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July 24, 2002

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

Attached for filing are the Post Workshop Comments on Behalf of AT&T Communications of the Southern States, LLC and TCG South Florida, Inc, and AT&T Broadband Phone of Florida, LLC, collectively, AT&T.

If you have any questions, please call me on 404-810-4922.

Sincerely,

Virginia C. Tate
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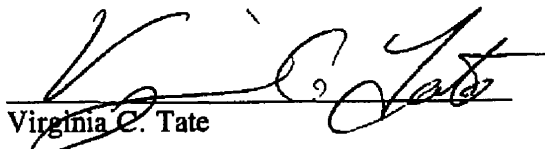
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CERTIFICATE OF SERVICE

DOCKET NO. 960786B-TL

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Consideration of BellSouth Telecommunications,)
Inc.'s entry into interLATA services pursuant to) Docket No. 960786B-TP
Section 271 of the Federal Telecommunications)
Act of 1996 (Third Party OSS Testing))
)
In Re: Petition of Competitive Carriers For Commission)
Action To Support Local Competition In BellSouth) Docket No. 981834-TP
Telecommunications, Inc.'s Service Territory)

Filed: July 24, 2002

**POST-WORKSHOP COMMENTS ON BEHALF OF
AT&T COMMUNICATIONS OF THE SOUTHERN STATES, LLC, TCG SOUTH
FLORIDA, INC., AND AT&T BROADBAND PHONE
OF FLORIDA, LLC**

AT&T Communications of the Southern States, LLC, TCG South Florida, Inc. and AT&T Broadband of Florida, LLC (collectively "AT&T") hereby submit their post-workshop comments in connection with the above captioned matter.

INTRODUCTION

On July 12, 2002, the Florida Public Service Commission ("Commission" or "FPSC") held a workshop to consider KPMG Consulting, Inc.'s ("KCI's") June 21, 2002 Draft Final Report, *BellSouth Telecommunications, Inc. OSS Evaluation Project, Draft Final Report Version 1.0* ("Draft Final Report" or "report"). KCI's report and its testimony at the workshop demonstrate that the results of the Operational Support Systems ("OSS") testing KCI conducted in Florida are not sufficient to establish that BellSouth's OSS meet the parity requirements of the

Telecommunications Act of 1996¹ (“Act”) or to assure this Commission that BellSouth’s OSS are operationally ready to meet the needs of Florida Alternative Local Exchange Carriers (“ALECs”) and their customers. Specifically, the workshop and report established:

- BellSouth failed to meet critical test criteria in key testing areas including change management, software interface development, pre-ordering, ordering, provisioning, flow-through, and data integrity;
- Many of the performance failures KCI identified will not be retested;
- BellSouth’s commercial data cannot support a Section 271 determination. KCI’s metrics evaluation is not complete and KCI cannot verify the commercial data BellSouth has provided;
- KCI’s testing does not provide a complete portrait of BellSouth’s OSS performance in Florida; and
- KCI’s testing does not provide this Commission a like-to-like comparison of BellSouth’s retail and wholesale systems.

As a result, this Commission cannot rely upon the results of KCI’s third-party test to make a definitive conclusion regarding whether ALECs will have nondiscriminatory access to BellSouth’s OSS.

I. THE DRAFT FINAL REPORT SHOWS THAT BELL SOUTH FAILED TO MEET EVALUATION CRITERIA IN TEST AREAS OF SIGNIFICANT IMPACT TO ALECS AND FLORIDA CONSUMERS

Overall, BellSouth failed to satisfy fifteen (15) of KCI’s tests.² These performance failures occurred in the Relationship Management and Infrastructure (PPR1 and PPR5), Pre-ordering and Ordering (TVV1 and TVV3), and Provisioning (TVV4) domains. During the workshop, KCI cautioned that “all evaluation criteria are not created equal” and explained that to

¹ Pub. L. No. 104-104, 110 Stat. 56 (1996), codified at 47 U.S.C. § 251 *et seq.*

² KCI determined BellSouth failed to meet the evaluation criteria for tests PPR1-3, PPR1-4, PPR1-6, PPR1-8, PPR5-2, PPR5-3, PPR5-17, TVV1-2-2, TVV1-3-16, TVV3-2, TVV3-4, TVV4-1, TVV4-3, TVV4-28, and TVV4-29.

evaluate the results of the test “[o]ne has to look at the underlying report and the evaluation criteria and what was satisfied and what kinds of problems and issues were highlighted in our comments section to really understand and grasp the significance of a particular criterion.” (Tr. at 70). Accordingly, the important evaluative exercise here is not simply whether BellSouth satisfied more criteria than it failed. Rather, the appropriate calculus is whether BellSouth’s performance failures are significant. KCI has already found these 15 performance failures critically impact ALECs’ ability to compete in this state. Accordingly, this Commission should give considerable weight to the fifteen tests BellSouth failed.

The workshop and report established:

- significant issues related to BellSouth’s change control process remain unresolved;
- significant issues related BellSouth’s failure to test software releases and correct software defects remain unresolved;
- significant issues related to the adequacy of the pre-ordering and ordering functionalities BellSouth provides to ALECs remain unresolved;
- significant provisioning problems remain unresolved; and
- significant issues related to BellSouth’s order flow-through are unresolved.

BellSouth’s deficiencies in each of these areas -- change management, software interface development, pre-ordering, ordering, provisioning, flow-through, and data integrity -- negatively impact ALECs’ ability to compete in this state. KCI will not retest these areas. (*See, e.g.*, Tr. at 61, 85, 133 and 159). Consequently, when KCI publishes its final report at the end of this month, important questions regarding BellSouth’s performance in these critical areas will remain unresolved.

For example, KCI determined that ALECs are unable to participate in the prioritization of Change Requests that originate from internal BellSouth organizations that directly affect how BellSouth conducts its wholesale business. (See Exception 88). KCI found BellSouth's "policy inhibits one of the primary objectives of the [Change Control Process] 'to allow for mutual impact assessment and resource planning to manage and schedule changes.'" *Id.* These findings mean ALECs have no input into key BellSouth business decisions that directly affect the ALEC community as a whole. Accordingly, BellSouth's failure in this important area may preclude Change Requests important to the ALEC community from being developed or implemented in a timely manner. *Id.* No retesting in this important, ALEC-impacting area is planned. (Tr. at 85).

KCI's report and workshop testimony also demonstrate that BellSouth's performance deficiencies negatively impact Florida consumers. KCI found, for example, that BellSouth continues to have significant provisioning problems related to the accuracy of its directory listing orders. (See E-171, TVV4-1, TVV4-29). This problem directly impacts consumers in this state. As KCI stated at the workshop, "BellSouth's inability to accurately update information directory listing databases may result in the mishandling of customer requests and cause a decrease in [A]LEC satisfaction." (Tr. at 58). This problem is significant, particularly for ALECs' business customers. Many businesses rely upon their directory listings as advertising tools and as a primary method of customer contact. Inaccuracies in these directory listings may cause significant adverse financial consequences.

