries in various Sections of the CSR, as well as from BellSouth's business rules for pre-ordering and BellSouth's business rules for submitting electronic and manual LSRs. The absence of parsed field(s) on the CSR does not preclude any CLEC from continuing to submit electronic and manual LSRs to BellSouth.
87. During a discussion of the parsed CSR in the CCP meeting of December 10, 2001, BellSouth questioned the CLECs as to how long they would need before they could begin testing. CLECs stated that they needed time to digest the business rules and then would notify BellSouth when they were ready to begin testing. BellSouth agreed, that when ready, BellSouth would allow CLECs to test. The meeting minutes are attached as Exhibit SVA-32. On December 21, 2001, the CCP sent a memo to the CLECs announcing the extension of the window to test parsed CSRs, stating that, "[t]he CAVE test window for PCSR [parsed CSR] will be extended as appropriate to accommodate individual CLEC needs." CLECs were instructed to contact their account teams to

be burdensome or how often they are encountered. The Georgia PSC “...also finds it significant that no other CLEC has complained to the [Georgia PSC] about these workarounds.” Georgia PSC Supplemental Comments at 14, n. 12. As these defects were corrected on March 23, 2002, this issue is moot.

### **Enhancements to the Parsed CSR**

131. As mentioned in Bradbury and Norris’s Joint Supplemental Declaration at ¶ 52, and referred to in ITC^DeltaCom’s remarks in the Florida OSS workshop (attached to the Bradbury/Norris Joint Reply Declaration as Attachment 9), these two CLECs consider Hunting to be a “critical” field for parsing. BellSouth and the Georgia PSC disagree. The Georgia PSC found that there was “no showing that parsing of these fields is critical” to meeting the DOJ’s standard. Georgia PSC Supplemental Comments at 15 (citing the Evaluation of the Department of Justice at 10). They found it to be particularly true “given that other BOCs do not provide some of the fields [Hunting is one of those fields] and that the information for the remaining fields at issue can be obtained elsewhere from the CSR.” Id. at 15-16. Nevertheless, Hunting was one of the fields that CLECs had originally requested to have parsed, and it has been addressed by BellSouth as explained in detail below.
132. As discussed above, BellSouth was not able to provide all the fields, requested by the CLECs, in the parsed format – that is, extract information directly from the CSR in response to a pre-order query and return it in LSOG 4 format.<sup>20</sup> As a result, BellSouth continued to investigate ways to translate information from the CSR, which it could then translate into LSOG 4 format and provide to the CLECs. As a result, BellSouth developed a means to translate the hunting fields, as reflected in CR0651, and successfully implemented that functionality in Release 10.4 on March 23, 2002. The

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<sup>20</sup> See the discussion in ¶¶ 80-85 of the Joint Affidavit of February 14, 2002.

User Requirements for Hunting (CR0651), as provided in Release 10.4, are attached as Exhibit WNS-21.

133. BellSouth initiated another change request (CR0652) to address the translation of the additional fields to be delivered to the CLECs in an upcoming release. The CLECs are scheduled to prioritize this change request in its upcoming meeting on March 27, 2002.
134. Bradbury and Norris of AT&T, at ¶ 32 of their joint supplemental declaration, and AT&T's Supplemental Comments at 9, footnote 5, complain that LENS and RoboTAG™ were not included in BellSouth's parsing efforts. First, as LENS is subject to CCP, AT&T's concern could have been properly addressed through the CCP at any time. No change request regarding parsing of CSRs for LENS has been submitted. Second, to BellSouth's knowledge, RoboTAG™ was never included in any discussions leading up to the implementation of the parsing functionality. In addition, no CLEC, including AT&T, proposed including RoboTAG™ in the parsed CSR implementation.

**“TN Migration”**

135. As part of its Docket 6863-U, the Georgia PSC recently reviewed BellSouth's implementation of TN migration.<sup>21</sup> The Georgia PSC believes that the DOJ's concern, as expressed at pages 23-25 of its Evaluation of November 6, 2001, about the lack of TN migration has now been resolved by BellSouth's TN migration for UNE-P implemented November 2001. See the Georgia PSC's Supplemental Comments of March 4, 2002, at page 6.
136. MCI/WorldCom apparently agrees. At ¶ 9 of her declaration, Ms. Lichtenberg of MCI/WorldCom acknowledges that BellSouth's TN migration “is working relatively

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<sup>21</sup> Contrary to AT&T's remark in footnote 9 of its Supplemental Comments, the Georgia PSC, in its Order of October 2, 2001, did not order the implementation of TN migration as a condition of its approval. See Order, *Consideration of BellSouth Telecommunications, Inc.'s Entry into InterLATA Services Pursuant to Section 271 of the Telecommunications Act of 1996, et al.*, GPSC Docket No. 6863-U (Oct. 2, 2001).