

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Implementation of requirements  
arising from Federal Communications  
Commission's triennial UNE review: Local  
Circuit Switching for Mass Market  
Customers. | DOCKET NO. 030851-TP

**DIRECT TESTIMONY OF SHERRY LICHTENBERG**

**On Behalf Of**

**MCI WORLDCOM COMMUNICATIONS, INC.  
AND**

**MCIMETRO ACCESS TRANSMISSION SERVICES LLC**

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1 Q. PLEASE STATE YOUR NAME, EMPLOYER AND TITLE.

2 A. My name is Sherry Lichtenberg. I am currently employed by MCI as Senior  
3 Manager, Operational Support Systems Interfaces and Facilities Development.

4 Q. PLEASE DESCRIBE YOUR BUSINESS EXPERIENCE.

5 A. I have twenty-two years of experience in the telecommunications market, fifteen  
6 years with AT&T and seven with MCI. I joined MCI in 1996 as a member of the  
7 initial team responsible for the development of MCI's local services products,  
8 both UNE-P and facilities-based. Prior to joining MCI, I held a number of  
9 positions at AT&T, including working in the General Departments organization,  
10 where I developed methods and procedures and billing and ordering systems for  
11 use by the Bell Operating Companies and later American Bell. I was Pricing and  
12 Proposals Director for AT&T Government Markets, and Executive Assistant to  
13 the President and Staff Director for AT&T Government Markets. I also held a  
14 number of positions in Product and Project Management. My current role with  
15 MCI includes designing, managing, and implementing MCI's local  
16 telecommunications services to residential and small business customers on a  
17 mass-market basis nationwide. I support both UNE-P product development and  
18 our testing and planning for facilities based competition via UNE-L. I have  
19 testified in numerous proceedings before the FCC and state public service  
20 commissions including multiple state 271 proceedings, network modernization  
21 proceedings and a variety of DSL proceedings. In addition, I have worked with  
22 the MCI contracts organization to negotiate our interconnection agreements with  
23 the incumbents.

1 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS**  
2 **PROCEEDING?**

3 A. The purpose of my testimony is to address Issues 5(c) and 6. The discussion of  
4 operational barriers in Issue 5(c) falls into two categories: network operational  
5 issues and customer impacting operational issues. My testimony addresses the  
6 customer impacting operational issues, while MCI's Network Operational  
7 Testimony discusses the network barriers that exist today. Although it appears  
8 that BellSouth is the only ILEC in Florida that will be putting on testimony of  
9 operational impairment in Issue 5(c), my direct testimony on that issue deals with  
10 ILECs generally, because my testimony addresses not only operational barriers  
11 CLECs face, but also approaches to resolving problems I have identified, which  
12 will involve participation by all the players in the industry.

13 **Q. PLEASE SUMMARIZE YOUR TESTIMONY.**

14 A. After years of laying the necessary operational and regulatory groundwork, MCI  
15 has begun providing local service to Florida residential and small business  
16 consumers. MCI now serves tens of thousands of Florida consumers using UNE-  
17 P, the only service delivery method that has proved successful thus far in bringing  
18 local service to the mass market. MCI is now exploring a move to a UNE-L  
19 service delivery method to serve these customers, because MCI would prefer to  
20 serve these customers whenever possible over its own facilities and because it  
21 wants to provide voice and DSL service using the same network. Today,  
22 transitioning from UNE-P to UNE-L is extremely difficult as a practical matter,  
23 in part because of the customer impacting operational problems that I discuss

1 below. Such problems must be understood in the context of today's market, both  
2 with respect to customer expectations and developing competition among carriers.  
3 Today's customers have experienced relatively seamless migrations with their  
4 long distance carriers, and increasingly with their local carriers as well. They will  
5 judge their experience with UNE-L carriers by the same standards, and thus so  
6 should the Commission. Today's competitive landscape involves a number of  
7 carriers with significant consumer customer bases, so it is no longer sufficient just  
8 to consider whether the ILECs can effect a customer's initial migration to a  
9 CLEC. Now the entire industry must be taken into account, because it is just as  
10 important that subsequent migrations from one CLEC to another be transparent to  
11 the customer.