In addition, BellSouth continues to incorrectly provision switch translations. (See E-84). When BellSouth fails to provision switches appropriately, ALEC customers do not receive the services they request. For example, an ALEC customer may request features such as Call Waiting or Caller ID. If BellSouth fails to provision the switch appropriately, the ALEC's

customer will not receive these services. (Tr. at 60-61). No retesting of either of these customer-impacting provisioning problems is planned. (*See id.* at 58, 61).

BellSouth's ordering problems are also customer-impacting. As part of its testing, KCI evaluated whether BellSouth's representatives or systems provide "accurate and complete Error (ERR)/Clarification messages." (*Report* at POP-66, TVV-1-2-2). KCI determined that BellSouth did not "satisfy" this important ordering area. (*See* E-165). Inaccurately clarified service requests translate into missed appointments and rescheduled orders. Consequently, ALECs cannot provision telephone service to their customers on the date promised. This failure negatively impacts the ALEC-customer relationship. To attempt to prevent such occurrences, ALECs must devote additional resources "to verify order information before successfully processing individual customer orders." *Id.* This increases ALECs' costs and decreases their efficiency.

This Commission has no assurances that BellSouth will correct the important deficiencies KCI identified. As this Commission knows, KCI's test was not developed to identify the root cause of BellSouth's significant performance deficiencies. (*See, e.g.*, Tr. at 18-19, 44-45, 53-54, 65-66 and 140). KCI emphasized the purpose of its third-party test was to identify the existence of an issue, but not to determine the source of the problem. (*See, e.g.* Tr. at 54-55). Without performing a root cause analysis for each performance deficiency identified, neither this Commission nor ALECs will know why the problems occurred and whether BellSouth can correct them.

Indeed, KCI has not provided this Commission or ALECs sufficient assurance that BellSouth has corrected the significant unresolved problems identified by KCI. Accordingly, this Commission should require BellSouth to remedy these deficiencies and confirm through a

thorough review of validated Florida-specific data that BellSouth's solutions permanently correct these problems. Only then will the Commission be assured that BellSouth is providing nondiscriminatory access to its network as required by the Act.

II. THE COMMERCIAL DATA BELLSOUTH HAS PROVIDED CANNOT SUPPORT A SECTION 271 DETERMINATION

In an effort to support its quest for Section 271 approval, BellSouth provided KCI with three consecutive months of commercial data, January through March 2002. The Federal Communications Commission ("FCC") has stated that an analysis of commercial data is a primary way to evaluate whether an ILEC provides nondiscriminatory service to ALECs.³ Reliance on self-reported data to determine checklist compliance is appropriate only when there is a "reasonable assurance that the reported data is accurate."⁴ This Commission directed KCI to evaluate BellSouth's commercial data as part of its OSS testing. (*See Report* at G-3). KCI has not validated BellSouth's performance data and has indicated that it will be unable to do so until it completes its performance metrics review.⁵ More importantly, the performance metrics testing KCI has completed to date suggests that BellSouth's data is unreliable and that certain calculation methods BellSouth uses to prepare its performance reports are questionable.

³ See Memorandum Opinion and Order, *In the Matter of Joint Application by BellSouth Corporation, BellSouth Telecommunications, Inc., And BellSouth Long Distance, Inc. for Provision of In-Region, InterLATA Services in Georgia and Louisiana*, 2002 WL 992213 (F.C.C., May 15, 2002) (NO. FCC 02-147, 02-35) App. D ¶ 31.

⁴ Memorandum and Order, *In the Matter of Application By Bell Atlantic New York for Authorization under Section 271 of the Communication Act to Provide In-Region, InterLATA Service in the State of New York*, 15 FCC Rcd. 3953 (F.C.C. Dec. 22, 1999) (No. CC 99-295, FCC 99-404) ("*Bell Atlantic New York Order*") ¶ 433. This requirement, stated in the context of public interest review of a performance monitoring plan, applies at least equally to BellSouth's proffer of its own data to prove checklist compliance.

⁵ KCI anticipates that its metrics review will be complete by October 31, 2002. (Tr. at 175).

Accordingly, it would be inappropriate for this Commission to evaluate BellSouth's compliance with Section 271 until KCI verifies, and BellSouth corrects, its performance data.

A. KPMG Has Not Verified BellSouth's Commercial Data

1. KCI has not completed its Metric Evaluation

In its August 9, 1999 Order, this Commission highlighted the importance of metrics testing.

It is also important to us that we have some assurance that the performance measures currently being employed by BellSouth are adequate and that the results reported by BellSouth are accurate. Therefore, we believe that a comprehensive review of performance measures *must* be included in any testing done for Florida.⁶

This Commission is well aware that KCI's metrics evaluation is incomplete. Every test within the Performance Metrics Domain is categorized as "Testing in Progress." During KCI's metrics testing, BellSouth changed the Performance Measures and Analysis Platform ("PMAP") it uses to collect, store, and process its raw data and generate its Service Quality Measurement ("SQM") reports. (*See Report at Metrics-3*). This system change implemented "brand new systems, or at least new points of collection." (Tr. at 198-69). Accordingly, KCI stated that it cannot opine on the accuracy or reliability of BellSouth's self-reported data. (*Id.* at 176) ("Given that there were issues in 2.6 and we did not finish our analysis of 2.6, we cannot form an opinion on the commercial data.")).

The testing that was completed on BellSouth's prior version of PMAP revealed concerns about the reported data. KCI's testing of BellSouth's predecessor PMAP generated eleven open

⁶ Notice of Proposed Agency Action Order On Process For Third Party Testing, *In re: Petition of Competitive Carriers for Commission action to support local competition in BellSouth Telecommunications, Inc.'s service territory and In re: Consideration of BellSouth Telecommunications, Inc.'s entry into interLATA services pursuant to Section 271 of the Federal Telecommunications Act of 1996*, Docket Nos. 981834-TP and 960786-TL, Order No. PSC-99-1568-PAA-TP (Aug. 9, 1999) at 8 (emphasis added).

exceptions and six open observations in this important area. For example, KCI has determined that BellSouth incorrectly excludes data from important measures concerning FOCs and rejects (E-114, E-120, E-143, E-145). Additionally, KCI discovered it could not replicate BellSouth's data for key performance measures such as flow-through (E-124), local number portability (E-153), and average completion notices (O-176). Significantly, KCI continues to identify deficiencies with BellSouth's "upgraded" PMAP system, PMAP 4.0. Indeed, on July 22, 2002, KCI opened Exception 176 in which it found that BellSouth had excluded improperly well over 5,000 records necessary to calculate BellSouth's ordering measures. (See E-176). In addition, on July 15, 2002, KCI opened three new observations related to data replication problems present in BellSouth's PMAP 4.0.⁷ An additional observation addressing this same issue, O-213, was opened on July 19, 2002. Among the deficiencies KCI identified are:

- KCI cannot replicate the values in BellSouth's SQM report for the Maintenance & Repair: Out of Service > 24 hours measure (O-212);
- KCI cannot replicate the values in BellSouth's SQM report for the Maintenance & Repair: Missed Appointments measure (O-211); and
- KCI cannot replicate the values in BellSouth's SQM report for the Provisioning: Percent Missed Installation Appointments (Non-trunks) measure (O-210).

