BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Implementation of requirements arising from Federal Communications Commission triennial UNE review: Local Circuit Switching for Mass Market Customers.	))))	Docket No. 030851-TP

DIRECT TESTIMONY OF

MARK DAVID VAN DE WATER

ON BEHALF OF
AT&T COMMUNICATIONS OF THE SOUTHERN STATES, LLC

DECEMBER 4, 2003

REDACTED VERSION

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Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A. My name is Mark David Van de Water. My business address is 7300 East Hampton Avenue, Room 1102, Mesa, AZ, 85208-3373.

Q. PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND AND WORK EXPERIENCE IN THE TELECOMMUNICATIONS INDUSTRY.

A. I hold a Bachelors of Arts in Psychology and a Masters of Arts in Organizational Management. I am employed by AT&T, operating in Florida as AT&T of the Southern States, LLC ("AT&T"). For the past 5 years I have worked in the Local Services and Access Management organization of AT&T with responsibility for negotiating and implementing operational support system ("OSS") requirements and interfaces, and for resolving operational issues between AT&T Local Services and Southwestern Bell Corporation ("SBC"). In particular, I participated with SBC in formalizing their documented coordinated and uncoordinated unbundled network element-loop ("UNE-L") with local number portability ("LNP") hot cut processes. During 2003, I negotiated with SBC, on a business-to-business basis, to create a process by which AT&T is able to convert multiple unbundled network element-platform ("UNE-P") customers to UNE-L. A trial is currently being conducted of this process. Further, this process is the foundation of SBC's current "batch" hot cut proposal presented throughout its 13-state region. Before this assignment, I worked for over 16 years at Western Electric Company in various positions.

Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE REGULATORY COMMISSIONS?

A. Yes. I have testified before the California, Kansas, Missouri, Illinois, and Texas commissions in matters related to SBC's applications for in-region long distance authority under Section 271 of the Federal Telecommunications Act of 1996.

Q. WHAT ISSUES DOES YOUR TESTIMONY ADDRESS?

A. My testimony provides information directly related to the Commission's consideration of issues 3 and 6.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. The purpose of my testimony is to address the operational constraints associated with the hot cut process, to describe issues this Commission should consider in developing any bulk migration process for unbundled loops, and to recommend the parameters that should be included in any bulk migration process. My testimony covers four key areas in this proceeding.

First, I address the operational and economic barriers presented by the hot cut process. This section of my testimony explains the findings of the Federal Communications Commission ("FCC") in the Triennial Review Order ("TRO").[1] It summarizes the FCC's conclusions that competitive carriers are impaired without access to unbundled local switching as a result of economic and operational impairment due to the hot cut process and describes the FCC's directions to state commissions to approve and implement a batch loop migration process.

Second, I describe the specifics of the current hot cut process and AT&T's experience with hot cuts in the BellSouth region. My testimony summarizes why AT&T's experience led it to choose UNE-P to provide local service and describes specific concerns related to BellSouth's performance of hot cuts.

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[1] *Report and Order and Order on Remand and Further Notice of Proposed Rulemaking*, In the matter of Review of the Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers, Federal Communications Commission, CC Docket No. 01-338, Released August 21, 2003 (hereafter referred to as the "Triennial Review Order" or "TRO")

Third, I describe the challenges that must be addressed in implementing any batch loop migration process. I address the volume of hot cuts that will be required and the evaluation standards by which any batch migration process should be considered. My testimony discusses the number of UNE-L hot cuts that should be expected if unbundled local switching is no longer available and the segments of the market that pose unique challenges for development of a bulk migration process. My testimony also addresses new operational constraints that will arise if customer conversions require migration of a loop because unbundled local switching is no longer available to Competitive Local Exchange Carriers ("CLECs").

Fourth, my testimony includes recommendations for a batch hot cut process. Because CLECs have restricted insight into the operations of the Incumbent Local Exchange Carrier ("ILEC"), this recommended process addresses the parameters of a reasonable batch migration process. Development of a batch hot cut process rests primarily with the ILECs, in cooperation with the CLECs. Further, while my testimony points out the advantages of its recommended process, it also illustrates why no manually based process is capable of ensuring the seamless, low cost migration of loops that is required by the TRO and is equivalent to the ease and efficiency with which customers are migrated today when changing LD carriers and when using the unbundled network element platform.

I. BACKGROUND: THE OPERATIONAL AND ECONOMIC BARRIERS PRESENTED BY THE CURRENT HOT CUT PROCESS

Q. WHAT IS A HOT CUT?

A. When a mass-market (residential and small business) customer seeks to move his or her local service from one switch-based carrier to another, the connection between the

customer's analog loop and the original carrier's switch must be broken and a new connection must be established between that analog loop and the new carrier's switch. Because the customer's loop is lifted or "cut" while it still is provides active service to a customer (i.e., the loop is "hot"), the process used to transfer analog loops has become known as a "hot cut." The hot cut process involves two separate changes to the customer's service that must be coordinated to occur at approximately the same time: (1) the manual transfer of the customer's analog loop from one carrier's network to another's (the loop cut); and (2) the porting of the customer's telephone number (including the associated software changes and the disconnection of the original carrier's switch translations), so that inbound calls to the customer can be routed to the new carrier's switch using the customer's existing telephone number.

Q. DOES A HOT CUT CAUSE THE CUSTOMER TO LOSE SERVICE?

A. Yes. This occurs in two ways. The first is a complete loss of dial tone. From the time the customer's analog loop is disconnected from the ILEC's switch until it is reconnected to the CLEC's switch, the customer has no dial tone and is completely out of service. Second, from the time the customer's analog loop is reconnected to the CLEC's switch until the customer's number is successfully ported to the CLEC's switch, the customer cannot receive any incoming calls. That is because, until the appropriate change message is received by the Number Portability Administration Center ("NPAC"), the NPAC database indicates that calls should be routed to the ILEC's switch. If someone calls the customer and the calls are sent to the ILEC's switch after the customer's analog loop has been physically moved, the call will not complete and the caller will be unable to reach the customer.

Q. HOW DID THE FCC ADDRESS THE ISSUE OF HOT CUTS?

A. In short, it concluded that hot cuts cause impairment. In the TRO, the FCC reviewed substantial data and descriptions of this hot cut process provided by both ILECs and CLECs and found, on a national basis, that competing carriers providing voice service to mass market customers are impaired without access to unbundled local circuit switching. TRO ¶ 459. This finding was based in part on clear evidence regarding the economic and operational barriers caused by the hot cut process. *Id. See also* ¶ 473 ("Our national finding of impairment is based on the combined effect of all aspects of the hot cut process on competitors' ability to serve mass market voice customers.") The FCC recognized that "whether a customer was previously being served by the competitive LEC using unbundled local circuit switching [i.e., using UNE-P], or by the incumbent itself, a hot cut must be performed [if unbundled local switching is no longer available]. *Id.*¶ 465.

Q. DID THE FCC MAKE SPECIFIC FINDINGS?

A. Yes. The FCC found:

> "[H]ot cuts frequently lead to provisioning delays and service outages, and are often priced at rates that prohibit facilities-based competition for the mass market. The barriers associated with the manual hot cut process are directly associated with incumbent LECs' historical local monopoly, and thus go beyond the burdens universally associated with competitive entry. Specifically, the incumbent LECs' networks were designed for use in a single carrier, non-competitive environment..." Id. ¶ 465.[2]

The FCC recognized that, as a result, "for the incumbent, connecting or disconnecting a customer is generally merely a matter of a software change. In contrast, a competitive carrier

[2] For a full discussion of the impairments created by the incumbents' current network architecture, see the Direct Testimony of AT&T Witness Jay Bradbury.

must overcome the economic and operational barriers associated with manual hot cuts." *Id*. (citations omitted).

Upon review of the evidence, the FCC concluded that the economic and operational barriers of the hot cut process include "the associated non-recurring costs, the potential for disruption of service to the customer, and our conclusion, as demonstrated by the record, that incumbent LECs appear unable to handle the necessary volume of migrations to support competitive switching in the absence of unbundled switching." *Id.* ¶¶ 459. The FCC further concluded that "[t]hese hot cut barriers not only make it uneconomic for competitive LECs to self-deploy switches specifically to serve the mass market, but also hinder competitive carriers' ability to serve mass market customers using switches self-deployed to serve enterprise customers." *Id.*

Q. HOW DID THE FCC PROPOSE TO ADDRESS THESE PROBLEMS?

A. The FCC found that "[c]ompetition in the absence of unbundled local circuit switching requires seamless and timely migration not only to and from the incumbent's facilities, but also to and from the facilities of other competitive carriers." TRO ¶ 478 (citations omitted). Having reached this conclusion, the FCC indicated that "loop access barriers contained in the record *may* be mitigated through the creation of a batch cut process . . . ." TRO ¶ 487 (emphasis added). The FCC then directed state commissions to approve and implement a batch process that attempts to address the economic and operational barriers caused by hot cuts, or make detailed findings why such a process is not necessary in a particular market. *Id.* ¶ 488; *see also* ¶ 423. The FCC identified issues that must be addressed by any batch hot cut process developed, *id.* ¶ 489, and outlined the

detailed findings that must be made if a state commission declines to institute a batch hot cut process for a particular market. *Id.* ¶ 490.

Critically, however, the FCC recognized that even after such a process is implemented, competitive carriers may still face barriers associated with loop provisioning -- even problems arising from newly improved cutover processes -- that may continue to be a significant barrier to competitive entry into the mass market. *Id.* ¶ 512. The FCC asked state commissions "to consider more granular evidence concerning the incumbent LEC's ability to transfer loops in a timely and reliable manner." *Id.* Some of the evidence the FCC suggested commissions should consider includes "commercial performance data . . . and the existence of a penalty plan with respect to the applicable metrics" and "whether the incumbent's facilities, human resources, and processes are sufficient to handle adequately the demand for loops, collocation, cross connects and other services required by competitors for facilities-based entry into the voice market." *Id.*

II. OPERATIONAL AND ECONOMIC IMPACTS WHEN USING UNBUNDLED LOOPS: WHY AT&T USES UNE-P RATHER THAN UNBUNDLED LOOPS

Q. HOW IS AT&T CURRENTLY SERVING MASS MARKET CUSTOMERS IN BELLSOUTH TERRITORY?

A. AT&T is currently acquiring virtually all its mass market (residential and small business) customers using the Unbundled Network Element Platform ("UNE-P"). For example, from January through June 2003, BellSouth has only completed REDACTED hot cut orders for AT&T for the entire nine-state BellSouth region. Below are the numbers of hot cut orders by month and the number of UNE-P orders per month.

Month	UNE-P Orders	Hot Cut Orders
January, 2003		
February, 2003		
March, 2003		
April, 2003		
May, 2003		
June, 2003		

From BellSouth's BellSouth Performance Measurement and Analysis Platform ("PMAP')

Further, according to PMAP's Customer Trouble Report Rate reports, as of October 2003, while AT&T had over REDACTED UNE-L lines in service in BellSouth territory, it had over REDACTED UNE-P lines in service.

Q. HAS AT&T USED METHODS OTHER THAN UNE-P TO PROVIDE SERVICE TO MASS MARKET CUSTOMERS?

A. Yes. As noted above, AT&T has served a limited portion of the small business market using an unbundled loop from BellSouth with an AT&T owned switch using the hot cut process. Significant cost and operational provisioning problems that occurred even at these low volumes of hot cuts, however, caused AT&T to virtually eliminate UNE-L as a means of acquiring customers.

Q. DID AT&T EXPERIENCE THE HOT CUT IMPAIRMENTS FOUND BY THE FCC?

A. Yes. As confirmed by the FCC, AT&T's experience was that the hot cut process frequently led to provisioning delays and service outages that led to an untenable level of customer dissatisfaction. Naturally, this dissatisfaction was directed at AT&T as the retail provider of the service, not BellSouth, the underlying wholesale provider. In particular, BellSouth's provisioning delays included its substandard performance in returning timely firm order confirmations, its failure to provide a reliable schedule for performing hot cuts, and its failure to notify AT&T consistently and timely that customer loops had been

transferred to AT&T, so that AT&T could complete the final steps necessary to port the customer's telephone number to ensure the customer could receive incoming calls.[3] Factors that contributed to customer service outages included BellSouth's erroneous disconnection of end users' lines and, when erroneous disconnections occurred, undue delay in reconnection. In addition, BellSouth's high charges for hot cuts make facilities-based competition using UNE-L for mass market customers uneconomic.

Q. GIVEN THESE PROBLEMS, WHY DOES AT&T CONTINUE TO USE HOT CUTS AT ALL?

A. AT&T has existing business customers that it serves using its own switch and unbundled analog loops dating back to the time when AT&T was using UNE-L to provide local service. When these customers wish to change their service by adding lines or migrating additional lines from the ILEC, AT&T will continue to use UNE-L to satisfy this request. Additionally, when a large customer migrates more lines to AT&T than can be provisioned on a single DS1, but less than can economically be provisioned on two DS1's, AT&T will provide service to this customer by using a DS1 loop, and unbundled analog loops for the additional lines that could not be supported on the DS1.

AT&T follows this practice because it maintains separate processes and databases for its customers served via loop facilities and its customers served via UNE-P. Having all of a customer's lines provisioned using the same network configuration allows AT&T to provide more efficient and effective on-going customer service, maintenance, and repair. AT&T does not actively market analog services to small business mass market customers using a UNE-L strategy, due to the provisioning problems and the high costs of hot cuts and

[3] Timely firm order confirmations are essential to communicate when the order is to be provisioned so that number porting activities can began and service migration can be confirmed with the customer. Late firm order

backhaul costs, *i.e.*, the costs of extending the loop from the ILEC central office to AT&T's switch.

Q. HOW DOES THE HOT CUT PROCESS DIFFER FROM PROVIDING SERVICE USING UNE-P?

A. UNE-P is a simple process that is ordered and provisioned electronically. With UNE-P, there should be no need to perform physical work in the ILEC's central office or outside loop plant to migrate an existing ILEC customer to a CLEC that is providing service using UNE-P. The migration from ILEC-retail to CLEC-UNE-P service only requires the ILEC to perform software changes. Thus, there is little chance for error and the customer does not have to lose service during the migration, because the service, both before and after the change, is being provided through the use of the ILEC's switch. This eliminates the need for a physical transfer of the customer's loop, as well as the need to port the customer's telephone number to another switch. Consequently, this service is almost always provided to the customer very quickly.

A hot cut, in sharp contrast, is a complex, highly manual process. It requires significant coordination between both the ILEC and a CLEC. Both carriers must perform multiple tasks in the hot cut ordering and provisioning processes, and both parties must coordinate these operations in the proper, agreed-upon sequence. If the many steps of the hot cut process are not performed in that exact sequence -- and properly coordinated between both carriers -- and if the ILEC does not complete its downstream processes correctly and timely, the customer will experience a service outage that is much longer than the unavoidable outage associated with this process.

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confirmations also cause the customer's order to be delayed past the times originally requested by the customer.

Q. PLEASE DESCRIBE THE MAJOR STEPS IN MIGRATING A CUSTOMER FROM AN ILEC TO A CLEC USING UNE-P.

A. There are only a few significant steps involved in migrating a mass-market customer from the ILEC to a CLEC using UNE-P:

- After completing the sale to the customer, the CLEC accesses the ILEC's pre-ordering OSS in order to obtain the necessary customer information, such as the correct name and address. A CLEC agent enters this information into the CLEC systems to create the CLEC customer service record and establish the CLEC bill. The agent must take special care to ensure the information used by CLEC matches the ILEC's records in order to avoid an order rejection by the ILEC.
- The CLEC's agent prepares the Local Service Request ("LSR") and submits it electronically to the ILEC interface. The large majority of UNE-P migration orders can be processed by the ILEC without the need for any manual intervention by ILEC personnel. Thus, most UNE-P migration orders electronically flow-through the ILEC's OSS, and can be provisioned on a same day or next day basis.
- Upon receipt of the LSR, the ILEC electronically validates that the order is error-free, and electronically sends the CLEC a Firm Order Confirmation ("FOC").
- Upon receipt of the FOC, the CLEC updates its systems to reflect the due date of the order.
- Thereafter, the remaining processes are electronic. On the due date, which is typically the next day, the ILEC's OSS implement the order by making appropriate software changes that (i) transfer ownership of the account to the CLEC and establish wholesale billing to the CLEC for the customer and (ii) cause the ILEC's internal systems to send a final retail bill to the end user.
- When the CLEC receives the provisioning completion notice electronically from the ILEC, the CLEC closes out the order in its systems including such items as establishing the customer's new billing arrangement.[4]

For UNE-P, the migration process is electronic with little opportunity for human error. According to BellSouth's Response to AT&T Interrogatory 32 (see Exhibit MDV-1), with UNE-P migrations, over eighty four percent (84.4%) of orders flowed through completely electronically, eliminating opportunities for human error. However, only about twenty four percent (23.7%) of UNE-L migration orders flowed through. (See BellSouth's

[4] If the customer has requested voicemail, the CLEC must also build and test the voice mailbox, if applicable.

response to AT&T Interrogatory No. 28, attached as Exhibit MDV-2) Additionally, there is rarely a service interruption when a customer is migrated to a CLEC using UNE-P. After ordering service from a competitive carrier, the entire customer migration process is completely hidden from the end-user in a manner that makes changing local carriers as seamless as changing long distance carriers. These electronic processes are the rough equivalent of the Primary Inter-exchange Carrier "PIC" process that was developed to support the highly competitive long distance market.

Q. PLEASE DESCRIBE THE ADDITIONAL SIGNIFICANT STEPS OF MIGRATING A CUSTOMER FROM AN ILEC TO A CLEC USING A HOT CUT.

A. When a CLEC seeks to use its own switch to serve mass market local customers using a UNE-L architecture, the processes needed to change local carriers are much more complex, manual and costly than for UNE-P, requiring physical work to transfer the customer's analog loop from one carrier's switch to another's. For example, the CLEC must assign the customer to facilities in its switch and equipment; both the CLEC and the ILEC must conduct a series of number porting activities; and the ILEC must perform numerous manual provisioning and testing activities in its central office and sometimes in the field. Before the CLEC even submits an order for a hot cut, the CLEC must conduct the following activities in addition to those required for a UNE-P migration:

- The CLEC negotiates a due date with the customer based on the standard intervals for loop migrations that are lengthier than UNE-P intervals. For business customers, a cutover time must also be negotiated to ensure the service outage does not impact the operation of the customer's business.
- The CLEC conducts an inventory of facilities and electronically assigns the customer's loop to specific facilities in the CLEC's switch, to equipment located in CLEC-owned collocation space and to a Connecting Facility Assignment ("CFA") that will be used by the ILEC to connect the customer's loop to the CLEC's collocated equipment.

- The CLEC accesses the ILEC's Loop Facility Assignment Control System ("LFACS") database to confirm that the availability of the CFA information in both companies' databases match.

After completing these activities, the CLEC prepares and submits the LSR. After submission of the LSR, the ILEC begins its activities.

- The ILEC checks its CFA database to ensure the CFA on the order matches its inventory.
- The ILEC issues the number portability "trigger" order by setting switch triggers which will ensure the customer receives intra-switch calls between the period of time the CLEC ports the number to its switch until the ILEC disconnects the telephone number in its switch.
- The ILEC inputs the order into its backend systems to create the internal service orders that will be needed to accomplish the migration.

Then the ILEC returns the FOC to the CLEC. Unlike UNE-P, after receiving the FOC, in a UNE-L migration the CLEC and the ILEC cannot rely on the electronic systems to flawlessly provision the service. Instead, the following complicated set of activities occurs, activities that must be coordinated if the cut is to be successful for the customer:

- The CLEC confirms with the customer the specific time and date when the hot cut is scheduled to take place based on the information in the FOC.
- The CLEC verifies that dial tone is being delivered from its switch to the CFA in the collocation cage.
- The CLEC alerts the National Number Portability Administration Center ("NPAC") that reprogramming is needed to move the customer's telephone number from the ILEC to the CLEC by sending an electronic "create" message to the Administrator. This begins the process of porting the customer's telephone number. This "create" message prompts NPAC to send a message to the ILEC to ensure the ILEC consents. The ILEC has eighteen (18) hours to respond.

After the CLEC completes these activities, the ILEC completes other activities necessary to a hot cut that are not required for a UNE-P conversion.

- The ILEC determines whether the facilities currently being used by the customer can be reused. For example, if the customer is on Integrated Digital Carrier Loop ("IDLC"), the facilities cannot be reused and spare non-IDLC facilities must be identified and assigned to this customer.
- The ILEC pre-wires the cross-connection frames.

- The ILEC confirms the presence of dial tone from the CLEC's switch on the cross-connects in the CLEC's collocation space.
- Upon receipt of the "create" message from NPAC, the ILEC will send a "concur" message back to NPAC.
- The ILEC verifies that the proper phone number is on the loop that is to be cut over.

After these activities, the ILEC contacts the CLEC to determine whether the cut can proceed as scheduled. During this call the ILEC may also provide essential information such as test results. Assuming nothing has gone wrong, on the day of the cut over, the ILEC and the CLEC will continue the following activities:

- The ILEC ensures it has the correct line for the cut.
- The ILEC verifies dial tone on the line at the ILEC Main Distribution Frame ("MDF").
- The ILEC monitors the line and, when idle, removes at the MDF the old cross connection jumper that connected the customer's loop to the ILEC's switch and terminates the pre-wired cross connection from the CLEC's CFA to the customer's loop.
- The ILEC provisioning center contacts the CLEC to advise that the conversion is complete.
- The CLEC then conducts its own tests to ensure that all lines have been successfully migrated.
- If testing is successful, the CLEC sends an "activate" message to NPAC advising that the customer's number should be ported to the CLEC's switch.
- The CLEC then calls the ILEC to accept the service.

The cut, however, is still not complete.

- Upon receipt of the activate message from NPAC, the ILEC completes the disconnect order and sends an "unlock" message for the E911 database administration to allow the CLEC access to the E911 database record for the ported number.
- Then the CLEC migrates the 911 record by updating the Automatic Location Indicator ("ALI") database to identify the CLEC as the local service provider. This ALI information supports the Public Safety Answer Point ("PSAP") that receives 911 calls.
- The ILEC must remove the old cross connections from its frame to free up the ILEC's switch port for another customer.

Only then is the hot cut complete. Not only are there significantly more steps involved in a hot cut, those steps must be coordinated if a cut is to be successful in limiting the time the customer is out of service.

To demonstrate the flow and order of activities, I have attached as Exhibit MDV-3 a process flow document for a hot cut. The first three pages show by numbered tasks the activities the ILEC must conduct to complete a hot cut. Page Four shows by lettered tasks, the activities the CLEC must complete. Beginning with Task A on Page Four, one can follow the flow of the simplest type of error-free hot cut. As the exhibit reveals, the ILEC must conduct at least twenty-three (23) separate tasks and the CLEC must conduct at least twelve (12). These tasks cannot be conducted at the same time but must move forward in a back and forth flow and often must be coordinated with the other party. In addition, I have attached to my testimony as Exhibit MDV-4 a video depicting the extensive changes to the network architecture required to perform the hot cut process, the numerous manual steps involved in the actual hot cut, and an efficient and effective alternative to the manual hot cut process.

Q. HOW DO THESE ADDITIONAL STEPS IMPACT CLECS THAT ATTEMPT TO USE THEIR OWN SWITCHES?

A. First, these additional steps add time. UNE-P orders are completed much more quickly than UNE-L orders. The completion interval for a UNE-P order without any field work is from less than ½ day to less than 1 ½ days:

Dispatch Type	Volume	Order Interval (excluding FOC Interval)
Switch based Completions	95,704	0.35 days
Central Office Based Completions	16,164	1.20 days

In contrast, the completion interval for UNE-L orders that do not require field work is as follows:

Loop Type	Volume	Order Interval (excluding FOC Interval)
2 wire analog loop (designed)	33	5.85 Days
2 wire analog loop (non-designed)	142	3.62 Days
2 wire analog loop with LNP (designed)	17	5.47
2 wire analog loop with LNP (non-designed)	420	4.82

(See measure P-4, Order Completion Interval--September, 2003 Florida Monthly State Summary ("MSS") report)

Second, the multi-step, highly manual UNE-L process introduces numerous opportunities for human error and degradation of service quality. The greater the opportunity for error, the more likely the service migration date may be delayed or changed, which causes customer dissatisfaction with the CLEC. Moreover, introduction of errors also significantly increases the likelihood that the customer may be either completely out of service for an extended period or be unable to receive incoming calls. For example, when customers in Florida experience service outages during a hot cut, the outage duration has lasted from a monthly low average of 2.8 hours to a high average of 13.6 hours. (See Florida's September, 2003 MSS Chart Reports (B.2.22.2).)

Mass market customers will not accept such delays or errors. As the FCC noted, these customers *"have come to expect the ability to change local service providers in a seamless and rapid manner."* TRO ¶ 471 (citations omitted) (emphasis added). They "generally demand reliable, easy-to-operate service and trouble-free installation." *Id.* at 467 (citations omitted). Moreover, when troubles occur, end-user customers blame the CLECs. The FCC recognized that "[s]ervice disruptions also will influence customer perceptions of

competitive LECs' ability to provide quality service, and thus affect competitive LECs' ability to attract customers." *Id.* at 466.

These critical service quality concerns and others are reflected in the following table that illustrates the inferior performance BellSouth provides for analog loops compared to UNE-P in Florida obtained from the recently BellSouth-reported performance data.

	UNE-P	**Analog Loops/with LNP**
FOCs-% on time	95.56%	Design –34.74% Non-design –31.87%
FOCs-average interval	4.48 business hours	21.65 business hours-Design 22.94 business hours-Non-design
Flow-Through for migration orders	84.4%	23.7%
% Orders Placed in Jeopardy	Dispatch--6.60%	Design/Dispatch—55.00% Non-Design/Dispatch—13.86%
% Orders requiring Field Dispatch[5]	2%	13%
Non-dispatch Order Completion Intervals	.35 days for switch based 1.20 days for central office	Design 5.47 days Non-design 4.82 days

From September MSS Reports, October PMAP reports, and Exhibits MDV-1 and MDV-2.

As is depicted above (even with the current minimal UNE-L volumes), far fewer UNE-L orders flow-through and thus more orders have to be handled manually, fewer UNE-L Firm Order Confirmations are returned on time and take longer to return on average, significantly more UNE-L orders require a field dispatch, more orders are placed in jeopardy, and due date intervals are longer for UNE-L than UNE-P. In sum, the enormous increase in physical work in the central office to provision hot cut customers is exacerbated by significantly more manual work and delay in every step of the process.

Third, these additional steps add significant cost. The cost for processing and provisioning a UNE-P order in BellSouth Florida is $1.62. In sharp contrast, the cost for

most hot cuts in BellSouth Florida is $83.11. Similarly, a CLEC's internal costs for UNE-P are significantly less than UNE-L. This is because once the UNE-P orders are submitted, they are tracked electronically and generally do not require individual work. For UNE-L orders, however, the CLEC bears labor costs to prepare, track and implement its orders. As represented more fully in Exhibit MDV-3, these additional CLEC costs include the following work activities: (1) connecting facility assignments ("CFA") inventory management, (2) dial tone and conformance testing, (3) internal pre-cut and day of cut coordination with ILEC, and (4) separate systems and activities required to support number portability. In addition, if the CLEC's customer wants the conversion completed during "non-business" hours in order to avoid service disruption during the time when service is most critical to the customer, the CLEC must pay overtime for any involved personnel. And critically, the CLEC will never recover these costs if the CLEC loses the customer as a result of problems incurred during the hot cut itself, or in situations where the industry is experiencing rapid customer churn. TRO ¶ 471.

Q. WHAT COST DOES AT&T BELIEVE IS APPROPRIATE FOR MIGRATING CUSTOMERS?

A. AT&T believes that the cost for migrating customers among providers must be based on forward-looking technology (electronic) technology, and should be as equitable as possible among types of service migrations. For example, the cost of a PIC change in BellSouth Florida is $1.95, and the cost of a migration to UNE-P in BellSouth Florida is $1.62. Methods other than electronic provisioning of service migrations lead to discriminatory price differences that are impossible to overcome.

[5] The 2% field dispatch for UNE-P is likely to be applicable to new installations only (not migrations), creating an even greater disparity between field dispatch for UNE-P than UNE-L than the data indicate.

Q. ARE THE OPERATIONAL ISSUES YOU DISCUSS UNIQUE TO BELLSOUTH?

A. No. While, as discussed below, BellSouth has created some unique issues due to its refusal to respond reasonably to requested improvements in its hot cut process, most of the operational barriers inherent in the hot cut process exist simply because it is a burdensome manual process that must be performed on a loop by loop basis. Any manual process, by nature, introduces significant potential for human error. Mistakes such as (1) disconnecting the wrong loop, (2) premature disconnects, (3) cross-connecting the loop to the wrong CFA, (4) inadvertently breaking cross-connection wires on the frame for end-users not involved in the hot cut while connecting the new or disconnecting the old jumper pairs, or (5) making poor connections on the terminal block (*e.g.*, loose wire wraps) all can lead to customer service outages that can be lengthy if the problem goes undetected by the person who made the error. The hot cut process is inherently labor-intensive, inefficient, prone to error, and incapable of sustaining the volumes necessary to allow effective competition in the mass market.

Q. WHY DO YOU SAY THE HOT CUT PROCESS IS INHERENTLY INCAPABLE OF SUSTAINING VOLUMES NECESSARY TO ALLOW EFFECTIVE COMPETITION FOR MASS MARKET CUSTOMERS?

A. The failure and service restoration problems that occur at low volumes will only be exacerbated by the tremendous increase in the level of activity that will be required if unbundled local switching were not available and CLECs are forced to use UNE-L to serve mass market customers. These problems will be further compounded with the number of additional inexperienced people that will be necessary to work the hot cut process and to troubleshoot and repair the increased troubles that are likely to occur. Because the industry

as a whole has absolutely no experience providing service to mass market customers using a hot cut process -- or anything remotely comparable to it -- it is impossible to accurately qualify the impact this process will have on service quality. We do know, however, that service quality is likely to decline, because any time a process requires human intervention and manual steps, there is greater opportunity for failures to occur. Moreover, the opportunity for failures increases disproportionately when rapid increases in volumes occur. For decades, all industries, including the telecommunications industry, have affirmatively sought out and implemented technological improvements that reduce or eliminate manual activity in their transaction processes. Attempting to serve the mass market using the manual hot cut process on each and every customer's analog loop runs counter to that trend and can only turn back the clock on the technological advancements that have been made.

Q. DOES BELLSOUTH CURRENTLY HAVE A BULK OR BATCH HOT CUT PROCESS?

A. No. BellSouth currently has a bulk ***ordering*** process, but the hot cut provisioning is not done in a batch mode. In fact, if a CLEC requests that a group of hot cuts be done together, BellSouth places more restrictions on those hot cuts than if they are performed on an individual basis. For example, BellSouth currently offers time-specific hot cuts for individual analog loop migrations, but does not allow time-specific cuts when using its batch ordering process.

Q. HAS AT&T ASKED BELLSOUTH TO DEVELOP A BULK HOT CUT PROCESS?

A. Yes. AT&T has twice requested BellSouth to develop a bulk conversion processes with BellSouth. These requests were made because AT&T had found the individual hot cut

process to be inadequate. Therefore, these requests were intended to provide AT&T a more efficient and effective means to migrate customers to its facilities, when it was otherwise feasible to do so.[6] In particular, it was intended to provide AT&T an additional *optional* tool for use at its discretion when the determination was made that a limited migration from UNE-P to UNE-L in unique circumstances for certain sets of customers was economically feasible.[7] AT&T did not contemplate, nor is it feasible that the processes it requested, even if implemented properly, would be capable of being used as a replacement for UNE-P.

Q. WAS A BULK HOT CUT PROCESS AS REQUESTED BY AT&T TIMELY IMPLEMENTED?

A. No. AT&T made its first request, via the BellSouth change control process, in November 2000. In March 2003 -- nearly 28 months later, BellSouth implemented a bulk ordering (not provisioning), process as a result of AT&T's change request.[8] However, that process did not meet AT&T's needs as described in the change request. In fact, the provisioning (or actual hot cut portion) of BellSouth's "new" process appears to be "business as usual," with the critical exception that it does not allow time-specific cuts, which are essential to customer satisfaction. The process implemented was simply the bulk ordering process mentioned earlier.

[6] It was also anticipated by AT&T that these new BellSouth "bulk" methods would cost less than a "one at a time" process. (See Exhibit MDV-5 August 30, 2002 letter from Denise Berger of AT&T to Jim Schenk of BellSouth)

[7] Such conditions include a high concentration of customers, facilities are "on network" using CLEC owned fiber, and spare DLC equipment is in place and effectively represents a sunk cost to AT&T.

[8] See Exhibit MDV-6, which attaches BellSouth's UNE-P to UNE-L Bulk Migration CLEC Information Package.

Q. WHAT SPECIFIC CONCERNS DID AT&T HAVE WITH BELLSOUTH'S BULK PROCESS OFFERING?

A. The process had numerous flaws that made it at least as inefficient and expensive as the old process, if not more so. Among other things, (1) the process did not allow for after-business-hours hot cuts, (2) did not provide any assurances that all end users' lines or services would in fact be provisioned at the same time or even on the same day, (3) failed to guarantee any number of total lines that BellSouth would provision in a single day, and (4) lacked a process for timely restoration of customer service in the event of a problem. Moreover, there were no cost-savings from the process.

Q. IS THIS THE SAME PROCESS THAT BELLSOUTH PRESENTED AT THE FLORIDA COMMISSION WORKSHOP ON OCTOBER 28, 2003?

A. Yes, it appears to be exactly the same. And, as I discuss below in my testimony, and contrary to BellSouth's assertions at the workshop, this process does not meet the requirements set forth by the FCC for batch hot cuts.

Q. PLEASE DESCRIBE YOUR SECOND REQUEST OF BELLSOUTH TO IMPLEMENT A BULK PROCESS.

A. In August 2002, AT&T requested, on a business-to-business basis, that BellSouth adopt a new process to address the insufficiency in the individual loop hot cut process. AT&T requested that the process include among other things:

- The ability to convert between 100 – 250 lines within a single Local Serving Office (LSO) in a single batch;
- That BellSouth complete its conversion readiness, including dial-tone/Automatic Number Identification ("ANI") testing, loop qualification testing and pre-wiring, in advance of the conversion;
- That BellSouth commit to immediate service restoration if a service outage occurred during the conversion process;
- The development of appropriate measurements and tracking to ensure the quality of the process, and if necessary, to further improve the process; and

- Substantially reduced prices for hot cuts.

Q. WHAT WAS BELLSOUTH'S RESPONSE TO THIS REQUEST?

A. BellSouth refused to commit to any volume of lines that could be included in a batch. BellSouth responded that AT&T's request was technically feasible except "the quantity of physical facilities and telephone numbers cut per evening will vary based on the load at the time the request is submitted, and will be driven by the actual lines per customer." It also indicated it would charge AT&T $134.32 per working telephone number, *in addition* to regular ordering and provisioning charges, as well as other unspecified overtime charges for technicians and service representatives.[9] In other words, the costs for the requested process were much higher and completely unpredictable. AT&T, of course, was unable to accept such a cost prohibitive proposal since the purpose of the request was to move customers' analog loops from UNE-P to AT&T facilities when it was economic to do so.

Q. IF BELLSOUTH WERE TO IMPLEMENT NOW THE PROCESS AT&T REQUESTED, WOULD SUCH IMPLEMENTATION SATISFY THE FCC'S DIRECTION TO APPROVE AND IMPLEMENT A BATCH HOT CUT PROCESS?

A. No. AT&T requested this bulk hot cut process for use in limited circumstances and for relatively small volumes of customer lines. That process would not be adequate for the increased number of loop migrations that would be necessary in a world in which unbundled local switching is not available to CLECs. The FCC has directed state commissions "to approve and implement . . . a seamless, low-cost process for transferring large volumes of mass-market customers . . .." TRO ¶ 423. The process that AT&T proposed to BellSouth on a business-to-business basis would not comply with the FCC's directive.

[9] See Exhibit MDV-7 for June 9, 2003 letter from Denise Berger of AT&T to Phillip Cook of BellSouth.

III. THE FCC'S DIRECTION TO ESTABLISH A BATCH HOT-CUT PROCESS: WHAT ARE THE CHALLENGES?

Q. WHAT DEFICIENCIES DID THE FCC FIND WITH THE CURRENT HOT CUT PROCESS?

A. The FCC made numerous findings regarding the inadequacy of the ILECs' current hot cut process. These findings confirm the concerns AT&T has raised about hot cuts in the past and demonstrate why AT&T moved away from provisioning mass market customers' analog loops using hot cuts to provide service to its customers.

First, the FCC recognized that deficiencies in the hot cut process are seen and felt by the CLECs' customers. It found that the problems and delays associated with hot cuts "prevent[ ] the competitive LEC from providing service in a way that mass market customers have come to expect." TRO ¶ 466. This is a substantial problem because "competition is meant to benefit consumers, and not create obstacles for them." *Id.* ¶ 467.

Second, the FCC recognized that CLECs are likely to lose customers as a result of these deficiencies. "Service disruptions also will influence customer perceptions of competitive LECs' ability to provide quality service, and thus affect competitive LECs' ability to attract customers." *Id.* ¶ 466. Specifically, the FCC found that the "record shows that customers experiencing service disruptions generally blame their provider, even if the problem is caused by the incumbent." *Id.* ¶ 467 (citations omitted).

Third, the FCC recognized that many of the deficiencies with provisioning analog loops using hot cuts are inherent in the process. The FCC concluded, based on the evidence presented, that "hot cut capacity is limited by several factors, such as the labor intensiveness of the process, including substantial incumbent LEC and competitive resources devoted to coordination of the process, the need for highly trained workers to perform the hot cuts, and

the practical limitations on how many hot cuts the incumbent LECs can perform without interference or disruption." *Id.* ¶ 465 (citations omitted).

Fourth, the FCC focused specifically on the unavoidable limitations on the volume of hot cuts the ILECs could perform. The FCC found that CLECs were impaired because hot cuts could not be performed in the volumes that would occur in the mass market: "[h]aving reviewed the record evidence, we find that it is unlikely that incumbent LECs will be able to provision hot cuts in sufficient volumes absent unbundled local circuit switching in all markets." *Id.* ¶ 468. The FCC specifically rejected ILEC arguments that the FCC's prior findings in section 271 proceedings regarding hot cuts demonstrated lack of operational impairment. The FCC correctly found that the number of hot cuts in the current market environment "is not comparable to the number that incumbent LECs would need to perform if unbundled switching were not available for all customer locations served with voice-grade loops." *Id.* ¶ 469 (citations omitted). Thus, the issue here is that there is "an *inherent limitation* in the number of manual cut overs that can be performed, which poses a barrier to entry that is likely to make entry into a market uneconomic." *Id.* (emphasis added) (citations omitted).