12 In this context, the operational issues I discuss below are critical. Those  
13 issues involve the extensive manual ordering and provisioning processes and  
14 multi-carrier coordination currently required for UNE-L migration, as well as the  
15 exchange of information concerning the databases for customer service records  
16 ("CSRs"), the Local Facilities Administration and Control System ("LFACS"),  
17 E911, the National Number Portability Administration Center ("NPAC"), Local  
18 Number Portability ("LNP"), the Line Information Database ("LIDB"), the Caller  
19 Name Database ("CNAM"), Directory Listing/Directory Assistance ("DL/DA"),  
20 and printed directories. I also will discuss issues that must be addressed with  
21 respect to trouble handling. In addition to outlining these issues, I also have  
22 suggested approaches to addressing them, which should at least provide a starting  
23 point for resolution. Additional issues are certain to arise as MCI and other

1 carriers gain experience with UNE-L, and thus the Commission will need to play  
2 a continuing role to ensure that all operational barriers to UNE-L implementation  
3 are addressed and resolved.

4 Rolling access to UNE-P would not solve these operational problems.  
5 Rolling access only would address the initial migration from the ILEC to a CLEC,  
6 and not subsequent migrations between carriers. Moreover, rolling access would  
7 not address the operational issues I discuss below. In the final analysis, there is  
8 no “silver bullet” that will solve all the operational problems involved in rolling  
9 out UNE-L to the mass market. As with UNE-P, these problems will have to be  
10 solved one at a time with the Commission’s oversight and with the active  
11 involvement of all industry players.

12 In short, numerous customer impacting operational barriers currently  
13 render CLEC entry via UNE-L uneconomic throughout Florida, and the  
14 Commission should so find. Upon reaching this conclusion (if not beforehand),  
15 the Commission should work with the industry to address that impairment so that  
16 the operational barriers that currently exist may be removed.

17  
18 **Issue 5(c): In which markets do any of the following potential operational**  
19 **barriers render CLEC entry uneconomic absent access to unbundled local**  
20 **circuit switching:**

- 21  
22 **1. The ILEC’s performance in provisioning loops;**  
23 **2. difficulties in obtaining collocation space due to lack of space**  
24 **or delays in provisioning by the ILEC; or**  
25 **3. difficulties in obtaining cross-connects in the ILEC’s wire**  
26 **centers?**  
27

1 **MCI's Florida Local Mass Market Service**

2 **Q. WHY IS IT IMPORTANT FOR THE COMMISSION TO CONSIDER**  
3 **CLECS' EXPERIENCE IN ENTERING THE FLORIDA LOCAL**  
4 **CONSUMER MARKET?**

5 A. A review of CLECs' experience to date with UNE-P should provide the  
6 Commission with a general understanding of the kinds of obstacles that must be  
7 overcome in developing and implementing a new service delivery method. And  
8 consideration of CLECs' fledgling efforts to implement UNE-L will provide  
9 insight into the real-world operational challenges that CLECs face when  
10 attempting to serve the mass market with their own switches. Further, CLECs'  
11 efforts to enter the Florida local consumer market shed light on what consumers  
12 have come to expect when they migrate from one local service provider to  
13 another. Understanding those consumer expectations is a key part of recognizing  
14 and addressing operational problems.

15 **Q. WHAT IS THE DIFFERENCE BETWEEN UNE-P AND UNE-L?**

16 A. UNE-P involves the leasing of the piece parts of an ILEC's network on an end-to-  
17 end basis. When a customer is migrated from an ILEC to a UNE-P CLEC, no  
18 changes are made to the physical facilities used to serve the customer. To date,  
19 UNE-P has been the only service delivery method that has enabled CLECs to  
20 serve residential and small business customers on a broad scale and will continue  
21 be the only way to provide such service for some time.

22 In contrast, UNE-L involves leasing the customer's loop, terminating that  
23 loop to a CLEC's collocation space in the ILEC's central office (assuming the

1 CLEC has such a space), and transporting calls to the CLEC's switch from which  
2 the customer draws dial tone and receives local service. Migrating a customer  
3 from BellSouth today to a UNE-L CLEC requires the customer's loop to be "cut  
4 over" from the BellSouth switch to the CLEC's collocation space while the  
5 customer's service is still on, thus giving rise to the term "hot cut." Hot cuts are  
6 required in all UNE-L scenarios, for example, as when a CLEC migrates its own  
7 or another CLEC's UNE-P customer to UNE-L, or when a UNE-L customer  
8 moves from one CLEC to another, or even when a CLEC UNE-L customer is  
9 won back to the ILEC. Many steps in the cutover process are manual, which  
10 inevitably leads to customer outages and other problems that occur only rarely  
11 with UNE-P migrations. In addition, carriers must exchange critical information  
12 with each other and third parties, but the processes for doing so are far from  
13 seamless. As I discuss below, however, MCI is beginning to pursue UNE-L in  
14 certain locations where it makes economic and operational sense because of the  
15 advantages that could be realized once the many challenges to providing such  
16 service have been overcome.