Performance metrics "are the yardstick by which the existence of nondiscrimination or parity will be determined during the OSS third-party testing."⁸ Consequently, BellSouth's performance metrics, performance reports and associated data must be accurate and verifiable.

⁷ KCI opened O-210, O-211, and O-212 on July 15, 2002.

⁸ Notice of Proposed Agency Action Order Approving Interim Performance Metrics, *In re: Petition of Competitive Carriers for Commission action to support local competition in BellSouth Telecommunications, Inc.'s service territory and In re: Consideration of BellSouth Telecommunications, Inc.'s entry into interLATA services pursuant to Section 271 of the Federal Telecommunications Act of 1996*. Docket Nos. 981834-TP and 960786-TL, Order No. PSC-00-0260-PAA-TP (Feb. 8, 1999) at 3 (emphasis added).

Both ALECs' commercial experience and the test results to date indicate that significant problems exist in this key area. Accordingly, until the metrics analysis is complete, neither ALECs, KCI, nor this Commission can determine whether BellSouth provides the nondiscriminatory access required by the Act.

2. KCI will not verify BellSouth's commercial data

This Commission should not rely on BellSouth's unverified commercial data set forth in Appendix G of KCI's Draft Final Report. BellSouth's data is suspect and KCI has not been able to verify its accuracy or completeness. (*See Report* at G-6). Moreover, KCI has identified several fundamental problems with how BellSouth calculates and reports its performance data. (Tr. at 176; *Report* at G-7). KCI, for example, has concluded that the statistical methodology BellSouth employs when compiling its Monthly State Summary ("MSS") reports is inappropriate, particularly for sample sizes below 200. (*Report* at G-7) (BellSouth's "statistical analysis is based, in part, on methods that . . . KPMG Consulting does not believe are appropriate.")). Accordingly, until BellSouth corrects these reports and associated data, this Commission should not rely on BellSouth's commercial data as conclusive evidence of its compliance with Section 271.

3. KCI cannot state whether its experience as a pseudo-ALEC reflects ALECs' commercial experience

As one of its test objectives, KCI attempted to gain first hand knowledge of ALECs' experience in Florida. At the workshop, KCI stated that it had attempted to compare its test experience to ALECs' actual experience as reflected in the BellSouth's commercial data. KCI, however, was "unable to draw any conclusions from the commercial data and the KPMG test [A]LEC." (Tr. at 176). Several factors precluded this analysis. First, KCI could not consider much of the performance data KCI produced as a pseudo-ALEC because it was not

representative of actual ALEC experience.⁹ Second, KCI did not possess any pseudo-ALEC data for a number of important measures such as Troubles and Local Number Portability. (*Id.* at 10, 176). Accordingly, no comparison for these measures could be made. Finally, KCI determined it could not rely upon numerous PMAP 2.6 metrics because those measures were seriously flawed. (*Id.* at 176). As KCI admitted, once it eliminated all of the data for which a comparison was inappropriate, there was “nothing left to evaluate.” *Id.* KCI’s findings call into question what use, if any, this Commission can make of its experience as a pseudo-ALEC.

KCI admitted that its experience as a pseudo-ALEC would not necessarily reflect the experiences of ALECs in the marketplace. KCI’s Mr. Weeks commented, “[o]bviously your mileage may vary. . . . [ALECs] may have a different experience than we had . . . our report reflects what we saw and what we experienced.” (*Id.* at 94). It is important for this Commission to understand that KCI could not conduct a completely blind test. Indeed, KCI acknowledges that “it is impossible for any ALEC to totally avoid being recognized by BellSouth.” (*Report* at EX-8). During these tests, KCI was visible to BellSouth. This lack of blindness calls into question the illustrative value of KCI’s experience as a pseudo-ALEC.

While KCI’s experience provides some indicia of how good BellSouth’s performance can be, ALECs urge the Commission to consider the commercial experiences ALECs have described to this Commission. ALECs “mileage” does vary. Contrary to KCI’s findings, ALECs experience discriminatory treatment as reflected in the commercial experience workshop.

⁹ KCI explained that for testing purposes some measures, such as Maintenance and Repair Troubles, KCI was obligated to “create” a trouble. Because this is not how such a problem would be created commercially, KCI stated that there was no appropriate metric to compare ALECs’ experience for this measure. (Tr. at 176).

B. KCI's Work In Progress Reveals That BellSouth's Commercial Data Is Inaccurate and Unreliable

KCI's work in progress demonstrates that BellSouth's commercial data is inaccurate and unreliable. To date, KCI's evaluation of PMAP 2.6 and PMAP 4.0 has generated nine open exceptions that identify significant BellSouth data integrity problems. (See E-36, E-113, E-114, E-120, E-143, E-144, E-145, E-175, and E-176). According to KCI, BellSouth incorrectly excludes data necessary to calculate certain measures (Exceptions 114, 120, 143, 144, 145, 175 and 176) and incorrectly calculates measures (E-36). KCI also determined that BellSouth's data are incomplete (E-113) and inaccurate (E-174). The commercial experience comments ALECs submitted to this Commission separately confirm KCI's findings. As KCI's impact statements for these data exceptions indicate, without accurate and complete data sets and SQM reports, ALECs cannot measure the quality of service they are receiving from BellSouth and cannot plan reliably for future business activities.

BellSouth's recent change in PMAP software has not corrected BellSouth's data integrity problems. Indeed, KCI just opened Exception 176 in which it found BellSouth excluded over 5,000 records from its ordering measures. KCI determined that this problem can "cause [BellSouth's] reported values to not accurately reflect the actual quality of service provided. Without accurate and complete data sets, CLECs are unable to assess the quality of service received or plan for future business activities reliably." (E-176). Additionally, on July 15, 2002, one day after this Commission's workshop, KCI issued three observations concerning KCI's inability to replicate values in BellSouth's SQM reports. (See Observations 210, 211, and 212). KCI notes in the observations' impact statements that the deficiencies identified call into question:

- the accuracy of BellSouth's performance measures calculations; and

- the completeness and accuracy of the SQM documentation and calculation instructions BellSouth provides ALEC.

Id. ALECs are impacted by BellSouth's failure to report accurate data beyond the inconvenience and frustration of reconciling their data to BellSouth reports. Without accurate and complete performance reports and performance data, ALECs and this Commission will be prevented from accurately assessing whether BellSouth is providing nondiscriminatory access to local services. By excluding data or calculating it incorrectly, BellSouth can mask important ALEC-impacting performance deficiencies.