Finally, the FCC concluded that ILEC *promises* regarding their ability to perform any requested volume of hot cuts cannot be relied upon to demonstrate adequate performance. Specifically, the FCC found that "incumbent LECs' promises of future hot cut performance [are] insufficient to support a Commission finding that the hot cut process does not impair" CLECs. *Id.* at n. 1437.

In sum, the FCC found "ample testimony in the record" on CLECs' operational and economic difficulties with hot cuts. *Id.* ¶ 466. It recognized that "hot cuts frequently lead to

provisioning delays and service outages and are often priced at rates that prohibit facilities-based competition for the mass market." *Id.* ¶ 465.

Q. PLEASE SUMMARIZE THE FCC'S ANALYSIS OF THE CONCERNS WITH HOT CUTS.

A. Consistent with AT&T's own experience, the FCC drew the following conclusions with regard to the operational deficiencies involved in the hot cut process, especially as they would apply in a market in which competitors do not have access to UNE-P:

- Hot cuts are labor intensive
- Hot cuts require the expenditure of substantial ILEC and CLEC resources
- There is a practical limitation on how many manual hot cuts an ILEC can perform
- Hot cuts often result in provisioning delays
- Hot cuts can cause significant service outages
- Poor hot cut performance causes customer dissatisfaction with individual competitors and the competitive process in general
- Hot cuts generally impose prohibitively high costs on competitors, both internal and external
- ILEC claims that current hot cut performance can be readily expanded to a "UNE-L only" environment cannot be accepted without proof of performance.

Based in part on these conclusions relating to hot cuts, the FCC made a "national finding that competitive carriers providing service to mass market customers are impaired without unbundled access to local circuit switching." *Id.* ¶ 422. In attempting to set out a plan to help mitigate the inherent deficiencies with the ILECs' current hot cut processes, the FCC asked state commissions to "approve and implement a batch cut migration process – a *seamless, low-cost process for transferring large volumes of mass market customers . . . .*" *Id.* ¶¶ 422-423. (emphasis added). This batch cut process must "render the hot cut process more efficient and reduce per-line hot cut costs." *Id.* ¶ 460. It must also "address the costs and timeliness of the hot cut process." *Id.* ¶ 488.

Q. WHAT DOES THE FCC MEAN BY "BATCH CUT PROCESS"?

A. The FCC defined a batch cut process as a seamless, low-cost process for transferring large volumes of mass market customers. *Id.* ¶ 487. The FCC found that "the hot cut process could be improved if cut-overs were done on a bulk basis, such that the timing and volume of the cut over is better managed," and the non-recurring costs reduced. *Id.* ¶ 474 (citations omitted). Indeed, the FCC found that "such improvements are likely to be *essential* to overcome the operational impairment that competitors face in serving mass market customers. *Without such improvement*, the record shows that *carriers are likely to be unable to economically serve a market characterized by low margins*." *Id.* (emphasis added).

Q. DID THE FCC FIND CURRENT ILEC PROCESSES FOR CONVERTING CUSTOMERS IN BULK TO BE SUFFICIENT?

A. No. The FCC found that:

> Project managed cut-overs involve the conversion of a number of lines at one time, pursuant to provisioning requirements and intervals negotiated by the incumbent and the competitive LEC. We find that these approaches are not sufficiently developed or widespread enough to adequately address the impairment created by the loop cut over process. The evidence in the record demonstrates that the carriers that have used project-managed cut overs have used them only for business customers, and only after acquiring the customer through a means that offered the use of incumbent LEC loops and switches in combination.

Id. ¶ 474 (citations omitted). The FCC also noted that "the record evidence indicates that incumbent LECs are not well-equipped to handle hot cut volumes even with the existence of a procedure to manage bulk migrations on a project-managed basis." *Id.* ¶ 487 at n. 1516.

Q. WHAT DIRECTION DID THE FCC PROVIDE TO STATE COMMISSIONS REGARDING BATCH CUT PROCESSES?

A. The FCC found that a "seamless, low-cost batch cut process for moving mass market customers from one carrier to another is necessary, ***at a minimum***, for carriers to compete effectively in the mass market." *Id.* ¶ 487. The FCC's Order directs state commissions to approve, within nine months of the effective date of the Order, a batch hot cut migration process to be implemented by the incumbent LECs that will address the costs and timelines of the hot cut process.[10] *Id.* ¶ 488. More specifically, it requires state commissions to do the following:

- Adopt a batch cutover "increment" for migrating customers served by unbundled loops combined with unbundled local circuit switching to unbundled stand-alone loops. In other words, states should decide the appropriate volume of loops that should be included in the "batch."
- In conjunction with incumbent LECs and competitive LECs, approve specific processes to be employed when performing a batch cut. The FCC "expect[s] these processes to result in efficiencies associated with performing tasks once for multiple lines that would otherwise have been performed on a line-by-line basis."
- Determine whether the ILEC is capable of migrating batch cutovers in a timely manner.
- Adopt TELRIC rates for the batch cut process. These rates should reflect the efficiencies associated with batch migration of loops to a competitive LEC's switch, either through a reduced per-line rate or through volume discounts.

TRO ¶ 489.

[10] A state commission may decline to institute a batch cut process, provided that it instead issues *detailed* findings regarding the volume of UNE-L migrations that could be expected if competitive LECs were no longer entitled to unbundled local circuit switching, that the incumbent can be expected to meet that demand in a timely and efficient manner using the existing hot cut process, and that the non-recurring costs associated with the hot cut process are not an entry barrier. *Id.* ¶ 490. Failure to develop a process, however, does not relieve the state commission of its obligation to analyze whether requesting carriers are impaired without access to unbundled switching.

Q. DOES BELLSOUTH CURRENTLY HAVE A BATCH HOT CUT PROCESS THAT MEETS THESE REQUIREMENTS?

A. No. As discussed above, BellSouth's bulk process is a bulk ordering process, not a process for provisioning analog loops via hot cuts in batches. Moreover, it is not seamless, it is not low cost, and it is not capable of handling large volumes of mass market customers. Thus, BellSouth does not have a process that meets a single one of the FCC's requirements.

First, the FCC said that the "states should decide the appropriate volume of loops that should be included in the 'batch'." TRO ¶ 489. As previously discussed, BellSouth has quantified how many lines a CLEC can order in bulk, but it has not identified the quantity that will be *provisioned* together. Thus, BellSouth has provided no information regarding the size of any batch, how many (if any) simultaneous batches it could provision, or how frequently it would be able to schedule such batches, either in individual offices or in groups of offices at the same time or over any stated period.

Second, the FCC said that, "[i]n conjunction with incumbent LECs and competitive LECs, [states must] approve specific processes to be employed when performing a batch cut." TRO ¶ 489. As I described above, AT&T's attempts to work with BellSouth, both through the Change Control Process and through business-to-business channels, on an effective bulk process have not yielded a satisfactory process.

Third, states must "determine whether the ILEC is capable of migrating batch cutovers in a timely manner." *Id.* BellSouth's target intervals, as described below and stated in its UNE-P to UNE-L Bulk Migration information package, are far from timely.[11]

# of End-user Telephone Numbers	Minimum Number of Days from submission of project notification to due date of requests
Up to 99	24 business days

[11] See Exhibit MDV-6, page 10.

100-200	27 business days
201+	Negotiated

Fourth, states must "adopt TELRIC rates for the batch cut activities they approve." TRO at ¶ 489. As shown above, BellSouth's rates for its bulk ordering process are very high – indeed, they are the same as for individual cuts, indicating that BellSouth does not believe that it will realize any economic efficiencies through its proposed batch process. And certainly, the ***additional*** $134.32 plus overtime BellSouth proposed to AT&T was not based on TELRIC.

Q. HAS AT&T NEGOTIATED WITH VERIZON FOR A BATCH HOT CUT PROCESS IN FLORIDA?

A. No. AT&T has negotiated with Verizon (and participated in regulatory proceedings) in New York for a bulk hot cut process.

Q. IS VERIZON OFFERING A BATCH HOT CUT PROCESS IN FLORIDA?

A. On October 28, 2003, a Verizon representative made a presentation at an informal hot cut workshop offered by the Florida Commission.[12] This presentation included four slides (pages 14-17) regarding TRO issues and Verizon's batch hot cut process. It is unclear whether this process is offered for use today, or whether Verizon will propose this process to this Commission for approval.

Q. DOES THE PROCESS OUTLINED IN VERIZON'S PRESENTATION MEET THE REQUIREMENTS OF THE TRO?

A. No. Although Verizon's presentation provided few details, its batch hot cut process is clearly inadequate. As further information regarding Verizon's batch hot cut process is

[12] See Exhibit MDV-8 for excerpts from Verizon's October 28, 2003 presentation.

made available through this proceeding, AT&T will supplement these comments in its rebuttal testimony.

Q. PLEASE DESCRIBE THE DEFICIENCIES IN VERIZON'S BATCH HOT CUT PROCESS, BASED ON YOUR REVIEW OF ITS PRESENTATION FROM THE FLORIDA BATCH HOT CUT WORKSHOP.

A. First, the FCC said that the "states should decide the appropriate volume of loops that should be included in the 'batch'." TRO ¶ 489. Verizon did not address batch volumes, but did briefly address scalability on slide 15 of its presentation. It appears that Verizon believes that current UNE-P and UNE-L activities should be used to estimate volumes, but it does not address the impact of win-backs by Verizon or other central office activities on the workload of Verizon personnel. Nor does it address the impact of IDLC, line-splitting, CLEC-to-CLEC migrations, collocation issues, and central office space issues, such as how long it takes to provision a hot cut and how many Verizon personnel can work simultaneously at a frame. Without addressing these issues, Verizon cannot demonstrate to this Commission that it is capable of handling overall mass market volumes, including the appropriate size of an individual batch.

Second, the FCC said that, "in conjunction with incumbent LECs and competitive LECs, [states must] approve specific processes to be employed when performing a batch cut." *Id.* ¶ 489. As I described above, AT&T has not yet attempted to work with Verizon on a bulk or batch process in Florida. However, AT&T has not been able to reach agreement with Verizon in New York on an acceptable bulk hot cut process, and is currently participating in a proceeding at the New York Commission on this issue.[13]

[13] Case 02-C-1425 –Proceeding on Motion of the Commission to Examine the Process, and Related Costs of Performing Loop Migrations on a More Streamlined (e.g. Bulk) Basis

Third, states must "determine whether the ILEC is capable of migrating batch cutovers in a timely manner." *Id.* Verizon's presentation (page 17) indicates that after the CLEC sends an LSR signifying a batch hot cut, Verizon gives "a future due date" to the order, and that "batch hot cut orders are accumulated on a CO-by-CO basis." Thus it appears that the end-users wishing to migrate to a CLEC are placed in limbo until Verizon creates a batch. This is hardly timely when compared to the migration intervals for UNE-P customers or long distance PIC changes.

Fourth, states must "adopt TELRIC rates for the batch cut activities they approve." Verizon's presentation (page 14) indicated that there were "economic issues," but did not propose rates for its process. Further, Verizon appears to accept that the TRO requires "keeping costs down." Verizon does not, however, address the TRO requirement that the batch process be "low cost." *Id.* ¶ 487. Nor does it provide any information that this Commission requires to "address the costs and timeliness of the hot cut process." *Id.* ¶ 488.

Q. DO YOU BELIEVE THAT A BATCH PROCESS HAS REASONABLE PROSPECTS FOR ALLEVIATING THE OPERATIONAL AND ECONOMIC PROBLEMS THE FCC FOUND IN THE INDIVIDUAL HOT CUT PROCESS?

A. No. While AT&T has sought the implementation of bulk hot cut processes to improve the existing manual process, the improvements that AT&T sought were intended to augment *existing* manual provisioning processes. Project-managed, after hours, bulk transfers of customers on a central office and CLEC specific basis could improve the quality and efficiency of the hot cut process, and allow AT&T and other CLECs to make use of their facilities in the limited cases where such migrations are otherwise feasible. It was never contemplated that such a process, if implemented, would be adequate to support the migration volumes of customer's analog loops sufficient to serve the entire mass market.

However, BellSouth's proposed bulk ordering process, as well as AT&T's proposed hot cut process, are almost entirely manual by design. Indeed, although the process is called "batch" or "bulk", each physical loop cutover is done individually, just as they are for "individual" hot cuts. Even the best manual processes that could be operationalized today, including any batch migration process, cannot sustain competitively unconstrained migrations of hundreds of thousands of mass market customers among all carriers.

Q. WILL THE IMPLEMENTATION OF A BATCH HOT CUT PROCESS ELIMINATE ECONOMIC IMPAIRMENT?

A. No. First, any efficiency gains realized from a manual batch hot cut process likely will be too small to result in substantial reduction of the overall costs required to extend mass market analog loops to CLEC switches. Critically, a batch provisioning process does not relieve any of the economic impairment that results from the collocation, digitization, concentration and backhaul costs that a CLEC must incur to connect the ILEC loop to its switch. *See* Direct Testimony of AT&T Witness Steven E. Turner.

Q. WHAT OPERATIONAL CONSTRAINTS ON COMPETITION SHOULD THIS COMMISSION REVIEW?

A. First, this Commission should review the capacity constraints of any proposed batch cut process. Capacity limitations are imposed by the physical structure of the network and the manual nature of the process. Second, the Commission should conduct a review to ensure that all types of service configurations are accommodated in any proposed batch provisioning process. For example, current batch provisioning processes do not address the following significant market components: customers served by Integrated Digital Loop Carrier ("IDLC") loops, customers in a line splitting arrangement, and customers migrating

between CLECs. Unless these service configurations are included, CLECs have no choice but to use the current inadequate individual hot cut process for these tens of thousands of customers, and leave them out of the "improved" process that the FCC requires. Third, this Commission should review BellSouth policies that impede CLECs from obtaining unbundled local switching from third parties. Fourth, migrating all mass market customers served by CLECs to UNE-L is likely to create new operational constraints. For example, new traffic patterns from the ILEC's switch-to-switch network to the ILEC's tandem network may increase the blocking of interconnection trunks behind the ILEC's tandem switches and create congestion in the ILEC's tandem switches. In developing a new batch hot cut process, this Commission must investigate and understand those concerns to assure that customers served by CLECs receive quality service.

A. Any Batch Process Must Address Capacity Constraints

Q. WHY IS THE CAPACITY OF THE ILEC'S HOT CUT PROCESS IMPORTANT TO THIS PROCEEDING?

A. An ILEC's ability to provision mass market customers' analog loops easily and quickly between carriers at the volume or "scale" required for competition in the mass market is central to the issue of operational impairment. Clearly, if an ILEC's hot cut process creates a bottleneck or otherwise constrains the number of analog loops that can be provisioned, CLECs are operationally impaired in serving mass market customers. There is no question that current hot cut processes are predominantly manual. As such, they impose limits on the number of customer's analog loops that can be provisioned in any given day and the number of customers a CLEC can actually migrate to its services.

This manual process stands in glaring contrast to an ILEC's ability to transfer new mass market long distance customers to its services at very low cost, in very high volumes, and in a short period of time using the highly automated PIC change process that the industry has developed over the past 20 years. There are no practical limits on an ILEC's ability to provision new long distance customers through the time-tested electronic PIC migration process. If an ILEC cannot develop a hot cut process that meets the needs of the competitive mass market for local services commensurate with the scale achieved in the long distance market, then CLECs are operationally impaired, as they are relegated to manual processes which limit their ability to acquire local customers, while the ILEC enjoys virtually unconstrained ability to provision both its local and long distance service electronically.

The TRO recognizes that, in making operational and impairment decisions, state commissions must look to all factors affecting likely revenues and costs. *See* TRO at n. 1497. ILECs will have limited costs and complete lack of operational constraints when it utilizes the PIC process for acquiring long distance customers for its bundled local and long distance service offering. That same kind of efficient, seamless, high-volume, low cost process for CLECs attempting to acquire local customers for the CLEC's bundled local and long distance service offering is necessary to ensure a level competitive playing field. If local competition for mass market customers is to be maintained and encouraged, the process for switching local carriers must be as seamless and unobtrusive to the end-user as the PIC change process.

Q. DID THE FCC ADDRESS THIS CAPACITY ISSUE?

A. Yes. The FCC's Triennial Review Order expressed a number of significant concerns regarding the capacity limitations of the hot cut process. First, the FCC found that hot cut

capacity "is limited by several factors, such as the labor intensiveness of the process, including substantial incumbent LEC and competitive resources devoted to coordination of the process . . . and the ***practical limitations on how many hot cuts the incumbent LECs can perform without interference or disruption.***" *Id.* ¶ 465 (emphasis added) (citations omitted). Second, the FCC stated that "[i]n deciding whether competitors are impaired by incumbent LEC provisioning processes, we must necessarily make a predictive judgment concerning this systemic capability to handle anticipated future hot cut volumes, which (absent access to unbundled local circuit switching) would be greater than volumes that have been experienced in the past . . . . Having reviewed the record evidence, ***we find that it is unlikely that incumbent LECs will be able to provision hot cuts in sufficient volumes absent unbundled local circuit switching in all markets.***" ¶ 468 (emphasis added). Third, the FCC found that "the issue is not how well the process works currently with limited hot cut volumes, rather the issue identified by the record is ***an inherent limitation in the number of manual cut overs that can be performed***, which poses a barrier to entry that is likely to make entry into a market uneconomic." *Id.* ¶ 469 (emphasis added) (citations omitted).

Q. DOES BELLSOUTH'S CURRENT HOT CUT PROCESS HAVE SUFFICIENT CAPACITY TO SUPPORT MASS MARKET VOLUMES?

A. No. While BellSouth has produced no explicit information demonstrating its capacity to perform hot cuts, stating only that they are "scalable depending on volumes" (*See* BellSouth's response to AT&T Interrogatory No. 8, attached as Exhibit MDV-9), other information provided by BellSouth can be used to draw a reasonable conclusion on this issue. First, this information indicates, as I would expect, that there is a physical limit to the number of hot cuts that can be performed per technician per day. For example, in its state 271

proceedings and the FCC Triennial Review proceedings, BellSouth provided a pictorial depiction of the central office activities required to implement a hot cut including, pre- and post-cut testing, wiring, coordination, and cut-over of the circuit (*see* Exhibit MDV-10). This straight-forward example uses a single sided distribution frame, with the work at a floor level. Much more complex frame configurations are more likely to be encountered, including configurations involving intermediate as well as main distribution frames, frames located on different floors, frames with more tiers, frames that require multiple cross connections, as well as differing technologies such as solder, punch down, and /or wire wrap terminals.

As is clear from BellSouth's own representation, the hot cut process involves numerous steps, is highly manual and takes place in an environment that lends itself to (1) disconnecting the wrong loop, (2) cross connecting the loop to the wrong CFA, (3) inadvertently breaking cross-connection wires on the frame for end-users not involved in the hot cut while running in the new or disconnecting the old jumper pairs, and (4) making poor connections on the terminal block. All these errors will lead to a customer service outage which can be lengthy should the problem go undetected by the person who made the error.

Further, BellSouth's response to AT&T Interrogatory No. 11 attached as Exhibit MDV-11, indicates that it takes central office personnel working directly on the central office frame(s) between 30 to 50 minutes for the initial loop on an order to be cut over and from 21 to 25 minutes for each additional loop. That equates to a maximum of 14 line conversions per shift for a technician working seven hours at an average of 30 minutes per loop conversion. This prediction is consistent with Bell South's response to AT&T Interrogatory No. 44, attached as Exhibit MDV-12, an analysis it conducted for an FCC Ex Parte, in which

it was assuming that in 2 to 3 shifts of technicians working per day, each technician would complete 12 to 13 conversions per shift.

Moreover, there is a limit to how many technicians can work simultaneously at a distribution frame. Again, BellSouth's own data amply demonstrate this point. For example, central office "HLWDFLWH" had 14,506 lines and BellSouth estimated that it would take 6.98 months to convert the lines in that one central office.[14] BellSouth further stated in its response to Interrogatory 44 that in making this estimate, it assumed (because this was a large office) 6 frame technicians dedicated to this task during the day and 12 at night, for an average of 9. It also stated that it assumed each technician would conduct approximately 11.5 cuts per day for approximately 104 conversions per day. Therefore, even in this "large office" with well over 100,000 lines, BellSouth would only convert 104 lines per day, even with working two shifts of up to twelve technicians.[15] Maximum migrations of volumes such as these, which comprise a tiny fraction of the available customers, are a completely inadequate number to support meaningful UNE-based competition.

Finally, it is important to keep in mind that the BellSouth personnel responsible for the hot cut frame work are not dedicated exclusively to this task. Consideration must be made of the personnel and space availability requirements for *other simultaneous* central office activities such as new service installations for both BellSouth and CLECs, migrations back to BellSouth, troubleshooting and repairing frame related troubles on existing lines. For example, when BellSouth technicians install new wires on the Main Distribution Frame

[14] See Exhibit MDV-13 for excerpts from December 24, 2002 Ex Parte of BellSouth filed in FCC WC Docket 01-338.

[15] The largest number of loop conversions conducted to date in this central office was 69 on May 23, 2001. Indeed, in a review of the daily hot cuts over a three-year period for all BellSouth's Florida central offices (28,725 instances) revealed only 106 instances of more than 50 cuts per day. See BellSouth response to AT&T Interrogatory 4.

"MDF" for an existing customer migration, the technicians will also have to perform a separate job (or jobs) to disconnect and remove (or "mine") the existing wires from the MDF.

Q. WHAT CAPACITY TO MANUALLY PROVISION LOOPS FOR THE MASS MARKET SHOULD BE REQUIRED?

A. The appropriate model for an analysis of required capacity is the activity in the long distance market, which is actively competitive, and therefore representative of the level of competition sought by regulators and the CLEC industry. There, the average "churn rate" – the percentage of all customers making a carrier change – is approximately 25% of all lines in a year.[16] In BellSouth Florida territory, that level of churn would mean if customers were moved from one carrier to another using UNE-loops exclusively, the churn would be approximately 123,958 lines per month. (Based on BellSouth's September MSS Customer Trouble Report Rate report that states it has approximately 5,950,000 POTS lines in service in Florida (retail POTS, resale, UNE-P, and analog UNE-L). This equates to 5,635 hot cuts per business day. In such a market, BellSouth would have to perform more hot cuts in a day--every business day--than it currently performs in up to a three-month period of time.

The ***minimum*** standard against which BellSouth's capacity should be assessed is the amount of hot cuts BellSouth would need to perform in a market in which competition currently relies on both UNE-P availability and UNE-L availability but, if unbundled local switching is not available, would rely on only UNE-L availability. In other words, the Commission should compare loop volumes to UNE-P volumes to see if BellSouth is indeed capable of performing the former type of customer transfer at the same level as the latter.

[16]From the Yankee Group's 2003 TAF (Technologically Advanced Family) survey- a national household survey mailed to several thousand US households during the second quarter of the year. The study sample is selected from a Consumer Mail Panel of 600,000 representative households, which is updated annually.

Elimination of UNE-P should never be allowed to materially restrict competitive choices that consumers have today. According to BellSouth's response to AT&T interrogatory 32 (See Exhibit MDV-1), it has issued an average of 28,959 service orders per month to migrate customers to UNE-P in Florida during a recent 14-month period.[17] During that same period, BellSouth issued an average of 207 migrations to UNE-L orders per month. (See Exhibit MDV-2). Thus, BellSouth has processed on average ***140 times more*** UNE-P migration orders each month than it has UNE-L migration orders.[18] In short, converting from using UNE-L for specialty market situations into UNE-L for the mass market requires scaling by a factor of 140 to 1.[19]

Q ARE THERE OTHER PHYSICAL STRUCTURE ISSUES THAT LIMIT THE CAPACITY OF BELLSOUTH'S HOT CUT PROCESS IN FLORIDA?

A. Yes. The rate at which BellSouth can conduct hot cuts is also adversely affected by the extra dispatches of technicians required by: (1) unmanned central offices, and (2) hot cuts involving IDLC loops, which will require a field dispatch.[20] For example, 23% of

[17] While the number of orders issued is not equal to number of orders completed, it is a reasonable surrogate for purpose of this analysis. If BellSouth responds to pending AT&T discovery requests, these numbers can be refined in future testimony.

[18] These numbers do not include migrations back to the ILEC, which also require provisioning work. In assessing BellSouth's capacity to do the work required, those volumes must be added. Indeed, these numbers may be significant. For example, while this data indicates that BellSouth completed approximately 27,000 UNE-P migration orders, data from the July and August 2003 MSS Customer Trouble Report Rate reports indicates that there was only a net increase of 8000 UNE-P lines in August from July. If BellSouth responds to pending AT&T discovery requests, these numbers can be refined in future testimony.

[19] Both these models are conservative in that they do not include the additional work that would be created if any markets are found not be to impaired and thus the embedded base of UNE-P must be migrated.

[20] Field dispatches are not required in these two scenarios when migrating a customer to UNE-P.

BellSouth's overall central offices are unmanned, with over 15,000 UNE-P lines provided to customers served from those unmanned locations. (*See* BellSouth response to AT&T Interrogatory No. 1 attached as Exhibit MDV-14).

Further, 31.8% of BellSouth's lines in Florida are served using Integrated Digital Loop Carrier ("IDLC").[21] As described below, loops on IDLC do not have an appearance on BellSouth's MDF and thus cannot be transferred (if at all), without additional work. At a minimum, a technician would have to be dispatched to transition the service to Universal Digital Loop Carrier ("UDLC") or copper facilities, if they are available.[22] As described earlier in my testimony, only 2% of UNE-P orders required field dispatch. However, approximately 31.3% of the hot cuts require field dispatch as they are on IDLC (See BellSouth response to AT&T's Request for Production of Documents ("POD") No. 14 attached as Exhibit DMV-16). Based on these two available IDLC percentages of 31%, BellSouth would have to dispatch technicians over 200,000 times just to convert the existing embedded base of UNE-P.[23] Dispatches such as these add complexity to the cut and could well lengthen the cut interval.

BellSouth recognizes these issues. In its response to AT&T's POD 14 (See Exhibit MDV-16), BellSouth stated "[a]dditional time to provide loops where existing service is provided over IDLC is necessary due to the fact that the process for handling a hot cut

[21] See Exhibit MDV-15-May 5, 2003 letter from Laurel MacKenzie of BellSouth to Denise Berger of AT&T.

[22] *Id.*

[23] According to BellSouth's September 2003 MSS Customer Trouble Report Rate report, BellSouth had 675,729 UNE-P lines in service. 31 per cent of 675,729 is 209,475.

conversion is *significantly different* than with non-IDLC." Certainly the travel time and extra personnel required add to the cost and reduce the efficiency of the overall process. None of these problems affect customers served by UNE-P.

Q. DOES BELLSOUTH HAVE THE SPARE COPPER LOOP FACILITIES OR UDLC SYSTEMS TO MOVE THIS QUANTITY OF LINES OFF OF IDLC SYSTEMS?

A. BellSouth's data, provided in its response to AT&T Interrogatory No. 23 (attached as Exhibit MDV-17), indicated that of the total of 2,301,238 loops on IDLC in Florida, 1,901,063, or 82% have existing parallel copper or UDLC facilities available for hot cut conversions. Accordingly, for 18% of the market, spare copper facilities are not available.

Q. ARE THERE CENTRAL OFFICES THAT HAVE LESS SPARE CAPACITY AVAILABLE?

A. Absolutely. For example, of the 195 central offices listed in BellSouth's response to AT&T's Interrogatory 23, 69 (42%) of the central offices had between 10,000 to 116,000 IDLC lines per office (with the remainder having less than 10,000). Of these 69 larger offices, 34 have less than half of the spare copper or UDLC facilities sufficient to replace IDLC loops currently serving customers.

Q. CAN YOU GIVE SOME SPECIFIC EXAMPLES OF THIS PROBLEM?

A. Yes. In the chart below are ten examples of central offices where, of all the lines on IDLC, only one quarter to one half of those lines on IDLC have spare capacity facilities available for hot cut conversions.

CLLI Code	Address	IDLC Loops	Total Spares	%
bcrtflsa	Boca Raton	37,159	8973	24.15
pnscflfp	Pensacola	29,080	14,760	50.76
ftldflwn	Ft. Lauderdale	32,415	8,728	26.93%

hlwdflpe	Hollywood	116,900	26,165	22.38%
jcvlflwc	Jacksonville.	21,332	9,122	42.78%
mlbrflma	Melbourne	58,383	19,045	32.62%
orldflph	Orlando	74,315	19,315	25.99%
strtflma	Stuart	31,852	15,917	49.97%
wpbhflga	Palm Beach Gardens	44,186	19,155	43.35%
wwspflsh	Spring Hill	25,845	3,287	12.72%

Q. DOES BELLSOUTH HAVE AN OBLIGATION TO PROVIDE AN UNBUNDLED LOOP WHEN AT&T REQUESTS A LOOP SERVICED BY AN IDLC SYSTEM?

A. Yes. First, BellSouth has an obligation as described in the Florida AT&T/BellSouth Interconnection Agreement to unbundle IDLC delivered loops, using one of several alternative methods, where available. (See Attachment 2, Section 3.11 of the Interconnection Agreement). Further, the TRO requires BellSouth to develop an alternative that permits the customer's choice to be effectuated. TRO ¶ 297 (citations omitted).

Q. IN LIGHT OF BELLSOUTH'S OBLIGATIONS, DOES AT&T HAVE CONCERNS REGARDING ITS ABILITY TO OBTAIN UNBUNDLED LOOPS FROM BELLSOUTH?

A. Yes. If switching is eliminated as a UNE, the demand for unbundled loops may well be unlike anything BellSouth has experienced to date, and the CLECs have no assurance that BellSouth will not experience capacity issues due to IDLC loops, especially in those central offices with high percentages of IDLC loops. AT&T is concerned that because of this prevalence of ILDC lines in many of BellSouth's central offices, CLECs may find themselves having to caveat all of their service offer marketing materials with language such as, "if available in your area." CLECs will also have to overcome negative word of mouth publicity because of their inability, through no fault of their own, to provide service to a customer.

Q. ARE THERE OTHER CONSTRAINTS ON THE CAPACITY TO PERFORM HOT CUTS CAUSED BY THE MANUAL NATURE OF THIS PROCESS?

A. Yes. Electronic order flow-through is an important component of capacity, as each instance of manual (human) intervention decreases efficiency and lengthens the provisioning interval. For example, when a service request flows through the ordering OSS without manual intervention, BellSouth is required to return a rejection in one hour or a FOC in 3 hours. However, if it falls out for manual handling, that interval becomes 10 (business) hours, which in most cases means that BellSouth can delay the order for a full day if it does not flow through. (BellSouth provides no performance data on the frequency and duration of fall-out from its provisioning systems) Further, BellSouth's current rate of manual intervention for loop migration orders is significant. The percent of orders migrating service to UNE-L which were manually handled by BellSouth in Florida were significant: June 2003 - 76.1%, July 2003 - 69.7%, and August 2003 - 76.3%. In contrast, the UNE-P migration orders requiring manual handling for June, July and August, 2003 were as follows: 17.4%, 17.1%, and 15.6%. Thus, while the orders migrating service to UNE-L were handled manually on average 74% of the time, orders migrating service to UNE-P were handled manually on average only 17% of the time. (See Exhibits MDV-1 and MDV-2). With three quarters of the UNE-L migration orders requiring manual intervention, it is obvious that productivity will be impacted if the volumes of orders were increased many-fold.

B. Any Batch Process Must Address the Segments of the Market That Pose Special Challenges

Q. WHAT SEGMENTS OF THE MASS MARKET POSE UNIQUE CHALLENGES FOR ANY MANUAL BATCH PROVISIONING PROCESS?

A. Customers served by IDLC loops, customers in a line splitting arrangement, and customers migrating between CLECs pose a problem for the hot cut process. As a technical

matter they pose some process challenges. In addition, BellSouth's and Verizon's policy choices may well exclude them from a batch provisioning process.

1. IDLC

Q. WHY DO CUSTOMERS SERVED BY IDLC LOOPS POSE SPECIAL CHALLENGES FOR A BATCH PROVISIONING PROCESS?

A. The architecture of the loop/switch combination on IDLC loops is substantially different from other mass market loop architectures. Instead of aggregating copper loops in cables and carrying them all the way to the MDF at the central office, the ILEC brings the loop first to IDLC equipment that is housed in a remote terminal in a neighborhood. The IDLC at the remote terminal converts the analog signals coming from the customer's telephone service to digital signals and multiplexes all the digital signals for all of the customers served by the IDLC onto a digital carrier system for transmission to the central office. At the central office, the digital loops bypass the MDF altogether and access the switch directly through a digital cross-connection frame. No analog signal or physical reappearance on an MDF is ever re-established to identify an individual subscriber's loop. Therefore, when a customer is served by an IDLC loop, there is no separable wire at the MDF that is associated with his/her individual loop that can be disconnected and reconnected to a CLEC's collocated equipment. Therefore, if a CLEC wishes to use its own switch to serve a customer that is currently on an IDLC system, BellSouth must first physically move the customer's line to a pre-existing copper facility or to a UDLC system. Loops that arrive in the central office on a UDLC system have an appearance on the MDF and therefore can be cross-connected to a CLEC's collocated equipment. As a result, loop migrations involving IDLC involve a field dispatch. RBOCs, such as SBC and Verizon-NY which have performed bulk hot cuts, have limited them to migrations that could be performed solely

within the central office where the bulk cut-over was being conducted. When the ILECs in Florida are ordered to provide batch hot cuts, it is essential that IDLC, a significant portion of the market, not be excluded from the process.[24]

2. Line Splitting

Q. WHY WOULD CUSTOMERS IN A LINE SPLITTING ARRANGEMENT POSE SPECIAL CONCERNS IN ANY INSTANCE WHERE SWITCHING IS ELIMINATED AS A UNE, AS WELL AS IN DEVELOPING A BATCH HOT CUT PROCESS?

A. Line splitting is an arrangement that allows a DLEC (Data Local Exchange Carrier) and a CLEC to provide data and voice service over a single loop. The voice and data carriers may be the same or two different carriers. Line Splitting consists of:

(i) a UNE loop, a UNE switch port, and cross connections at a BellSouth central office,

(ii) a BellSouth owned or D/CLEC owned splitter, and

(iii) a D/CLEC owned DSLAM.

With line splitting, the voice service typically uses BellSouth facilities purchased by the CLEC as an unbundled loop and port. Since this service configuration uses both the ILEC loop and the ILEC voice switching, it is referred to here as "UNE-P based" line splitting. Exhibit MDV-18 depicts BellSouth line splitting arrangements with a D/CLEC providing the splitter, and with BellSouth providing the splitter. In both cases, the voice output of the splitter appears on the BellSouth MDF and is cross-connected to the BellSouth switch port. While there is no technical reason that the output of the BellSouth splitter could not be hot cut to the voice CLEC directly from the MDF, as a matter of policy, BellSouth refuses to do it. Moreover, BellSouth does not include line split lines in its current bulk hot cut process.

[24] As stated earlier in my testimony, BellSouth serves 31.8 percent of its customers using IDLC technology in Florida.

Q. HOW WOULD A CLEC PROVIDE DSL SERVICE TO ITS CUSTOMERS IF UNE-P, AND THUS UNE-P BASED LINE SPLITTING, WERE NO LONGER AVAILABLE?

A. In order to be able to provide voice and data services over a single loop, as is available via UNE-P based line splitting today, CLECs instead would have to provide DSL service via a UNE-L based line splitting arrangement, which is sometimes referred to as "loop splitting."

Q. PLEASE DESCRIBE YOUR UNDERSTANDING OF HOW UNE-L BASED LINE SPLITTING WOULD BE IMPLEMENTED IN BELLSOUTH TERRITORY.

A. UNE-L line splitting is the process by which a CLEC and a DLEC may collaborate to provide both voice and DSL service over a single copper loop without the use of ILEC provided switching. The CLEC would use a BellSouth provided loop and a non-BellSouth switch to provide voice service, and either self-provide or partner with a DLEC which would provide the data service using the high frequency portion of the loop and its own data switching network.

The only practical process available in BellSouth territory by which CLECs and DLECs can implement UNE-L line splitting today is through the use of pre-wired (dedicated) cage-to-cage cabling between their respective collocations to enable interconnection of the necessary equipment (splitter, DSLAM, and DLC). [25] A CLEC such as AT&T can only interconnect between its collocation and those of another collocated CLEC if the interconnection agreements between BellSouth and AT&T and BellSouth and the other

[25] CLECs could theoretically install non-dedicated cage-to-cage cabling between their collocations, but this would require a dispatch to each party's collocation cage to implement each new voice/DSL customer's service. The recurring dispatch costs make such an arrangement both operationally and economically infeasible.

CLEC both contain co-carrier cross connect language. See Exhibit MDV-19 for a depiction of a UNE-L Line Splitting arrangement using a single DLEC partner.

Q. WHAT OPERATIONAL CONCERNS ARE ASSOCIATED WITH USING THIS UNE-L LINE SPLITTING OR LOOP SPLITTING ARRANGEMENT COMPARED TO UNE-P LINE SPLITTING?

A. It is far more difficult for a CLEC to offer a DSL/voice bundle under a UNE-L arrangement than under UNE-P. For example, UNE-L line splitting adds operational complexity and risk, costs, and potential customer impact associated with cage-to-cage cross-connects and routing the CLEC's voice path through a DLEC's collocation space.

Q. PLEASE DESCRIBE THE OPERATIONAL COMPLEXITY AND THE ASSOCIATED RISK TO CUSTOMERS IN MORE DETAIL.

A. Assume that a CLEC and a DLEC have partnered to provide voice and DSL service using a UNE-P based serving arrangement (i.e. an ILEC provided loop and ILEC circuit switching) and that the DLEC provides the splitter being used. In this scenario, as with an ordinary hot cut, the customer's loop is delivered to the DLEC's collocation over a cable pair that passes through the BellSouth distribution frame. The cable pair to be used is identified at the BellSouth distribution frame by the Connecting Facility Assignment ("CFA").[26] Once at the DLEC's collocation, the high frequency signal present on the cable pair, (the DSL signal), is separated from the voice signal by the DLEC's splitter and is routed to its DSLAM, and ultimately connected out to its data network. The voice portion of the loop

[26] BellSouth provides CLECs with the circuit facility assignments (that is, cable and pair assignments for the cable between the CLEC's collocation arrangement and BellSouth's equipment such as distributing frames or cross-connect bays). CFAs are assigned to the CLEC at the time the CLEC's collocation arrangement is made available. Each CLEC is required to maintain its own circuit facility assignment records and assign each pair that the CLEC wants BellSouth to use in order to connect BellSouth facilities to the CLEC's facilities.

must be returned from the splitter in the DLEC collocation to the BellSouth frame (and ultimately the BellSouth switch) using a second CFA.