17 **Q. PLEASE DESCRIBE THE PROCESS THAT LED TO MCI'S LAUNCH OF**  
18 **LOCAL MASS MARKET SERVICE IN FLORIDA.**

19 A. That process was a long one, beginning with the passage of the  
20 Telecommunications Act of 1996 ("Act"). Although the Act required ILECs to  
21 unbundle their networks, a number of battles had to be fought before MCI could  
22 launch its local consumer service in Florida. First of all, CLECs had to establish  
23 the right to use UNE-P, which took several years and two U.S. Supreme Court

1 decisions. Second, the industry and the Commission undertook lengthy UNE  
2 pricing proceedings for BellSouth alone, which have moved UNE rates closer to  
3 the TELRIC standard required by the FCC. Finally, major changes taking several  
4 years were required to modify BellSouth's operations support systems ("OSS") to  
5 make it feasible to order and provision service using UNE-P in the volumes  
6 required to serve mass market customers. UNE-L will bring additional systems  
7 requirements and changes, including the need to develop electronic processes and  
8 to interface to a significant number of data bases and to coordinate with additional  
9 vendors to ensure that customer migrations are completed in a timely and correct  
10 manner. Since these outside systems, such as the NPAC have not had to deal with  
11 mass markets customer migrations of the type seen with UNE-P, they are untested  
12 and potentially unready for these changes, making the process of curing  
13 "impairment" all the more difficult.

14 **Q. WHEN DID MCI LAUNCH ITS LOCAL CONSUMER SERVICE AND**  
15 **WHAT HAS ITS EXPERIENCE BEEN?**

16 A. MCI launched its residential service in BellSouth's Florida service territory using  
17 UNE-P in November 2001. Initially, the service was offered only a limited basis,  
18 with the expectation that future Commission rulings on pricing and other issues  
19 would enable MCI to sustain and broaden its service. Since then, MCI has  
20 expanded its local footprint and now serves more than 100,000 UNE-P lines in  
21 Florida and more than 3 million nationally. In April 2002 MCI launched "The  
22 Neighborhood built by MCI" in Florida and a number of other states. The  
23 Neighborhood provides Florida residential and small business consumers with



1 packages of local, intraLATA and interLATA voice services, along with  
2 assortments of popular features. MCI recently has begun supplementing its  
3 national voice offerings with DSL services provided via MCI's and its partners'  
4 digital data equipment, known as DSLAMs, located in certain BellSouth central  
5 offices. MCI is still in the early stages of rolling out its DSL service in Florida.

6 **Q. DOES MCI PLAN TO MOVE ITS LOCAL RESIDENTIAL AND SMALL**  
7 **BUSINESS CUSTOMERS TO ITS OWN NETWORK?**

8 A. Yes. MCI currently is evaluating the use of UNE-L in Florida. Once the  
9 problems with full-scale use of UNE-L described in my testimony and in MCI's  
10 Network Operational Testimony are corrected (and the economic issues addressed  
11 in MCI's economic testimony are addressed), we can begin to make the transition  
12 from UNE-P to UNE-L. The timing and scope of the deployment will of  
13 necessity be limited not only by the resolution of operational problems, but also  
14 by MCI's collocation and switch footprint and availability.

15 **Q. WHY DOES MCI WANT TO TRANSITION CUSTOMERS FROM UNE-P**  
16 **TO UNE-L?**

17 A. There are at least two reasons. First, MCI, like any carrier, would prefer to  
18 provide service using its own network as much as possible because doing so  
19 would allow MCI both to use its state-of-the-art network and to promote further  
20 innovation of its products and services through further development and  
21 deployment of new technology. Although UNE-P has been, and remains, critical  
22 to MCI being able to provide local residential and small business service in  
23 Florida, UNE-P requires MCI to rely on its chief competitor, BellSouth, for

1 network services. To the extent it is possible as a practical matter to do so, MCI  
2 would prefer to use its own network via UNE-L, to provide service to its  
3 customers.