In sum, KCI has not completed its review and validation of BellSouth's metrics and commercial data. The work KCI has done demonstrates that BellSouth's performance data is inaccurate and unreliable. Moreover, KCI has not been able to verify that its experience as a pseudo-ALEC comports with the commercial data BellSouth has provided this Commission. Consequently, the results of the third-party test do not provide sufficient evidence to support a finding that BellSouth provides nondiscriminatory access to local services. Accordingly, this Commission should withhold any Section 271 deliberations until KCI has the opportunity to complete its metrics evaluation and until BellSouth corrects the deficiencies KCI's review will reveal.

III. THE DRAFT FINAL REPORT DOES NOT PROVIDE A COMPLETE PORTRAIT OF BELLSOUTH'S PERFORMANCE

KCI's Draft Final Report does not provide a complete portrait of BellSouth's performance in this state. For example,

- KCI tested whether documents explaining BellSouth's process existed. KCI did not test whether BellSouth adhered to its documented procedures;
- in the critical area of change control, the test does not reveal the impact BellSouth's deficient change control process has on ALECs;

- when KCI performed its disaggregated testing, it did not test what ALECs order;
- KCI disregarded Commission-established parity standards and evaluated BellSouth's performance based on a KCI-established standard.

As described below, each of these issues impacts the degree of reliance this Commission can place on the results of the third-party test to determine whether BellSouth provides nondiscriminatory access.

A. KCI Tested Whether Documents Explaining BellSouth's Process Existed. KCI Did Not Test Whether BellSouth Adhered To Its Documented Procedures

The workshop revealed that a substantial number of KCI's tests focused on the existence of documentation and whether that documentation was well formed, rather than on BellSouth's compliance with its documented procedures. By way of illustration, consider KCI's testing results related to BellSouth's Change Control Process ("CCP"), tests PPR1-1, PPR1-2, and PPR1-6. These tests are designed to evaluate whether

- BellSouth's change management process responsibilities and activities are defined (PPR1-1);
- BellSouth's change management process is in place and documented (PPR1-2); and
- BellSouth's documentation regarding proposed changes is distributed in a timely manner (PPR1-6).

Indeed, KCI confirmed that PPR1-1 and PPR1-2 only address whether BellSouth's CCP is defined and documented—not whether BellSouth's adheres to its CCP. (Tr. at 28).

A review of KCI's testing in this area demonstrates the importance of this problem. KCI's change management testing revealed that, among other things, BellSouth failed to follow its documentation in classifying certain Change Requests as defects. KCI opened Exception 123

after determining this deficiency would result in a negative finding in its report. (Tr. at 12). KCI described the impact of this problem on ALECs:

BellSouth is required to provide workarounds and/or fixes for all Defect Change Requests within a specified timeframe. However, issues classified as features or not opened as any type of change request are not subject to any resolution timeframe. The lack of timely workarounds and resolutions to defects may result in the CLECs inability to efficiently execute transactions with BellSouth resulting in CLEC customer dissatisfaction.

(E-123).

Today, Exception 123 remains open because BellSouth has not yet corrected its deficient performance. Tests PPR1-1 and PPR1-2, however, are now listed as “satisfied” in the Draft Final Report. (*Report* at RMI-10, 12 and 18). When questioned at the hearing about this apparent incongruity, KCI’s Mr. Wirsching explained that Exception 123 contained both a process and a performance component. (Tr. at 85). Once BellSouth updated its documentation describing its internal process, KCI could determine that BellSouth had satisfied the process portion of the exception, i.e. PPR1-1 and PPR1-2. *Id.* The test assessing whether BellSouth follows its documentation, PPR1-6, however, remains categorized as “not satisfied.” KCI admitted this example demonstrates that BellSouth can provide noncompliant performance but “satisfy” certain evaluation criteria relating to the existence of documentation. (*Id.* at 28).

Another example of KCI’s testing of the existence of documents rather than adherence to the documented procedures is found in connection with KCI’s Account Management and Establishment Processes test, PPR2. The “existence” tests in PPR2 include:

- PPR2-1, account establishment and management responsibilities and activities are defined;
- PPR2-2, account management staff is organized to provide account coverage;
- PPR2-3, a description of the account establishment and management process is documented;

- PPR2-4, instructions for contacting Account Managers are published;
- PPR2-5, procedures for receiving, managing and resolving customer inquiries are defined;
- PPR2-6, procedures for escalating time-sensitive and unresolved customer issues are defined;
- PPR2-8, procedures for emergency notifications and communications to customers are defined; and
- PPR2-9, BellSouth has procedures for out of office coverage.

(*Id.* at 93). As KCI acknowledged, even though KCI found that these evaluation criteria were “satisfied,” ALECs may receive deficient performance. In connection with these tests, KCI’s Mr. Weeks commented, “[a]nd so something could exist and not be followed as an example of a situation where you could have a successful evaluation criteria, get it satisfied, but not have people follow those procedures in the normal course of business and, therefore, not have an ALEC be happy with the level of service they are receiving.” *Id.* Accordingly, KCI’s “existence” testing does not give this Commission an adequate basis to conclude BellSouth’s performance satisfies the pro-competitive principles of the Act.

B. In The Critical Area Of Change Control, The Test Does Not Reveal The Impact Of BellSouth’s Deficient Process On ALECs

When evaluating BellSouth’s OSS, an important parity consideration is the ability of ALECs to alter efficiently their interfaces to conform to changes BellSouth makes to its OSS, and the ability of ALECs to implement Change Requests to alter BellSouth’s OSS to better suit the needs of the ALEC community. KCI did not test important aspects of BellSouth’s Change Control Process. Consequently, the results of KCI’s CCP evaluation do not provide this Commission with sufficient evidence to evaluate whether BellSouth’s CCP comports with the requirements of the Act.

1. KCI made no qualitative evaluation regarding how long it took BellSouth to implement Change Requests

KCI's testing, for example, did not measure how long it took BellSouth to implement Change Requests. This issue is particularly important in connection with changes BellSouth must make because of defects in its software releases. ALECs have no control over whether BellSouth's releases are deficient. These defects can severely impair ALECs' ability to compete. Accordingly, it is critical that these defects be corrected quickly. Yet, as AT&T has explained in its commercial experience comments, BellSouth currently has a backlog of over 32 defect Change Requests.

Also important is how long it takes BellSouth to implement the Change Requests ALECs prioritize. These prioritizations represent the ALEC community's determination of what are the most ALEC-impacting changes that BellSouth must make in order for ALECs to be able to compete more efficiently. Again, BellSouth has not implemented these Change Requests as scheduled. Because KCI's test did not evaluate BellSouth's implementation intervals for defect and ALEC Change Requests, the test fails to identify these serious problems for this Commission's review. As demonstrated in ALECs' commercial experience comments, had KCI made this comparison, it would have discovered that BellSouth fails to comply with its CCP documentation, has failed to implement significant numbers of prioritized ALEC Change Requests, and that its releases continue to be fraught with defects.