If instead that same CLEC and DLEC were to provide the same voice and DSL service to the same customer using a UNE-L arrangement, dedicated cage-to-cage cabling would be required, as would additional CFA management. In such a case, the customer's loop would still be delivered to the DLEC collocation from the BellSouth distribution frame on a cable pair identified by a CFA. However, the voice portion of the loop however would *not* be returned to BellSouth. Rather, it would be sent to a DLC in the CLEC's collocation area using dedicated cage-to-cage cabling, which would necessitate DLEC-to-CLEC CFAs.

The CLECs' Digital Loop Carrier (DLC) port in its collocation space that is used for voice only UNE-L service could not be used if the customer adds UNE-L based line split DSL, because the DLC port used to provide voice only service is pre-wired to the BellSouth distribution frame using dedicated cabling. Moreover, connections between the DLEC collocation and the CLEC collocation also use dedicated cage-to-cage cabling. The only alternative would be to dispatch a technician to recreate each connection. Thus the number of CFAs and the number of parties managing those CFAs increases when UNE-L line splitting is required. And, as a CLEC desires to have a business arrangement with more than one DLEC the problem becomes even larger. Exhibit MDV-20 illustrates the complexity of loop splitting when a CLEC chooses to have business relationships with multiple data providers.

Q. WHY DOES THE INCREASED NUMBER OF CFAS AND THE INCREASED NUMBER OF PEOPLE MANAGING CFAS CAUSE PROBLEMS?

A. First, maintaining proper CFA inventories has been problematic for the industry in general. Proper management of CFAs is critical to continuity of service for customers. If an incorrect CFA is used by either the ILEC or a CLEC, an end user may lose service or a change in service may be delayed. Accordingly, it is critical that all competitors, ILECs, CLECs, and DLECs maintain accurate CFA inventories and use appropriate CFAs. This becomes especially difficult in a UNE-L line splitting arrangement. The order exchange among the three parties in a UNE-L line splitting scenario must contain the information necessary for each party to determine what it is to provide, where and when. To accomplish this, the voice CLEC and the data DLEC must both send separate LSRs to BellSouth containing the CFA assignments for the BellSouth provided loop and the DLEC provided splitter. In addition, the CLEC and DLEC must select the same dedicated facility CFA between their two cages. Any differences in the CFAs on the two orders to BellSouth will cause them to be rejected and will cause delays. Likewise, if the CLEC and DLEC select different dedicated facilities between their cages, the order cannot be processed.

The greater the number of CFAs, the greater the number of potential breakage points in the service provisioning elements. This creates additional risk to the customer's voice service and greater difficulty in resolving any troubles, because the splitter is located in the DLEC's collocation cage rather than the CLEC's cage or the ILEC's common space. As a result, there must now be three parties involved in troubleshooting problems with a customer's voice service:

(i) the CLEC that owns the DLC and voice switch;

(ii) the DLEC that owns the splitter, through which the voice service passes; and

(iii) the ILEC, which provides the loop over which the voice service runs out to the end user's premises.

Thus, having the DLEC provide the splitter in a UNE-L line splitting configuration is quite different from having the DLEC provide the splitter in a UNE-P based line splitting arrangement. In the latter configuration, only the DLEC and ILEC need to be physically involved in troubleshooting complex voice problems. In a UNE-L line splitting arrangement, the ILEC, DLEC and CLEC must all be involved, and there are many more connections that could be causing the problem.

Q. PLEASE DESCRIBE THE COST IMPACTS TO AT&T OF USING A UNE-L BASED LINE SPLITTING ARRANGEMENT INSTEAD OF A UNE-P BASED ARRANGEMENT.

A. UNE-L line splitting will require rearrangements to add dedicated cage-to-cage cables and the pre-wiring of splitter ports, DSLAM ports and DLC ports to the cage-to-cage cables in advance of actually providing any service to end users. The smallest size increment available in pre-wired bundles for dedicated cage-to-cage cabling is 25 at a time. In order to mitigate the fixed costs of installation, however, CLECs would most likely want to wire most viable locations for 100 new customer installations per phase. The installation would have to include installation of more DLCs because, as described above, the DLCs used for voice only service would generally not be available. In order to avoid any increased maintenance costs, all pre-wired arrangements would be ready for service and thus would require power exactly as if they were in service. This factor automatically creates a surplus inventory that consumes power but generates no revenue. The additional cost of committing such network resources in advance is significant. For example, assume a CLEC with an established collocation providing voice service were to add the necessary equipment to be able to partner

with a DLEC collocated approximately 50 feet away from the CLEC in the ILEC central office. The CLEC would provide DSL service to its customers via UNE-L line splitting arrangements described above. The CLEC would incur the following up front costs for *each* DLEC with whom it chose to partner.

DLC Bay – One Shelf	$30,556.00
Pots Bay –Termination Block	$1,001.00
Cage to Cage Connectivity Costs–Non ILEC	2,445.00
Application Fee to BellSouth	$584.11
Total up front costs	34,586.11

Additionally, BellSouth charges $625.00 per month for electrical power. Importantly, these costs are extremely conservative, as they do not include OSS costs for such items as additional CFA management, extra construction charges such as traversing fire stops (which can add hundreds, even thousands of dollars), and maintenance.

Q. DOES THE PROCESS YOU DESCRIBED MEET THE REQUIREMENTS OF THE TRO?

A. No. The FCC stated "we have also determined that an incumbent LEC's failure to *provide* cross-connections between the facilities of two competitive LECs on a timely basis can result in impairment." TRO ¶ 514 (emphasis added). The expensive and cumbersome process described above merely permits CLECs to cross-connect to each other; BellSouth does not *provide* the cross-connections.

3. CLEC-to-CLEC Migrations

Q. YOU MENTIONED THAT ANY BATCH PROVISIONING PROCESS MUST ADDRESS CLEC-TO-CLEC MIGRATIONS. WHAT ARE THE CONCERNS THAT ARISE WHEN A CUSTOMER SWITCHES FROM ONE CLEC TO ANOTHER?

A. As the mass market matures, migrations between CLECs will occur more frequently. Currently, there are no standard or agreed-upon processes or intervals between CLECs for responding to requests for information such as customer service records and other customer transition information that is needed to create service orders. Similarly, there are no standard processes for order status responses, such as FOCs and rejections. Further, the in-depth procedures needed for migrating the customer are lacking or ill-defined. For example, items as basic as agreed-upon intervals for migrating a customer from one CLEC to another have not been established. In addition, the ILEC will have to be involved in all hot cuts because it performs the necessary loop transfers and manages directory listing changes. However, requests to have the ILEC transfer the loop from one CLEC to another must be submitted to the ILEC manually, adding delay, error, and expense.

Accordingly, efficient processes must be developed for both the "winning" and the "losing" CLECs so they can place orders with the ILEC and interact with each other and the ILEC to have customers efficiently migrated. Without these improvements, the current lack of efficient and equitable ordering and provisioning processes for CLEC to CLEC hot cut migrations will create more delay, customer confusion, expense, and customer outages in the industry. In contrast, a CLEC to CLEC migration using UNE-P requires only an electronic order from the CLEC acquiring the customer. The CLEC losing the customer electronically receives or obtains a line loss report.

Q. DOES BELLSOUTH INCLUDE CLEC TO CLEC MIGRATIONS IN ANY BATCH PROCESS?

A. No. BellSouth's current bulk offering does not address CLEC-to-CLEC migrations.

C. Any Batch Process Must Address Wholesale Switching

Q. ARE CLECS ABLE TO OBTAIN LOCAL SWITCHING FROM THIRD PARTIES?

A. No. BellSouth's policies, practices, and systems effectively prevent a CLEC from being able to order a loop from BellSouth and switching from another CLEC, thus precluding CLECs from purchasing alternative local switching from wholesalers. For example, if AT&T were to submit a service request to purchase a loop from BellSouth and deliver it to another CLEC's collocation, BellSouth's systems could not process the order.

Q. WHAT IS REQUIRED FOR A CLEC TO BE ABLE TO ORDER A LOOP FROM BELLSOUTH AND WHOLESALE SWITCHING FROM ANOTHER CLEC?

A. Under today's processes, a CLEC sends BellSouth a Local Service Request ('LSR") that tells BellSouth, among other things, three critical pieces of information: (1) "who I am," (2) "where I want your service delivered," and (3) "where to send my bill." An LSR contains many fields into which the CLEC will insert the necessary information or codes to convey this information. Various industry groups and standards provide guidance as to the fields and codes used on an LSR, but BellSouth determines how the information will be used by its systems and in its databases after the LSR has been received.

As part of its "who I am" information on its LSR, the CLEC must provide BellSouth with its Access Customer Name Abbreviation ("ACNA"). The ACNA identifies who is to be billed for the services (*i.e.*, the loop) ordered. As part of its "where I want your service delivered" information on its LSR, the CLEC must also provide BellSouth with an Access

Customer Terminal Location ("ACTL").[27] The ACTL identifies the location where BellSouth's loop is to be delivered for connection with a CLEC's equipment. Accordingly, the ACNA tells BellSouth "who I am" and the ACTL tells BellSouth "where I want your service delivered."

Q. HOW DOES A PROBLEM ARISE?

A. BellSouth currently requires that the ACNA or "who I am" of the CLEC ordering service from BellSouth be the *same* as the ACNA associated with the ACTL or "where I want your service delivered" code. This requirement effectively precludes a CLEC from ordering a loop from BellSouth and connecting it to the collocation arrangement of a different CLEC in order to use that CLEC's switch.

Q. IS THERE ANY INDUSTRY REQUIREMENT THAT A CLEC ORDERING SERVICE TO BE DELIVERED TO A SPECIFIC LOCATION BE THE OWNER OF THAT LOCATION?

A. No. However, BellSouth's systems improperly include edits that require that the ACNA ("who I am") associated with the ACTL ("where I want your service delivered") on an order must match the ACNA submitted on the order. If United Parcel Service were to use the same concept or edit, they would be telling you that you can only send packages to your own address.

[27] "Where I want your service delivered" codes are actually address information. The principal "code" used for these purposes is the Common Language Location Identifier ("CLLI"), which is either 8 or 11 characters long and is developed in accord with guidelines provided by Telcordia, which also keeps the master CLLI Database. Each CLLI has an "owner," and that owner is identified in the CLLI Database by the owner's Interexchange Access Customer code, or ACNA. This CLLI code is used to populate the Access Customer Terminal Location ("ACTL") field. Connecting Facility Assignment ("CFA"), Cable Identification ("Cable ID"), and Channel or Pair Identification ("Chan/Pair") are another group of "codes," which, while they are different items, are commonly referred to as CFA. All tell BellSouth the actual physical point where it is to deliver its services to the CLEC. Often the terms ACTL and CFA are used interchangeably to represent this physical point of interconnection.

Q. HOW DOES AT&T KNOW THIS PROBLEM EXISTS AT BELLSOUTH?

A. AT&T has experienced this problem in the limited cases in which it has ordered UNE loops from BellSouth. AT&T, because of its acquisition of TCG, owns collocations that were built pursuant to TCG's agreement with BellSouth as well as collocations that were built under AT&T's direct agreement with BellSouth. The codes used to describe TCG collocations are labeled "TPM" and the codes for the AT&T collocations are labeled "ATX." When an order sent to BellSouth using the "TCG" label seeks to purchase an unbundled loop from BellSouth and wants it directed to an AT&T collocation that is labeled "ATX," BellSouth's systems cannot electronically process the order.

Q. HOW WILL THIS PROBLEM AFFECT THE INDUSTRY AS A WHOLE?

A. BellSouth's systems currently look for a match between the codes for "who I am" and "where I want your service delivered." When these codes do not match, these orders fall out for manual handling. BellSouth has in the past addressed this problem for AT&T with a manual work-around that assigned a secondary code to identify all the collocations as belonging to AT&T. However, BellSouth has recently indicated to AT&T that "BellSouth has no plans to continue to service orders that require manual processing" caused by the use of multiple company codes, and reiterating its previous recommendation that AT&T pay for a mechanization upgrade to "allow multiple ACNA orders to flow-through BellSouth's systems without manual intervention".[28] This work-around (at best) or outright refusal to process orders (at worst) obviously will not be sufficient in a world in which CLECs may choose to purchase unbundled local switching from each other or from wholesale providers.

[28] See Exhibit MDV-21-July 21, 2003 letter from Jim Schenk of BellSouth to Denise Berger of AT&T.

CLECs must be able to order a loop and have that loop delivered to someone else's collocation space.

Q. HAS BELLSOUTH BEEN ABLE TO DEMONSTRATE AT ANY TIME DURING THE AT&T/BELLSOUTH DISCUSSIONS THAT ITS POSITIONS ARE SUPPORTED BY INDUSTRY STANDARDS OR TECHNICAL INFEASIBILITY?

A. No. In fact BellSouth's correspondence clearly states that its positions are based exclusively on its self-generated policy. Exhibit MDV-22 is a June 20, 2002 letter from Mr. James M. Schenk of BellSouth to Mrs. Denise Berger of AT&T. In this letter Mr. Schenk states:

> "It is BellSouth's policy not to accept assignments from CLECs other than the owner of the collocation space and associated cable assignments. Therefore, BellSouth's ordering and provisioning systems contains edits to prevent unauthorized assignment of its customer's collocation assets." (Letter, page 1)

Q. WHAT SHOULD THE COMMISSION DO TO SOLVE THIS BELLSOUTH CAUSED PROBLEM?

A. BellSouth unilaterally placed itself in the role of CLEC "asset policeman" implementing edits that are not required by any industry guidelines and that needlessly restrict CLECs' ability to do business in BellSouth's region. Having established these needless edits, BellSouth then declared all transactions that fail to pass its self-defined edits are "out of process" when in fact it is the edits themselves that are unjustified. BellSouth must have in place policies that do not impede competition. It should be required to delete these unnecessary edits. Moreover, any batch provisioning process must contemplate and provide for CLECs that want to use a third-party's switch.

D. Operational Constraints That Will Be Created If All Migrations Require UNE-L Conversions

Q. ARE THERE NEW OPERATIONAL CONSTRAINTS THAT WILL ARISE IF ALL UNE-P CUSTOMERS ARE MIGRATED TO UNE-L?

A. If UNE-P is no longer available to CLECs, there will be significant changes in traffic patterns and the items CLECs order from BellSouth. As a result, BellSouth's network may have insufficient capacity in certain instances and surplus capacity in others. Two specific examples are trunking and collocation space.

Q. WHAT IS TRUNKING?

A. The transport pathways that carry calls from switch to switch are called interconnection trunks. Within the local network, such trunks connect BellSouth's central office switches, CLEC switches to BellSouth switches, and may connect BellSouth's central office switches to tandem switches. Tandem switches often are used by ILECs to serve as a connector between central offices. Tandems are used because it is not always efficient to connect each central office to every other central office or to connect these offices for their full complement of traffic during peak times. In such cases, the ILEC will connect the central offices to a tandem switch. Traffic may flow from any central office switch to the tandem and then from the tandem to any other switch in the network.

Q. HOW WILL TRUNKING BE AFFECTED IF ALL MASS MARKET CUSTOMERS MUST BE SERVED USING UNE-L?

A. Many trunks will be over utilized while some may be under utilized. To understand these impacts, the Commission must first recognize that, with UNE-P, all traffic travels on BellSouth's transport network. If BellSouth connects Central Office 1 with Central Office 2

using direct trunking, all calls between those switches will generally travel through that trunk without every passing through a tandem switch. If, however, all CLECs must provide service using their own switches, those switches will principally be connected to BellSouth's network using BellSouth's tandem switches, because the CLEC does not have the economies of scale to connect directly to each and every BellSouth local switch. Accordingly, nearly every call from a CLEC customer, whether to a BellSouth customer or to another CLEC's customer will have to pass through trunks connected to BellSouth tandems. When a trunk is carrying its total capacity for calls, the next call is blocked which means the customer gets a "fast busy" signal and the call cannot complete. If all UNE-P customers are migrated to UNE-L, significant blocking of trunks connected to the tandem or tandem switching congestion can be expected. Accordingly, the Commission must investigate the effects that forcing traffic onto UNE-L may have on BellSouth's tandem and interconnection facilities, to assure that CLEC customers' quality of service would not be degraded if CLECs no longer have access to UNE-P.

Conversely, in some cases, interconnection trunks between BellSouth central office switches may be under utilized. Because calls to and from CLEC customers will travel through BellSouth's tandem switch, there will be less demand for the shared transport between BellSouth's central office switches. However, the extra capacity there cannot be redeployed to accommodate this shift in traffic patterns.

Q. WHAT OTHER OPERATIONAL CONSTRAINTS WILL ARISE?

A. If unbundled local switching is no longer available to competitors, all competitors will have to install their own facilities in collocation space. It is unclear whether BellSouth will be able to accommodate the dramatic increase in the space that will be needed as CLECs

expand existing collocations or when new CLECs that were formerly UNE-P only providers seek to install equipment. At the very least, the interval to obtain and build out collocation space likely will increase. At the worst, sufficient space may not be available, especially in remote central offices that are generally very small in size.[29]

Q. ARE THERE OTHER ISSUES RELATED TO BATCH CUTS THAT THIS COMMISSION WAS DIRECTED TO CONSIDER?

A. Yes. The FCC also directed state commissions to consider whether (or the extent to which) temporary or "rolling access" to UNE-P would address all identified impairment. TRO ¶ 524. Rolling access to UNE-P is clearly not adequate to "cure" the many operational and economic issues for the reasons described in this and other AT&T testimony. For example, rolling access would not alleviate service outages caused by hot cuts; it would not resolve the economic impairment that results from the collocation, digitization, concentration and backhaul costs that a CLEC must incur to connect the ILEC loop to its switch; it would not correct the inefficiencies and errors created by the manual hot cut provisioning; and it would not overcome the capacity constraints which are created by the volumes of hot cuts required and exacerbated by scenarios such as IDLC, line splitting and CLEC-to CLEC migrations. Moreover, even if such rolling access were ordered by the Commission, it must allow the CLEC to acquire the customer using UNE-P before moving it to a UNE-L/CLEC

[29] The FCC identified available collocation space as an issue. TRO ¶ 513. "We find that the absence of sufficient collocation space in the incumbent central office or offices might in some markets render competitive entry impossible and thus result in impairment. We therefore direct the state commissions to consider evidence concerning the costs and physical constraints associated with collocation in a particular market. We direct state commissions to consider whether competitive entry is inhibited, or is likely to be inhibited going forward, by the exhaustion of available collocation space in the incumbent LEC's central offices. Evidence relevant to this inquiry would include, for example, the amount of space currently available in those central offices; the expected growth or decline, if any, in the amount of space available; and the expected growth or decline, if any, of requesting carriers' collocation space needs, assuming that access to unbundled switching were curtailed.

switch network configuration as AT&T is not aware of any methodology for transferring "batches" of customers that would not require the customers to first be acquired by the CLEC.[30] Further, as acknowledged by the FCC, "competitive LECs may face difficulties in accumulating enough customers to justify batch line migration processing *in both new central offices* and existing collocations." *Id.* ¶ 522 (emphasis added). Any such process must also include sufficient time for CLECs to accumulate enough customers to justify collocation, and enough time to then establish the collocation in new central offices. That said, even with these minimal requirements, such a process still would not address the operational and economic problems identified.

IV. AT&T'S RECOMMENDATIONS

Q. DID THE FCC IDENTIFY A STANDARD AGAINST WHICH AN ILEC'S HOT CUT PROCESS SHOULD BE MEASURED?

A. Yes. In describing a hot cut process that demonstrated "consistently reliable performance," the FCC recognized that for the migration of customers, UNE-P should be the standard of performance. It stated: "This review is necessary to ensure that customer loops can be transferred from the incumbent LEC main distribution frame to a competitive LEC collocation *as promptly and efficiently as incumbent LECs can transfer customers using unbundled local circuit switching*." TRO at n. 1574 (emphasis added). Thus, the appropriate comparison must be whether the ILEC can move customers served by UNE-L at the same volumes and performance levels as UNE-P. This is perfectly logical, since CLECs would be

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The state commissions shall consider this factor in determining whether to find that requesting carriers are not impaired without access to unbundled local circuit switching.

[30] The FCC stated that "we find that the availability of unbundled local switching -- even on a temporary basis -- may enable competitors to acquire customers, aggregate them, and migrate them to the carriers own switch in

forced to abandon UNE-P and substitute UNE-L if they are denied access to unbundled local switching.

Moreover, such a standard is required in order to provide parity to all carriers that seek to provide a bundle of both local and long distance services to mass market customers. ILECs today can (and do) add large numbers of long distance customers through the electronic PIC process, which is very comparable to the electronic OSS used to provide UNE-P service. If CLECs cannot have the same ability to add local customers, they are seriously impaired in their ability to provide similar bundled offers. Indeed, the RBOCs themselves have recognized that the ability to offer such bundles is a major competitive advantage in fending off CLECs and/or winning back CLEC local customers. Further, since the FCC's impairment standard requires a review of all costs and revenues a CLEC would incur, including long distance, CLECs must have the same ability to offer local/long distance bundles as the ILEC.

Q. WHAT CHARACTERISTICS SHOULD BE INCLUDED IN ANY BATCH CUT PROCESS CONSIDERED BY THIS COMMISSION?

A. While any batch process will very likely continue to contain too much manual work to significantly reduce the economic and operational impairment, the development of a batch cut process by this Commission would be of some benefit to competition, because it would facilitate CLECs' use of non-ILEC facilities in the limited situations where it is otherwise feasible to do so. The process should, at a minimum, address the following:

OVERALL

- As an initial matter, because it is based primarily on manual work, the batch process should be recognized as an interim solution with limited opportunities for

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a manner *that would not be feasible if the customers each had to be migrated individually* upon signing up with the competitive LEC. TRO ¶ 522 (emphasis added).

improvement over the current individual hot cut process. Therefore, to more effectively reduce CLEC impairment, the Commission should develop a plan with specific time frames to move to an electronic solution that requires fundamental changes to the ILECs' network architecture that currently creates operational and economic barriers to competitive entry to serve mass market customers.

- Any hot cut issue raised by any party that is not solved through the development and implementation of a batch process should be documented for further review by the Commission.

APPLICABILITY/SCOPE

- The batch process must include all mass market (residential and small business) customers, all types of loops used to serve such customers, and all types of transfers between all LECs. Thus, the process should be insensitive to the identity of the previous carrier and the technology that carrier uses to provide service. In addition, the process should not require CLECs to perform any pre-order activity to "qualify" that an unbundled loop can be migrated. In addition to existing UNE-P customers served over copper, UDLC, and NDGLC, at a minimum, the process must apply to:

    - IDLC loops
    - UNE-L based line splitting
    - CLEC to CLEC migrations

VOLUME/CAPACITY

- The batch process must support efficient migration of a sufficient quantity of bundled loops (equivalent to LD PIC changes/UNE-P volumes/churn of ILEC win-backs/CLEC to CLEC) to support a fully competitive mass market at quality levels no less than the UNE-P alternative that would be removed.

- Size of batch

    - The batch should be sized to permit the CLEC and ILEC to achieve cost efficiencies.
    - The batch (as well as the number of batches per day) should be sized to accommodate the overall number of migrations required to achieve the scale needed to handle mass volumes.

PROCESS REQUIREMENTS

- The batch process must operate in conjunction with an existing electronic customer acquisition process (*i.e.*, UNE-P).

- To facilitate a workable transition of customers between CLECs, the customer should first be migrated to UNE-P as a bridge between the UNE-L setup of each CLEC.

- The ILEC should provide CLECs the capability to identify which UNE-P customers/lines are eligible for a batch on a mechanized and batch basis (*e.g.*, the CLEC should not be required to do one-by-one prospective queries to determine if the conditions necessary to include a specific line in a batch are or are not met). The ILEC should also establish the electronic ability to provide a specific batch of potential telephone numbers to a CLEC when the conditions for a batch have been met.

- After receiving the notification from the ILEC that the conditions for a batch cut over are met, the CLEC must have sufficient lead-time to advise its customers of the need to reprogram features such as voice mail and speed dialing, and in appropriate cases sufficient lead-time to prepare its collocation equipment, switching equipment and/or technician time so the CLEC can accept the loops to be transferred.

- The CLEC should have the ability to schedule hot cuts and batch hot cuts at any point in a twenty-four hour day with the costs insensitive to the scheduled time of the hot cut (as in an electronic system such as UNE-P).

- "Batches" should be CLEC specific, *i.e.*, each "batch" should only apply to one CLEC.

- The batch process must be developed to provide equivalent OSS functionality to UNE-P transactions, including:

    - Equivalent electronic pre-ordering and ordering capability
    - Equivalent levels of flow-through for ordering and provisioning systems to increase accuracy and lower costs.
    - One LSR per migrating UNE-P customer / account
    - Directory Listings must remain AS-IS when converting from UNE-P to UNE-Loop

- Real-time electronic notification must be available for order status, testing status, and notification of individual loop cut completion.

- The Commission should include in its analysis the feasibility of interim automation of hot cut provisioning as part of the batch process.

CUSTOMER CARE

- There must be a self-executing process to immediately switch customers back to UNE-P if an individual cut fails, with follow-up electronic communication from the ILEC to the CLEC indicating the cause of the failure, how the ILEC will remedy the

failure and when the customer can be migrated to an unbundled loop. The rolling interval for affected loops/customers should restart.

ECONOMIC

- The batch process design must result in significant cost reduction for all involved parties.

VALIDATION, TESTING AND QUALITY ASSURANCE

- ILECs must prove they have systemic capability to handle the provisioning of hot cuts at volumes anticipated across all its markets in the absence of unbundled local switching. Therefore, once designed, the batch cut process must be subject to both pre-implementation and post implementation testing. Pre-implementation testing should include third party "time and motion" study of the hot cut process, and third party-monitored ILEC testing using its own collocation and migration of significant numbers of its own customers through hot cuts from direct connection to its switch to its collocation equipment installed to operate as a pseudo-CLEC specifically for this test. Post-implementation "testing" would include on-going commission review to determine if the batch hot cut process meets the needs of commercial mass markets in a manner that permits effective and efficient competition.

- The Commission must direct the ILEC to investigate, report and eliminate any negative impacts of large scale migration from UNE-P to UNE-L from the following:

    - E-911 "unlocks"
    - Number porting
    - Availability of repair testing capabilities
    - Repair databases
    - Billing system migrations, such as from Carrier Access Billing System ("CABS") to Customer Record Information System ("CRIS")
    - Provisioning systems such as Trunks Integrated Records Keeping System ("TIRKS")
    - Directory listing and assistance

- The Commission must direct the ILEC to investigate, report and eliminate any negative impact of large-scale migration from UNE-P to UNE-L on local network interconnection trunking and tandem performance.

- The Commission must direct the ILEC to report at a central office level the current number of working IDLC access lines and the spare parallel copper or UDLC facilities available to migrate these lines to, should the customer wish to change their local service provider. It should also provide its plans to provide an unbundled loop when spare parallel copper or UDLC facilities are not available.

- The process must include a method to insure CFA inventories between and among ILECs and CLECs are initially accurate and remain reconciled.

- Competitors must be guaranteed easy access to collocation sites, including the right to use reasonably qualified contractors (*i.e.*, ILEC should not be allowed to dictate the identity of contractors, provided they meet a reasonable skill set)

PERFORMANCE STANDARDS AND ASSURANCE

- Batch cut and other associated loop performance standards should be equivalent to performance for migrating a customer from retail to UNE-P.

- Key performance measurement factors must be in place:

    - Continue to measure at the most granular level feasible for each activity (FOC, rejection, missed appointment, cuts on time, service outage, etc.)
    - Create new measures for key activities unique to batch process, e.g. per centage of batches started on time and completed on time.
    - Eliminate current exclusions in performance measures for projects/batches
    - Create, if not currently in place, measures for % service outages during conversion, and average recovery time of outages
    - Revise/establish benchmarks to drive performance that protects end-users

- Self-executing financial consequences must be in place for ILEC failures to meet required performance standards. For all conversion service outages, these consequences should be commensurate with the average net revenue times the average life of the customer

Following are additional requirements should the Commission establish only temporary access to UNE-P:

- To mitigate customer confusion and frustration with the double migration that would occur if UNE-P were only available on a temporary basis, all of the features offered by the incumbent LEC should be made available to the CLEC at TELRIC rates. By doing so, customers would not be forced to change their programmable features such as speed dialing and voice mail multiple times during this rolling acquisition process.

- There must be exceptions to any established time limits that customers may remain in UNE-P "acquisition mode" pending placement into a batch for transition to UNE-L. These include:

    - The time needed to add new CLEC equipment (*e.g.*, DLC in collocation) or to augment CLEC facilities (e.g. transport) when the expansion or augmentation is not complete for reasons beyond its reasonable planning or control
    - The time needed to augment collocation space
    - Cases of ILEC collocation space exhaust

- The ILEC's inability to migrate customers to UNE-L within prescribed time frames
- ILEC failure to meet non-discriminatory service standards

Q. WHAT INFORMATION DOES THIS COMMISSION REQUIRE FROM THE ILEC TO DETERMINE IF ITS HOT CUT PROCESS IS SUFFCIENTLY SCALABLE TO SERVE THE MASS MARKET?

A. AT&T believes it is clear from available information that BellSouth's current hot cut process capability, demonstrated by its own data, is not capable of supporting mass market competition. However, in conducting any assessment of the capacity of BellSouth's hot cut process (quantity) along with adequate quality, it is essential for BellSouth to provide the following information, with appropriate and adequate supporting detail, so that the Commission can ascertain the relative capability BellSouth has to provision service to mass market customers:

1. Proof that a neutral, third-party, valid time and motion study has been conducted to determine the time it takes to perform all of the steps necessary on the frame to perform a hot cut, and that volume testing has also been conducted.
2. Determination of the ILEC's maximum daily hot cut throughput based on the output of the time and motion study and its current staffing levels.
3. The ILEC's estimate of the daily hot cut volumes it will face in a non-UNE-P environment and the supporting details on how it arrived at this estimate.
4. The ILEC's human resources strategy specifically outlining the number of additional people it will need and how it plans to recruit, hire and train these additional people.
5. Outputs from a third party-monitored ILEC testing using its own collocation and migration of significant numbers of its own customers through hot cuts from direct connection to its switch to its collocation equipment installed to operate as a pseudo-CLEC specifically for this test.
6. The ILEC's plans for converting the imbedded base of UNE-P customers while continuing to perform its normal day-to-day frame work.
7. Disclosure of an inventory of its access lines on IDLC facilities and the amount of spare copper/UDLC facilities that these lines can be migrated to.
8. Disclosure of an inventory of the collocation space readily available in each central office in Florida and its plan for how it will support the additional requests it could be expected to receive for new collocation arrangements and augments to

existing arrangements, together with the impacts that this plan will have on existing collocation intervals.

9. The ILEC's plans for how it will expand its tandem switching and associated transport network to accommodate all of the additional traffic it will be receiving from the CLEC switches.

10. The ILEC's plans for deploying new technologies to eliminate the manual efforts associated with a hot cut.

11. The metrics that the ILEC proposes that the Commission use to monitor its performance.

Moreover, the answers to these questions alone do not adequately describe what capacity or scalability means. In a fully competitive market, carrier changes occur in multiple directions: from ILEC to a CLEC, from a CLEC to an ILEC, from a CLEC to another CLEC. Mass-market scalability means that the ILEC can manage all of these types of transactions over its entire geographic footprint each day and every day. That is a substantial task that is being achieved in the long distance market using the PIC process and in the local market today using UNE-P. Further, as the TRO economic impairment test requires CLECs to use a model that includes both local and long distance revenues, failure to have comparable processes for use by ILECs and CLECs for both local and long distance will result in significant impairment to CLECs.

The ILECs should not be allowed to respond to this absolutely critical issue with vague assurances that its processes are scalable or otherwise capable of supporting mass market UNE-L competition.[31] Both central office specific and statewide analysis, documentation and testing is necessary, and the benchmark adopted must demonstrate

[31] *See TRO* n. 1437 ("We find, however, incumbent LECs' promises of future hot cut performance insufficient to support a Commission finding that the hot cut process does not impair the ability of a requesting carrier to provide the service it seeks to offer without at least some sort of unbundled circuit switching. While incumbent LECs state that they have the capacity to meet any reasonable foreseeable increase in demand for stand-alone loops that might result from increased competitive LEC reliance on self-provisioned switching, there is little other evidence in the record to show that the incumbent LECs could efficiently and seamlessly perform hot cuts on a going-forward basis for competitors who submit large volumes of orders to switch residential subscribers.")

BellSouth's ability to perform sufficient volumes to support a fully competitive market at the same performance level as UNE-P, in order to ensure robust mass market competition.

Q. IF THIS COMMISSION ORDERS, AND THE ILEC SUCCESSFULLY IMPLEMENTS, THE BATCH HOT CUT PROCESS AT&T REQUESTS, WILL THAT SUFFICIENTLY ADDRESS IMPAIRMENT ISSUES?

A. No. Although a batch process, if properly designed and performing at levels and volumes equivalent to UNE-P would address many specific operational impairment concerns, new operational issues are likely to arise as discussed above. And even if the BellSouth charges for hot cuts were reduced, that would affect only one of many additional costs that only CLECs face in attempting to provide service using non-ILEC switches. *See* Direct Testimony of AT&T Witness Steven E. Turner.

Q. ONE OF THE ISSUES THE FCC ASKED STATE COMMISSIONS TO ADDRESS WAS THE VOLUME OF LOOPS THAT SHOULD BE INCLUDED IN A BATCH. WHAT IS THE NUMBER OF HOT CUTS BELLSOUTH SHOULD BE ABLE TO RELIABLY PERFORM IN A GIVEN TIMEFRAME?

A. As described earlier in my testimony, based on its analysis of available data, AT&T has grave concerns regarding BellSouth's capability to perform at the volumes required to support the mass market. I also described the capacity standards (equal to level of long distance competition) that AT&T believes the Commission should require the ILEC to achieve. For example, if 2.1% of the Florida access lines change long distance carriers each month, then the ILECs' process for migrating local customers should also accommodate the same percentage churn for local loops.

Based on the volumes of hot cut orders the Commission determines that the ILEC be required to perform per day to facilitate mass market competition, it should then establish

batch sizes and numbers of batches per day sufficient to permit the required volume of transactions to occur.

Q. WHAT MUST THIS COMMISSION ORDER IN TERMS OF IMPLEMENTING ITS APPROVED HOT CUT PROCESS?

A. The FCC directed state commissions to "approve *and implement*" a batch cut migration process. TRO ¶¶ 423, 460 (emphasis added). Thus, this Commission must do more than simply order BellSouth to design a process; it must test BellSouth's process until it is proven to work. Otherwise, the Commission will have failed its task of approving "a seamless, low-cost process for transferring large volumes of mass market customers." *Id.* at ¶ 423.

Q. GIVEN THAT THE IMPROVEMENTS THAT CAN BE MADE TO THE CURRENT MANUAL PROCESS ARE ALMOST CERTAINLY INADEQUATE TO OVERCOME THE ECONOMIC AND OPERATIONAL IMPAIRMENTS IDENTIFIED BY THE FCC, WHAT OTHER SOLUTIONS SHOULD THIS COMMISSION CONSIDER?

A. As discussed above, the FCC found, on a national basis, that CLECs are impaired in their ability to provide local exchange service because, among other things, of the expense, delay and service degradation caused by the current, manual hot cut process. This should logically prompt state regulators to question whether, in an age of digital processing, any manual, labor-intensive, and error-prone system for loop migration will ever be efficient enough, both economically and technically, to support robust local exchange competition.

There is a means available that uses currently available technology and allows the provisioning of loops to be operationally and competitively neutral, making it the local service counterpart of "equal access" in the long-distance market. This is a process that AT&T has generically referred to as "electronic loop provisioning" ("ELP"). In this

environment, consumers would be able to change their local carrier seamlessly, and no carrier would have inordinate advantages in competing for a mass market customer's business. This is in sharp contrast to the current, hard-wired, manual connections from customer premises to ILEC central offices described in the accompanying testimony of Jay Bradbury. Implementation of such an electronic provisioning process would create permanent virtual circuits that could use software commands to shift loops from one carrier to another quickly and inexpensively, with no loss or degradation of service. Thus, the Commission should consider whether the use of ELP -- or some other automated process -- is necessary to place all competitors on an equal footing in their ability to provide service using mass market loops and CLEC-provided switching.

V. CONCLUSION

Q. PLEASE SUMMARIZE YOUR TESTIMONY.

A. The process of migrating customers to a CLEC-owned switch using an ILEC loop, the so-called "hot cut process," is extremely dependent on manual work, rendering the process prohibitively expensive, highly error prone, and not scalable to handle reasonable commercial volumes. As such, CLECs will remain impaired by any manual hot cut or loop migration process. Even the best manual processes that could be operationalized today, including batch migration processes, cannot satisfy the requirements needed to eliminate the CLECs' operational impairment in attempting to compete for mass-market customers. Accordingly, this Commission should develop and approve a comprehensive process but should test and implement that process carefully to evaluate the extent to which CLECs remain impaired. At the same time, this Commission should encourage development of a process that automates the transfer of end-user loops. Any migration process that does not

automate the transfer of end-user loops, eliminating the need for manual "hot cuts," cannot sustain competitively unconstrained migrations of customers among all carriers, both CLECs and ILECs alike. In order to establish and sustain competitively unconstrained migrations of customers among all carriers, an electronic process for loop provisioning must be made available which is as easy, efficient, and reliable as the UNE-P provisioning process for local customers and the PIC change methodology in place for long distance.

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes.

REQUEST: For each month between August, 2000 and August, 2003, or for the latest period in which this information is available, (by state if available, if not, by region), what percent of total BellSouth retail to UNE-P orders were fully mechanized and required no manual intervention in BellSouth's ordering systems?

(a) What percent of any fallout is returned to the CLEC for correction/resolution?
(b) What percent does BellSouth manually create in its OSS?

RESPONSE: See response to Interrogatory No. 28. For the same reasons BellSouth cannot provide the information requested for migrations from specific services to UNE-L, BellSouth cannot provide similar information for migrations from specific services to UNE-P.

However, in the attached data tables, BellSouth provides – for the timeframe July 2002 to August 2003, and by state and region – the percent of *total* CLEC UNE-P migration orders (regardless of the type of service being changed) that were fully mechanized and required no manual intervention in BellSouth's ordering systems. Further, the responses for items (a) and (b) above are contained in columns on each table.

For the reasons cited in the response to Interrogatory No. 28, similar data for the August 2000 to June 2002 timeframe is not readily available.

RESPONSE PROVIDED BY: Ronald M. Pate

BellSouth Telecommunications, Inc.
Florida Public Service Commission
Docket No. 030851-TP
AT&T's 1st Interrogatories
October 6, 2003
Item No. 32

ATTACHMENT TO INTERROGATORY, ITEM NO. 32

Migrations to UNE-P
Region

Month	LSR Submissions		Mech LSR Submissions								Percent Fully Mech	Percent Fallout Returned to CLEC	Percent BS Manually Creates
	Total Manual LSR's	Total Mech LSR's	Total Manual Fallout	Auto Clarification	Pending Supps	Validated LSR's	Total System Fallout	BST Caused Fallout	CLEC Caused Fallout	Issued SO's			
Jul-02	1112	129740	8774	17089	264	103613	16343	13132	3211	87270	79.1%	19.6%	20.9%
Aug-02	1440	182895	9804	27574	362	145155	23192	18522	4670	121963	80.4%	20.1%	19.6%
Sep-02	669	138847	8355	21993	388	108111	14672	11484	3188	93439	82.0%	21.7%	18.0%
Oct-02	1263	168016	9516	25186	300	133014	11545	9424	2121	121469	85.7%	18.4%	14.3%
Nov-02	1071	173626	8684	26557	325	138060	8072	6467	1605	129988	88.9%	19.9%	11.1%
Dec-02	1288	155952	6842	26625	332	122153	10311	7702	2609	111842	87.6%	25.3%	12.4%
Jan-03	2002	168668	7067	26241	382	134978	15100	11828	3272	119878	85.2%	21.7%	14.8%
Feb-03	1177	183489	9394	28191	379	145525	9540	6881	2659	135985	88.6%	27.9%	11.4%
Mar-03	1598	197211	10474	29950	359	156428	9550	6850	2700	146878	88.6%	28.3%	11.4%
Apr-03	1548	222405	11535	35132	404	175334	10840	7456	3384	164494	88.9%	31.2%	11.1%
May-03	1616	213074	11767	32080	305	168922	8019	4819	3200	160903	89.8%	39.9%	10.2%
Jun-03	1712	231610	12773	38181	417	180239	14756	8788	5968	165483	87.7%	40.4%	12.3%
Jul-03	2625	254854	14707	38847	459	200841	22981	7853	15128	177860	87.6%	65.8%	12.4%
Aug-03	1550	228326	13225	31762	393	182946	19594	5157	14437	163352	89.1%	73.7%	10.9%

Notes:
(1) Percent Fully Mech = Issues SO's / (Total Manual LSR's + (Total Mech LSR's - Auto Clarifications - Pending Supps - CLEC Caused Fallout))
(2) Percent Fallout Returned to CLEC = CLEC Caused Fallout / Total System Fallout
This does not give any consideration to manual clarifications processed from LSR's from the Total Manual Fallout category.
(3) Percent BST Manually Creates = (Total Manual LSR's + Total Manual Fallout + BST Caused Fallout) / (Total Manual LSR's + (Total Mech LSR's - Auto Clarifications - Pending Supps - CLEC Caused Fallout))

Migrations to UNE-P
Alabama

Month	LSR Submissions		Mech LSR Submissions								Percent Fully Mech	Percent Fallout Returned to CLEC	Percent BST Manually Creates
	Total Manual LSR's	Total Mech LSR's	Total Manual Fallout	Auto Clarification	Pending Supps	Validated LSR's	Total System Fallout	BST Caused Fallout	CLEC Caused Fallout	Issued SO's			
Jul-02	38	8121	545	1138	20	6418	1377	1099	278	5041	75.0%	20.2%	25.0%
Aug-02	89	19393	662	2638	30	16063	1835	1522	313	14228	86.2%	17.1%	13.8%
Sep-02	91	9637	567	1473	21	7576	738	604	134	6838	84.4%	18.2%	15.6%
Oct-02	123	11836	506	1786	12	9532	688	563	125	8844	88.1%	18.2%	11.9%
Nov-02	136	11434	388	1680	25	9341	540	432	108	8801	90.2%	20.0%	9.8%
Dec-02	114	9048	298	1450	17	7283	634	490	144	6649	88.1%	22.7%	11.9%
Jan-03	300	11462	379	1508	22	9553	1103	914	189	8450	84.1%	17.1%	15.9%
Feb-03	86	13149	547	1839	25	10738	669	530	139	10069	89.6%	20.8%	10.4%
Mar-03	130	14509	672	2010	27	11800	634	500	134	11166	89.6%	21.1%	10.4%
Apr-03	130	17925	789	2552	25	14559	1035	827	208	13524	88.6%	20.1%	11.4%
May-03	70	15675	718	2290	28	12639	573	341	232	12066	91.4%	40.5%	8.6%
Jun-03	102	17351	1163	2370	25	13793	1303	550	753	12490	87.3%	57.8%	12.7%
Jul-03	147	24206	1344	2516	21	20325	2142	804	1338	18183	88.8%	62.5%	11.2%
Aug-03	121	15747	878	2010	13	12846	1171	288	883	11675	90.1%	75.4%	9.9%

Notes:
(1) Percent Fully Mech = Issues SO's / (Total Manual LSR's + (Total Mech LSR's - Auto Clarifications - Pending Supps - CLEC Caused Fallout))
(2) Percent Fallout Returned to CLEC = CLEC Caused Fallout / Total System Fallout
This does not give any consideration to manual clarifications processed from LSR's from the Total Manual Fallout category.
(3) Percent BST Manually Creates = (Total Manual LSR's + Total Manual Fallout + BST Caused Fallout) / (Total Manual LSR's + (Total Mech LSR's - Auto Clarifications - Pending Supps - CLEC Caused Fallout))

Migrations to UNE-P
Florida

Month	LSR Submissions		Mech LSR Submissions								Percent Fully Mech	Percent Fallout Returned to CLEC	Percent BS Manually Creates
	Total Manual LSR's	Total Mech LSR's	Total Manual Fallout	Auto Clarification	Pending Supps	Validated LSR's	Total System Fallout	BST Caused Fallout	CLEC Caused Fallout	Issued SO's			
Jul-02	110	35167	1999	5432	69	27667	4796	3879	917	22871	79.3%	19.1%	20.7%
Aug-02	231	42877	1927	8151	73	32726	5590	4687	903	27136	79.9%	16.2%	20.1%
Sep-02	101	35682	3716	5992	83	25891	3188	2467	721	22703	78.3%	22.6%	21.7%
Oct-02	162	31166	2473	5622	46	23025	1550	1269	281	21475	84.6%	18.1%	15.4%
Nov-02	162	36624	1798	6621	87	28118	1709	1390	319	26409	88.7%	18.7%	11.3%
Dec-02	272	48229	2336	10085	150	35658	3460	2372	1088	32198	86.6%	31.4%	13.4%
Jan-03	449	47173	2245	9739	183	35006	4848	3591	1257	30158	82.8%	25.9%	17.2%
Feb-03	339	47760	3023	9813	181	34743	2885	1912	973	31858	85.8%	33.7%	14.2%
Mar-03	562	49415	2865	9874	129	36547	2936	2071	865	33611	85.9%	29.5%	14.1%
Apr-03	623	57818	3463	12673	160	41522	3122	1874	1248	38400	86.6%	40.0%	13.4%
May-03	939	48688	3190	10374	106	35018	2613	1468	1145	32405	85.3%	43.8%	14.7%
Jun-03	943	46506	3046	12398	152	30910	3049	1870	1179	27861	82.6%	38.7%	17.4%
Jul-03	1415	49969	3447	11389	165	34968	4245	1467	2778	30723	82.9%	65.4%	17.1%
Aug-03	640	42479	3159	7491	166	31663	4044	1291	2753	27619	84.4%	68.1%	15.6%

Notes:
(1) Percent Fully Mech = Issues SO's / (Total Manual LSR's + (Total Mech LSR's - Auto Clarifications - Pending Supps - CLEC Caused Fallout))
(2) Percent Fallout Returned to CLEC = CLEC Caused Fallout / Total System Fallout
This does not give any consideration to manual clarifications processed from LSR's from the Total Manual Fallout category.
(3) Percent BST Manually Creates = (Total Manual LSR's + Total Manual Fallout + BST Caused Fallout) / (Total Manual LSR's + (Total Mech LSR's - Auto Clarifications - Pending Supps - CLEC Caused Fallout))

Migrations to UNE-P
Georgia

Month	LSR Submissions		Mech LSR Submissions								Percent Fully Mech	Percent Fallout Returned to CLEC	Percent BST Manually Creates
	Total Manual LSR's	Total Mech LSR's	Total Manual Fallout	Auto Clarification	Pending Supps	Validated LSR's	Total System Fallout	BST Caused Fallout	CLEC Caused Fallout	Issued SO's			
Jul-02	493	41989	2019	4967	50	34953	4352	3587	765	30601	83.4%	17.6%	16.6%
Aug-02	534	32410	1643	4189	43	26535	3807	2859	948	22728	81.9%	24.9%	18.1%
Sep-02	182	27098	1077	3520	65	22436	2900	2185	715	19536	85.0%	24.7%	15.0%
Oct-02	436	39986	2001	4676	38	33271	3076	2491	585	30195	86.0%	19.0%	14.0%
Nov-02	190	37926	1491	4981	36	31418	1619	1286	333	29799	90.9%	20.6%	9.1%
Dec-02	206	32936	1500	4721	34	26681	1878	1477	401	24803	88.6%	21.4%	11.4%
Jan-03	256	38691	1881	4015	55	32740	3339	2614	725	29401	86.1%	21.7%	13.9%
Feb-03	198	39865	2063	4375	42	33385	1873	1387	486	31512	89.6%	25.9%	10.4%
Mar-03	272	41974	2318	4513	46	35097	1745	1169	576	33352	89.9%	33.0%	10.1%
Apr-03	301	43601	2331	4885	52	36333	1813	1230	583	34520	89.9%	32.2%	10.1%
May-03	140	46158	2593	4845	49	38671	1541	905	636	37130	91.1%	41.3%	8.9%
Jun-03	146	50978	2412	7146	74	41346	2881	1951	930	38465	89.5%	32.3%	10.5%
Jul-03	378	55191	2646	11507	61	40977	3974	1992	1982	37003	88.1%	49.9%	11.9%
Aug-03	206	50964	2637	9951	50	38326	2880	863	2017	35446	90.5%	70.0%	9.5%

Notes:
(1) Percent Fully Mech = Issues SO's / (Total Manual LSR's + (Total Mech LSR's - Auto Clarifications - Pending Supps - CLEC Caused Fallout))
(2) Percent Fallout Returned to CLEC = CLEC Caused Fallout / Total System Fallout
This does not give any consideration to manual clarifications processed from LSR's from the Total Manual Fallout category.
(3) Percent BST Manually Creates = (Total Manual LSR's + Total Manual Fallout + BST Caused Fallout) / (Total Manual LSR's + (Total Mech LSR's - Auto Clarifications - Pending Supps - CLEC Caused Fallout))

Migrations to UNE-P
Kentucky

Month	LSR Submissions		Mech LSR Submissions								Percent Fully Mech	Percent Fallout Returned to CLEC	Percent BS Manually Creates
	Total Manual LSR's	Total Mech LSR's	Total Manual Fallout	Auto Clarification	Pending Supps	Validated LSR's	Total System Fallout	BST Caused Fallout	CLEC Caused Fallout	Issued SO's			
Jul-02	66	3350	438	496	16	2400	290	198	92	2110	75.0%	31.7%	25.0%
Aug-02	116	5587	368	1012	30	4177	769	631	138	3408	75.3%	17.9%	24.7%
Sep-02	29	8274	263	1550	24	6437	779	634	145	5658	85.9%	18.6%	14.1%
Oct-02	55	13719	542	2247	37	10893	1013	825	188	9880	87.4%	18.6%	12.6%
Nov-02	65	10831	316	1761	37	8717	437	365	72	8280	91.7%	16.5%	8.3%
Dec-02	54	7213	346	1263	14	5590	480	371	109	5110	86.9%	22.7%	13.1%
Jan-03	67	9337	290	1512	9	7526	709	568	141	6817	88.1%	19.9%	11.9%
Feb-03	58	11041	486	1756	20	8779	488	355	133	8291	90.2%	27.3%	9.8%
Mar-03	64	13551	659	2004	21	10867	437	300	137	10430	91.1%	31.4%	8.9%
Apr-03	45	11254	520	1553	31	9150	511	336	175	8639	90.6%	34.2%	9.4%
May-03	32	14919	687	1886	28	12318	435	284	151	11883	92.2%	34.7%	7.8%
Jun-03	11	14671	625	2708	23	11315	703	507	196	10612	90.3%	27.9%	9.7%
Jul-03	75	14583	704	1361	48	12470	1055	390	665	11415	90.7%	63.0%	9.3%
Aug-03	71	12416	705	1245	24	10442	842	277	565	9600	90.1%	67.1%	9.9%

Notes:
(1) Percent Fully Mech = Issues SO's / (Total Manual LSR's + (Total Mech LSR's - Auto Clarifications - Pending Supps - CLEC Caused Fallout))
(2) Percent Fallout Returned to CLEC = CLEC Caused Fallout / Total System Fallout
This does not give any consideration to manual clarifications processed from LSR's from the Total Manual Fallout category.
(3) Percent BST Manually Creates = (Total Manual LSR's + Total Manual Fallout + BST Caused Fallout) / (Total Manual LSR's + (Total Mech LSR's - Auto Clarifications - Pending Supps - CLEC Caused Fallout))

Migrations to UNE-P
Louisiana

Month	LSR Submissions		Mech LSR Submissions								Percent Fully Mech	Percent Fallout Returned to CLEC	Percent BST Manually Creates
	Total Manual LSR's	Total Mech LSR's	Total Manual Fallout	Auto Clarification	Pending Supps	Validated LSR's	Total System Fallout	BST Caused Fallout	CLEC Caused Fallout	Issued SO's			
Jul-02	117	8442	797	1173	39	6433	2097	1729	368	4336	62.1%	17.5%	37.9%
Aug-02	160	32368	2774	4732	72	24790	5004	3964	1040	19786	74.1%	20.8%	25.9%
Sep-02	81	15093	645	2668	86	11694	2900	2396	504	8794	73.8%	17.4%	26.2%
Oct-02	132	15460	680	2548	62	12170	1619	1375	244	10551	82.8%	15.1%	17.2%
Nov-02	160	16792	609	2637	32	13514	758	639	119	12756	90.1%	15.7%	9.9%
Dec-02	193	11680	429	1972	21	9258	646	507	139	8612	88.4%	21.5%	11.6%
Jan-03	332	14861	558	2558	30	11715	1148	973	175	10567	85.0%	15.2%	15.0%
Feb-03	83	17547	800	2499	20	14228	756	604	152	13472	90.1%	20.1%	9.9%
Mar-03	109	18388	1016	3017	27	14328	689	510	179	13639	89.3%	26.0%	10.7%
Apr-03	119	19948	939	3086	35	15888	661	408	253	15227	91.2%	38.3%	8.8%
May-03	118	18356	970	3506	19	13861	485	293	192	13376	90.6%	39.6%	9.4%
Jun-03	179	21400	1291	3439	39	16631	1615	839	776	15016	86.7%	48.0%	13.3%
Jul-03	182	20953	1501	2624	37	16791	2790	592	2198	14001	86.0%	78.8%	14.0%
Aug-03	146	17586	1031	1980	22	14553	2060	278	1782	12493	89.6%	86.5%	10.4%

Notes:
(1) Percent Fully Mech = Issues SO's / (Total Manual LSR's + (Total Mech LSR's - Auto Clarifications - Pending Supps - CLEC Caused Fallout))
(2) Percent Fallout Returned to CLEC = CLEC Caused Fallout / Total System Fallout
This does not give any consideration to manual clarifications processed from LSR's from the Total Manual Fallout category.
(3) Percent BST Manually Creates = (Total Manual LSR's + Total Manual Fallout + BST Caused Fallout) / (Total Manual LSR's + (Total Mech LSR's - Auto Clarifications - Pending Supps - CLEC Caused Fallout))

Migrations to UNE-P
Mississippi

Month	LSR Submissions		Mech LSR Submissions								Percent Fully Mech	Percent Fallout Returned to CLEC	Percent BS Manually Creates
	Total Manual LSR's	Total Mech LSR's	Total Manual Fallout	Auto Clarification	Pending Supps	Validated LSR's	Total System Fallout	BST Caused Fallout	CLEC Caused Fallout	Issued SO's			
Jul-02	64	2850	271	524	18	2037	575	447	128	1462	65.2%	22.3%	34.8%
Aug-02	122	9527	823	1493	30	7181	1527	1118	409	5654	73.3%	26.8%	26.7%
Sep-02	62	9095	380	1871	38	6806	980	729	251	5826	83.3%	25.6%	16.7%
Oct-02	82	12073	507	2011	31	9524	965	777	188	8559	86.2%	19.5%	13.8%
Nov-02	64	11354	387	1922	27	9018	742	564	178	8276	89.1%	24.0%	10.9%
Dec-02	83	8151	324	1412	22	6393	637	490	147	5756	86.5%	23.1%	13.5%
Jan-03	203	10447	367	1823	27	8230	940	728	212	7290	84.9%	22.6%	15.1%
Feb-03	88	12254	576	2030	43	9605	709	482	227	8896	88.6%	32.0%	11.4%
Mar-03	98	14017	708	2187	36	11086	805	555	250	10281	88.3%	31.1%	11.7%
Apr-03	87	15692	905	2511	30	12246	849	626	223	11397	87.6%	26.3%	12.4%
May-03	86	11953	721	2200	19	9013	443	273	170	8570	88.8%	38.4%	11.2%
Jun-03	61	11373	800	1769	16	8788	791	455	336	7997	85.9%	42.5%	14.1%
Jul-03	88	13041	880	1952	18	10191	1308	406	902	8883	86.6%	69.0%	13.4%
Aug-03	63	14319	798	1825	32	11664	1563	525	1038	10101	87.9%	66.4%	12.1%

Notes:
(1) Percent Fully Mech = Issues SO's / (Total Manual LSR's + (Total Mech LSR's - Auto Clarifications - Pending Supps - CLEC Caused Fallout))
(2) Percent Fallout Returned to CLEC = CLEC Caused Fallout / Total System Fallout
This does not give any consideration to manual clarifications processed from LSR's from the Total Manual Fallout category.
(3) Percent BST Manually Creates = (Total Manual LSR's + Total Manual Fallout + BST Caused Fallout) / (Total Manual LSR's + (Total Mech LSR's - Auto Clarifications - Pending Supps - CLEC Caused Fallout))

Migrations to UNE-P
South Carolina

Month	LSR Submissions		Mech LSR Submissions								Percent Fully Mech	Percent Fallout Returned to CLEC	Percent BST Manually Creates
	Total Manual LSR's	Total Mech LSR's	Total Manual Fallout	Auto Clarification	Pending Supps	Validated LSR's	Total System Fallout	BST Caused Fallout	CLEC Caused Fallout	Issued SO's			
Jul-02	53	3122	1082	336	9	1695	311	249	62	1384	50.0%	19.9%	50.0%
Aug-02	27	4057	215	716	7	3119	691	537	154	2428	75.7%	22.3%	24.3%
Sep-02	21	7407	232	1265	19	5891	891	631	260	5000	85.0%	29.2%	15.0%
Oct-02	34	10780	605	1562	18	8595	692	500	192	7903	87.4%	27.7%	12.6%
Nov-02	35	10312	322	1524	18	8448	363	285	78	8085	92.6%	21.5%	7.4%
Dec-02	17	5835	272	911	12	4640	304	233	71	4336	89.3%	23.4%	10.7%
Jan-03	57	7484	239	1209	8	6028	500	405	95	5528	88.7%	19.0%	11.3%
Feb-03	60	9705	447	1500	12	7746	370	291	79	7376	90.2%	21.4%	9.8%
Mar-03	46	10585	519	1500	15	8551	574	471	103	7977	88.5%	17.9%	11.5%
Apr-03	32	12734	562	2025	20	10127	689	521	168	9438	89.4%	24.4%	10.6%
May-03	34	9440	465	1300	13	7662	369	232	137	7293	90.9%	37.1%	9.1%
Jun-03	59	9414	450	1500	4	7460	611	379	232	6849	88.5%	38.0%	11.5%
Jul-03	50	10862	629	1198	11	9024	645	302	343	8379	89.5%	53.2%	10.5%
Aug-03	44	10034	629	1126	15	8264	723	232	491	7541	89.3%	67.9%	10.7%

Notes:
(1) Percent Fully Mech = Issues SO's / (Total Manual LSR's + (Total Mech LSR's - Auto Clarifications - Pending Supps - CLEC Caused Fallout))
(2) Percent Fallout Returned to CLEC = CLEC Caused Fallout / Total System Fallout
This does not give any consideration to manual clarifications processed from LSR's from the Total Manual Fallout category.
(3) Percent BST Manually Creates = (Total Manual LSR's + Total Manual Fallout + BST Caused Fallout) / (Total Manual LSR's + (Total Mech LSR's - Auto Clarifications - Pending Supps - CLEC Caused Fallout))

Migrations to UNE-P
North Carolina

Month	LSR Submissions		Mech LSR Submissions								Percent Fully Mech	Percent Fallout Returned to CLEC	Percent BST Manually Creates
	Total Manual LSR's	Total Mech LSR's	Total Manual Fallout	Auto Clarification	Pending Supps	Validated LSR's	Total System Fallout	BST Caused Fallout	CLEC Caused Fallout	Issued SO's			
Jul-02	56	13683	742	1444	18	11479	1028	842	186	10451	86.4%	18.1%	13.6%
Aug-02	64	12072	447	1240	28	10357	1181	973	208	9176	86.1%	17.6%	13.9%
Sep-02	40	9819	399	1179	10	8231	683	568	115	7548	88.2%	16.8%	11.8%
Oct-02	106	13452	687	1644	17	11104	675	564	111	10429	88.5%	16.4%	11.5%
Nov-02	100	16189	518	1899	27	13745	691	547	144	13054	91.8%	20.8%	8.2%
Dec-02	94	14386	468	1770	16	12132	670	540	130	11462	91.2%	19.4%	8.8%
Jan-03	115	13269	441	1431	23	11374	951	809	142	10423	88.4%	14.9%	11.6%
Feb-03	75	14622	628	1590	15	12389	709	528	181	11680	90.5%	25.5%	9.5%
Mar-03	130	15369	716	1688	30	12935	664	519	145	12271	90.0%	21.8%	10.0%
Apr-03	74	16904	786	1826	19	14273	1010	849	161	13263	88.6%	15.9%	11.4%
May-03	55	13994	742	1450	11	11791	420	265	155	11371	91.5%	36.9%	8.5%
Jun-03	68	14193	688	1371	16	12118	992	736	256	11126	88.2%	25.8%	11.8%
Jul-03	141	14596	941	1289	14	12352	945	389	556	11407	88.6%	58.8%	11.4%
Aug-03	105	14983	845	1199	14	12925	1032	275	757	11893	90.7%	73.4%	9.3%

Notes:

(1) Percent Fully Mech = Issues SO's / (Total Manual LSR's + (Total Mech LSR's - Auto Clarifications - Pending Supps - CLEC Caused Fallout))

(2) Percent Fallout Returned to CLEC = CLEC Caused Fallout / Total System Fallout
This does not give any consideration to manual clarifications processed from LSR's from the Total Manual Fallout category.

(3) Percent BST Manually Creates = (Total Manual LSR's + Total Manual Fallout + BST Caused Fallout) / (Total Manual LSR's + (Total Mech LSR's - Auto Clarifications - Pending Supps - CLEC Caused Fallout))

Migrations to UNE-P
Tennessee

Month	LSR Submissions		Mech LSR Submissions								Percent Fully Mech	Percent Fallout Returned to CLEC	Percent BST Manually Creates
	Total Manual LSR's	Total Mech LSR's	Total Manual Fallout	Auto Clarification	Pending Supps	Validated LSR's	Total System Fallout	BST Caused Fallout	CLEC Caused Fallout	Issued SO's			
Jul-02	115	11414	803	1442	25	9144	1073	852	221	8071	82.0%	20.6%	18.0%
Aug-02	97	22106	685	3050	48	18323	2251	1844	407	16072	86.0%	18.1%	14.0%
Sep-02	62	13159	575	2093	41	10450	1158	932	226	9292	85.6%	19.5%	14.4%
Oct-02	133	16156	953	2775	35	12393	939	788	151	11454	85.9%	16.1%	14.1%
Nov-02	159	17936	866	3108	34	13928	946	767	179	12982	87.9%	18.9%	12.1%
Dec-02	255	15353	556	2711	45	12041	1297	971	326	10744	85.8%	25.1%	14.2%
Jan-03	223	14157	534	2294	24	11305	1348	1060	288	9957	84.6%	21.4%	15.4%
Feb-03	190	16019	687	2646	20	12666	902	657	245	11764	88.5%	27.2%	11.5%
Mar-03	187	17499	792	2819	27	13861	876	611	265	12985	89.1%	30.3%	10.9%
Apr-03	137	22228	996	3561	32	17639	868	636	232	16771	90.5%	26.7%	9.5%
May-03	142	17795	806	2711	24	14254	615	374	241	13639	91.2%	39.2%	8.8%
Jun-03	143	20657	843	2611	55	17148	1827	955	872	15321	88.8%	47.7%	11.2%
Jul-03	149	23100	1179	1686	55	20180	3882	683	3199	16298	89.0%	82.4%	11.0%
Aug-03	154	18450	958	1613	36	15843	3085	513	2572	12758	88.7%	83.4%	11.3%

Notes:
(1) Percent Fully Mech = Issues SO's / (Total Manual LSR's + (Total Mech LSR's - Auto Clarifications - Pending Supps - CLEC Caused Fallout))
(2) Percent Fallout Returned to CLEC = CLEC Caused Fallout / Total System Fallout
This does not give any consideration to manual clarifications processed from LSR's from the Total Manual Fallout category.
(3) Percent BST Manually Creates = (Total Manual LSR's + Total Manual Fallout + BST Caused Fallout) / (Total Manual LSR's + (Total Mech LSR's - Auto Clarifications - Pending Supps - CLEC Caused Fallout))

Docket No. 030851-TP
M. Van De Water Exhibit No. MDV-1, Page 12 of 13
BellSouth's Interrogatory No. 32

Migrations to UNE-P
Undefined State

Month	LSR Submissions		Mech LSR Submissions							
	Total Manual LSR's	Total Mech LSR's	Total Manual Fallout	Auto Clarification	Pending Supps	Validated LSR's	Total System Fallout	BST Caused Fallout	CLEC Caused Fallout	Issued SO's
Jul-02	0	1602	78	137	0	1387	444	250	194	943
Aug-02	0	2498	260	353	1	1884	537	387	150	1347
Sep-02	0	3583	501	382	1	2699	455	338	117	2244
Oct-02	0	3388	562	315	4	2507	328	272	56	2179
Nov-02	0	4228	1989	424	2	1813	267	192	75	1546
Dec-02	0	3121	313	330	1	2477	305	251	54	2172
Jan-03	0	1787	133	152	1	1501	214	166	48	1287
Feb-03	0	1527	137	143	1	1246	179	135	44	1067
Mar-03	0	1904	209	338	1	1356	190	144	46	1166
Apr-03	0	4301	244	460	0	3597	282	149	133	3315
May-03	0	16096	875	1518	8	13695	525	384	141	13170
Jun-03	0	25067	1455	2869	13	20730	984	546	438	19746
Jul-03	0	28353	1436	3325	29	23563	1995	828	1167	21568
Aug-03	0	31348	1585	3322	21	26420	2194	615	1579	24226

Percent Fully Mech	Percent Fallout Returned to CLEC	Percent BS Manually Creates
74.2%	43.7%	25.8%
67.6%	27.9%	32.4%
72.8%	25.7%	27.2%
72.3%	17.1%	27.7%
41.5%	28.1%	58.5%
79.4%	17.7%	20.6%
81.1%	22.4%	18.9%
79.7%	24.6%	20.3%
76.8%	24.2%	23.2%
89.4%	47.2%	10.6%
91.3%	26.9%	8.7%
90.8%	44.5%	9.2%
90.5%	58.5%	9.5%
91.7%	72.0%	8.3%

Notes:
(1) Percent Fully Mech = Issues SO's / (Total Manual LSR's + (Total Mech LSR's - Auto Clarifications - Pending Supps - CLEC Caused Fallout))
(2) Percent Fallout Returned to CLEC = CLEC Caused Fallout / Total System Fallout
This does not give any consideration to manual clarifications processed from LSR's from the Total Manual Fallout category.
(3) Percent BST Manually Creates = (Total Manual LSR's + Total Manual Fallout + BST Caused Fallout) / (Total Manual LSR's + (Total Mech LSR's - Auto Clarifications - Pending Supps - CLEC Caused Fallout))

REQUEST: For each month between August 2000 and August 2003, or for the latest period in which this information is available (by state, if available; if not, by region), what percent of total BellSouth retail to UNE-L orders were fully mechanized and required no manual intervention in BellSouth's ordering system.

(a) What percent of any fallout is returned to the CLEC for correction/resolution?

(b) What percent does BellSouth manually created in its OSS?

RESPONSE: BellSouth does not track information at the level of specificity requested in this interrogatory. The ordering process – and BellSouth's ability to track certain data items – is driven by the submission of the local service request (LSR) by a CLEC. The LSR specifies the service that is being ordered, but does not provide information as to the type of service that is being changed. Consequently, BellSouth cannot provide the data as requested.

However, in the attached data tables, BellSouth provides – for the timeframe July 2002 to August 2003, and by state and region – the percent of *total* CLEC UNE-L migration orders (regardless of the type of service being changed) that were fully mechanized and required no manual intervention in BellSouth's ordering systems. Further, the responses for items (a) and (b) above are contained in columns on each table.

Similar data for the August 2000 to June 2002 timeframe is not readily available. BellSouth created the July 2002-August 2003 data tables primarily by using disaggregated LSR information that is the underlying data for the BellSouth flow-through report provided monthly on the BellSouth PMAP website. Since July 2002, BellSouth has retained the disaggregated LSR information in an accessible online database.

While BellSouth retains monthly flow-through reporting information well back beyond July 2002 as required, access to the disaggregated LSR information used to create the flow-through reports prior to July 2002 is not

available. That information is currently stored on magnetic tape, but it is not stored in a manner

RESPONSE (CONT.):

that allows extraction in a useable format without an extensive programming effort to develop special code.

Due to many modifications that have taken place within BellSouth's OSS over the past several years – and the impacts to extraction capabilities – separate code would have to be written for each month's flow-through data in order to extract the disaggregated LSR data required to calculate pre-July 2002 percentages as defined on the tables.

RESPONSE PROVIDED BY: Ronald M. Pate

BellSouth Telecommunications, Inc.
Florida Public Service Commission
Docket No. 030851-TP
AT&T's 1st Interrogatories
October 6, 2003
Item No. 28

ATTACHMENT TO INTERROGATORY, ITEM NO. 28

Migrations to UNE-L
Region

Month	LSR Submissions		Mech LSR Submissions								Percent Fully Mech	Percent Fallout Returned to CLEC	Percent BST Manually Creates
	Total Manual LSR's	Total Mech LSR's	Total Manual Fallout	Auto Clarification	Pending Supps	Validated LSR's	Total System Fallout	BST Caused Fallout	CLEC Caused Fallout	Issued SO's			
Jul-02	736	2435	1110	180	0	1145	824	563	261	321	11.8%	31.7%	88.2%
Aug-02	788	2392	1038	166	1	1187	939	679	260	248	9.0%	27.7%	91.0%
Sep-02	414	2094	955	118	0	1021	845	594	251	176	8.2%	29.7%	91.8%
Oct-02	478	3053	1254	177	0	1622	1417	1069	348	205	6.8%	24.6%	93.2%
Nov-02	436	2584	722	179	0	1683	1478	1087	391	205	8.4%	26.5%	91.6%
Dec-02	439	2515	750	139	2	1624	1273	970	303	351	14.0%	23.8%	86.0%
Jan-03	633	4417	840	236	11	3330	1490	943	547	1840	43.2%	36.7%	56.8%
Feb-03	483	2662	678	118	1	1865	1080	779	301	785	28.8%	27.9%	71.2%
Mar-03	453	2298	663	155	2	1478	1199	860	339	279	12.4%	28.3%	87.6%
Apr-03	367	2135	586	106	0	1443	946	651	295	497	23.7%	31.2%	76.3%
May-03	385	2492	702	158	1	1631	1092	748	344	539	22.7%	31.5%	77.3%
Jun-03	435	2263	865	227	0	1171	544	404	140	627	26.9%	25.7%	73.1%
Jul-03	274	3218	1262	221	0	1735	577	409	168	1158	37.3%	29.1%	62.7%
Aug-03	136	3120	1325	233	0	1562	782	635	147	780	27.1%	18.8%	72.9%

Notes:

(1) Percent Fully Mech = Issues SO's / (Total Manual LSR's + (Total Mech LSR's - Auto Clarifications - Pending Supps - CLEC Caused Fallout))

(2) Percent Fallout Returned to CLEC = CLEC Caused Fallout / Total System Fallout
This does not give any consideration to manual clarifications processed from LSR's from the Total Manual Fallout category.

(3) Percent BST Manually Creates = (Total Manual LSR's + Total Manual Fallout + BST Caused Fallout) / (Total Manual LSR's + (Total Mech LSR's - Auto Clarifications - Pending Supps - CLEC Caused Fallout))

Migrations to UNE-L
Alabama

Month	LSR Submissions		Mech LSR Submissions								Percent Fully Mech	Percent Fallout Returned to CLEC	Percent BS Manually Creates
	Total Manual LSR's	Total Mech LSR's	Total Manual Fallout	Auto Clarification	Pending Supps	Validated LSR's	Total System Fallout	BST Caused Fallout	CLEC Caused Fallout	Issued SO's			
Jul-02	6	10	6	0	0	4	3	0	3	1	7.7%	100.0%	92.3%
Aug-02	12	3	1	0	0	2	2	2	0	0	0.0%	0.0%	100.0%
Sep-02	6	8	0	0	0	8	7	5	2	1	8.3%	28.6%	91.7%
Oct-02	2	1	0	0	0	1	0	0	0	1	33.3%	#DIV/0!	66.7%
Nov-02	0	2	0	1	0	1	0	0	0	1	100.0%	#DIV/0!	0.0%
Dec-02	5	25	3	0	0	22	16	12	4	6	23.1%	25.0%	76.9%
Jan-03	4	109	8	1	0	100	21	12	9	79	76.7%	42.9%	23.3%
Feb-03	2	27	4	0	0	23	1	1	0	22	75.9%	0.0%	24.1%
Mar-03	0	4	0	0	0	4	2	0	2	2	100.0%	100.0%	0.0%
Apr-03	0	7	1	1	0	5	4	3	1	1	20.0%	25.0%	80.0%
May-03	0	5	0	0	0	5	3	3	0	2	40.0%	0.0%	60.0%
Jun-03	0	9	5	2	0	2	0	0	0	2	28.6%	#DIV/0!	71.4%
Jul-03	0	8	7	0	0	1	0	0	0	1	12.5%	#DIV/0!	87.5%
Aug-03	0	1	0	0	0	1	0	0	0	1	100.0%	#DIV/0!	0.0%

Notes:

(1) Percent Fully Mech = Issues SO's / (Total Manual LSR's + (Total Mech LSR's - Auto Clarifications - Pending Supps - CLEC Caused Fallout))

(2) Percent Fallout Returned to CLEC = CLEC Caused Fallout / Total System Fallout
This does not give any consideration to manual clarifications processed from LSR's from the Total Manual Fallout category.

(3) Percent BST Manually Creates = (Total Manual LSR's + Total Manual Fallout + BST Caused Fallout) / (Total Manual LSR's + (Total Mech LSR's - Auto Clarifications - Pending Supps - CLEC Caused Fallout))

Migrations to UNE-L
Flordia

Month	LSR Submissions		Mech LSR Submissions								Percent Fully Mech	Percent Fallout Returned to CLEC	Percent BST Manually Creates
	Total Manual LSR's	Total Mech LSR's	Total Manual Fallout	Auto Clarification	Pending Supps	Validated LSR's	Total System Fallout	BST Caused Fallout	CLEC Caused Fallout	Issued SO's			
Jul-02	243	1497	682	126	0	689	653	488	165	36	2.5%	25.3%	97.5%
Aug-02	245	1540	618	126	1	795	767	590	177	28	1.9%	23.1%	98.1%
Sep-02	103	1350	585	99	0	666	650	483	167	16	1.3%	25.7%	98.7%
Oct-02	163	2217	876	135	0	1206	1173	928	245	33	1.7%	20.9%	98.4%
Nov-02	138	1863	515	145	0	1203	1167	906	261	36	2.3%	22.4%	97.7%
Dec-02	158	1813	567	112	1	1133	1018	823	195	115	6.9%	19.2%	93.1%
Jan-03	238	2489	512	161	6	1810	970	674	296	840	37.1%	30.5%	62.9%
Feb-03	116	1537	374	82	1	1080	758	609	149	322	22.7%	19.7%	77.3%
Mar-03	47	1328	375	102	2	849	811	650	161	38	3.4%	19.9%	96.6%
Apr-03	101	1074	302	60	0	712	498	394	104	214	21.2%	20.9%	78.8%
May-03	100	1244	298	83	1	862	612	472	140	250	22.3%	22.9%	77.7%
Jun-03	101	1172	451	145	0	576	320	263	57	256	23.9%	17.8%	76.1%
Jul-03	69	1414	595	127	0	692	300	239	61	392	30.3%	20.3%	69.7%
Aug-03	21	1548	651	143	0	754	430	373	57	324	23.7%	13.3%	76.3%

Notes:
(1) Percent Fully Mech = Issues SO's / (Total Manual LSR's + (Total Mech LSR's - Auto Clarifications - Pending Supps - CLEC Caused Fallout))
(2) Percent Fallout Returned to CLEC = CLEC Caused Fallout / Total System Fallout
This does not give any consideration to manual clarifications processed from LSR's from the Total Manual Fallout category.
(3) Percent BST Manually Creates = (Total Manual LSR's + Total Manual Fallout + BST Caused Fallout) / (Total Manual LSR's + Total Mech LSR's) - Auto Clarifications - Pending Supps - CLEC Caused Fallout))

Migrations to UNE-L
Georgia

Month	LSR Submissions		Mech LSR Submissions								Percent Fully Mech	Percent Fallout Returned to CLEC	Percent BS Manually Creates
	Total Manual LSR's	Total Mech LSR's	Total Manual Fallout	Auto Clarification	Pending Supps	Validated LSR's	Total System Fallout	BST Caused Fallout	CLEC Caused Fallout	Issued SO's			
Jul-02	120	290	146	20	0	124	63	32	31	61	17.0%	49.2%	83.0%
Aug-02	156	260	127	11	0	122	45	25	20	77	20.0%	44.4%	80.0%
Sep-02	53	252	116	11	0	125	47	21	26	78	29.1%	55.3%	70.9%
Oct-02	57	254	102	23	0	129	48	22	26	81	30.9%	54.2%	69.1%
Nov-02	40	236	74	17	0	145	57	24	33	88	38.9%	57.9%	61.1%
Dec-02	55	226	47	9	1	169	48	25	23	121	48.8%	47.9%	51.2%
Jan-03	93	757	143	36	4	574	185	84	101	389	54.9%	54.6%	45.1%
Feb-03	70	433	118	19	0	296	105	48	57	191	44.7%	54.3%	55.3%
Mar-03	19	348	118	27	0	203	102	36	66	101	36.9%	64.7%	63.1%
Apr-03	50	362	101	14	0	247	110	40	70	137	41.8%	63.6%	58.2%
May-03	21	411	111	31	0	269	106	40	66	163	48.7%	62.3%	51.3%
Jun-03	33	574	186	44	0	344	77	36	41	267	51.1%	53.2%	48.9%
Jul-03	22	852	277	38	0	537	83	33	50	454	57.8%	60.2%	42.2%
Aug-03	9	817	346	45	0	426	130	91	39	296	39.9%	30.0%	60.1%

Notes:

(1) Percent Fully Mech = Issues SO's / (Total Manual LSR's + (Total Mech LSR's - Auto Clarifications - Pending Supps - CLEC Caused Fallout))

(2) Percent Fallout Returned to CLEC = CLEC Caused Fallout / Total System Fallout
This does not give any consideration to manual clarifications processed from LSR's from the Total Manual Fallout category.