2. KCI failed to test important aspects of BellSouth's CCP

KCI's testing has not brought to light other CCP deficiencies that adversely impact ALECs' ability to compete in this state. KCI simply did not consider important areas of BellSouth's CCP. For example,

- KCI failed to evaluate BellSouth's retail change management practices;¹⁰
- KCI did not conduct any transactions in the CAVE environment;¹¹
- KCI failed to consider or review ALECs' proposal for the resolution of Exception 88.¹²

KCI's failure to evaluate BellSouth's retail change management practices means this Commission has no basis to determine whether the quality of service BellSouth provides ALECs is the same as what BellSouth provides itself. Additionally, this Commission has no basis to determine whether the testing environment BellSouth has provided to ALECs, CAVE, adequately mirrors the production environment such that it provides ALECs with adequate testing capability. Nor did KCI consider ALECs' proposal for resolving an important change management exception. All of these areas are critical to ALECs' ability to compete in this state, and ALECs' experience demonstrates BellSouth's CCP performance and proposed resolution to Exception 88 are inadequate. Simply put, by failing to evaluate these areas, KCI's CCP review does not paint an adequate portrait of how BellSouth's CCP operates in Florida.

3. Even the limited review KPMG performed identified significant problems

The limited review KCI performed in this key area demonstrates that BellSouth's CCP is deficient. The workshop established, for example, that BellSouth does not supply ALECs with its annual release schedule in a timely manner. BellSouth provided ALECs its 2000 release schedule in August 2000, and provided the 2001 release schedule in July 2001. (Tr. at 80).

¹⁰ Tr. at 76.

¹¹ *Id.* at 99.

¹² *Id.* at 89.

These release schedules are critical for business planning purposes. ALECs have a right to understand how BellSouth intends to change its OSS in a timely manner.

In addition to failing to provide release schedules at an appropriate time, BellSouth failed to meet KCI's evaluation criteria for PPR1-3 (the change management process has a framework to evaluate, categorize, and prioritize proposed changes); PPR1-4 (the change management process includes procedures for allowing input from all interested parties); PPR1-6 (documentation regarding proposed changes is distributed on a timely basis); and PPR1-8 (criteria are defined for prioritizing and assigning severity codes to Change Requests). These "not satisfied" determinations will not be resolved by the time KCI publishes its Final Report.

An adequate change control process is essential to ALECs' ability to develop business systems and plans based on a set of agreed upon expectations. BellSouth's current system is inadequate. It allows BellSouth veto power over any change, even if all other carriers support the change; it allows BellSouth to implement changes regardless of industry dissent; and it allows BellSouth to schedule changes unilaterally without adequate notice to ALECs. These significant problems cannot be identified by evaluating whether CCP documentation exists and is well formed. The ultimate question, and the one which KCI did not answer, is whether BellSouth adheres to its CPP. ALECs' experience in Florida indicates BellSouth does not.

C. KCI did not test what ALECs order

KCI's third-party test does not provide this Commission an adequate view of BellSouth's performance on a disaggregated level. KCI did not test all of what ALECs order. KCI failed to validate whether products used to test small sample sizes for its disaggregation testing reflected an appropriate mix of all of the products ALECs order in this state. In addition, KCI evaluated BellSouth's performance related to certain ordering measures on an aggregated basis for the purposes of determining whether tests were satisfied. (Tr. at 131-32). As a result, KCI

determined BellSouth satisfied key areas such as FOC timeliness even though BellSouth failed to meet the criteria for important product types. (*Id.* at 132).

At the workshop, KCI explained that when it conducted its pre-ordering and ordering testing of products such as UNE-loops or UNE-P, it did not validate whether the sample sizes used in its analysis at a disaggregated level were representative of what ALECs order in the marketplace. KCI designed its analysis “to be similar to what ALECs were ordering based on experience in data provided [from] historical transactions.” (*Id.* at 113). BellSouth supplied KCI with this historical information, and KCI did not verify its accuracy. Testing of small sample sizes is particularly susceptible to statistical manipulation. Accordingly, KCI cannot know whether the results of its testing are indicative of ALECs’ commercial experience.

In addition to its failure to validate the product mix used for testing, KCI aggregated test results when determining whether BellSouth satisfied test criteria. When evaluating whether BellSouth delivers timely firm order confirmations for fully mechanized orders, for example, KCI found that BellSouth failed to meet the Commission’s standards for UNE-loops.¹³ (*Report* at POP-106). Nonetheless, based on the aggregated data for fully mechanized orders across all product types, KCI determined that BellSouth has satisfied the Commission’s standard for FOC timeliness for fully mechanized orders.

KCI’s practice of evaluating BellSouth based on aggregated performance data skews the test results. As evidenced by BellSouth’s deficient performance in UNE-loops, evaluating test results based on aggregated data rather than on disaggregated data can permit otherwise

¹³ The SQM benchmark KCI used to evaluate TVV1-3-4 is 95% received within three hour for fully mechanized transactions. For fully mechanized UNE-loop orders, BellSouth met this standard only 93.96% of the time. (*Report* at POP-106). *Despite* this deficient result, KCI determined BellSouth’s performance for the test was satisfactory.

unsatisfactory performance to remain undetected or to be counter-balanced by areas which might out-perform the standard. This failure to identify BellSouth OSS deficiencies at a disaggregated level means that KCI's test does not provide an adequate basis to predict whether BellSouth's performance on a going-forward basis will be nondiscriminatory.

The performance measures this Commission approved required an evaluation of BellSouth's performance at a disaggregate level. Nonetheless, as Mr. Weeks admitted, "it was not a designed objective of the test to hold the company to performance at the same levels of disaggregation as the SQMs do" (Tr. at 114). The purpose of the third-party test was to ensure individual evaluation of certain test criteria so the Commission could take full measure of the results. By failing to evaluate on a disaggregated basis, however, KCI has denied the Commission the opportunity to measure fully BellSouth's performance in this state.

D. KCI disregarded Commission-established parity standards in favor of its own standard

One of the goals of KCI's POP Volume Performance test, TVV2, was to evaluate the timeliness of BellSouth's pre-order responses. (See TVV2-3-1 through TVV2-3-14). For eleven of these fourteen tests,¹⁴ KCI disregarded the Commission-established standard of parity plus two seconds and evaluated BellSouth based on a standard of its own design, parity plus ten seconds. At the workshop, KCI admitted that it derived this standard based on its professional judgment and applied it to evaluate eleven tests¹⁵ within TVV2. (Tr. at 134).

¹⁴ The parity plus two seconds standard applied to tests TVV2-3-2, 2-3-3, 2-3-4, 2-3-5, 2-3-6, 2-3-9, 2-3-10, 2-3-11, 2-3-12, 2-3-13, and 2-3-14. KCI, however, applied its own standard of parity plus 10 seconds in making its evaluation.

¹⁵ KCI applied its parity plus ten seconds standard to tests TVV2-3-2 through TVV2-3-6, and TVV2-3-9 through TVV2-3-14.

KCI's use of a different standard than what this Commission approved to evaluate BellSouth's performance is disturbing. The results of KCI's testing in this area "are intended to reflect the KPMG Consulting ALEC experience." (*Report* at POP-151). By failing to apply the SQM standard, KCI's evaluation is not representative of the performance this Commission requires for competition to flourish. Indeed, according to the Commission-established performance standards, commercial performance exceeding parity plus two seconds is deficient. KCI's evaluation thus provides this Commission with no insight regarding whether BellSouth's performance toward ALECs trying to compete in this state promotes or hinders competition. Accordingly, in making its Section 271 evaluation, this Commission should accord these test results no evaluative weight.

IV. KCI'S PARITY EVALUATIONS DO NOT PROVIDE A LIKE-TO-LIKE COMPARISON

KCI's parity evaluations do not present this Commission with a like-to-like comparison of BellSouth's retail and wholesale systems. KCI, for example, did not evaluate BellSouth's complete ordering system. Consequently, the third-party test does not reveal critical problems in this customer-impacting area. In addition, many of the parity evaluations KCI performed focused on whether BellSouth's processes were at parity, not whether BellSouth provided ALECs performance that was as good as what BellSouth provides itself. Parity tests that are based on incomplete information or that do not consider parity of performance do not provide a sufficient basis to support a Section 271 evaluation.

A. KCI Did Not Fully Evaluate BellSouth's Complete Ordering System

KCI's evaluation of BellSouth's ordering system was incomplete—KCI failed to evaluate significant BellSouth ordering systems. KCI's order flow-through evaluation (TVV3) was designed to assess the ability of ALEC orders to flow-through BellSouth's ordering systems

without falling out for manual processing. Part of KCI's testing of this critical area¹⁶ was to analyze BellSouth's retail ordering process and compare the flow-through capabilities of BellSouth's retail and wholesale systems. (*Report* at POP-261). Based upon its observation of BellSouth employees inputting orders at the retail service centers, KCI concluded that BellSouth's retail orders do not require a translation process similar to what ALECs use. (Tr. at 151). In addition, KCI determined that because BellSouth's orders do not need to be translated, BellSouth does not "experience fallout that can be compared to the fallout experienced by wholesale orders." (*Id.*; *Report* at POP-278).

KCI's observations and conclusions are incorrect. BellSouth retail orders are translated prior to submission to SOCS. Indeed, there are two separate systems of editing and formatting software that prevent BellSouth employees from submitting service requests that contain certain errors. These software programs include the FID USOC Editing Library ("FUEL") and the Service Order Layout and Assembly Routine ("SOLAR"). The FUEL and SOLAR systems are similar to the systems ALECs use, LEO and LESOG. In 1997, during proceedings conducted in Docket 960786-TL, BellSouth witness Gloria Calhoun confirmed BellSouth relies upon FUEL and SOLAR in its ordering process and that there is no functional difference among FUEL, SOLAR, LEO, and LESOG. (*See* Testimony of BellSouth witness Gloria Calhoun, Docket No.

¹⁶ Flow-through is an important tool this Commission should use to evaluate whether BellSouth's OSS denies an efficient competitor a meaningful opportunity to compete. The FCC has found "a direct correlation between the evidence of order flow-through and the BOC's ability to provide competing carriers with nondiscriminatory access to the BOC's OSS functions." *See* Memorandum Opinion and Order, *In the Matter of Application of BellSouth Corporation, BellSouth Telecommunications, Inc., and BellSouth Long Distance, Inc., for Provisions of In-Region, InterLATA Services in Louisiana*, 13 FCC Rcd. 20, 599 ¶ 107 (F.C.C. October 13, 1998) (No. CC 98-121, FCC 98-271) ("*Second Louisiana Order*"). As ALECs commercial experience demonstrates, BellSouth's flow-through performance is deficient. KCI's testing confirms BellSouth's performance in this area is not satisfactory (*See* TVV 3-2, TVV3-4).

960786-TL, Sept. 4, 1997 at 1436-1446 (excerpts attached as Exhibit 1)). At the hearing, KCI admitted it did not evaluate how BellSouth's ordering systems convert service representatives' inputs into a service order format. (Tr. at 151-52).

KCI's incomplete evaluation of BellSouth's ordering system denies this Commission the ability to make a parity evaluation of BellSouth's and ALECs' fallout rates. Flow-through provides numerous benefits to customers including: (1) earlier due dates; (2) a lower risk of provisioning errors; and (3) lower prices (fully automated order processing is significantly less expensive than manual processing). BellSouth orders flow through almost 100% of the time. ALECs orders continue to fallout at an alarmingly high rate.

When orders fallout for manual processing, customers' orders are delayed and ALECs' costs for providing service to their customers increase. Had KCI's test evaluated this important area, BellSouth's deficient performance toward ALEC orders likely would have been detected and corrected.

Prior to determining whether BellSouth satisfies its Section 271 obligations, this Commission should require KCI to evaluate BellSouth's complete ordering system and determine whether validated commercial data indicates BellSouth's performance for ALECs in this key area is at parity with the performance BellSouth provides its retail operations.

B. KCI's Parity Evaluation Focused On Process Parity Not Performance Parity

ALECs identified at the workshop that many of KCI's parity evaluations focused on whether BellSouth's processes were similar—not whether BellSouth provided parity of performance. As part of PPR7, for example, KCI tested BellSouth's escalation procedures. ALECs rely on BellSouth's escalation procedures to resolve significant issues that arise when servicing their customers. Despite the importance of this area, KCI only considered whether certain escalation processes existed within BellSouth's documentation. (Tr. at 103). KCI did not

evaluate whether BellSouth followed its escalation procedures and did not analyze whether BellSouth resolved ALECs' escalation issues as promptly as it did its own. *Id.*

Simultaneously, as part of its POP manual processing evaluation, KCI considered whether ALECs' order entry and service order generation functionalities ("DOE") performed at parity with BellSouth's similar functionality ("ROS"). (*Report* at POP-19). KCI determined that ROS and DOE were functionally comparable. *Id.* This determination was based on KCI's conclusion that both ROS and DOE permitted users to enter certain LSR information and both systems accepted the information. (Tr. at 102). KCI's testing did not compare how well these systems performed. (*Id.* at 103). Accordingly, KCI's test results tell the Commission nothing about the quality of service ALECs receive from BellSouth in this ALEC-impacting area.

In addition, KCI conducted a "process parity review, not a quantitative review" of KCI's POP Work Center Support Evaluation, PPR8. (*Id.* at 104). KCI described its PPR8 testing as follows, "we were looking for parallel structure in the definition and description and design of the process and the function as opposed to trying to monitor the performance actually delivered onto the wholesale community or delivered onto the retail community." (*Id.* at 105).