(3) Percent BST Manually Creates = (Total Manual LSR's + Total Manual Fallout + BST Caused Fallout) / (Total Manual LSR's + Total Mech LSR's) - Auto Clarifications - Pending Supps - CLEC Caused Fallout))

Migrations to UNE-L
Kentucky

Month	LSR Submissions		Mech LSR Submissions								Percent Fully Mech	Percent Fallout Returned to CLEC	Percent BST Manually Creates
	Total Manual LSR's	Total Mech LSR's	Total Manual Fallout	Auto Clarification	Pending Supps	Validated LSR's	Total System Fallout	BST Caused Fallout	CLEC Caused Fallout	Issued SO's			
Jul-02	3	4	0	1	0	3	0	0	0	3	50.0%	#DIV/0!	50.0%
Aug-02	5	0	0	0	0	0	0	0	0	0	0.0%	#DIV/0!	100.0%
Sep-02	2	1	0	0	0	1	0	0	0	1	33.3%	#DIV/0!	66.7%
Oct-02	4	1	0	0	0	1	0	0	0	1	20.0%	#DIV/0!	80.0%
Nov-02	2	1	0	0	0	1	0	0	0	1	33.3%	#DIV/0!	66.7%
Dec-02	3	4	0	0	0	4	1	0	1	3	50.0%	100.0%	50.0%
Jan-03	13	82	2	2	0	78	8	4	4	70	78.7%	50.0%	21.3%
Feb-03	1	32	4	0	0	28	2	1	1	26	81.3%	50.0%	18.8%
Mar-03	0	12	8	3	0	1	0	0	0	1	11.1%	#DIV/0!	88.9%
Apr-03	0	2	0	0	0	2	1	1	0	1	50.0%	0.0%	50.0%
May-03	2	0	0	0	0	0	0	0	0	0	0.0%	#DIV/0!	100.0%
Jun-03	0	3	0	1	0	2	0	0	0	2	100.0%	#DIV/0!	0.0%
Jul-03	0	3	0	0	0	3	0	0	0	3	100.0%	#DIV/0!	0.0%
Aug-03	0	4	1	0	0	3	1	1	0	2	50.0%	0.0%	50.0%

Notes:
(1) Percent Fully Mech = Issues SO's / (Total Manual LSR's + (Total Mech LSR's - Auto Clarifications - Pending Supps - CLEC Caused Fallout))
(2) Percent Fallout Returned to CLEC = CLEC Caused Fallout / Total System Fallout
This does not give any consideration to manual clarifications processed from LSR's from the Total Manual Fallout category.
(3) Percent BST Manually Creates = (Total Manual LSR's + Total Manual Fallout + BST Caused Fallout) / (Total Manual LSR's + Total Mech LSR's)
- Auto Clarifications - Pending Supps - CLEC Caused Fallout))

Migrations to UNE-L
Louisiana

Month	LSR Submissions		Mech LSR Submissions								Percent Fully Mech	Percent Fallout Returned to CLEC	Percent BS Manually Creates
	Total Manual LSR's	Total Mech LSR's	Total Manual Fallout	Auto Clarification	Pending Supps	Validated LSR's	Total System Fallout	BST Caused Fallout	CLEC Caused Fallout	Issued SO's			
Jul-02	56	150	67	17	0	66	29	9	20	37	21.9%	69.0%	78.1
Aug-02	92	89	43	4	0	42	20	7	13	22	13.4%	65.0%	86.6
Sep-02	39	76	35	0	0	41	34	25	9	7	6.6%	26.5%	93.4
Oct-02	40	125	54	0	0	71	64	42	22	7	4.9%	34.4%	95.1
Nov-02	22	139	24	1	0	114	93	64	29	21	16.0%	31.2%	84.0
Dec-02	60	112	34	1	0	77	54	36	18	23	15.0%	33.3%	85.0
Jan-03	51	187	27	4	0	156	57	29	28	99	48.1%	49.1%	51.9
Feb-03	49	111	22	1	0	88	49	36	13	39	26.7%	26.5%	73.3
Mar-03	215	89	15	1	0	73	62	44	18	11	3.9%	29.0%	96.1
Apr-03	80	141	21	3	0	117	102	78	24	15	7.7%	23.5%	92.3
May-03	100	162	55	2	0	105	96	71	25	9	3.8%	26.0%	96.2
Jun-03	58	92	26	6	0	60	46	39	7	14	10.2%	15.2%	89.8
Jul-03	44	109	21	9	0	79	25	21	4	54	38.6%	16.0%	61.4
Aug-03	10	82	9	11	0	62	36	28	8	26	35.6%	22.2%	64.4

Notes:
(1) Percent Fully Mech = Issues SO's / (Total Manual LSR's + (Total Mech LSR's - Auto Clarifications - Pending Supps - CLEC Caused Fallout))
(2) Percent Fallout Returned to CLEC = CLEC Caused Fallout / Total System Fallout
This does not give any consideration to manual clarifications processed from LSR's from the Total Manual Fallout category.
(3) Percent BST Manually Creates = (Total Manual LSR's + Total Manual Fallout + BST Caused Fallout) / (Total Manual LSR's + Total Mech LSR's) - Auto Clarifications - Pending Supps - CLEC Caused Fallout))

Migrations to UNE-L
Mississippi

Month	LSR Submissions		Mech LSR Submissions								Percent Fully Mech	Percent Fallout Returned to CLEC	Percent BST Manually Creates
	Total Manual LSR's	Total Mech LSR's	Total Manual Fallout	Auto Clarification	Pending Supps	Validated LSR's	Total System Fallout	BST Caused Fallout	CLEC Caused Fallout	Issued SO's			
Jul-02	44	5	2	0	0	3	3	2	1	0	0.0%	33.3%	100.0%
Aug-02	39	6	3	0	0	3	3	1	2	0	0.0%	66.7%	100.0%
Sep-02	80	3	0	0	0	3	3	3	0	0	0.0%	0.0%	100.0%
Oct-02	78	1	0	0	0	1	1	1	0	0	0.0%	0.0%	100.0%
Nov-02	71	2	0	0	0	2	2	1	1	0	0.0%	50.0%	100.0%
Dec-02	41	1	0	0	0	1	1	0	1	0	0.0%	100.0%	100.0%
Jan-03	106	2	0	0	0	2	2	2	0	0	0.0%	0.0%	100.0%
Feb-03	73	0	0	0	0	0	0	0	0	0	0.0%	#DIV/0!	100.0%
Mar-03	45	1	0	0	0	1	1	1	0	0	0.0%	0.0%	100.0%
Apr-03	43	12	6	0	0	6	6	2	4	0	0.0%	66.7%	100.0%
May-03	37	0	0	0	0	0	0	0	0	0	0.0%	#DIV/0!	100.0%
Jun-03	88	5	0	0	0	5	2	2	0	3	3.2%	0.0%	96.8%
Jul-03	23	35	18	1	0	16	2	2	0	14	24.6%	0.0%	75.4%
Aug-03	20	28	7	0	0	21	9	7	2	12	26.1%	22.2%	73.9%

Notes:
(1) Percent Fully Mech = Issues SO's / (Total Manual LSR's + (Total Mech LSR's - Auto Clarifications - Pending Supps - CLEC Caused Fallout))
(2) Percent Fallout Returned to CLEC = CLEC Caused Fallout / Total System Fallout
This does not give any consideration to manual clarifications processed from LSR's from the Total Manual Fallout category.
(3) Percent BST Manually Creates = (Total Manual LSR's + Total Manual Fallout + BST Caused Fallout) / (Total Manual LSR's + Total Mech LSR's - Auto Clarifications - Pending Supps - CLEC Caused Fallout))

Migrations to UNE-L
North Carolina

Month	LSR Submissions		Mech LSR Submissions								Percent Fully Mech	Percent Fallout Returned to CLEC	Percent BS Manually Creates
	Total Manual LSR's	Total Mech LSR's	Total Manual Fallout	Auto Clarification	Pending Supps	Validated LSR's	Total System Fallout	BST Caused Fallout	CLEC Caused Fallout	Issued SO's			
Jul-02	210	249	114	10	0	125	35	15	20	90	21.0%	57.1%	79.0%
Aug-02	180	290	161	17	0	112	45	18	27	67	15.7%	60.0%	84.3%
Sep-02	85	224	129	6	0	89	34	11	23	55	19.6%	67.6%	80.4%
Oct-02	101	233	115	17	0	101	43	22	21	58	19.6%	48.8%	80.4%
Nov-02	143	152	65	8	0	79	47	15	32	32	12.5%	68.1%	87.5%
Dec-02	78	170	53	13	0	104	47	18	29	57	27.7%	61.7%	72.3%
Jan-03	88	395	73	13	1	308	111	46	65	197	48.8%	58.6%	51.2%
Feb-03	145	286	85	11	0	190	72	30	42	118	31.2%	58.3%	68.8%
Mar-03	102	293	73	14	0	206	113	52	61	93	29.1%	54.0%	70.9%
Apr-03	77	281	78	14	0	189	92	35	57	97	33.8%	62.0%	66.2%
May-03	96	344	126	24	0	194	102	41	61	92	25.9%	59.8%	74.1%
Jun-03	79	252	137	23	0	92	37	16	21	55	19.2%	56.8%	80.8%
Jul-03	94	588	270	33	0	285	104	66	38	181	29.6%	36.5%	70.4%
Aug-03	58	415	220	21	0	174	108	79	29	66	15.6%	26.9%	84.4%

Notes:
(1) Percent Fully Mech = Issues SO's / (Total Manual LSR's + (Total Mech LSR's - Auto Clarifications - Pending Supps - CLEC Caused Fallout))
(2) Percent Fallout Returned to CLEC = CLEC Caused Fallout / Total System Fallout
This does not give any consideration to manual clarifications processed from LSR's from the Total Manual Fallout category.
(3) Percent BST Manually Creates = (Total Manual LSR's + Total Manual Fallout + BST Caused Fallout) / (Total Manual LSR's + Total Mech LSR's) - Auto Clarifications - Pending Supps - CLEC Caused Fallout))

Migrations to UNE-L
South Carolina

Month	LSR Submissions		Mech LSR Submissions								Percent Fully Mech	Percent Fallout Returned to CLEC	Percent BS Manually Creates
	Total Manual LSR's	Total Mech LSR's	Total Manual Fallout	Auto Clarification	Pending Supps	Validated LSR's	Total System Fallout	BST Caused Fallout	CLEC Caused Fallout	Issued SO's			
Jul-02	4	86	40	0	0	46	17	6	11	29	36.7%	64.7%	63.3%
Aug-02	19	72	37	3	0	32	19	6	13	13	17.3%	68.4%	82.7%
Sep-02	5	64	42	1	0	21	11	6	5	10	15.9%	45.5%	84.1%
Oct-02	0	66	36	2	0	28	15	7	8	13	23.2%	53.3%	76.8%
Nov-02	4	72	26	6	0	40	23	15	8	17	27.4%	34.8%	72.6%
Dec-02	1	42	21	2	0	19	12	5	7	7	20.6%	58.3%	79.4%
Jan-03	9	85	32	7	0	46	34	13	21	12	18.2%	61.8%	81.8%
Feb-03	0	106	41	2	0	63	41	14	27	22	28.6%	65.9%	71.4%
Mar-03	0	45	17	2	0	26	10	7	3	16	40.0%	30.0%	60.0%
Apr-03	4	99	44	10	0	45	27	10	17	18	23.7%	63.0%	76.3%
May-03	12	99	51	7	0	41	31	15	16	10	11.4%	51.6%	88.6%
Jun-03	19	54	22	5	0	27	12	5	7	15	24.6%	58.3%	75.4%
Jul-03	5	90	35	9	0	46	19	12	7	27	34.2%	36.8%	65.8%
Aug-03	4	94	50	5	0	39	24	18	6	15	17.2%	25.0%	82.8%

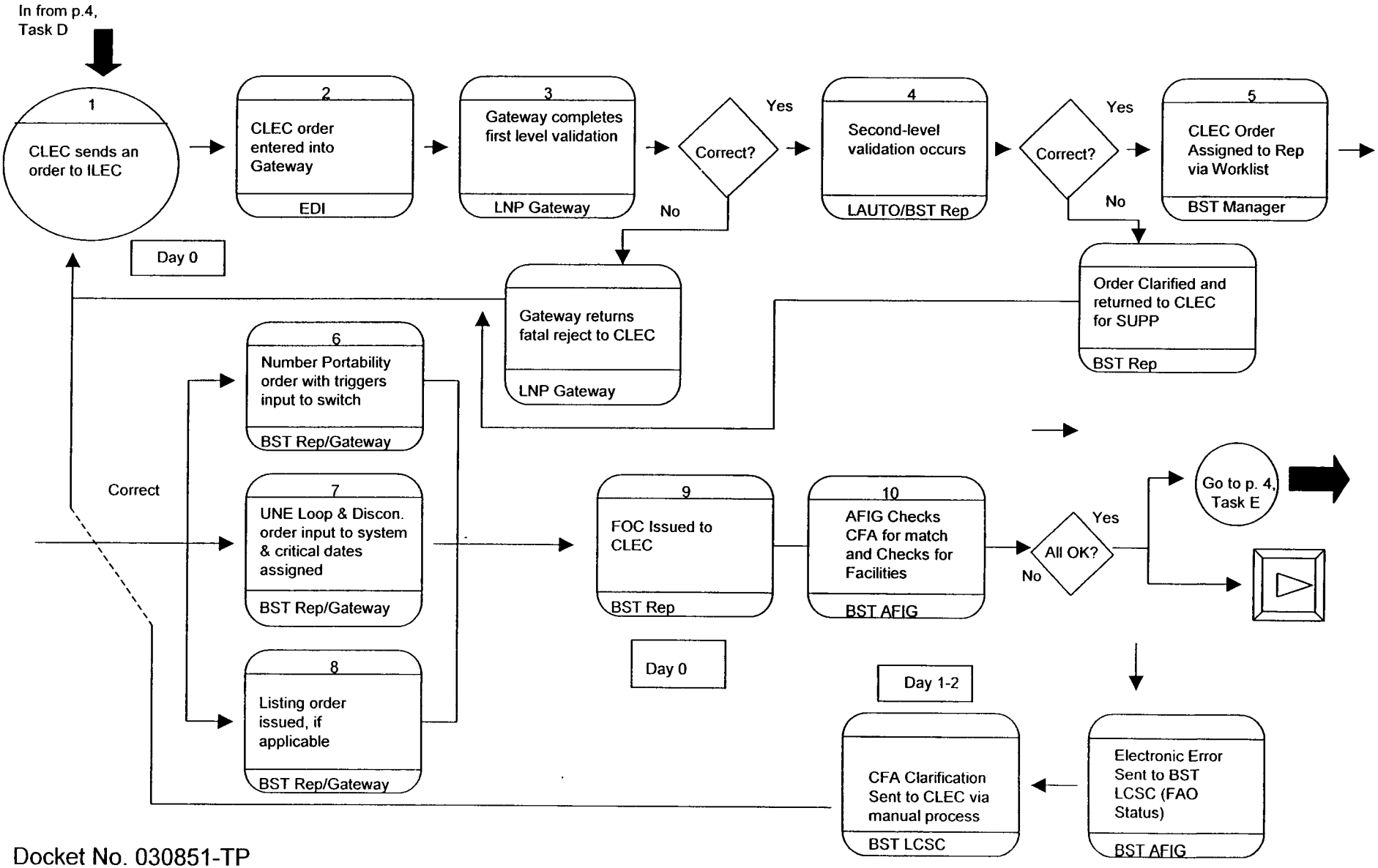
Notes:
(1) Percent Fully Mech = Issues SO's / (Total Manual LSR's + (Total Mech LSR's - Auto Clarifications - Pending Supps - CLEC Caused Fallout))
(2) Percent Fallout Returned to CLEC = CLEC Caused Fallout / Total System Fallout
This does not give any consideration to manual clarifications processed from LSR's from the Total Manual Fallout category.
(3) Percent BST Manually Creates = (Total Manual LSR's + Total Manual Fallout + BST Caused Fallout) / (Total Manual LSR's + Total Mech LSR's) - Auto Clarifications - Pending Supps - CLEC Caused Fallout))

Migrations to UNE-L
Tennessee

Month	LSR Submissions		Mech LSR Submissions								Percent Fully Mech	Percent Fallout Returned to CLEC	Percent BS Manually Creates
	Total Manual LSR's	Total Mech LSR's	Total Manual Fallout	Auto Clarification	Pending Supps	Validated LSR's	Total System Fallout	BST Caused Fallout	CLEC Caused Fallout	Issued SO's			
Jul-02	50	144	53	6	0	85	21	11	10	64	36.0%	47.6%	64.0%
Aug-02	40	132	48	5	0	79	38	30	8	41	25.8%	21.1%	74.2%
Sep-02	41	116	48	1	0	67	59	40	19	8	5.8%	32.2%	94.2%
Oct-02	33	155	71	0	0	84	73	47	26	11	6.8%	35.6%	93.2%
Nov-02	16	117	18	1	0	98	89	62	27	9	8.6%	30.3%	91.4%
Dec-02	38	122	25	2	0	95	76	51	25	19	14.3%	32.9%	85.7%
Jan-03	31	311	43	12	0	256	102	79	23	154	50.2%	22.5%	49.8%
Feb-03	27	130	30	3	0	97	52	40	12	45	31.7%	23.1%	68.3%
Mar-03	25	178	57	6	0	115	98	70	28	17	10.1%	28.6%	89.9%
Apr-03	12	157	33	4	0	120	106	88	18	14	9.5%	17.0%	90.5%
May-03	17	227	61	11	0	155	142	106	36	13	6.6%	25.4%	93.4%
Jun-03	57	102	38	1	0	63	50	43	7	13	8.6%	14.0%	91.4%
Jul-03	17	119	39	4	0	76	44	36	8	32	25.8%	18.2%	74.2%
Aug-03	14	131	41	8	0	82	44	38	6	38	29.0%	13.6%	71.0%

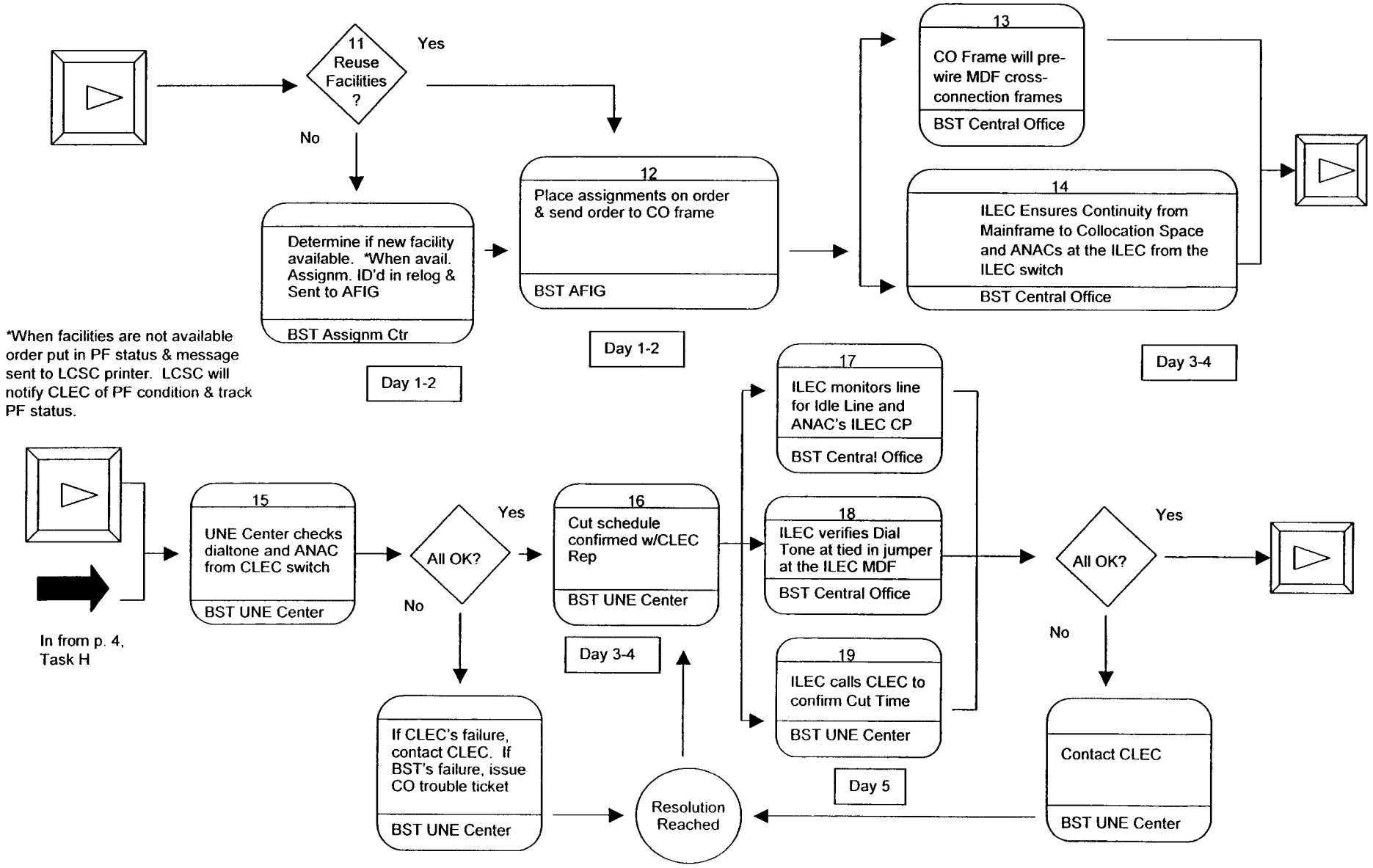
Notes:
(1) Percent Fully Mech = Issues SO's / (Total Manual LSR's + (Total Mech LSR's - Auto Clarifications - Pending Supps - CLEC Caused Fallout))
(2) Percent Fallout Returned to CLEC = CLEC Caused Fallout / Total System Fallout
This does not give any consideration to manual clarifications processed from LSR's from the Total Manual Fallout category.
(3) Percent BST Manually Creates = (Total Manual LSR's + Total Manual Fallout + BST Caused Fallout) / (Total Manual LSR's + Total Mech LSR's) - Auto Clarifications - Pending Supps - CLEC Caused Fallout))

Coordinated Hot Cut Process



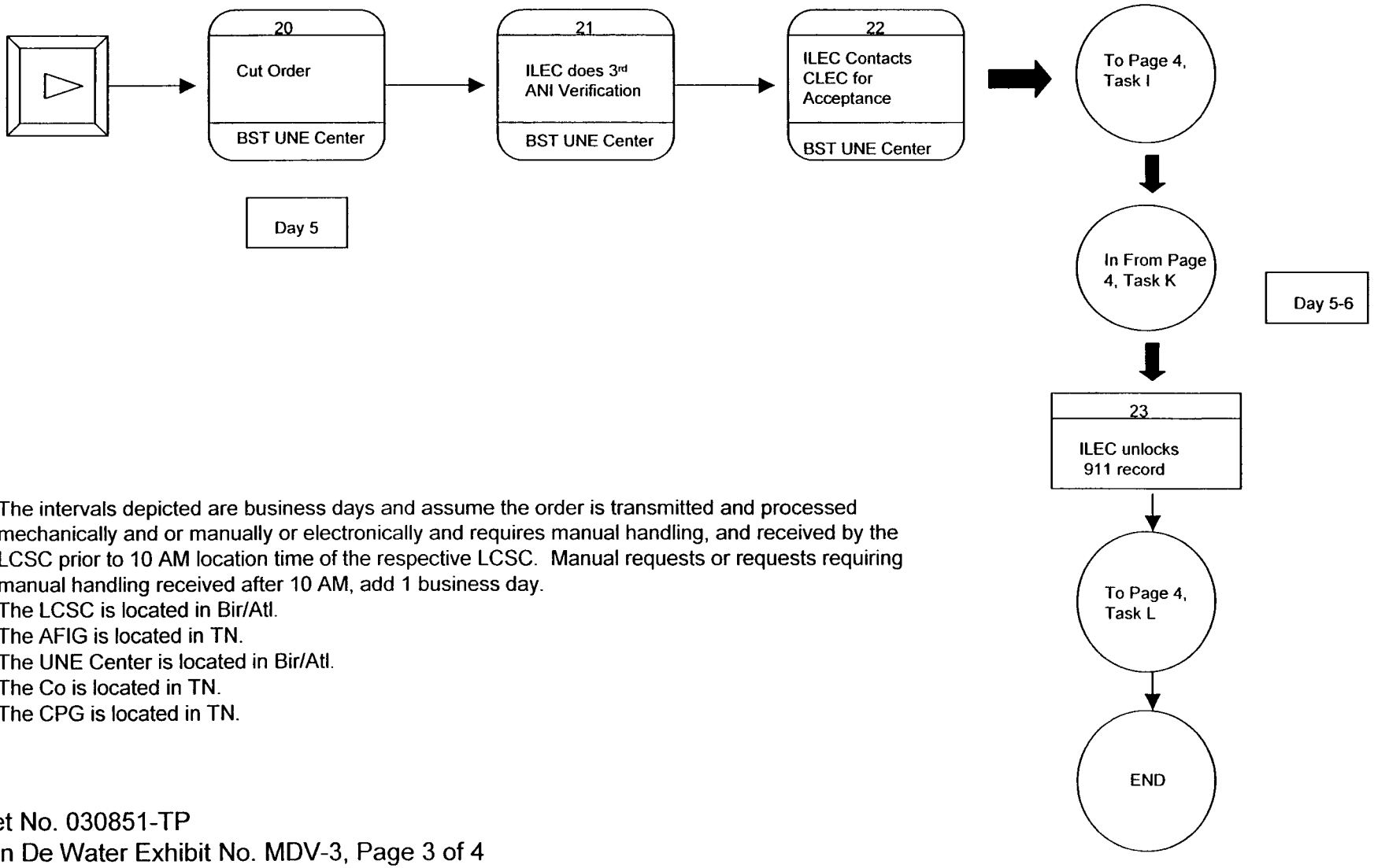
Docket No. 030851-TP
M. Van De Water Exhibit No. MDV-3, Page 1 of 4
UNE-L Flow Chart

Coordinated Hot Cut Process



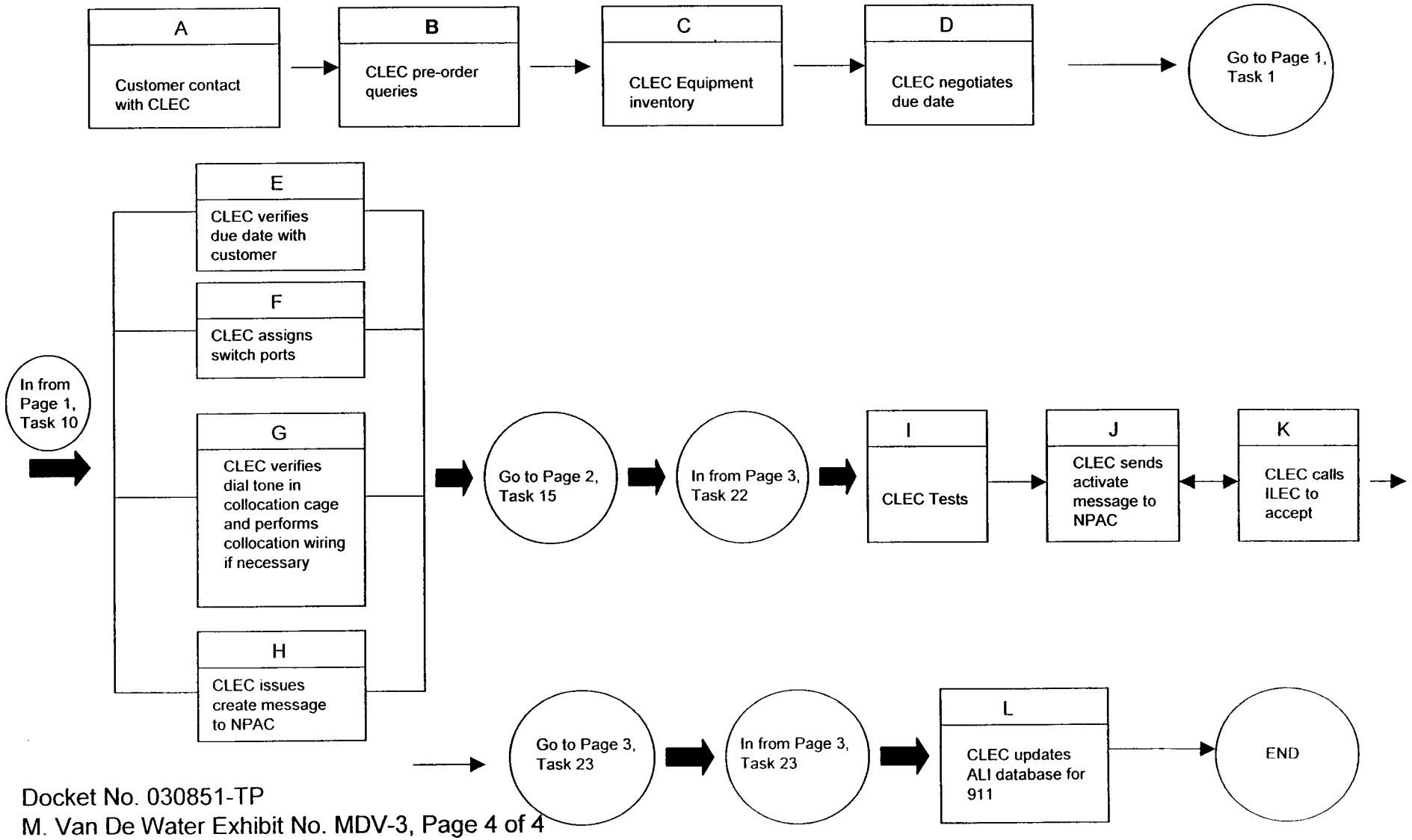
Docket No. 030851-TP
M. Van De Water Exhibit No. MDV-3, Page 2 of 4
UNE-L Flow Chart

Coordinated Hot Cut Process



The intervals depicted are business days and assume the order is transmitted and processed mechanically and or manually or electronically and requires manual handling, and received by the LCSC prior to 10 AM location time of the respective LCSC. Manual requests or requests requiring manual handling received after 10 AM, add 1 business day.
The LCSC is located in Bir/Atl.
The AFIG is located in TN.
The UNE Center is located in Bir/Atl.
The Co is located in TN.
The CPG is located in TN.

Coordinated Hot Cut Process
CLEC Hot Cut Incremental Activities



Docket No. 030851-TP
M. Van De Water Exhibit No. MDV-3, Page 4 of 4
UNE-L Flow Chart

SEE VIDEO ATTACHED

August 30, 2002

VIA FACSIMILE AND MAIL

Jim Schenk
BellSouth Telecommunications, Inc.
600 North 19th Street
8th Floor
Birmingham, Alabama 35203

RE: Coordinated Bulk Hot Cut Process

Dear Jim:

The purpose of this letter is to request BellSouth's adoption of a new process in our companies' efforts to address the insufficiency in today's loop-by-loop hot cut process. As we have discussed on several occasions, in spite of its commitment to serving customers on our own local network, AT&T has found it increasingly difficult to use unbundled loops to provide service to our small business local customers. While there are many factors, the inability to complete individual hot cuts in a commercially reasonable manner has proven to be a significant initial hurdle. In fact, in spite of the development of detailed individual hot cut processes to avoid outages, our experience has shown that current methods are unreliable, uneconomical and incapable of sustaining commercial volumes in a competitive environment.

However, AT&T has achieved a small measure of success in New York where, using an outside contractor, AT&T has been able to convert thousands of customers to AT&T's network using a bulk hot cut process. We wish to implement a similar process in the BellSouth territory. This process allows for the project-based conversion of a number of AT&T customers within a single local serving office ("LSO") and takes advantage of the efficiency of converting a number of lines, after regular business hours, with real time coordination between AT&T and BellSouth. Contrary to the current individual hot cut processes, the bulk conversion process can eliminate many of today's problems with customer outages and the lack of commercial volumes, while at the same time significantly lowering the cost to both BellSouth and AT&T.

Based on the New York experience, it is clear that it would be worthwhile to develop a process which would allow AT&T to migrate those customers currently served on the

UNE platform to AT&T's own network using unbundled loops. More importantly, because a bulk conversion process will be less costly for BellSouth to implement, we would anticipate substantial reductions on UNE-L hot cut charges associated with this process. Therefore, I am now asking for your commitment to work collaboratively with AT&T to fully document and implement the necessary procedures for such bulk conversions. AT&T has identified a number of factors that must be addressed in order to ensure a successful process. Although probably not a comprehensive list, these factors include:

- The ability to convert between 100 – 250 lines within a single LSO at one time;
- The development of a streamlined ordering process to avoid unnecessary individual orders and both the work and costs associated with them;
- A project managed focus at both AT&T and the BellSouth;
- BellSouth's conversion readiness, including dial-tone/ANI testing, loop qualification testing and pre-wiring in advance of the conversion;
- Dedicated personnel at BellSouth for the duration of the conversion process, including personnel able to resolve CFA discrepancies identified during the bulk conversion;
- Commitment of immediate service restoration in the event of a service outage during the conversion process;
- The development of appropriate measurements and tracking to ensure the quality of the process, and if necessary, to further improve the process;
- Substantially reduced prices for UNE-L hot cuts to take into account reduced costs for BellSouth.

Additional requirements, which, we believe, BellSouth already delivers via COSMOS and LENS, are the electronic access to BellSouth's CFA inventory and the ability to identify spare and utilized facilities.

In order to most efficiently develop and test a bulk hot cut process, I suggest that each company designate a representative to lead our implementation teams with this effort. I will lead the AT&T team and ask that you designate the appropriate BellSouth team leader as soon as possible. Given the importance of this process to any attempt by AT&T to use unbundled loops to serve our customers, I ask that negotiations on the process begin no later than September 16, 2002.

Sincerely,

cc: Greg Terry

UNE-Port/Loop Combination (UNE-P) to UNE-Loop (UNE-L) Bulk Migration

CLEC Information Package

Version 1

UNE-P to UNE-L Bulk Migration

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UNE-P to UNE-L Bulk Migration

1. Introduction & Scope

This Product Information Package is intended to provide CLECs general ordering information specific to the **UNE-P** to **UNE-L** Bulk Migration process described herein.

The information contained in this document is subject to change. BellSouth will provide notification of changes to the document through the CLEC Notification Process.

Please contact your BellSouth Local Support Manager if you have any questions about the information contained herein.

UNE-P to UNE-L Bulk Migration

2. Service Description

The Unbundled Network Element – Port/Loop Combination (UNE-P) to Unbundled Network Element – Loop (UNE-L) Bulk Migration process may be used by a CLEC when migrating existing multiple non-complex UNE-P Services to a UNE-L offering.

All Bulk Migration orders will be project managed by a BellSouth Project Manager. Initially, the CLEC will submit required information to a BellSouth Project Manager who after reviewing the bulk migration work effort with the field organizations will provide due dates back to the CLEC. Once the CLEC receives the due date information from the BellSouth Project Manager, the CLEC will electronically submit a Bulk Request for service order processing and provisioning. This allows migration of multiple UNE-P end-users to a UNE-L offering without submitting individual Local Service Requests.

UNE-P and UNE-L are defined below:

2.1 UNE-P

UNE-P is a UNE Port/Loop Switched Combination that combines a UNE local switch port and UNE loop to create an end-user-to-end-user transmission path and provides local exchange service. The CLEC may also choose to use the vertical services that are available through the features and functions of the local switch.

2.2 UNE-L

UNE-L is defined as the local loop network element that is a transmission facility between the main distribution frame (MDF) in BellSouth's central office and the point of demarcation at an end-user's premises. This facility will allow for the transmission of the CLEC's telecommunications services when connected to the CLEC's switch equipment. The local loop will require cross-connects for connection to the CLEC's collocation equipment. BellSouth does not provide telecommunications services with the UNE-L.

UNE-P to UNE-L Bulk Migration

3. Requirements

Major requirements for UNE-P to UNE-L Bulk Migration process are listed below. For complete requirements, refer to the **UNE to UNE Bulk Migration** section of the **Local Ordering Handbook** *(formerly named "BellSouth Business Rules for Local Ordering")*

- Bulk Migration is available for migrating existing **non-complex** Port/Loop Combination services to Unbundled Loops with Local Number Portability (LNP).
- A UNE Loop will be provided for each ported telephone number formerly associated with the UNE-P Service.
- Complex UNE-P accounts are prohibited on Bulk Requests. Examples of Complex UNE-P are 2 Wire ISDN/BRI Digital Loop & Port UNE Combination, 4 Wire ISDN/PRI Digital Loop & Port UNE Combination, UNE-P Centrex, Digital Direct Integration Termination Service (DDITS), etc.
- The UNE-Ps that can be migrated are listed in the **UNE-P USOC** section.
- UNE-Ps can be migrated to the UNE-Ls listed in the **UNE-L USOC** section. These UNE-L types must be in the CLEC's Interconnection Agreement.
- Bulk Requests that require a change in existing loop facilities to a type of facility that is not available, resulting in a Pending Facility (PF) status, must be cancelled by the CLEC and removed from the Bulk Request.
- All Existing Account Telephone Numbers (EATNs) on the Bulk Request must use the existing Regional Street Address Guide (RSAG) valid end-user address.
- All EATNs must be served from the same BellSouth Serving Wire Center (SWC).
- All UNE-Ps on a Bulk Request must be migrated to a single UNE-L type.
- No end-user moves or changes of address will be allowed on the Bulk Request.
- Non-Recurring rates for the specific loop type being requested will be charged.
- Service order charges for mechanized orders (SOMEC) will be charged based on the current rules for individual Local Service Requests (LSRs) created per EATN of a Bulk Request.
- A BellSouth Project Manager (PM) will project manage the Bulk Request.
- CLEC must submit a **BellSouth UNE-P to UNE-L Bulk Migration Project Notification**, herein known as **Project Notification,** to the BellSouth PM prior to the CLEC's placing the mechanized Bulk Request.
- CLEC may specify Desired Due Dates (DDD) for each EATN. However, the BellSouth PM will negotiate firm Due Dates for the Bulk Request.
- A minimum of two (2) EATNs and up to a maximum of ninety-nine (99) EATNs can be placed on a single Bulk Request.
- A maximum of twenty-five (25) end-user telephone numbers per EATN can be placed on a Bulk Request.
- No additional EATNs or end-user telephone numbers may be added to the ***BellSouth UNE-P to UNE-L Bulk Migration Project Notification*** form once it has been submitted to the BellSouth PM.

UNE-P to UNE-L Bulk Migration

Requirements (continued)

- Order Coordination-Time Specific option is not applicable for a Bulk Request.
- UNE-Ls that require a Service Inquiry and/or Unbundled Loop Modification are excluded from the Bulk Request process.
- A Reservation Identification (RESID) (also referred to as a Facility Reservation Number (FRN)) is required on the Bulk Request for Unbundled ADSL Compatible Loops, HDSL Compatible Loops and Unbundled Copper Loop - Designed (UCL-D). Refer to the **Unbundled ADSL and Unbundled HDSL Compatible Loop, UCL-Designed CLEC Information Packages** and **Loop Make-Up CLEC Information Package** for RESID/FRN requirements.
- When a Mechanized Loop Make Up with Facility Reservation Number (FRN) is requested, the CLEC must submit the Bulk Request with the FRN to BellSouth within 24 hours of receiving FRN.
- Firm Order Confirmation (FOC) will be sent on individual LSRs generated from the Bulk Request.
- Upon receipt of a Reject, CLEC must re-submit a corrected Bulk Request or submit a cancellation of the Bulk Request.

4. Options

- Order Coordination (OC) /Coordinated Hot Cut (CHC) is included on the UVL-SL2, 2 Wire ADSL and 2/4 Wire HDSL Loops. OC is available when the loop is provisioned over an existing circuit that is currently providing service to the end-user.
- OC is available as a chargeable option for conversions to UVL-SL1, UCL-ND and UCL-Designed Loops. OC must be requested at the EATN level on the Project Notification form. An OC charge will be applied to each loop on the EATN for which OC has been requested. OC will be indicated on Project Notification and will not be required on the Bulk Request LSR at this time.
- The CLEC may qualify the existing UNE-P facilities for the UNE-L types requested. For example, through Loop Make-Up (LMU), the CLEC can verify that a UNE-P facility being migrated is not on an Integrated Digital Loop Carrier (IDLC). When the existing UNE-P facility is on IDLC, the CLEC can reserve alternate compatible facilities if available.

UNE-P to UNE-L Bulk Migration

5. Bulk Migration Submission/Flow Process

The Bulk Request Submission Process will consist of two main work activities. The CLEC will first submit a Project Notification. Once the Project Notification has been processed and returned to the CLEC, the CLEC will then prepare and input the mechanized Bulk Request. The Bulk Request must be submitted according to the guidelines contained in the **Local Ordering Handbook**. Below are the steps in the process :

Step #	Action
1	PM receives Project Notification form from CLEC and negotiates/assigns Bulk Order Package Identifier (BOPI) and validates information (i.e., USOCs, Same Wire Center, etc.).
2	If pertinent information is missing on the Project Notification package, the form is returned to CLEC along with a reason(s) for return. PM receives corrected Project Notification from the CLEC and continues the negotiation process.
3	PM contacts BellSouth's Network organization and negotiates Due Date (DD) for all related Purchase Order Numbers (PONs) in the Bulk package and returns Bulk Notification Form including negotiated DD to the CLEC.
4	Upon receipt of the Bulk Notification Form that includes negotiated DD from PM, CLEC submits Bulk Request package with negotiated dates for each EATN/PON via electronic ordering interface.
5	If the CLEC wants to supplement (SUP) (01,02,03) an individual PON, the request must be sent through the same electronic ordering system as the original Bulk Request.
6	At this point, the Bulk Request package will be processed for 1st level validation and any rejects will be mechanically generated to the CLEC.
7	The electronic ordering systems will accept the Bulk Request package, break the individual PONs into separate LSRs and populate the remaining required LSR fields from Operation Support System (OSS) systems prior to sending the individual LSRs downstream to the Local Number Portability (LNP) Gateway.
8	The LNP Gateway will perform 2nd level validations and provide any fallouts, per "business as usual" processes. The Local Carrier Service Center (LCSC) will handle all fallouts as normal. Any of the individual PONs that must be clarified will be sent back to the CLEC, business as usual.
9	After LNP Gateway issues the service orders, the LCSC will handle all manual service order fallouts as normal. The BellSouth Service Representative will send any PF and Missed Appointments (MA) to the CLEC via a jeopardy notice.
10	LNP Gateway will send an FOC on each individual PON associated with the Bulk Request package, to the CLEC.
11	The Project Manager will monitor PON, Service Order and Porting Statuses associated with the Bulk Request package. BellSouth's Service Representative and Project Manager will monitor the LNP gateway for the "Number Ported" messages and the Service Representative will handle manual port out order processing if required.

6. BellSouth UNE-P to UNE-L Bulk Migration Project Notification Process

Following is the Project Notification process:

- Complete the **BellSouth UNE-P to UNE-L Bulk Migration Project Notification** form according to the instructions.
- Electronically submit the ***Project Notification*** to the email address of the CLEC's assigned BellSouth Project Manager (PM). For help with identifying a Project Manager, contact your BellSouth Customer Support Manager.
- The BellSouth PM will review the information submitted by the CLEC and will assign a Bulk Order Package Identifier (BOPI) that the CLEC will later use on the electronic Bulk Request.
- The BellSouth PM will coordinate with BellSouth's field forces to schedule the migration Due Dates.
- Once the review with the field forces is complete, the BellSouth PM will include the Due Dates on the ***Project Notification*** and return it to the CLEC.
- No additional EATNs or end-user telephone numbers may be added to the ***Project Notification*** form once it has been submitted to the BellSouth PM.

UNE-P to UNE-L Bulk Migration

7. UNE-P USOCs

The UNE-P Services that can be migrated to UNE-L are represented by the Port USOCs listed in the table below:

Port USOC	Unbundled Port/Loop Combination Element	Description of Combinations using an Unbundled Exchange Port (UEP):
UEPBX	UEPLX	UEP, Business, 2 Wire Analog Business Line Port, UNE=P Basic Class of Service
UEPRX	UEPLX	UEP, Residence, 2 Wire Analog Residence Line Pot, UNE-P Basic Class of Service
UEPCO	UEPLX	UEP, Coin Basic Class of Service UNE-P
UEPBV	UEPLX	UEP, Remote Call Forwarding, Business Basic Class of Service
UEPVR	UEPLX	UEP, Remote Call Forwarding, Residence Basic Class of Service

8. UNE-L USOCs

Below are the UNE-L types and associated USOCs to which the UNE-Ps can be migrated:

Loop USOC	Description
UEAL2	2 Wire Unbundled Voice Loop – SL1
UEAL2, UEAR2	2 Wire Unbundled Voice Loop – SL2
UCLPW	2 Wire Unbundled Copper Loop/Short– Designed without manual Service Inquiry
UCL2W	2 Wire Unbundled Copper Loop/Long - Designed without manual Service Inquiry
UCL4W	4 Wire Unbundled Copper Loop/Short – Designed without manual Service Inquiry
UCL4O	4 wire Unbundled Copper Loop/Long – Designed without manual Service Inquiry
UEQ2X	2 Wire Unbundled Copper Loop – Non-Designed
UAL2W	2 Wire Unbundled ADSL Loop without manual Service Inquiry
UHL2W	2 Wire Unbundled HDSL Loop without manual Service Inquiry
UHL4W	4 Wire Unbundled HDSL Loop without manual Service Inquiry

UNE-P to UNE-L Bulk Migration

9. Intervals

9.1 BellSouth UNE-P to UNE-L Bulk Migration Project Notification Interval

- The "*PM Targeted Response Interval*" column in the table below represents the targeted number of business days in which the PM will respond back to the CLEC.
- CLEC must submit the **Project Notification** in advance of the earliest CLEC's requested Desired Due Date (DDD) according to the "*Minimum # of days in advance to submit Project Notification*" column in the table below. This column represents the number of days that the Project Notification must be submitted in advance of the earliest DDD.
- "*Minimum # of days*" includes the interval for the Project Manager to negotiate the Due Dates. It also allows three (3) days for the CLEC to correct, process and submit mechanized Bulk Request and it includes 14 days in order to meet the 14-business day submission requirement for the Bulk Request.
- The PM will attempt, where possible, to assign the work such that migrations occur on the requested DDD.

# of end-user Tel. Numbers	PM Targeted Response Interval	CLEC days after receipt from Proj Mgr	Bulk Request Submission Requirement	Minimum # of days in advance to submit Project Notification
Maximum of 99	7 business days	3 business days	14 business days	24 business days
100-200	10 business days	3 business days	14 business days	27 business days
201 +	To be determined	3 business days	14 business days	Contact PM

9.2 Bulk Request Service Order Intervals

- The BellSouth Project Manager will negotiate the Bulk Request due dates with BellSouth's provisioning personnel and will communicate the due date to the CLEC.
- The CLEC must submit the Bulk Request and it must be accepted by the mechanized system at least 14 business days in advance of the earliest Due Date for any end-user telephone number to be migrated.

9.3 Example of Intervals

An example of Intervals follows:

CLEC submits Project Notification with 87end-user telephone numbers on May 1, 2003:

- May 12, 2003 (7 business days) – CLEC receives Project Notification with firm Due Dates
- May 12 – May 15 (3 business days) – CLEC will prepare and submit mechanized Bulk request via the electronic interface.
- June 5, 2003 (14 business days) – the earliest PM assigned Due Date on the Project Notification returned to the CLEC.

UNE-P to UNE-L Bulk Migration

10. Acronyms

ADSL	Asymmetrical Digital Subscriber Line
BOPI	Bulk Order Package Identifier
CHC	Coordinated Hot Cut
CLEC	Competitive Local Exchange Carrier
DDD	Desired Due Date
EATN	Existing Account Telephone Number
FOC	Firm Order Confirmation
FRN	Facility Reservation Number
HDSL	High-Bit-Rate Digital Subscriber Line
LCSC	Local Carrier Service Center
LNP	Local Number Portability
LSR	Local Service Request
MDF	Main Distribution Frame
OC	Order Coordination
OSS	Operation Support System
PM	Project Manager
PON	Purchase Order Number
RESID	Reservation Identification
RSAG	Regional Street Address Guide
SWC	Serving Wire Center
UCL-D	Unbundled Copper Loop – Designed
UCL-ND	Unbundled Copper Loop – Non-Designed
UNE-P	Unbundled Network Element-Port/Loop Combination
UNE-L	UNE Loop

Denise C. Berger
Operations AVP
Local Supplier Management

Room 12256
1200 Peachtree Street NE
Atlanta, Georgia 30309
404 810-8644
FAX 281 664-3648
PAGER 888 858-7243 P N 1234568
WIRELESS 404 915-0796
deberger@att.com

June 9, 2003

Phillip Cook
BellSouth Interconnection Services
675 West Peachtree Street
Room 34H71
Atlanta, Georgia 30375

RE: NBR GA02-M931-00 Unbundled Network Element – Platform (UNE-P) to UNE-Loop (UNE-L) Coordinated Bulk Conversion Process

Dear Phillip:

The purpose of this letter is to respond to your letter of May 30, 2003, regarding New Business Request (NBR) GA02-M931-00. Your letter stated that BellSouth, pursuant to Section 1.10 of Attachment 10 of the Interconnection Agreement, would consider the NBR cancelled if an acceptance or rejection response was not provided within five (5) days.

In its initial request on August 30, 2002, AT&T indicated that BellSouth's current hot cut methods were "unreliable, uneconomical and incapable of sustaining commercial volumes in a competitive environment" and proposed a new process, designed to address each concern. Unfortunately, BellSouth has failed to adequately address these concerns.

First, AT&T is disappointed that BellSouth did not provide adequate information regarding the impact to customers served by BellSouth's IDLC facilities. Further, AT&T requested a process, which would allow the conversion of up to 500 customers in two (2) central offices per evening. In its letter of November 20, 2002, BellSouth states,

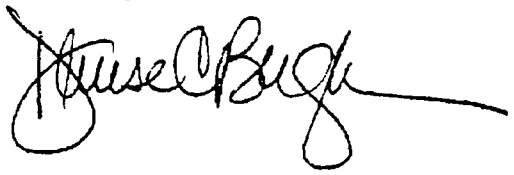
> "BellSouth has determined that AT&T's request is technically feasible with the following caveat:
>
> - The quantity of physical facilities and telephone numbers cut per evening will vary based on the load at the time the request is submitted, and will be driven by the actual number of lines per customer."

AT&T is distressed and concerned with this stated inability of BellSouth to sustain reasonable commercial volumes. AT&T finds BellSouth's unwillingness to commit to AT&T's modest request completely unacceptable.

Finally, BellSouth's ridiculous and excessive cost of $134.32 per working telephone number, plus regular ordering charges, as well as other unspecified overtime and technician charges, prohibits commercial use. BellSouth has once again presented AT&T with a Hobson's choice: risk a devastating disruption of a customer's service or pay BellSouth a ransom to mitigate the risk.

Please consider this letter a rejection of BellSouth's preliminary analysis and firm quote.

Sincerely,



cc: Steve Huels
Jim Schenk

Verizon Hot Cut Processes

Verizon Hot Cut Processes
TRO Impairment Issues

- **Operational issues:**
  - How to handle higher volume of Hot Cuts each month
    - WPTS automation opportunities
    - Scalability model
    - Leverage our existing, proven processes across the nation
      - Basic Hot Cuts
      - Project Hot Cuts
- **Economic issues:**
  - How to do all of the above while keeping costs down

Verizon Hot Cut Processes
Scalability Model

- **Estimate future Hot Cut volumes:**
  - Current UNE-P inward activities
    - New
    - Migration
  - Current Hot Cut Volumes
- **Determine required work times:**
  - Technicians
  - Coordination and support centers
- **Calculate required force:**
  - (Volumes) X (Work Time) = Force Required

REQUEST: Please provide the maximum number of lines that can be converted (per day) to

UNE-L using:

(a) a "bulk" hot cut process per CO and for Florida as a whole; and
(b) an individual hot cut process per CO and for Florida as a whole.

RESPONSE:

a) BellSouth's bulk hot cut process is scalable depending on volumes.

b) BellSouth's individual hot cut process is scalable depending on volumes.

RESPONSE PROVIDED BY: Ken Ainsworth

LOOP CUTOVER PROCESS

Step 1: Technician gets call to begin cutover. Asks for cable pair information.

LOOP CUTOVER PROCESS

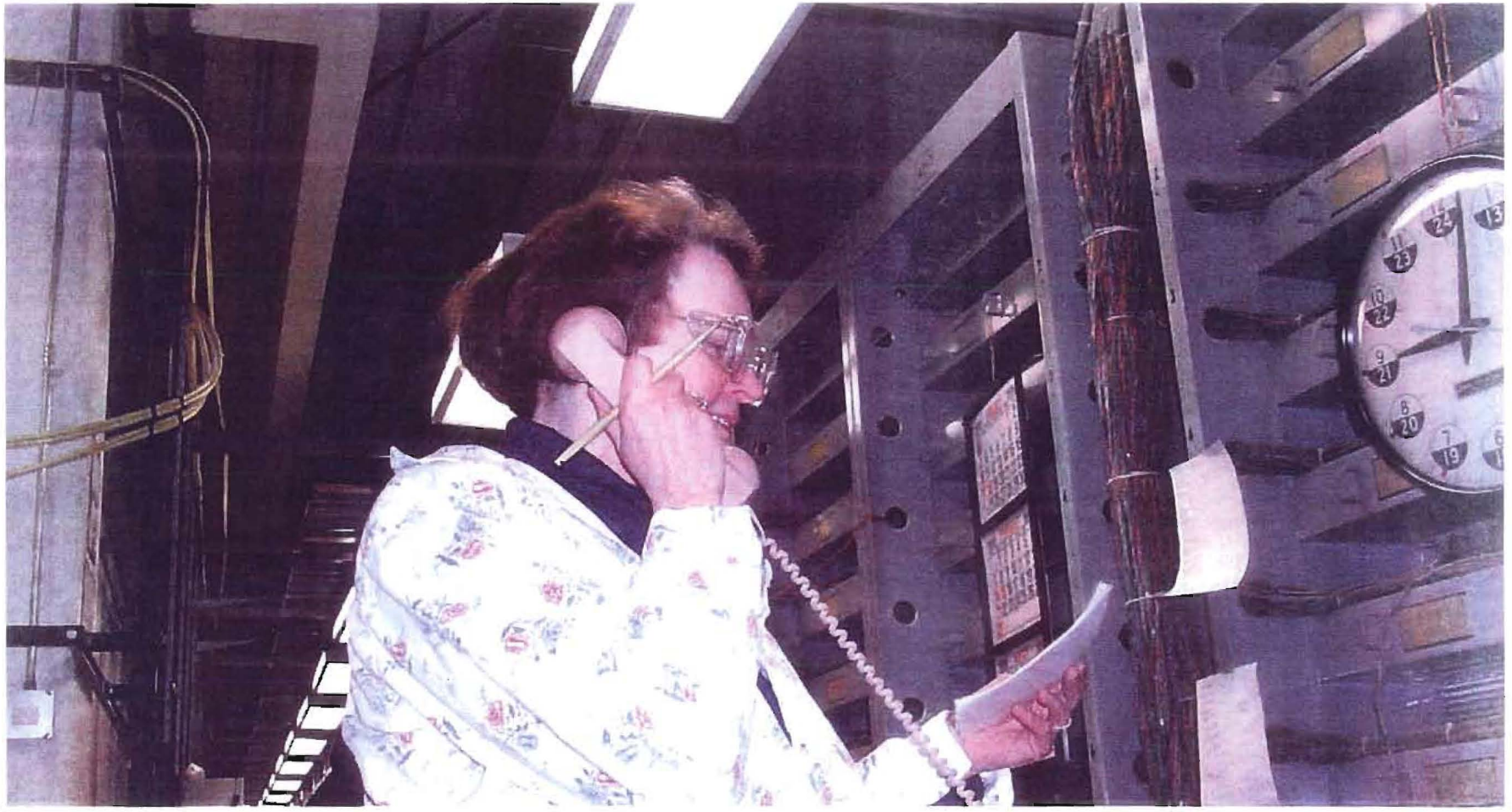
Step 2: Technician types in cable pair number to obtain order number.

LOOP CUTOVER PROCESS

Step 3: Technician retrieves copy of work order.

LOOP CUTOVER PROCESS

Step 4: Technician responds to UNE Center request to initiate overall cutover of service from BellSouth to CLEC.



LOOP CUTOVER PROCESS

Step 5: Technician conducts ANAC test to verify that correct loop is being cutover.

LOOP CUTOVER PROCESS

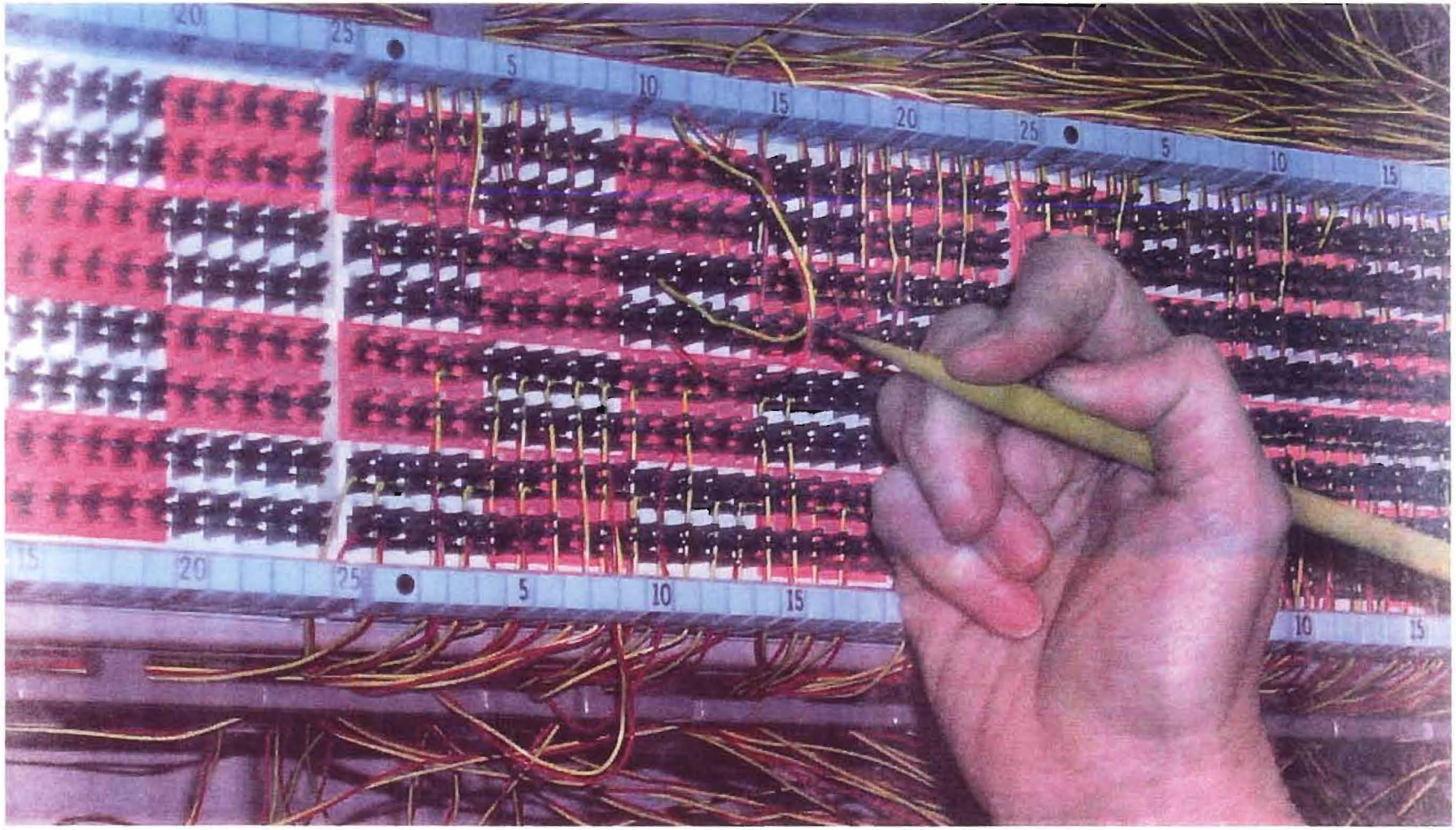
Step 6: Technician walks along Main Distributing Frame to locate both ends of jumper to be cut.

LOOP CUTOVER PROCESS

Step 7: Technician locates precise location of jumper.

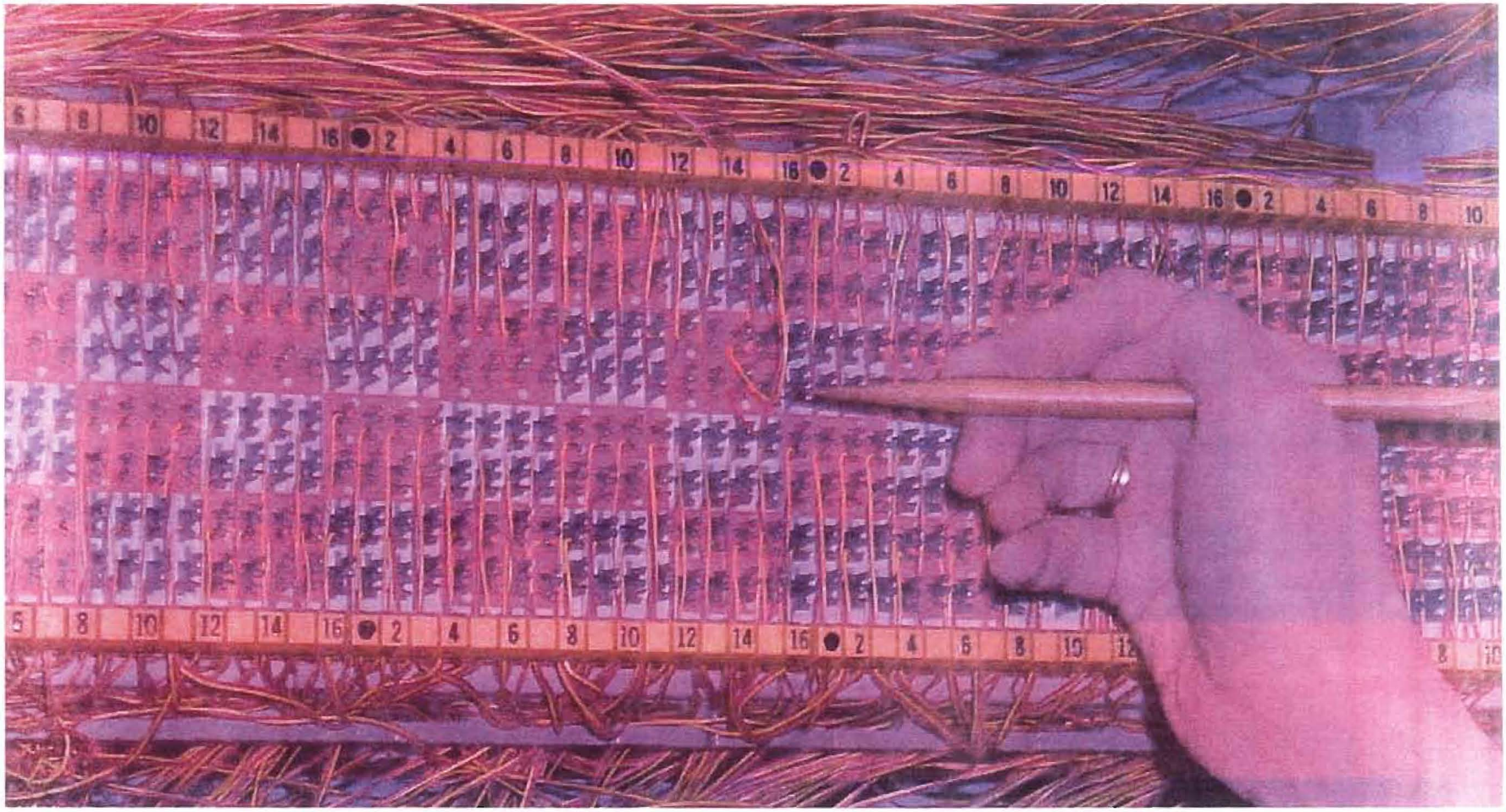
LOOP CUTOVER PROCESS

Step 8: Technician locates and removes end of jumper connected to the BellSouth cable pair.



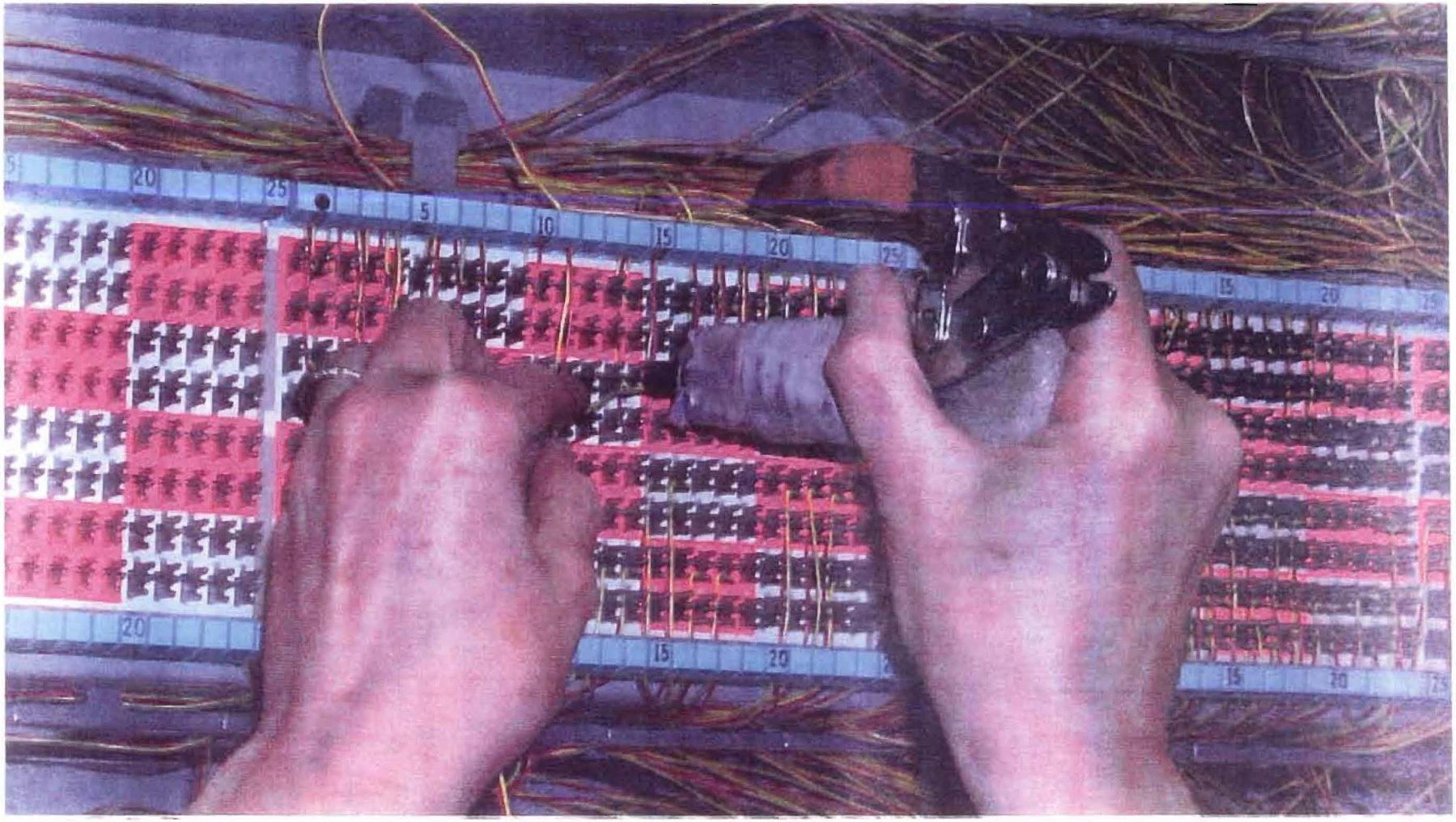
LOOP CUTOVER PROCESS

Step 9: Technician locates and removes end of jumper connected to the switching equipment.



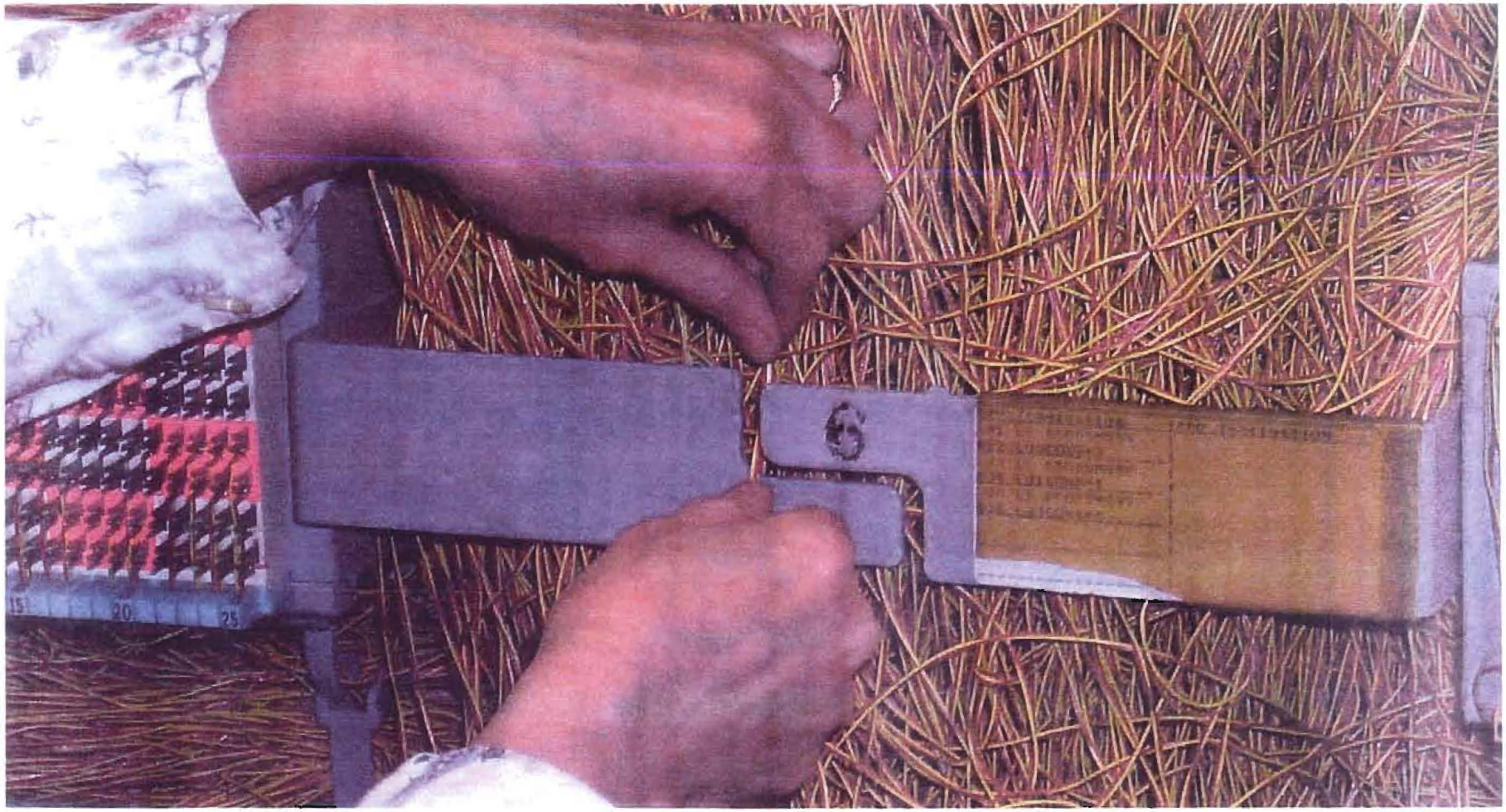
LOOP CUTOVER PROCESS

Step 10: Technician places new jumper on MDF.



LOOP CUTOVER PROCESS

Step 11: Technician weaves wire through cable rack to reach tie cable to CLEC's collocation equipment.



LOOP CUTOVER PROCESS

Step 12: Technician connects new jumper on frame to tie cables to CLEC equipment.

LOOP CUTOVER PROCESS

Step 13: Technician conducts ANAC test to verify that loop has been cut to correct CLEC switch port.

LOOP CUTOVER PROCESS

Step 14: Technician verifies cutover with CLEC, closes order, and notifies the UNE Center.

REQUEST: Provide the average time spent by BellSouth Central Office personnel who work directly on the Main Distribution Frame or other frames to conduct a single cutover on a single order, separated between each type or classification of cutover provided by BellSouth, including, but not limited to, "non-coordinated," "coordinated," "coordinated time-specific," or "bulk" cutovers, and explain how this was calculated.

RESPONSE: Presently, the average times spent by BellSouth Central Office personnel to conduct a single cutover for a non-designed SL1 loop on a single order are:

Activity	1st Loop (Minutes)	Additional Loops (Minutes)
non-coordinated cutover	30	21
coordinated cutover	40	23
coordinated time-specific cutover	50	25
bulk (with coordination) cutover	40	23

All of the times are based on Subject Matter Expert estimates.

In addition, see the response to Item No. 43.

RESPONSE PROVIDED BY: Dan Stinson

REQUEST: In BellSouth's Ex Parte in FCC Docket 01-338, filed December 24, 2002, on page 7, a table sets forth BellSouth's calculation of the time required to convert the "Top 20 UNE-P wire centers" to UNE-L or EELs. Provide answers to the following questions regarding that table:

(a) How many technicians were planned to work per shift, per wire center, to accomplish these conversions?
(b) How many conversions were planned per technician, per shift in each of the twenty wire centers?
(c) What is the maximum amount of new migrations BellSouth would be able to complete during the 3 –9 months these conversions would take place?
(d) How many UNE-P customers exist in these 20 wire centers as of September 1, 2003?

RESPONSE: (a) The assumption was that each of the Top 20 UNE-P wire centers, shown on page 7 of BellSouth's December 24, 2002, ex parte, have large frames and that there would typically be 6 technicians working on the frame during the normal day shift, with a maximum of 12 technicians able to work on the frame at any given time. Two shifts were assumed (except for the HLWDFLPE wire center where some third shift work was assumed) per day, with 6 technicians performing cuts during the day shift and 12 technicians performing cuts during the night shift, for an average of 9 technicians per wire center per day.

(b) The number of conversions per technician per shift in each of the twenty wire centers works out to be approximately 11.5, which results in approximately 104 conversions per wire center per day. In HLWDFLPE, assuming some third shift work, the number of conversions per technician per shift is approximately 13, which results in approximately 156 conversions per day.

(c) BellSouth's process is scalable depending on volumes.

RESPONSES (CONT.):

(d) See Attachment for response to Item No. 44(d).