What this means is that based on KCI's test, this Commission cannot determine:

- whether the performance standards applicable to BellSouth's wholesale and retail service centers are comparable;
- whether BellSouth's performance in the key area of service order accuracy is comparable between the retail and wholesale service centers;
- whether BellSouth's performance in the retail and wholesale service centers meets customer satisfaction requirements;
- whether there were speed of answer requirements for both the retail and wholesale centers and whether those requirements were the same for both centers; or

- whether there were hold time targets for answered calls that were comparable between BellSouth's retail and wholesale centers and whether BellSouth's performance in this area was at parity between its retail and wholesale centers.

(*Id.* at 104). These are important parity considerations that should be investigated prior to recommending BellSouth receive Section 271 approval. ALECs must interact with BellSouth's work center to address ordering, processing, and maintenance repair issues. (*Id.* at 105). When ALECs must wait for BellSouth's service representatives to answer the phone, or when BellSouth representatives err in completing ALEC orders, it is the consumers of this state that are impacted. Their telephone service is needlessly delayed or provisioned incorrectly. Accordingly, BellSouth's performance failures in this area negatively impact ALECs' ability to provide quality service to Florida consumers.

CONCLUSION

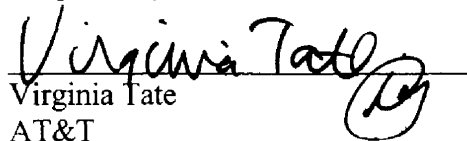
The results of the third-party test and the July 12, 2002 workshop demonstrate:

- KCI concluded that BellSouth failed to meet test criteria in key areas. Open exceptions will not be resolved by the time KCI concludes its testing. Accordingly, ALECs and this Commission cannot know when, and if, BellSouth will correct these known deficiencies.
- KCI's third-party test is incomplete. KCI has not been able to verify BellSouth's self-reported commercial data and KCI will not complete its Performance Metrics evaluation until October 31, 2002. Absent verified performance data, this Commission lacks an appropriate yardstick by which to measure BellSouth's performance in this state.
- KCI's testing does not provide a complete portrait of BellSouth's OSS performance in Florida. Many of KCI's tests focused on the existence of documentation, not whether BellSouth adhered to those documented procedures. In important areas such as change management, KCI's testing failed to demonstrated the impact of BellSouth's deficiencies on ALECs' ability to compete.
- KCI did not test all of what ALECs order in this state and disregarded certain Commission-established parity standards in favor of its own standards.

- **KCI's testing does not provide this Commission a like-to-like comparison of BellSouth's retail and wholesale systems.**

These problems translate into the real likelihood that Florida consumers will be negatively impacted if this Commission does not order BellSouth to correct deficiencies KCI and ALECs have identified. Once BellSouth informs this Commission that it has corrected these problems, this Commission should monitor validated commercial experience data to ensure BellSouth complies with the nondiscriminatory principles of the Act. Only then will it be appropriate for this Commission to recommend BellSouth for Section 271 authority.

Respectfully submitted,


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LLC

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

THIRD DAY - AFTERNOON SESSION

VOLUME 13

Pages 1380 through 1475

PROCEEDINGS: HEARING

BEFORE: JULIA L. JOHNSON, CHAIRMAN
 SUSAN F. CLARK, COMMISSIONER
 J. TERRY DEASON, COMMISSIONER
 DIANE K. KIESLING, COMMISSIONER
 JOE GARCIA, COMMISSIONER

DATE: Thursday, September 4, 1997

TIME: Commenced at 9:00 a.m.

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

REPORTED BY: Lisa Girod Jones, RPR, RMR

APPEARANCES:
 (As heretofore noted.)

BUREAU OF REPORTING

RECEIVED 9-4-97DOCUMENT NUMBER-DATE
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 BUREAU OF REPORTING

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3	NAME	PAGE NO.
4	GLORIA CALHOUN (Continuing)	
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1 P R O C E E D I N G S

2 (Transcript continues in sequence from
3 Volume 12.)

4 (After brief recess, hearing resumed at
5 3:10 p.m.)

6 CHAIRMAN JOHNSON: We're going to go back on
7 the record. Ms. Rule.

8 GLORIA CALHOUN
9 continues her testimony under oath from Volume 12.

10 CONTINUED CROSS

11 BY MS. RULE:

12 Q Ms. Calhoun, what is a service order reject?

13 A A service order reject can be for a number of
14 reasons. A reject --

15 COMMISSIONER GARCIA: Is the question what is
16 a server reject?

17 MS. RULE: Service order reject.

18 COMMISSIONER CLARK: He heard social reject, I
19 think.

20 WITNESS CALHOUN: It's an order that's
21 rejected by a system for one reason or another.

22 Q (By Ms. Rule) Would you turn in Attachment
23 15 to Page 4, please.

24 COMMISSIONER KIESLING: I'm sorry, would you
25 repeat the page number?

1 can just start in the firm order mode and do those same
2 things.

3 Q If you put that information into the LENS firm
4 order mode, you cannot save that information and come
5 back to it later that day, can you?

6 A No.

7 Q Now, RNS has the ability to combine the
8 capabilities of preordering and ordering; isn't that
9 correct?

10 A Yes.

11 Q Ms. Calhoun, would you please turn to Exhibit
12 No. 45 that was identified earlier and look at Page 2,
13 please?

14 A Is that the one that's marked ID No. GC-337

15 Q No, that is the -- the front page of that says
16 Demonstration of Electronic Interfaces that was
17 identified as Exhibit No. 45.

18 A Oh, okay.

19 Q If you'll look at Page 2.

20 A Yes.

21 Q It helps me to be able to visualize things.

22 So what I would like you to do for me is imagine you're
23 putting a template over the CLEC OSS access section that
24 you have there, where you have the CLEC and then the
25 EDI, and it shows the process that an order goes

1 through.

2 What I would like to do is for you to explain
3 to me the BellSouth RNS ordering process. And if you'll
4 just point out to me where the databases are different
5 and show me the steps that an order goes through.

6 A Okay.

7 Q Or explain to me the steps that an order goes
8 through through RNS. So, for example, you have on the
9 left, CLEC, that's BellSouth, and it goes into RNS.
10 What happens after that?

11 A There's -- it goes to a navigator, and where
12 you see LEO, there's a system called FUEL. Where you
13 see LESOG, there's a system called SOLAR. And the LCSC
14 is not involved.

15 MR. ELLENBERG: For the sake of the record,
16 could you spell those two acronyms for the court
17 reporter, please.

18 WITNESS CALHOUN: Yes. FUEL, F-U-E-L. SOLAR,
19 S-O-L-A-R.

20 Q (By Ms. Barone) And for the record, would you
21 state what those acronyms stand for, please?

22 A Yes, FUEL is what I would call a nesting
23 acronym. It stands for FID, USOC and Edit Library. And
24 FID is field identifier, and USOC, of course, is uniform
25 service order code. And SOLAR stands for service order

1 layout assembly routine.