RESPONSE PROVIDED BY: Lisa Brooks
Keith Milner

BellSouth Telecommunications, Inc.
Florida Public Service Commission
Docket No. 030851-TP
AT&T's 1st Interrogatories
October 6, 2003
Item No. 44 (d)

ATTACHMENT TO INTERROGATORY, ITEM NO. 44 (D)

Attachment
Response to Item No. 44 (d)

BellSouth's Top 20 UNE Impacted Wire Centers as of - 10/1/2003
WCs shaded are the Top Twenty Reported to FCC 12/23/2002

Rank	STATE	CLLI	Total UNE-P
1	FL	hlwdflpe	27662
2	FL	miamflhl	18049
3	FL	hlwdflwh	17955
4	GA	mrttgama	15599
5	FL	prrnflma	15038
6	GA	lrvlgaos	13118
7	FL	pmbhflcs	12014
8	FL	wpbhflga	11726
9	FL	miamflca	11704
10	FL	ftldfloa	11202
11	FL	pmbhflma	10631
12	FL	ndadflbr	10330
13	GA	jnbogama	9587
14	GA	smyrgama	9572
15	GA	wdstgacr	9551
16	FL	orldflph	9407
17	FL	ftldflpl	9406
18	GA	rswlgama	9292
19	GA	alprgama	9215
20	FL	miamflwd	9051
21	FL	ftldflja	9038
22	FL	ndadflac	8937
23	FL	bybhflma	8913
24	GA	gsvlgama	8862
25	GA	cmnggama	8842
26	GA	agstgafl	8415
27	FL	pmbhflfe	8269
28	FL	hlwdflma	8256
29	GA	llbngama	8088
30	FL	ftldflmr	8084
31	FL	ndadflgg	7939
32	GA	atlngaep	7849
33	GA	panlgama	7815
34	FL	miamflpl	7790

Attachment
Response to Item No. 44 (d)

BellSouth's Top 20 UNE Impacted Wire Centers as of ~ 10/1/2003
WCs shaded are the Top Twenty Reported to FCC 12/23/2002

Rank	STATE	CLLI	Total UNE-P
1	FL	hlwdflpe	27662
2	FL	miamflhl	18049
3	FL	hlwdflwh	17955
4	GA	mrttgama	15599
5	FL	prrnflma	15038
6	GA	irvlgaos	13118
7	FL	pmbhflcs	12014
8	FL	wpbhflga	11726
9	FL	miamflca	11704
10	FL	ftldfloa	11202
11	FL	pmbhflma	10631
12	FL	ndadflbr	10330
13	GA	jnbogama	9587
14	GA	smyrgama	9572
15	GA	wdstgacr	9551
16	FL	orldflph	9407
17	FL	ftldflpl	9406
18	GA	rswlgama	9292
19	GA	alprgama	9215
20	FL	miamflwd	9051
21	FL	ftldflja	9038
22	FL	ndadflac	8937
23	FL	bybhflma	8913
24	GA	gsvlgama	8862
25	GA	cmnggama	8842
26	GA	agstgafl	8415
27	FL	pmbhflfe	8269
28	FL	hlwdflma	8256
29	GA	llbngama	8088
30	FL	ftldflmr	8084
31	FL	ndadflgg	7939
32	GA	atlngaep	7849
33	GA	panlgama	7815
34	FL	miamflpl	7790

BELLSOUTH

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Robert T. Blau, Ph.D., CFA
Vice President-Executive and
Federal Regulatory Affairs

202 463-4108
Fax 202 463-4631

December 24, 2002

Ms Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Ex Parte in WC Docket No. 01-338

Dear Ms Dortch:

On December 23, 2002, Pete Martin, Jonathan Banks, Keith Milner, Ken Ainsworth and the undersigned met with William Maher, Jeffrey Carlisle and Rich Lerner of the Wireline Competition Bureau.

The purpose of this meeting was to discuss BellSouth's ability to hot-cut UNE-P to UNE-L lines, as well as BellSouth retail to UNE-L lines, in a timely and efficient manner. Details of the discussion are summarized in the attached document.

In accordance with Section 1.1206, I am filing this notice electronically and request that you please place them in the record of the proceeding identified above.

Sincerely,

Robert T. Blau/pdl

Attachment

cc: William Maher
Jeffrey Carlisle
Rich Lerner

Conversion of the Embedded UNE-P Base – Top 20 UNE-P Wire Centers

CO	UNE-P Bus Units	UNE-P Res Units	Total UNE-Ps	Months required to convert 100% of UNE-Ps to UNE-L and/or EELs	Months required to convert 30% of existing UNE-Ps to UNE-L and/or EELs	# of Collocation Arrangements by CLECs that are also providing UNE-Ps
HLWDFLPE Total	2,448	22,154	24,602	9.00	3.55	5
MIAMFLHL Total	3,177	12,883	16,060	7.73	2.32	4
HLWDFLWH Total	2,253	12,253	14,506	6.98	2.10	6
PRRNFLMA Total	2,433	10,647	13,080	6.30	1.89	4
MRTTGAMA Total	2,253	9,138	11,391	5.48	1.65	8
MIAMFLCA Total	1,290	9,843	11,133	5.36	1.61	2
PMBHFLCS Total	1,731	8,858	10,589	5.10	1.53	2
LRVLGAOS Total	1,414	7,982	9,396	4.52	1.36	2
MIAMFLWD Total	494	8,094	8,588	4.13	1.24	1
PMBHFLMA Total	2,258	6,205	8,463	4.07	1.22	5
WPBHFLGA Total	1,471	6,922	8,393	4.04	1.21	4
NDADFLBR Total	943	7,094	8,037	3.87	1.16	1
FTLDFLOA Total	1,358	6,675	8,033	3.87	1.16	3
FTLDFLJA Total	1,570	6,456	8,026	3.86	1.16	3
MIAMFLPL Total	5,353	1,912	7,265	3.50	1.05	4
WDSTGACR Total	1,165	6,014	7,179	3.46	1.04	2
FTLDFLPL Total	1,897	5,280	7,177	3.46	1.04	5
NDADFLAC Total	1,565	5,568	7,133	3.43	1.03	2
RSWLGAMA Total	1,391	5,515	6,906	3.33	1.00	7
SMYRGAMA Total	971	5,926	6,897	3.32	1.00	6
Total (Top 20 COs)	37,435	165,419	202,854			76
Grand Total (all COs)	576,297	821,002	1,397,299			898

NOTES: (1) Months required to convert 100% of UNE-Ps based on 2 shifts, except for HLWDFLPE, where some third shift work is included.
(2) Based on a mix of SL1 and SL2 loops.

Hot Cut Rates - First

Hot Cut Option	Cost Ref. No.	Rate Elements	AL	FL	GA	KY	LA	MS	NC	SC	TN
1	SL1 LOOP										
	A 1.1	SL1 Loop NRC (1st)	$37.81	$49.57	$42.54	$46.66	$36.54	$37.92	$36.54	$37.92	$31.99
	N 1.1	Electronic Service Order	$5.83	$1.52	$0.55	$7.88	$2.98	$5.70	$2.98	$5.92	$0.00
		TOTAL SL1 Loop Hot Cut (1st)	*$43.64*	*$51.09*	*$43.09*	*$54.54*	*$39.52*	*$43.62*	*$39.52*	*$43.84*	*$31.99*
2	SL1 LOOP with Order Coordination										
	A 1.1	SL1 Loop NRC (1st)	$37.81	$49.57	$42.54	$46.66	$36.54	$37.92	$36.54	$37.92	$31.99
	N 1.5	Order Coordination	$8.15	$9.00	$18.11	$9.00	$7.92	$8.20	$7.92	$8.17	$36.52
	N 1.1	Electronic Service Order	$5.83	$1.52	$0.56	$7.88	$2.98	$5.70	$2.98	$5.92	$0.00
		TOTAL SL1 Loop Hot Cut (1st)	*$51.79*	*$60.09*	*$59.20*	*$63.54*	*$47.44*	*$51.82*	*$47.44*	*$52.01*	*$68.51*
3	SL1 LOOP with Order Coordination and OC for Specified Conversion Time										
	A 1.1	SL1 Loop NRC (1st)	$37.81	$49.57	$42.54	$46.66	$36.54	$37.92	$36.54	$37.92	$31.99
	N 1.5	Order Coordination	$8.15	$9.00	$18.11	$9.00	$7.92	$8.20	$7.92	$8.17	$36.52
	N 1.6	Order Coordination for Specified Conversion Time	$18.09	$23.02	$35.74	$23.01	$17.56	$18.19	$17.56	$18.13	$34.29
	N 1.1	Electronic Service Order	$5.83	$1.52	$0.55	$7.88	$2.98	$5.70	$2.98	$5.92	$0.00
		TOTAL SL1 Loop Hot Cut (1st)	*$69.88*	*$83.11*	*$94.94*	*$86.55*	*$65.00*	*$70.01*	*$65.00*	*$70.14*	*$102.80*
4	SL2 LOOP (Order Coordination Included in Loop NRC)										
	A 1.2	SL2 Loop NRC (1st)	$88.00	$135.75	$104.17	$134.89	$102.10	$105.96	$102.10	$105.99	$75.06
	N 1.1	Electronic Service Order	$5.83	$1.52	$0.55	$7.88	$2.98	$5.70	$2.98	$5.92	$0.00
		TOTAL SL2 Loop Hot Cut (1st)	*$93.83*	*$137.27*	*$104.72*	*$142.77*	*$105.08*	*$111.66*	*$105.08*	*$111.90*	*$75.06*
5	SL2 LOOP (Order Coordination Included in Loop NRC) with OC for Specified										
	A 1.2	SL2 Loop NRC (1st)	$88.00	$135.75	$104.17	$134.89	$102.10	$105.96	$102.10	$105.99	$75.06
	N 1.6	Order Coordination for Specified Conversion Time	$18.09	$23.02	$35.74	$23.01	$17.56	$18.19	$17.56	$18.13	$34.29
	N 1.1	Electronic Service Order	$5.83	$1.52	$0.55	$7.88	$2.98	$5.70	$2.98	$5.92	$0.00
		TOTAL SL2 Loop Hot Cut (1st)	*$111.92*	*$160.29*	*$140.46*	*$165.78*	*$122.64*	*$129.85*	*$122.64*	*$130.03*	*$109.35*

Hot Cut Rates - Additional

Hot Cut Option	Cost Ref. No.	Rate Elements	AL	FL	GA	KY	LA	MS	NC	SC	TN
1	SL1 LOOP										
	A.1.1	SL1 Loop NRC (Addl)	$17.56	$22.83	$31.33	$22.57	$16.87	$17.55	$16.87	$17.62	$20.02
	N.1.1	Electronic Service Order	$5.83	$1.52	$0.56	$7.88	$2.98	$5.70	$2.98	$5.92	$0.00
		TOTAL SL1 Loop Hot Cut (Addl)	*$23.39*	*$24.35*	*$31.89*	*$30.45*	*$19.85*	*$23.25*	*$19.85*	*$23.54*	*$20.02*
2	SL1 LOOP with Order Coordination										
	A.1.1	SL1 Loop NRC (1st)	$17.56	$22.83	$31.33	$22.57	$16.87	$17.55	$16.87	$17.62	$20.02
	N.1.5	Order Coordination	$8.15	$9.00	$16.11	$9.00	$7.92	$8.20	$7.92	$8.17	$36.52
	N.1.1	Electronic Service Order	$5.83	$1.52	$0.56	$7.88	$2.98	$5.70	$2.98	$5.92	$0.00
		TOTAL SL1 Loop Hot Cut (Addl)	*$31.54*	*$33.35*	*$47.99*	*$39.45*	*$27.77*	*$31.45*	*$27.77*	*$31.71*	*$56.54*
3	SL1 LOOP with Order Coordination and OC for Specified Conversion Time										
	A.1.1	SL1 Loop NRC (1st)	$17.56	$22.83	$31.33	$22.57	$16.87	$17.55	$16.87	$17.62	$20.02
	N.1.5	Order Coordination	$8.15	$9.00	$16.11	$9.00	$7.92	$8.20	$7.92	$8.17	$36.52
	N.1.6	Order Coordination for Specified Conversion Time	$18.09	$23.02	$35.74	$23.01	$17.56	$18.19	$17.56	$18.13	$34.29
	N.1.1	Electronic Service Order	$5.83	$1.52	$0.56	$7.88	$2.98	$5.70	$2.98	$5.92	$0.00
		TOTAL SL1 Loop Hot Cut (Addl)	*$49.63*	*$56.37*	*$83.73*	*$62.46*	*$45.33*	*$49.64*	*$45.33*	*$49.84*	*$90.83*
4	SL2 LOOP (Order Coordination included in Loop NRC)										
	A.1.2	SL2 Loop NRC (1st)	$56.00	$62.47	$78.10	$61.87	$65.72	$68.26	$65.72	$68.43	$48.20
	N.1.1	Electronic Service Order	$5.83	$1.52	$0.56	$7.88	$2.98	$5.70	$2.98	$5.92	$0.00
		TOTAL SL2 Loop Hot Cut (Addl)	*$60.83*	*$63.99*	*$78.65*	*$69.75*	*$68.70*	*$73.96*	*$68.70*	*$74.35*	*$48.20*
5	SL2 LOOP (Order Coordination included in Loop NRC) with OC for Specified										
	A.1.2	SL2 Loop NRC (1st)	$56.00	$62.47	$78.10	$61.87	$65.72	$68.26	$65.72	$68.43	$48.20
	N.1.6	Order Coordination for Specified Conversion Time	$18.09	$23.02	$35.74	$23.01	$17.56	$18.19	$17.56	$18.13	$34.29
	N.1.1	Electronic Service Order	$5.83	$1.52	$0.56	$7.88	$2.98	$5.70	$2.98	$5.92	$0.00
		TOTAL SL2 Loop Hot Cut (Addl)	*$78.92*	*$107.01*	*$114.39*	*$112.76*	*$86.26*	*$92.17*	*$86.26*	*$92.48*	*$82.49*

REQUEST: Please provide, in table format, the following information for each BellSouth host or remote CO in the state of Florida:

(a) CLLI code;
(b) address;
(c) city or town;
(d) whether the CO is staffed full time (i.e., during regular business hours), part-time (and if so on what basis), or unstaffed; and
(e) whether the switch within the CO is a remote switch, and if so identify the associated host switch.

RESPONSE: See Attachment 1.

NOTE: A Central Office is noted as "Manned" if BellSouth reports employees to that central office every day regardless of workload, and a central office is marked "Unmanned" if employees are only dispatched to that location when workload warrants. No central offices are unmanned all the time.

RESPONSE PROVIDED BY: W. Keith Milner

BellSouth Telecommunications, Inc.
Florida Public Service Commission
Docket No. 030851-TP
AT&T's 1st Interrogatories
October 6, 2003
Item No. 1

ATTACHMENT TO INTERROGATORY, ITEM NO. 1

Attachment
Response to Item No. 1

CLLI	ADDRESS	CITY	STATE	ZIP	MANNED	HOST/REMOTE	HOST
ARCHFLMA	327 W ALABAMA ST	ARCHER	FL	32618	N	REMOTE	GSVLFLNW
BCRTFLBT	5140 S Congress Av	BOCA RATON	FL	33487	Y	HOST	
BCRTFLMA	838 S Dixie Hwy	BOCA RATON	FL	33432	Y	HOST	
BCRTFLSA	9407 Glades Rd	BOCA RATON	FL	33433	Y	HOST	
BGPIFLMA	US Hwy 1 MM 31	BIG PINE KEY	FL	33042	N	REMOTE	KYWSFLMA
BKVLFLJF	201 E JEFFERSON ST	BROOKSVILLE	FL	34613	Y	HOST	
BLDWFLMA	155 DREW ST	JACKSONVILLE	FL	32234	N	REMOTE	JCVLFLWC
BLGLFLMA	108 SW Av C	BELLE GLADE	FL	33430	N	HOST	
BNNLFLMA	111 SOUTH CHERRY STREET	BUNNELL	FL	32110	N	REMOTE	PLCSFLMA
BRSNFLMA	211 CAPITAL STREET	BRONSON	FL	32621	N	REMOTE	GSVLFLNW
BYBHFLMA	221 SE 4th St	BOYNTON BEACH	FL	33435	Y	HOST	
CCBHFLAF	1734 CANAVERAL AIR FORCE	CAPE CANAVERAL	FL	32920	N	REMOTE	CCBHFLMA
CCBHFLMA	450 W CCBH CAUSEWAY	COCOA BCH	FL	32931	Y	HOST	
CDKYFLMA	3RD STREET	CEDAR KEY	FL	32625	N	REMOTE	GSVLFLNW
CFLDFLMA	112 S.E. 1ST STREET	CHIEFLAND	FL	32626	Y	REMOTE	GSVLFLNW
CHPLFLJA	689A 3RD ST.	CHIPLEY	FL	32428	Y	HOST	
CNTMFLLE	521 MUSCOGEE RD	CANTONEMENT	FL	32533	Y	HOST	
COCOFLMA	712 FLORIDA AVENUE	COCOA	FL	32922	Y	HOST	
COCOFLME	125 EAST MUSTANG WAY	MERRITT ISLAND	FL	32953	Y	HOST	
CSCYFLBA	410 SW 1ST ST	CROSS CITY	FL	32628	Y	REMOTE	GSVLFLNW
DBRYFLDL	1204 PROVIDENCE BLVD	DELTONA	FL	32713	N	HOST	
DBRYFLMA	113 SOUTH HIGHWAY 17-92	DEBARY	FL	32713	N	REMOTE	DBRYFLDL
DELDFLMA	316 W NEW YORK AVE	DELAND	FL	32720	Y	HOST	
DLBHFLKP	6037 W Atlantic	DELRAY BEACH	FL	33445	Y	HOST	
DLBHFLMA	321 SE 2nd St	DELRAY BEACH	FL	33483	Y	HOST	
DLSPFLMA	135 BERLIN STREET	DELEON SPGS	FL	32130	N	REMOTE	DELDFLMA
DNLNFLWM	12060 S WILLIAMS ST	DUNNELLON	FL	34430	Y	REMOTE	WWSPFLHI
DRBHFLMA	780 S Deerfield Av	DEERFIELD	FL	33441	Y	HOST	
DYBHFLFN	1861 MASON AV	DAYTONA BCH	FL	32014	N	REMOTE	DYBHFLPO
DYBHFLMA	268 N RIDGEWOOD AVE	DAYTONA BCH	FL	32114	Y	HOST	
DYBHFLOB	22 S RIDGEWOOD AVE	ORMOND BCH	FL	32174	Y	HOST	
DYBHFLOS	1776 N OCEANSHORE BLVD	ORMOND BCH	FL	32174	N	REMOTE	DYBHFLOB
DYBHFLPO	829 ORANGE AVE	DAYTONA BCH	FL	32119	Y	HOST	
EGLLFLBG	1750 CROTON AVE	MELBOURNE	FL	32935	Y	HOST	
EGLLFLIH	980 PINETREE DRIVE	SATELLITE BCH	FL	32937	Y	HOST	
EORNFLMA	19544 COLONIAL DR.	ORLANDO	FL	32826	N	REMOTE	ORLDFLAP

Attachment
Response to Item No. 1

CLLI	ADDRESS	CITY	STATE	ZIP	MANNED	HOST/REMOTE	HOST
FLBHFLMA	210 S DAYTONA AVE	FLAGLER BCH	FL	32136	N	REMOTE	PLCSFLMA
FRBHFLFP	1910 SOUTH 8TH STREET	FERNANDINA BCH	FL	32034	Y	HOST	
FTGRFLMA	9451 HECKSCHER DRIVE	JACKSONVILLE	FL	32226	N	REMOTE	JCVLFLOW
FTLDFLAP	200 Terminal Dr	FT. LAUDERDALE	FL	33315	N	REMOTE	HLWDFLMA
FTLDFLCR	2530 E Oakland Park Blvd	FT.LAUDERDALE	FL	33306	Y	HOST	
FTLDFLCY	5395 NE 14th Av	FT.LAUDERDALE	FL	33334	Y	HOST	
FTLDFLJA	10141 W Broward Blvd	FT.LAUDERDALE	FL	33324	Y	HOST	
FTLDFLMR	211 NE 2nd St	FT.LAUDERDALE	FL	33301	Y	HOST	
FTLDFLOA	4200 W Oakland Park	FT.LAUDERDALE	FL	33313	Y	HOST	
FTLDFLPL	4036 Bryan Blvd	PLANTATION	FL	33317	Y	HOST	
FTLDFLSG	14000 NW 8th St	SUNRISE	FL	33325	Y	HOST	
FTLDFLSU	8750 W Oakland Park Blvd	BLVD SUNRISE	FL	33351	Y	HOST	
FTLDFLWN	1431 Bonaventure Blvd	FT.LAUDERDALE	FL	33326	Y	HOST	
FTPRFLMA	712 Citrus Av	FT PIERCE	FL	34950	Y	HOST	
GCSPFLCN	512 CENTER STREET	GREEN COVE SPGS	FL	32043	Y	HOST	
GCVLFLMA	5370 CLIFF STREET	GRACEVILLE	FL	32440	N	REMOTE	CHPLFLJA
GENVFLMA	173 FIRST ST	GENEVA	FL	32732	N	REMOTE	SNFRFLMA
GLBRFLMC	98 MCCLURE DR	GULF BREEZE	FL	32561	Y	HOST	
GSVLFLMA	400 SW 2ND AVENUE	GAINESVILLE	FL	32601	Y	HOST	
GSVLFLNW	7525 N.W. 5TH PLACE	GAINESVILLE	FL	32601	Y	HOST	
HAVNFLMA	111 1ST STREET SE	HAVANA	FL	32333	Y	HOST	
HBSDFLMA	1500 S Dixie Hwy	HOBE SOUND	FL	33455	Y	HOST	
HLNVFLMA	1810 STATE ROAD 87	NAVARRE	FL	32561	Y	HOST	
HLWDFLHA	120 NE 12th Av	HALLANDALE	FL	33009	Y	HOST	
HLWDFLMA	715 N Federal Hwy	HOLLYWOOD	FL	33020	Y	HOST	
HLWDFLPE	61 NW 98th Av	PEMBROKE PINES	FL	33024	Y	HOST	
HLWDFLWH	250 SW 62nd Av	HOLLYWOOD	FL	33023	Y	HOST	
HMSTFLEA	2850 NORTH CANAL DR	HOMESTEAD	FL	33033	N	REMOTE	HMSTFLHM
HMSTFLHM	75 Civic Ct	HOMESTEAD	FL	33030	Y	HOST	
HMSTFLNA	14475 SW 264th St	NARANJA	FL	33032	Y	REMOTE	HMSTFLHM
HTISFLMA	10990 S A1A	JRNSEN BEACH	FL	34957	Y	HOST	
HWTHFLMA	21 N.W. FIRST STREET	HAWTHORNE	FL	32640	Y	REMOTE	GSVLFLNW
ISLMFLMA	US Hwy MM 182	ISLAMORADA	FL	33036	Y	REMOTE	HMSTFLHM
JAYAFLMA	107 CHERRY STREET	JAY	FL	32565	N	REMOTE	CNTMFLLE
JCBHFLAB	13635 ATLANTIC BLVD.	JACKSONVILLE	FL	32225	Y	REMOTE	JCVLFLBW
JCBHFLMA	1824 NORTH 3RD STREET	JACKSONVILLE	FL	32250	Y	HOST	

Attachment
Response to Item No. 1

CLLI	ADDRESS	CITY	STATE	ZIP	MANNED	HOST/REMOTE	HOST
JCBHFLSP	3370 THALIA RD	JACKSONVILLE	FL	32250	Y	REMOTE	JCVLFLBW
JCVLFLAR	7553 ATLANTIC BLVD.	JACKSONVILLE	FL	32211	Y	HOST	
JCVLFLBW	11317 BEACH BLVD.	JACKSONVILLE	FL	32216	Y	HOST	
JCVLFLCL	424 PEARL STREET	JACKSONVILLE	FL	32202	Y	HOST	
JCVLFLFC	6654 FT CAROLINE RD	JACKSONVILLE	FL	32211	Y	HOST	
JCVLFLIA	1550 AIRPORT RD	JACKSONVILLE	FL	32218	N	REMOTE	JCVLFLOW
JCVLFLJT	4500 SALISBURY RD	JACKSONVILLE	FL	32216	Y	REMOTE	MNDRFLLO
JCVLFLLF	1441 W EDGEWOOD AVE	JACKSONVILLE	FL	32208	Y	HOST	
JCVLFLNO	6602 NORMANDY BLVD.	JACKSONVILLE	FL	32205	Y	HOST	
JCVLFLOW	11741 N MAIN ST	JACKSONVILLE	FL	32218	Y	HOST	
JCVLFLRV	1710 TALBOT AVENUE	JACKSONVILLE	FL	32205	Y	HOST	
JCVLFLSJ	6234 OLD ST AUGUSTINE RD	JACKSONVILLE	FL	32217	Y	HOST	
JCVLFLSM	2048 HENDRICKS AVE	JACKSONVILLE	FL	32207	Y	HOST	
JCVLFLWC	5532 JAMMES RD	JACKSONVILLE	FL	32210	Y	HOST	
JPTRFLMA	112 Seminole Av	JUPITER	FL	33458	Y	HOST	
KYHGFLMA	70 SW MAGNOLIA AVE	KEYSTONE HGHTS	FL	32656	N	REMOTE	GSVLFLNW
KYLRFLLS	US Hwy 1 MM 102.5	LARGO SOUND	FL	33037	Y	REMOTE	HMSTFLHM
KYLRFLMA	US Hwy 1 MM 95	KEY LARGO	FL	33037	Y	REMOTE	HMSTFLHM
KYWSFLMA	530 Southard St	KEY WEST	FL	33040	Y	HOST	
LKCYFLMA	130 WEST NASSAU STREET	LAKE CITY	FL	32055	Y	HOST	
LKMRFLMA	365 INTERNATIONAL PARKWAY	LAKE MARY	FL	32746	Y	HOST	
LYHNFLOH	812 OHIO AVE	LYNN HAVEN	FL	32444	Y	HOST	
MCNPFLMA	101 N.E. 3RD AVE	MICANOPY	FL	32667	N	REMOTE	GSVLFLNW
MDBGFLPM	3906 MAIN STREET	MIDDLEBURG	FL	32068	Y	HOST	
MIAMFLAE	115 Alhambra Dr	CORAL GABLES	FL	33134	Y	HOST	
MIAMFLAL	2470 NW 38th St	MIAMI	FL	33142	Y	HOST	
MIAMFLAP	5275 NW 36th St	MIAMI	FL	33166	Y	HOST	
MIAMFLBA	2010 NW 17th Av	MIAMI	FL	33142	Y	HOST	
MIAMFLBC	251 NW 29th St	MIAMI	FL	33056	Y	HOST	
MIAMFLBR	1550 Lennox Av	MIAMI	FL	33127	Y	HOST	
MIAMFLCA	2301 SW 100th Av	MIAMI	FL	33165	Y	HOST	
MIAMFLDB	9405 Old Dixie Hwy	MIAMI	FL	33156	N	REMOTE	MIAMFLRR
MIAMFLFL	2105 W. Flagler	MIAMI	FL	33135	Y	HOST	
MIAMFLGR	45 NW 5th St	MIAMI	FL	33128	Y	HOST	
MIAMFLHL	1245 W 69th St	HIALEAH	FL	33141	Y	HOST	
MIAMFLIC	6800 Harding Av	MIAMI BEACH	FL	33142	Y	HOST	

Attachment
Response to Item No. 1

CLLI	ADDRESS	CITY	STATE	ZIP	MANNED	HOST/REMOTE	HOST
MIAMFLKE	89 Westwood Dr	KEY BISCAYNE	FL	33149	Y	HOST	
MIAMFLME	1380 NW 21st St	MIAMI	FL	33138	Y	HOST	
MIAMFLNM	1360 NE 127th St	NORTH MIAMI	FL	33147	Y	HOST	
MIAMFLNS	2615 NW 79th St	MIAMI	FL	33169	Y	HOST	
MIAMFLOL	2660 E Superior St	MIAMI	FL	33178	Y	HOST	
MIAMFLPB	25 Nahkoda Dr	MIAMI	FL	33166	Y	HOST	
MIAMFLPL	9056 NW 41st St	MIAMI	FL	33164	Y	HOST	
MIAMFLRR	6100 SW 57th Av	MIAMI	FL	33143	Y	HOST	
MIAMFLSH	8451 NE 1st Av	MIAMI	FL	33161	Y	HOST	
MIAMFLSO	10701 SW 88th St	MIAMI	FL	33176	Y	HOST	
MIAMFLWD	15000 SW 88th St	MIAMI	FL	33196	Y	HOST	
MIAMFLWM	1155 SW 67th Av	MIAMI	FL	33144	Y	HOST	
MICCFLBB	720 Egret Cir	MICCO	FL	32957	N	REMOTE	VRBHFLMA
MLBRFLMA	728 E PALMETTO AVE	MELBOURNE	FL	32901	Y	HOST	
MLTNFLRA	6749 RAVINE STREET	MILTON	FL	32570	Y	HOST	
MNDRFLAV	8923 W WAY-SUITE 100	JACKSONVILLE	FL	32217	Y	HOST	
MNDRFLLO	11498 ST. AUGUSTINE ROAD	JACKSONVILLE	FL	32223	Y	HOST	
MNDRFLLW	577 SR 13	FRUIT COVE	FL	32223	N	REMOTE	MNDRFLLO
MNSNFLMA	11686 MUNSON WAY	MUNSON	FL	32531	N	REMOTE	CNTMFLLE
MRTHFLVE	US Hwy 1 MM 54.5	MARATHON	FL	33050	Y	REMOTE	KYWSFLMA
MXVLFLMA	8455 MAXVILLE BLVD	JACKSONVILLE	FL	32226	N	REMOTE	JCVLFLWC
NDADFLAC	2100 NE 164th St	MIAMI	FL	33139	Y	HOST	
NDADFLBR	18560 NW 27th Av	MIAMI	FL	33179	Y	HOST	
NDADFLGG	18400 NE 5th Av	MIAMI	FL	33179	Y	HOST	
NDADFLOL	19251 NE 26th Av	MIAMI	FL	33054	Y	HOST	
NKLRFLMA	Ocean Key Club St Rd 905	NORTH KEY LARGO	FL	33037	Y	REMOTE	HMSTFLHM
NSBHFLMA	100 CANAL ST	NEW SMYRNA BCH	FL	32169	Y	HOST	
NWBYFLMA	25410 NW 1ST AVE	NEWBERRY	FL	32669	Y	REMOTE	GSVLFLNW
OKHLFLMA	153 BELL AVE	OAKHILL	FL	32759	N	REMOTE	DYBHFLPO
OLTWFLLN	LEON ST. NO NUMBER	OLD TOWN	FL	32680	N	REMOTE	GSVLFLNW
ORLDFLAP	7320 LAKE UNDER HILL RD	ORLANDO	FL	32807	Y	HOST	
ORLDFLCL	2315 EAST CENTRAL BLVD	ORLANDO	FL	32803	Y	HOST	
ORLDFLMA	45 NORTH MAGNOLIA AVENUE	ORLANDO	FL	32801	Y	HOST	
ORLDFLPC	6621 SOUTH ORANGE AVENUE	ORLANDO	FL	32809	Y	HOST	
ORLDFLPH	5120 SILVER STAR ROAD	ORLANDO	FL	32808	Y	HOST	
ORLDFLSA	4959 SANDLAKE ROAD	ORLANDO	FL	32809	Y	HOST	

Attachment
Response to Item No. 1

CLLI	ADDRESS	CITY	STATE	ZIP	MANNED	HOST/REMOTE	HOST
ORPKFLMA	150 MCINTOSH AVE	ORANGE PARK	FL	32073	Y	HOST	
ORPKFLRW	721 BLANDING BLVD - B	ORANGE PARK	FL	32073	Y	HOST	
OVIDFLCA	84 SOUTH CENTRAL AVE	OVIEDO	FL	32765	Y	HOST	
PACEFLPV	4351 HIGHWAY 90	PACE	FL	32571	Y	REMOTE	MLTNFLRA
PAHKFLMA	826 E Main St	PAHOKEE	FL	33479	N	REMOTE	BLGLFLMA
PCBHFLNT	604 NAUTILUS	PANAMA CITY	FL	32401	Y	HOST	
PLCSFLMA	5 CLUBHOUSE DR	PALM COAST	FL	32137	Y	HOST	
PLTKFLMA	319 MAIN STREET	PALATKA	FL	32177	Y	HOST	
PMBHFLCS	9420 Royal Palm Blvd	CORAL SPRINGS	FL	33065	Y	HOST	
PMBHFLFE	1230 N Federal Hwy	POMPANO BEACH	FL	33062	Y	HOST	
PMBHFLMA	1180 Banks Rd	MARGATE	FL	33063	Y	HOST	
PMBHFLNP	1551 N. POWERLINE	FT. LAUDERDALE	FL		Y	REMOTE	PMBHFLTA
PMBHFLTA	7600 N University Dr	TAMARAC	FL	33321	Y	HOST	
PMPKFLMA	212 WORCHESTER RD	POMONA PARK	FL	32181	N	REMOTE	PLTKFLMA
PNCYFLCA	6609 EAST ST. RD. 22	PANAMA CITY	FL	32401	Y	REMOTE	PNCYFLMA
PNCYFLMA	111 EAST 5TH STREET	PANAMA CITY	FL	32401	Y	HOST	
PNSCFLBL	30 WEST BELMONT STREET	PENSACOLA	FL	32501	Y	HOST	
PNSCFLFP	1725 OLIVE ROAD	PENSACOLA	FL	32504	Y	HOST	
PNSCFLHC	6913 PINE FOREST RD NW	PENSACOLA	FL	32506	Y	REMOTE	PNSCFLFP
PNSCFLPB	5575 LARIMER ST	PERDIDO	FL	32507	Y	HOST	
PNSCFLWA	515 S OLD CORRY FIELD RD	PENSACOLA	FL	32507	Y	HOST	
PNVDFLMA	637 A1A N	PONTE VEDRA BCH	FL	32082	Y	HOST	
PRRNFLMA	16645 US Hwy 1	MIAMI	FL	33157	Y	HOST	
PRSNFLFD	112 N FOUNTAIN DR	PIERSON	FL	32180	N	REMOTE	DELDFLMA
PTSLFLMA	450 Irving St	PT ST LUCIE	FL	34983	Y	HOST	
PTSLFLSO	2002 Pt St Lucie Blvd	PORT ST LUCIE SOUTH	FL	34953	N	HOST	
SBSTFLFE	5 Bay St	FELLSMERE	FL	32948	N	REMOTE	VRBHFLMA
SBSTFLMA	1137 US Hwy 1	SEBASTIAN	FL	32958	Y	HOST	
SGKYFLMA	19921 Overseas Hwy	SUGARLOAF KEY	FL	33042	N	REMOTE	KYWSFLMA
SNFRFLMA	501 W 9TH ST	SANFORD	FL	32771	Y	HOST	
STAGFLBS	4900 A1A SOUTH	ST AUGUSTINE	FL	32084	N	REMOTE	STAGFLMA
STAGFLMA	69 CORDOVA STREET	ST AUGUSTINE	FL	32084	Y	HOST	
STAGFLSH	4460 US #1 SOUTH	ST AUGUSTINE	FL	32084	Y	REMOTE	STAGFLMA
STAGFLWG	4875 STATE ROAD 16	ST AUGUSTINE	FL	32095	N	REMOTE	MNDRFLLO
STRTFLMA	305 W 3rd St	STUART	FL	34994	Y	HOST	
SYHSFLCC	4228 COUNTRY CLUB LANE	SUNNY HILLS	FL	32463	N	REMOTE	CHPLFLJA

Attachment
Response to Item No. 1

CLLI	ADDRESS	CITY	STATE	ZIP	MANNED	HOST/REMOTE	HOST
TRENFLMA	213 N W 1ST ST.	TRENTON	FL	32693	Y	REMOTE	GSVLFLNW
TTVLFLMA	620 HOPKINS STREET	TITUSVILLE	FL	32796	Y	HOST	
VERNFLMA	3321 COURT AVENUE	VERNON	FL	32462	N	REMOTE	CHPLFLJA
VRBHFLBE	766 Beachland Blvd	VERO BEACH	FL	32963	N	REMOTE	SBSTFLMA
VRBHFLMA	1976 16th St	VERO BEACH	FL	32960	Y	HOST	
WELKFLMA	301 3RD AVE	WELAKA	FL	32193	N	REMOTE	PLTKFLMA
WPBHFLAN	325 Gardenia St	WEST PALM BEACH	FL	33401	Y	HOST	
WPBHFLGA	3800 S Military Trail	LAKE WORTH	FL	33463	Y	HOST	
WPBHFLGR	3700 RCA Blvd	PALM BEACH GARDENS	FL	33410	Y	HOST	
WPBHFLHH	1550 N Haverhill Rd	WEST PALM BEACH	FL	33417	Y	HOST	
WPBHFLLE	120 N K St	LAKE WORTH	FL	33460	Y	HOST	
WPBHFLRB	3640 Ave E	RIVIERA BEACH	FL	33404	Y	HOST	
WPBHFLRP	11455 State Rd 80	ROYAL PALM BEACH	FL	33411	Y	HOST	
WWSPFLHI	9401 CORTEZ BLVD	BROOKSVILLE	FL	34613	Y	HOST	
WWSPFLSH	1395 DELTONA BLVD	SPRING HILL	FL	34606	Y	HOST	
YNFNFLMA	12102 AZALEA ST	FOUNTAIN	FL	32438	N	REMOTE	LYHNFLMA
YNTWFLMA	SCHOOLCRAFT STREET	YANKEETOWN	FL	34498	N	REMOTE	BKVLFLJF
YULEFLMA	S.R. 200 & U.S. 17	YULEE	FL	32097	N	REMOTE	JCVLFLOW

BellSouth Interconnection Services
675 West Peachtree Street
Room 34H71
Atlanta, Georgia 30375

Laurel MacKenzie
(404) 927-7575
Fax: (404) 927-4985

May 5, 2003

Ms. Denise Berger
AT&T Local Services
Operations Assistant Vice President
Room 12256
1200 Peachtree St. NE
Atlanta, GA 30309

Dear Ms. Berger:

This is in response to your e-mail dated March 6, 2003, posing additional questions concerning the conversion of customers from Unbundled Network Element – Platform (UNE-P) to UNE-Loop (UNE-L). The following are BellSouth's responses to your questions:

AT&T Question #1: Will BellSouth support the transition of IDLC UNE-P customers to UNE Loop as a part of this proposed migration? If not, what is a viable alternative.

BellSouth Response: As part of this proposed migration, BellSouth will support transition of Integrated Digital Loop Carrier (IDLC) UNE-P customers to UNE-L when alternative arrangements exist. Attachment 2, Section 3.11.1 of AT&T's Interconnection Agreement specifies the viable alternatives.

AT&T Question #2: Will BellSouth identify the IDLC customers as part of its project planning process? If so, will BellSouth also identify the alternative facilities onto which it will move customers prior to the migration?

BellSouth Response: During the project planning process, BellSouth will identify the IDLC UNE-P customers and will assign alternate facilities, when such facilities exist, during the service order process.

AT&T Question #3: Does BellSouth plan to move the customer to copper prior to the migration? If so, how will BellSouth schedule that interim transition? If not, how will BellSouth care for the change in facilities?

BellSouth Response: Currently, BellSouth has no plans to convert IDLC UNE-P customers to copper on an interim basis prior to the negotiated due date of the actual conversion. BellSouth will perform the conversion on the due date as per existing processes being utilized today. This process, as well as the CLEC notification, is based on requested service type (SL1/SL2) and requested conversion type (coordinated or non-coordinated).

AT&T Question #4: AT&T assumes that dispatch technicians will be required to migrate IDLC customers. How does BellSouth plan to schedule these customers in order to minimize dispatch technician overtime?