2 Q All right, now will you walk me through the
3 process for those changes?

4 A Yes. The BellSouth service rep would put the
5 order in through RNS, and RNS would communicate through
6 the navigator contracts with FUEL and SOLAR, and the
7 ultimate order would be generated to SOCS, or the
8 service order control system.

9 Q So the navigator communicates with FUEL and
10 SOLAR at the same time?

11 A Yes.

12 Q And LESOG -- what does LESOG do and why is
13 that not necessary in this situation, in RNS?

14 A LESOG is the local exchange service order
15 generator, and its function is analogous to the SOLAR
16 system. They're both mechanized order formatters. And
17 FUEL is analogous to LEO.

18 Q And why -- I'll strike that.

19 Now would you go through the same process
20 explaining DOE for me?

21 A Yes. The BellSouth service representative
22 would input a service order into DOE. DOE would
23 communicate with a system called SOER, S-O-E-R, service
24 order edit routine, that performs functions analogous to
25 LEO and to FUEL, and then the order would ultimately be

1 put into SOCS.

2 Q BellSouth customer service representatives
3 have the ability to access pending orders in the RNS
4 system; isn't that correct?

5 A Yes.

6 Q Is this also true in the DOE system?

7 A Yes -- well, yes, yes, it's true in both.

8 Q After accessing a pending order, a BellSouth
9 representative can make modifications to the original
10 order by accessing an order update screen; isn't that
11 correct?

12 A Yes.

13 Q When moving from one screen to the next in
14 RNS, the customer information initially validated in the
15 system automatically populates the same fields in later
16 screens; isn't that correct?

17 A I'm sorry, could you repeat the first part?

18 Q When you move from one screen to the next in
19 RNS?

20 A Yes.

21 Q The customer information initially validated
22 in the system automatically populates the same fields in
23 later screens; doesn't it?

24 A Yes.

25 Q RNS and DOE have on-line credit capability;

1 isn't that correct?

2 A RNS does. RNS has a link to Equifax. I don't
3 believe DOE has that. RNS has a link that -- where you
4 can launch a query to Equifax, I don't believe that DOE
5 has that.

6 Q But you're not sure if DOE has that
7 capability?

8 A I'm not sure. I'm not totally sure.

9 Q And RNS and DOE have on-line edit capability;
10 don't they?

11 A Yes.

12 Q If an error is made by a BellSouth customer
13 service associate, a rejection notice is typically sent
14 back to the customer service associate within 30 minutes
15 by BellSouth's downstream representative; isn't that
16 correct?

17 A It's not necessarily sent back to the
18 originator of the order. There's an error handling
19 group that gets error notifications.

20 Q Is that notification typically within 30
21 minutes?

22 A I would have to check on that. That sounds
23 like a reasonable time frame, but I can't verify it for
24 sure.

25 Q In the products and services section of RNS,

1 sent it to us.

2 Q Are all of the fields that must be populated
3 in LENS and EDI distinguished in some way so that the
4 ALEC customer service representative knows that it must
5 populate the field before the order is processed?

6 A They are in the EDI.

7 Q But not in LENS?

8 A Yes.

9 Q And how are they distinguished in EDI?

10 A With an asterisk.

11 Q Earlier when you were referring to Exhibit
12 No. 45, you discussed FUEL. Now FUEL is the database
13 that BellSouth uses for its retail operations; isn't
14 that correct?

15 A Yes.

16 Q And LEO is the database that ALECs use for
17 ordering, correct?

18 A Yes.

19 Q Are there any differences between the FUEL and
20 LEO databases?

21 A I don't know. I would not be able to identify
22 them.

23 Q Do they serve the same functionality, or are
24 there different functionalities involved?

25 A Generally they serve the same functionality.

1 Q What do you mean generally?

2 A I mean in general they are intended to provide
3 the same functions, but I can't give you a side-by-side
4 listing of exactly how things are accomplished in each.
5 But in general they serve the purpose of checking
6 business rules, checking that USOCs are valid, that a
7 USOC that belongs with a particular -- that a USOC
8 belongs with a particular class of service and they're
9 doing content checking.

10 Q What's the difference between LESOG and SOLAR?

11 A Well, again, technically they're different.
12 Functionally they're equivalent. They are -- both of
13 them perform the task of manually converting the inputs
14 from the presentation system into codes and formats that
15 are recognized by SOCS.

16 Q What other databases were created to serve
17 ALECs that BellSouth does not use?

18 A I can't think of any offhand.

19 Q How does an ALEC know what its customers will
20 pay for the services ordered? Does LENS or EDI have
21 this capability?

22 A Well, no, pricing information is something
23 that's at the discretion of each ALEC. So the EDI and
24 LENS system are going to offer the same capabilities to
25 all ALECs, and then it's up to them to determine how

1 is possible for them to do that, and they would access
2 that information through the telephone number selection
3 screen.

4 Q I don't think you need to refer to this, but
5 if you do I'll stop after I ask the question. In
6 Late-filed Exhibit No. 2 you provide average talk times
7 for BellSouth service representatives.

8 Are these average intervals based on service
9 representatives using RNS? That's going to be your
10 Late-filed Exhibit No. 2 and that's part of what has
11 been identified as Exhibit No. 43. And you can find
12 that on Page 381.

13 A This includes business and residential. So it
14 will include both RNS and DOE.

15 Q One last question. Why did BellSouth create
16 separate databases for ALECs instead of allowing ALECs
17 direct access to the same databases that BellSouth uses
18 for its retail services, retail operations?

19 A Well, there are a couple different reasons for
20 that. One is, of course, as I've talked about at
21 length, the industry recommends EDI for ordering, and so
22 BellSouth made available an EDI ordering interface, but
23 another reason is that BellSouth has an RNS system for
24 residence customers, and a DOE system for business
25 customers in four states, and a SONGS system for

1 business customers in five states, and we had clear
2 indications from the CLECs that they wanted a single
3 interface that would support both business and residence
4 throughout the region. And in fact, there's language in
5 the MCI interconnection agreement that -- in which we
6 specifically agreed that we would not have separate
7 processes for business and residence customers. And so
8 we needed to provide a single, unified interface.

9 Q I just have a follow-up to that then. Why did
10 BellSouth create LEO and why did BellSouth create LESOG?

11 A FUEL and SOLAR are databases that are only
12 associated with residence customers -- with RNS, which
13 only supports residence customers. And so again,
14 because both CLECs, as our customers, told us they
15 wanted a single interface, we needed to have databases
16 performing those functions that would support both
17 business and residence customers, and because we're
18 contractually obligated to provide a single interface
19 for business and residence.

20 MS. BARONE: Thank you. That's all I have.

21 COMMISSIONER CLARK: Madam Chairman, I would
22 just like to ask one question.

23 With respect to your direct testimony -- and I
24 probably should have asked Mr. Varner the same thing,
25 but hopefully you can answer it. You take issue with