BellSouth Response: It is expected that IDLC UNE-P customers being converted to UNE-L will require a field dispatch. Upon initial receipt of the project planning notification from the CLEC, the project manager will negotiate due dates with the network organizations based on volumes and required dispatches. These dates will be set to maximize field resources with minimal or no use of overtime.

AT&T Question #5: What percentage of end-user customers by state in BellSouth's territory are on IDLC?

BellSouth Response: The following is the percentage by state within BellSouth territory of end-user customers of all carriers on IDLC:

AL 22.7%,	MS 22,7%
FL 31.8%,	NC 26.0%
GA 27.0%,	SC 36.3%
KY 13.4%,	TN 21.8%
LA 12.5%	

The questions that you submitted to Professional Services did not specifically pertain to the New Business Request (NBR) AT&T submitted earlier and, therefore, have required a longer response period. In the future, in an effort to facilitate quicker responses, please direct questions about general BellSouth practices to AT&T's Local Contract Manager within Jim Schenks' CLEC Care organization. CLEC Care has the resources assigned to AT&T to respond to your questions and interface with any department required to provide information in formulating an answer.

Sincerely,

Laurel MacKenzie

Laurel Mackenzie
Senior Manager – Professional Services
Interconnection Services Marketing

CC: Jim Schenks
Scott Kunze

REQUEST: With respect to the Coordinated Hot Cut Timeliness % Within Interval Measure, please provide all documents containing or pertaining to performance data, studies, or other information that support the benchmark of 95% within 4 hours window for IDLC loops.

RESPONSE: Additional time to provide loops where existing service is provided over IDLC is necessary due to the fact that the process for handling a hot cut conversion with IDLC is significantly different than with non-IDLC. As an example, moving a jumper and then testing the circuit can accomplish a very simple non-IDLC hot cut. However, when a hot cut involves IDLC, the facility to the customer's premise is integrated with BellSouth's digital switch. The facility must be separated from BellSouth's switch prior to the hot cut because the switching port is provided by the CLEC. This may require a transfer to a non-IDLC facility and may also require a technician at the customer's premise and in the BellSouth central office. Occasionally, hot cuts involving IDLC may also require the placement of non-IDLC facilities prior to the day of the hot cut.

The number of hot cuts involving IDLC is an appreciable percentage of the total number of hot cuts, and when an IDLC hot cut does occur, additional flexibility is required to dispatch the technicians at both ends of the circuit. In terms of volume, in July 2003, there were 526 hot cuts in Florida, and, of these, 146 (or 27.7%) involved IDLC. In August 2003, there were 520 hot cuts and, of these, 163 (or 31.3%) involved IDLC.

If the interval for hot cuts involving IDLC is less than four hours, then in order to satisfy this measurement, BellSouth will have to dispatch a technician prior to the time the hot cut is scheduled to make a line and station transfer (LST) to place the customer service on a non-integrated facility. This approach requires additional work time for the technician, which is currently performed before the scheduled hot cut. Although this extra work means additional cost to BellSouth, which is not covered in the price for the service, unless a technician is dispatched to perform the LST the day before the scheduled hot cut, BellSouth would be unable to meet a 15-minute interval for cutting over loops.
Given this, BellSouth has a separate benchmark interval for Measure P-7A, Coordinated Customers Conversions – Hot Cut Timeliness % within Interval and Average Interval for hot cuts involving Integrated Digital Loop Carrier ("IDLC") in order to account for the greater time required to coordinate these hot cuts. BellSouth has a benchmark of 95% within a 4-hour window. This allows

RESPONSE (CONT.):

BellSouth to dispatch the technician only once on the date the hot cut is scheduled to perform the station transfer to a non-IDLC facility, and to call the CWINS center when the technician is ready to perform the hot cut. The four-hour window would be 8 a.m. to 12 p.m. or 1 p.m. to 5 p.m. This four-hour window is consistent with the AM or PM dispatch strategy BellSouth currently has in place for other Provisioning work, providing the technicians sufficient time to complete all of the associated work with one dispatch in most cases.
On hot cuts involving IDLC, BellSouth would notify the CLEC by 10:30 a.m. the day before the scheduled cutover to advise the CLEC that IDLC is involved and that the four-hour window would apply.

The benchmark BellSouth proposes is consistent with the approach in New York, where Verizon has a four-hour window to cut over a loop served on IDLC. (See New York State Carrier-to-Carrier Guidelines Performance Standards and Reports, November 2002, PR-9 Hot Cut Performance.)

REQUEST: For the BellSouth access lines that are currently provisioned on IDLC/NGDLC technology as described in the response to Interrogatory No. 20 above, please state the percentage of such access lines for which BellSouth has existing, parallel copper or Universal Digital Loop Carrier ("UDLC") facilities available for hot cut conversions.

RESPONSE: Refer to Item No. 23 attachment (column labeled "% compatible"). To ascertain "parallel copper" and "UDLC facilities available for hot cut conversions", only loop feeder facilities are considered.

RESPONSE PROVIDED BY: W. Keith Milner

BellSouth Telecommunications, Inc.
Florida Public Service Commission
Docket No. 030851-TP
AT&T's 1st Interrogatories
October 6, 2003
Item No. 23

ATTACHMENT TO INTERROGATORY, ITEM NO. 23

Attachment
Response to Item No. 23

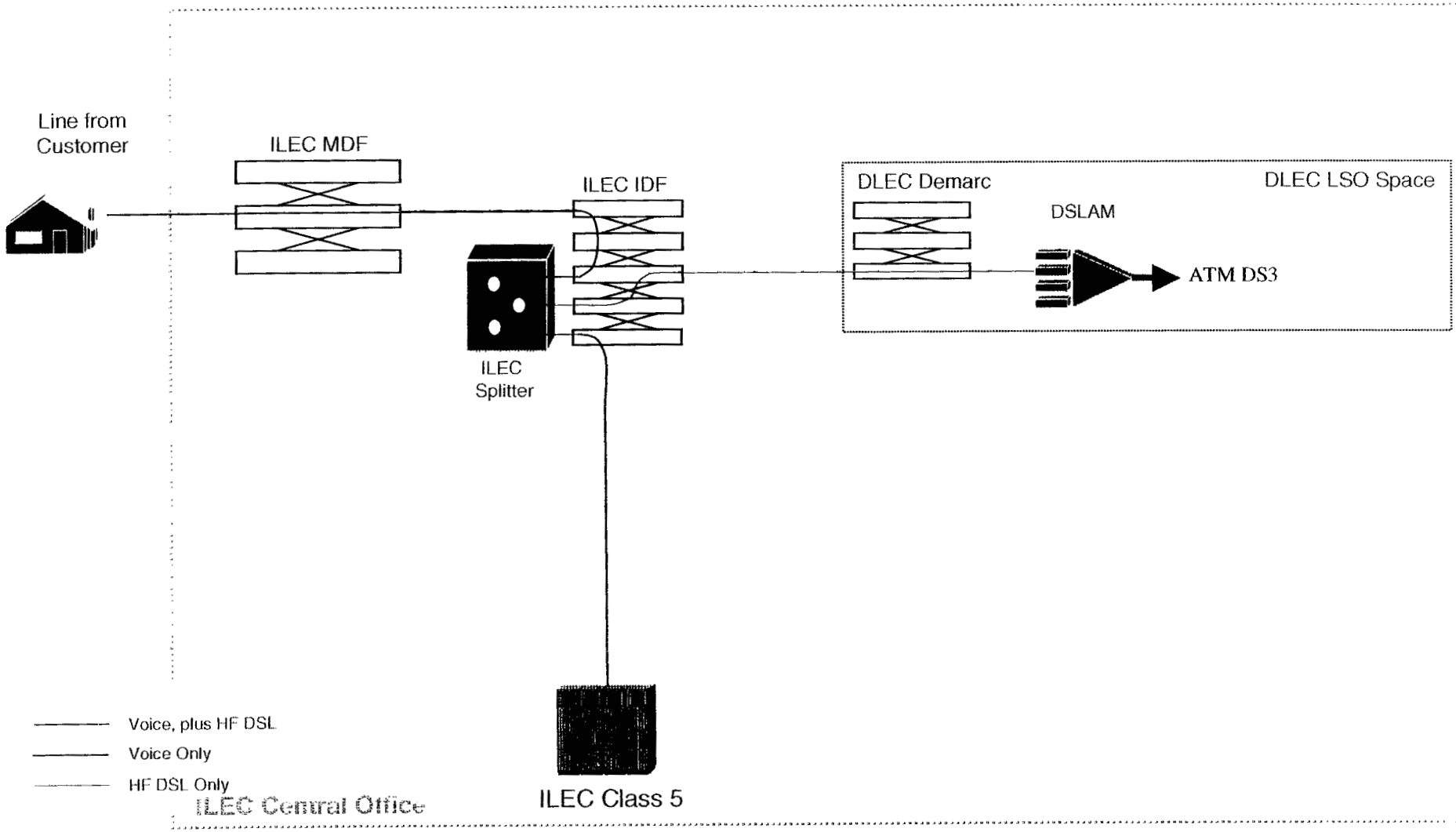
CLLI	total IDLC loops	total spares	% compatible spares
archflma	1207	1165	96.52%
bcrtflbt	12446	16954	100.00%
bcrtflsa	37159	8973	24.15%
bgpiflma	2748	2350	85.52%
bkvlfljf	13293	6951	52.29%
bldwflma	786	816	100.00%
blglflma	2430	2766	100.00%
bnnlflma	1806	4825	100.00%
brsnflma	2194	1113	50.73%
bybhflma	29668	19911	67.11%
ccbhflma	3718	5792	100.00%
cdkyflma	259	307	100.00%
cldflma	2594	1376	53.05%
chplflja	1790	1641	91.68%
cntmflle	3619	2274	62.84%
cocoflma	29683	13297	44.80%
cocoflme	12329	5468	44.35%
cscyflba	1750	1468	83.89%
dbryfldl	8379	1806	21.55%
dbryflma	5015	2358	47.02%
deldflma	5676	6274	100.00%
dlbhflkp	9878	9260	93.74%
dlbhflma	4	14792	100.00%
dlspflma	0	1449	N/A
dnlnflwm	6403	3880	60.60%
drbhflma	24431	15839	64.83%
dybhflfn	0	1742	N/A
dybhflma	22714	17038	75.01%
dybhflob	12406	10282	82.88%
dybhflos	1603	1882	100.00%
dybhflpo	15303	15520	100.00%
eglIflbg	34952	8417	24.08%
eglIflih	3940	4858	100.00%
eornflma	4545	1848	40.66%
flbhflma	472	1972	100.00%
frbhflfp	10510	4414	42.00%
ftgrflma	0	935	N/A
ftldflap	2434	4785	100.00%
ftldflcr	4571	14482	100.00%
ftldflcy	4684	18482	100.00%
ftldflja	29305	20620	70.36%
ftldflmr	15644	31482	100.00%
ftldfloa	12397	16466	100.00%
ftldflpl	18058	16872	93.43%
ftldflsg	6677	3935	58.93%
ftldflsu	0	14279	N/A
ftldflwn	32415	8728	26.93%
ftprflma	21990	11209	50.97%
gcspflcn	2842	2683	94.41%
gcvlflma	529	1661	100.00%
genvflma	979	711	72.63%
glbrflmc	9857	4086	41.45%
gsvlflma	48364	32786	67.79%
gsvlflnw	7185	4825	67.15%
havnflma	1772	1911	100.00%
hbsdflma	2319	3037	100.00%
hlnvflma	10192	4383	43.00%
hlwdflha	4	10186	100.00%
hlwdflma	9741	14196	100.00%
hlwdflpe	116900	26165	22.38%

hlwdflwh	26028	21929	84.25%
hmstflea	208	598	100.00%
hmstflhm	12370	14201	100.00%
hmstflna	1340	4885	100.00%
htisflma	4837	3413	70.56%
hwthflma	1695	1439	84.90%
islmflma	2482	1696	68.33%
jayaflma	0	1677	N/A
jcbhflab	12208	2067	16.93%
jcbhflma	0	13205	N/A
jcbhflsp	11096	3141	28.31%
jcvlflar	6661	11432	100.00%
jcvlflbw	27629	9563	34.61%
jcvlflcl	6684	42859	100.00%
jcvlflfc	4568	4406	96.45%
jcvlflia	0	903	N/A
jcvlfljt	3664	4765	100.00%
jcvlflif	0	10241	N/A
jcvlflno	13193	8546	64.78%
jcvlflow	8522	6651	78.05%
jcvlflrv	0	8139	N/A
jcvlflsj	7513	14523	100.00%
jcvlflsm	3333	12934	100.00%
jcvlflwc	21322	9122	42.78%
jptrflma	24133	8935	37.02%
kyhgflma	3038	1246	41.01%
kylrflls	3138	2529	80.59%
kylrflma	6271	3405	54.30%
kywsflma	11940	7511	62.91%
lkcyflma	15594	7177	46.02%
lkmrflma	8725	12985	100.00%
lyhnfloh	2550	4816	100.00%
mcnpflma	552	442	80.07%
mdbgflpm	5341	4012	75.12%
miamflae	8935	38592	100.00%
miamflai	0	8924	N/A
miamflap	1210	14592	100.00%
miamflba	0	19344	N/A
miamflbc	245	6978	100.00%
miamflbr	13267	32630	100.00%
miamflca	50859	32746	64.39%
miamfldb	0	4775	N/A
miamflfl	1021	8774	100.00%
miamflgr	5339	60296	100.00%
miamflhl	50836	28902	56.85%
miamflic	5156	13708	100.00%
miamflke	856	2633	100.00%
miamflme	0	7838	N/A
miamflnm	1363	8595	100.00%
miamflns	3535	8876	100.00%
miamflol	2142	9138	100.00%
miamflpb	349	15539	100.00%
miamflpl	31023	34141	100.00%
miamflrr	13279	20542	100.00%
miamflsh	0	12390	N/A
miamflso	13404	24562	100.00%
miamflwd	34830	14288	41.02%
miamflwm	6330	25967	100.00%
miccflbb	1906	1422	74.61%
mlbrflma	58383	19045	32.62%
mltnflra	7829	10912	100.00%

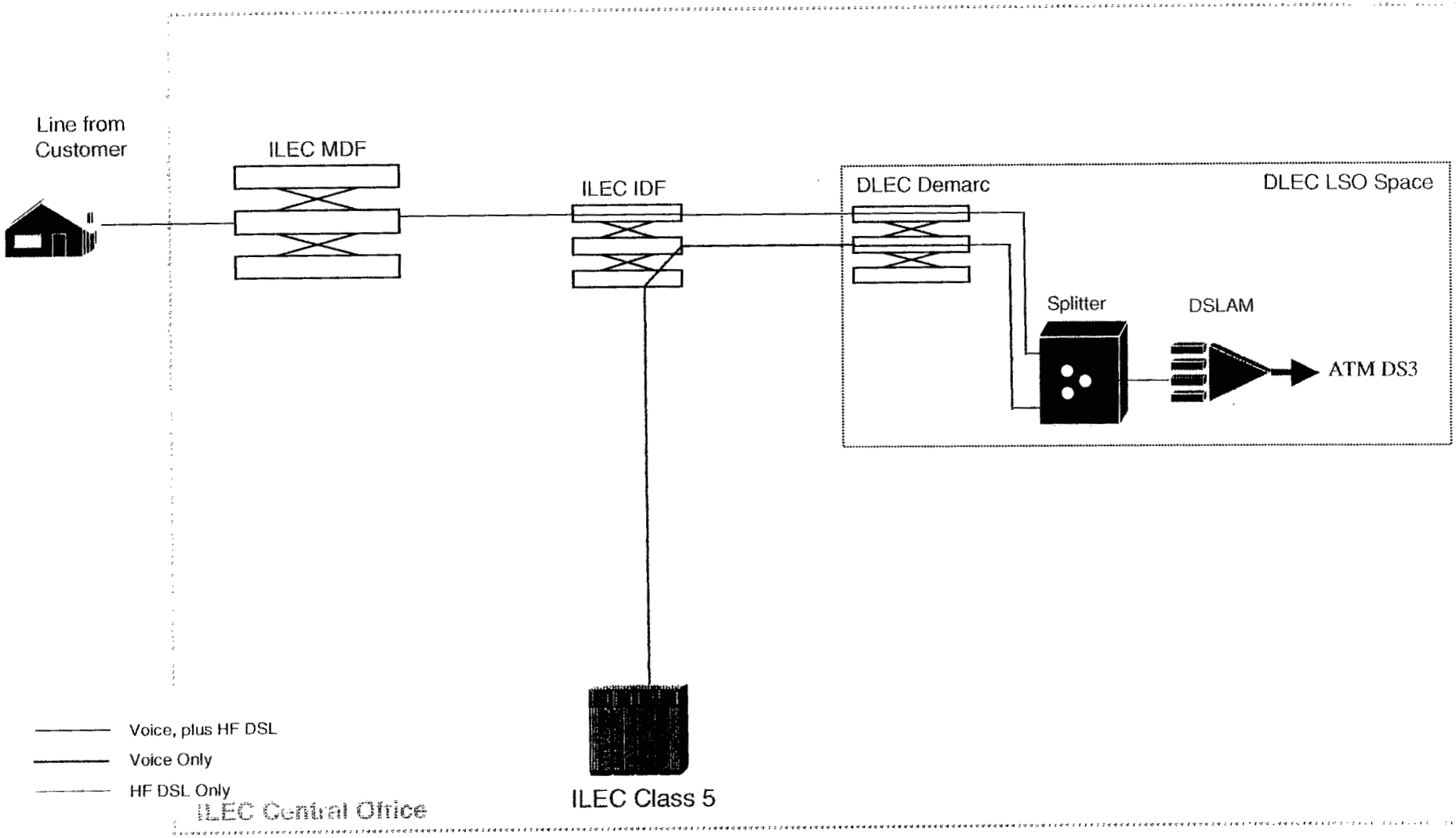
mndrflav	5678	2626	46.25%
mndrflio	22774	11182	49.10%
mndrfliw	9095	2308	25.38%
mnsnflma	0	1382	N/A
mrthflve	5549	3820	68.84%
mxvlflma	632	313	49.53%
ndadflac	6174	12597	100.00%
ndadflbr	14373	13981	97.27%
ndadflgg	3386	8653	100.00%
ndadflol	8522	17144	100.00%
nklrflma	0	2240	N/A
nsbhflma	7662	9280	100.00%
nwbyflma	1966	1325	67.40%
okhlflma	0	956	N/A
oltwflln	2272	588	25.88%
oridflap	75995	24003	31.58%
oridflcl	6918	10011	100.00%
oridflma	0	45488	N/A
oridflpc	57863	29171	50.41%
oridflph	74315	19315	25.99%
oridflsa	21231	15168	71.44%
orpkflma	12129	8595	70.86%
orpkflrw	1976	5593	100.00%
ovidflca	28998	7935	27.36%
pacefipv	5918	2499	42.23%
pahkflma	0	1782	N/A
pcbhflnt	19696	8151	41.38%
plcsflma	6512	3666	56.30%
pltkflma	10967	7151	65.20%
pmbhflcs	50663	19038	37.58%
pmbhflfe	17442	19041	100.00%
pmbhflma	25156	16952	67.39%
pmbhflta	15304	7107	46.44%
pmpkflma	1496	953	63.70%
pncyflca	1132	3719	100.00%
pncyflma	14947	12069	80.75%
pnscflbl	7769	16554	100.00%
pnscflfp	29080	14760	50.76%
pnscflhc	4939	1387	28.08%
pnscflpb	4643	2328	50.14%
pnscflwa	12452	10473	84.11%
pnvdflma	13816	3696	26.75%
prrnflma	36468	33668	92.32%
prsnflfd	0	1774	N/A
ptslflma	26457	7782	29.41%
ptslflso	5694	3706	65.09%
sbstflfe	0	730	N/A
sbstflma	8434	3962	46.98%
sgkyflma	3866	940	24.31%
snfrflma	43047	17478	40.60%
stagflbs	7283	3172	43.55%
stagflma	18444	9135	49.53%
stagflsh	6093	3348	54.95%
stagflwg	2348	3202	100.00%
strtflma	31852	15917	49.97%
syhsflcc	0	1238	N/A
trenflma	2361	1192	50.49%
ttvlflma	16333	9804	60.03%
vernflma	0	797	N/A
vrbhflbe	4914	2281	46.42%
vrbhflma	20482	8504	41.52%

welkflma	1177	853	72.47%
wpbhflan	7323	18020	100.00%
wpbhflga	44186	19155	43.35%
wpbhflgr	32320	23064	71.36%
wpbhflhh	31497	18072	57.38%
wpbhflle	4361	6973	100.00%
wpbhflrb	13	16558	100.00%
wpbhflrp	43589	15347	35.21%
wwspflhi	12856	1953	15.19%
wwspflsh	25845	3287	12.72%
ynfnflma	230	981	100.00%
yntwflma	1024	556	54.30%
yuleflma	0	1089	N/A

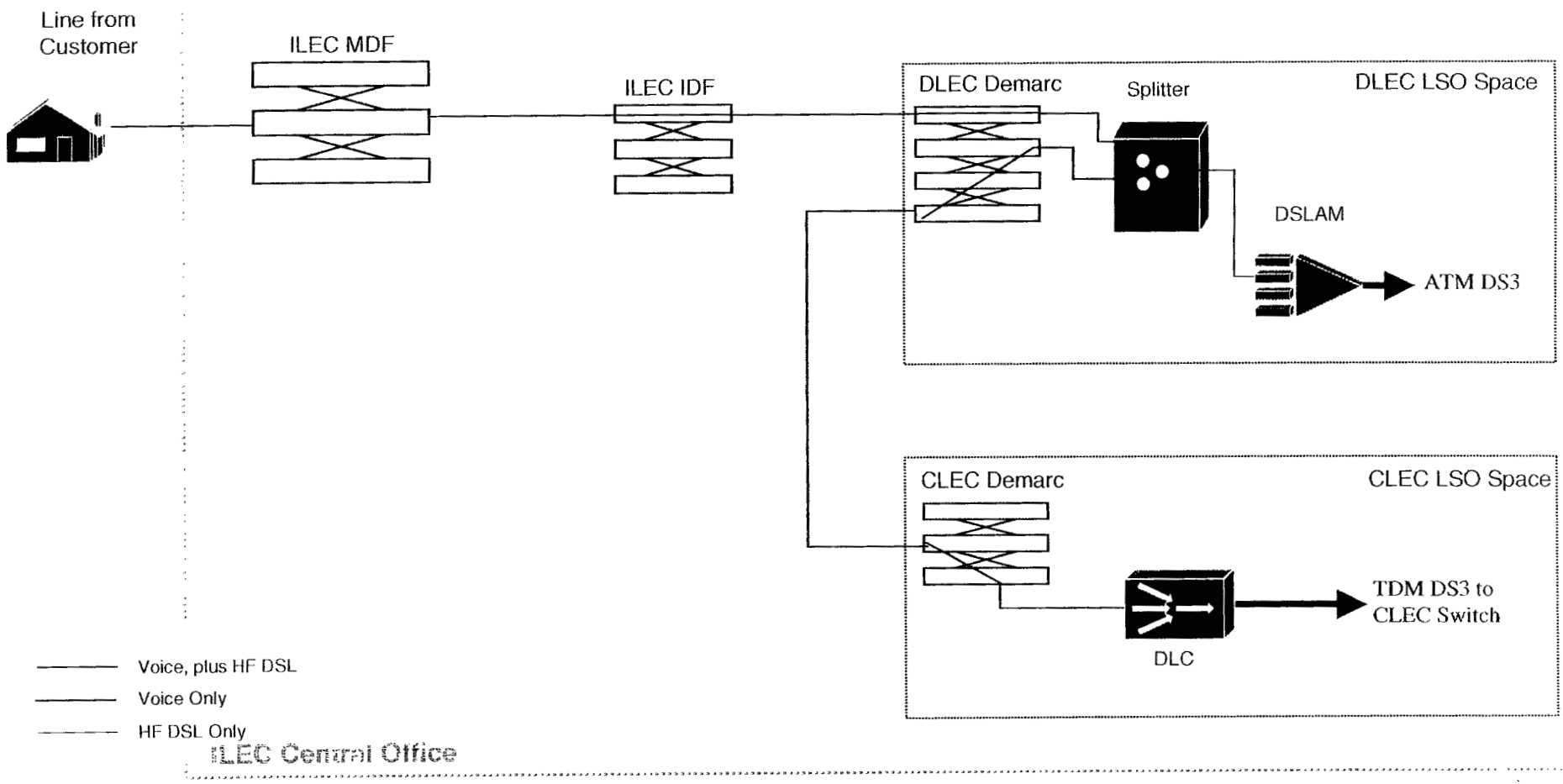
CLEC "UNE-P" Voice with DLEC DSL, (Line Splitting) using ILEC Splitter



CLEC "UNE-P" Voice with DLEC DSL, (Line Splitting) using DLEC Splitter

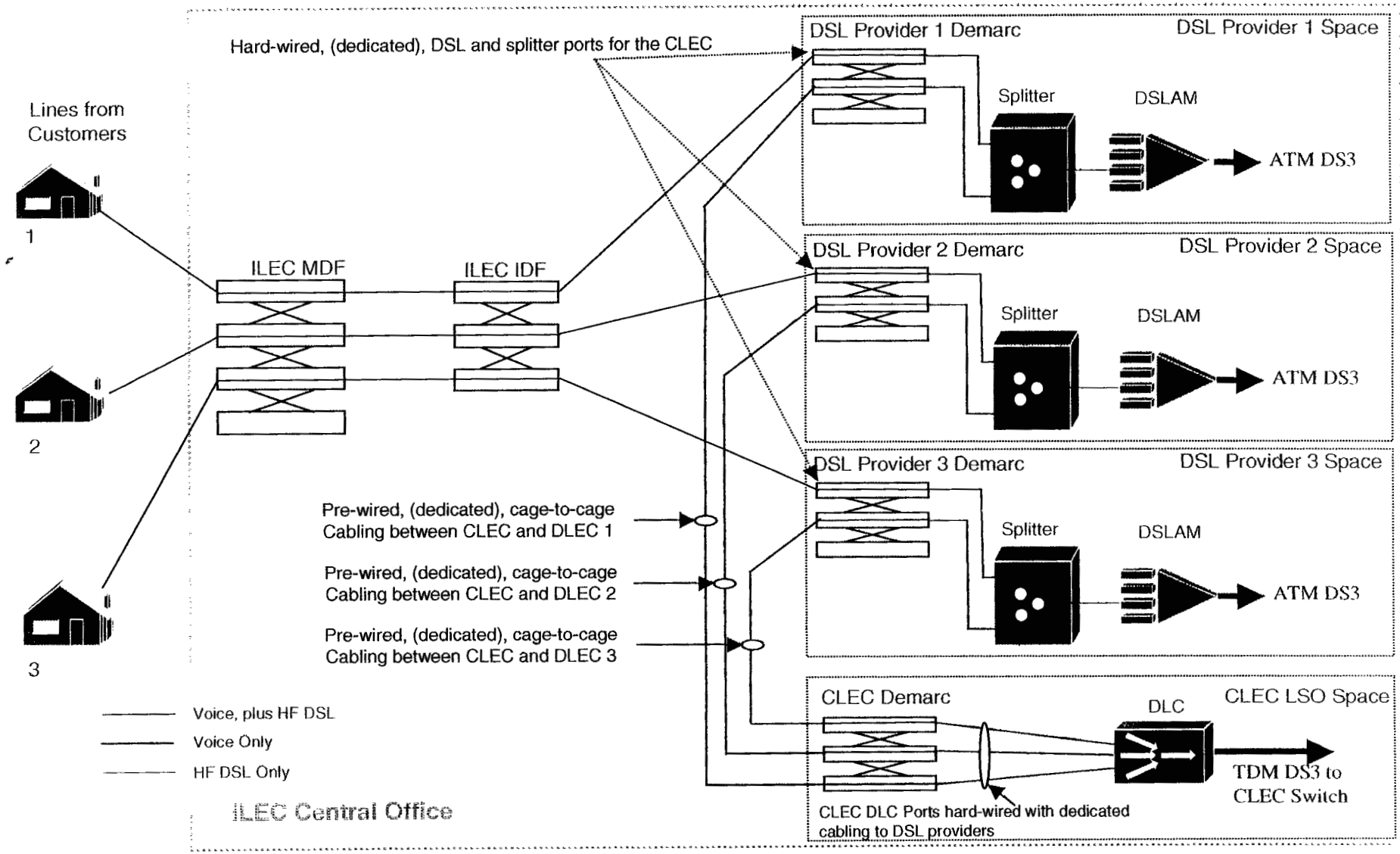


CLEC UNE-L Voice with DLEC DSL, (Loop Splitting) Using Pre-Wired "Cage-to-Cage" Dedicated Cables



Docket No. 030851-TP
M. Van de Water Exhibit No. MDV-19
Line-Splitting /One Partner

CLEC UNE-L Voice with DLEC DSL, (Loop Splitting) Using DLEC Splitters and Multiple Partners



Docket No. 030851-TP
M. Van de Water Exhibit No. MDV-20
Line-Splitting /Multiple Partners

BellSouth Interconnection Services
600 North 19th Street
8th Floor
Birmingham, Alabama

James M. Schenk
Sales AVP
205-321-4700
Fax 205-321-4757

July 21, 2003

Ms. Denise Berger
AT&T Operations – Assistant Vice President
1200 Peachtree Street NE
Room 12256
Atlanta, GA 30309

Dear Denise:

This is a follow up to telephone conversations and e-mails between BellSouth and AT&T concerning AT&T's use of Secondary Access Customer Terminal Locations (ACTLs) to Collocation sites. The Secondary ACTL process AT&T is currently utilizing requires manual processing in order for the service order(s) to flow through BellSouth's systems. The Federal Communications Commission (FCC) has issued a mandate that requires BellSouth to utilize an automated ordering process. For this reason, BellSouth has no plans to continue accepting service orders that require manual processing. AT&T has indicated there are nine (9) "FIM" Access Customer Name Abbreviation (ACNA) sites and an additional 15 "ATX" ACNA sites where a Secondary ACTL arrangement is needed.

BellSouth has previously recommended the following options to accommodate AT&T service orders while simultaneously meeting the mandated automated service order standards:

- **Use of a Single ACTL/ACNA at each Collocation Site**

  The specific root cause of this problem is AT&T's service requests that contain an ACNA in conflict with the ACNA of the collocation arrangement identified on the service order. AT&T should be aware that industry standards established by the National Exchange Carrier Association (NECA) and Telcordia subscribe to the premise of utilizing all codes consistently. Thus the option shown below :

  Use the "Transfer of Ownership" process to convert sites to one ACNA. This option eliminates the need to process orders for more than one ACNA at each site.

- **Accept the New Business Request (NBR) Option offered to convert BellSouth Databases to allow "Dual" ACNA Orders to flow through the BellSouth systems**

  In 2001, BellSouth worked with AT&T to develop a NBR for mechanization. This mechanization upgrade (involving 86 systems) would allow multiple ACNA orders to flow through BellSouth's systems without manual intervention.

Unfortunately, AT&T has rejected both of these options while requesting that BellSouth continue to manually process these service orders. Due to the FCC mandate and because of the costs of manually processing a service order, AT&T's request is unacceptable to BellSouth. In an effort to resolve this issue, BellSouth has continued to research additional options that would provide an "Order Flow Through".

The following proposal is an arrangement contained in the AT&T Interconnection Agreement that meets industry standards and allows valid service orders to flow through without manual intervention. BellSouth recommends the existing Secondary ACTL sites, additional 9 FIM sites, and 15 ATX sites use the following option to accomplish the Secondary ACTL requirement:

- **Use the 'Guest/Host' Collocation Arrangement to Establish a Guest Presence**

  Under this Collocation arrangement, each Host/Guest ACNA has unique ACTL and Connecting Facility Assignments (CFA) in the cage. The Host places a Collocation Augment Application, pursuant to its Interconnection Agreement, and submits a Letter of Authorization for the new entity (Guest). With the Guest/Host arrangement, a 30-day freeze would not be required provided applications are placed for new CFA facilities. The freeze would apply if existing CFAs were converted to a new ACNA. In addition, service order charges would apply to any services terminating in the collocation site involved in the change.

  Estimated costs to convert or add CFAs were previously provided for the ATX FTLDFLCY Collocation Site. (See Attachment.) The Guest/Host arrangement would allow orders to flow through without manual intervention since each ACNA would have a CFA and ACTL assigned in the collocation cage.

Please refer to AT&T's Interconnection Agreement or contact your Regional Collocation Manager for additional information about the Guest/Host Collocation Arrangement.

AT&T has indicated it was taking steps to resolve the need for multiple ACNA orders. Please advise BellSouth of the option AT&T prefers, thus eliminating the need for manual intervention on future service orders.

Should additional information be needed, please feel free to contact me at 205 321-4700.

Yours Truly,

ORIGINAL SIGNED BY JIM SCHENK

Attachment

Esitmate of charges to add Guest facilities (Florida Contract)							
Type Charge per contract	USOC	Description	Quantity	Charge per Unit	Total for item		
Subsequent Application Fee	PE1CA	NRC	1	$2,236.00	$2,236.00		
Cable Records fee per request	PE1CR	NRC	1	$980.22	$980.22		
VGDS0 per application	PE1CD	NRC	1	$656.50	$656.50		
VGDS0 per 100 pair	PE1C0	NRC	3425	$9.66 per 100 pair	$330.86		
DS1 PER T1TIE	PE1C1	NRC	280	4.52 per T1TIE	$1,265.60		
DS3 per T3TIE	PE1C3	NRC	48	15.82	$759.36		
Total estimate of augment w/cable records					$6,228.54		

BELLSOUTH

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June 20, 2002

Ms. Denise Berger
AT&T
Room 12256
1200 Peachtree St. NE
Atlanta, GA 30309

Dear Denise:

This is a follow up to our May 15, 2002 lunch discussion, as well as a follow-up to Jim Schenk's May 29, 2002 interim letter to your May 17, 2002 letter, concerning AT&T's use of multiple company codes. Following is BellSouth's response to each question:

1. Types of AT&T orders presently falling out for manual processing

Service requests from AT&T that are affected by the multiple Access Customer Name Abbreviation (ACNA) problem are those orders placed by one AT&T/ACNA entity designating assignment to collocation arrangements with dissimilar ACNA information. This applies to all service requests that involve collocation when the ACNA of the ordering company does not match the ACNA of the collocation arrangement. In many locations, AT&T established its collocation arrangements with the ACNA "ATX", for AT&T, but places service requests to those collocation sites using the ACNA "TPM", for Teleport Communications Group. A list of these specific collocation sites is attached.

2. Define code causing BellSouth the problem

As stated above, the specific root cause of this problem is AT&T's service requests containing an ACNA that is in conflict with the ACNA of the collocation arrangement identified on the service request. AT&T should be aware that industry standards set by National Exchange Carrier Association (NECA) and Telcordia prescribe that all codes should be used consistently.

3. Causes for orders to "fall out" for manual handling

When a CLEC orders collocation space from BellSouth, the collocation "address" is established using the ACNA of the ordering CLEC, which is built into the cable identification (ID). It is BellSouth's policy not to accept assignments from CLECs other than the owner of the collocation space and associated cable assignments. Therefore, BellSouth's ordering and provisioning systems contains edits to prevent unauthorized assignment of its customers' collocation assets. As stated above, the service requests in question are issued by AT&T with ACNAs that do not match the ACNA of the collocation arrangement designated on the service

request and, as a result, appear as though AT&T is making assignments to a different CLEC's collocation space. BellSouth must take several "out-of-process" steps to accommodate AT&T's conflicting assignments, which have come about due to AT&T establishing collocation arrangements with BellSouth initially using the ACNA of "ATX" and then places service requests to those collocation spaces using an ACNA of "TPM."

In the past, at AT&T's request, BellSouth created duplicate, additional collocation Access Customer Terminal Location (ACTL) Common Language Location Identification (CLLI) codes. This additional step has allowed BellSouth's service centers to process AT&T's Local Service Requests (LSR) without clarification. However, when the facility assignment on AT&T's service request does not match BellSouth's facility records of the collocation arrangements, additional facility assignment edits disrupt the order flow, requiring investigation of the mismatch, follow-up with the service center, and manual intervention to resolve the service order/records conflict.

4. **Additional steps taken by BellSouth to process the orders**

In addition to the steps required to create the supplemental ACTL CLLI code, as stated above, facility assignment errors must be investigated, reviewed with the service center and manually overridden before the order can be completed.

5. **Date BellSouth realized the necessity to manually process and work around these specific types of orders**

BellSouth has known from the outset that AT&T's request to make collocation facility assignments using conflicting ACNA information was outside of the process and required additional manual intervention to create the additional collocation ACTL CLLI codes and to resolve the downstream errors created by the conflicting information provided by AT&T.

6. **Implementation of the "firewall" that prevents one company from using another's facilities or assets?**

These edits have been in place by BellSouth since divestiture.

7. **Number of orders falling out for manual handling each month due to the use of multiple company codes**

AT&T has provided BellSouth a forecast of approximately 400 Unbundled Network Element (UNE) Loop orders per month for the next 6 months. Any of these orders placed with the ACNA "TPM" to collocation sites ordered with ACNA "ATX" are outside of the process and will require manual handling to complete, as would any interconnection trunk requests using the "ATX/TPM" ACNA combination.

8. **Action planned by BellSouth as of June 15, 2002**

As BellSouth advised AT&T on May 29, 2002, due to AT&T's expressed interest in pursuing the use of a single ACNA, BellSouth has elected to make no changes at this time on the existing collocation arrangements where duplicate collocation ACTL CLLI codes have been established. Please refer to the attached list of collocation sites for which supplemental ACTL CLLI codes were established.

9. **Embedded base of customers/orders/facilities**

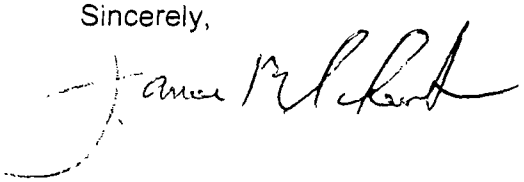
The embedded base of circuits would require a Transfer of Ownership to convert the ACNA to match the collocation ACNA. BellSouth's Professional Services team has procedures in place to manage the associated order activity.

10. Alternative solution

Currently, AT&T is negotiating with its BellSouth Collocation Account Team regarding the development of collocation inventories that will provide AT&T circuit details, including the circuit number and/or telephone number. BellSouth anticipates that the detail supplied would provide AT&T with more than enough information to identify the assets of each of AT&T's entities.

I hope the above information supports AT&T's understanding of the current out-of-process situation and its affects on AT&T's service order flow. Regarding your request for a meeting with all of BellSouth's Subject Matter Experts (SME) on this subject, I believe that you and Jan Flint agreed on June 11, 2002, that pending further investigation by BellSouth on a long-term solution to this issue, a meeting would not be productive at this time. If I can be of additional help, please let me know.

Sincerely,



Attachment