4 Second, MCI must take into account the changes taking place today in the  
5 telecommunications industry. Telecommunications is gradually moving from an  
6 industry controlled by large monopolies to one with multiple carriers offering  
7 multiple services to a dynamic customer base. The trend in the industry is toward  
8 bundled services and IP-centric offerings that enable consumers to select one  
9 carrier that meets all of their communications needs. As MCI begins to roll out its  
10 broadband services to consumers, it only makes sense to integrate its broadband  
11 facilities with its voice facilities. Eventually, when voice over internet protocol  
12 (“VoIP”) replaces traditional circuit switching as the technology of choice, it will  
13 be essential that MCI move off the ILECs’ circuit switches and onto its own  
14 facilities. MCI is planning for that future while serving its more than 3 million  
15 mass markets customers today.

16 **Q. WHERE WOULD MCI POTENTIALLY BE ABLE TO PROVIDE UNE-L**  
17 **SERVICE?**

18 A. UNE-L requires the CLEC to have its own switch and to be collocated in the  
19 BellSouth central office where the loops of the customers it wants to serve are  
20 terminated. MCI will be able to provide UNE-L service only in areas where it  
21 already has deployed collocation equipment and local switches. While MCI  
22 intends to expand its switch footprint as its UNE-L strategy moves forward, the  
23 number of customers that today can be served by UNE-L is constrained by its

1 limited collocation and switch deployment. MCI has been a facilities-based local  
2 exchange carrier in the large enterprise market for a number of years. MCImetro  
3 -- MCI's CLEC -- installed its first switch in 1995 and since then has installed  
4 local switches, collocations in ILEC central offices and fiber rings in major  
5 metropolitan areas throughout the country, including Florida. MCI uses these  
6 facilities (along with leased high capacity loop facilities or their equivalent) to  
7 provide competitive local exchange service to business customers today. Moving  
8 to UNE-L would enable MCI to take advantage of those facilities. MCI will use  
9 its network wherever and whenever it can instead of constantly having to rely on,  
10 and do battle with, the ILEC for the nondiscriminatory use and correct pricing of  
11 its network. But MCI can do this for mass markets customers only when it can  
12 ensure that those customers will continue to have the same seamless migration  
13 experience that its UNE-P customers have today.

14 **Q. DOES MCI INTEND TO USE UNE-L EVERYWHERE IT HAS MASS-**  
15 **MARKET CUSTOMERS?**

16 A. No. I can't imagine that would happen. For one thing, there are many areas and  
17 even entire states where MCI does not have any facilities. And it is highly  
18 unlikely that UNE-L will make economic and operational sense everywhere in  
19 every state, but that is an analysis that will be discussed in detail in the economic  
20 testimony being filed by MCI in this proceeding.

21

1 **Q. WHAT IS THE SIGNIFICANCE TO THIS CASE OF MCI'S PLANS TO**  
2 **BEGIN TRANSITIONING CUSTOMERS TO UNE-L?**

3 A. MCI is in the early stages of planning for UNE-L in the mass market  
4 environment. MCI's migration of UNE-P customers to UNE-L will place it in a  
5 good position to identify operational issues for the Commission in this case and to  
6 work with ILECs and the Commission to resolve those issues as those plans  
7 become a reality.

8 MCI's plans also illustrate a more fundamental point: MCI and other  
9 CLECs have every incentive to serve customers over their own networks, and will  
10 do so where and when it makes operational and economic sense. They do not  
11 need to be forced to do so. Once the operational and economic barriers have been  
12 brought down, CLECs will move freely to a UNE-L strategy, something they  
13 cannot do today. The success of that transition will be the best evidence that  
14 CLECs are no longer impaired without access to ILEC switching.

15 **Q. WHAT WOULD HAPPEN IF COMPETITORS WERE REQUIRED TO**  
16 **MOVE TO UNE-L TODAY?**

17 A. There would be chaos and consumers would be the ones hurt. The UNE-L  
18 migration process today is manually intensive and cumbersome with multiple  
19 points of failure that could result in delay, inability to receive calls and, worse yet,  
20 loss of dial tone for the consumer. Customer migration problems could lead to  
21 customers being "stranded" on a carrier's network, unable to move anywhere else.  
22 These and other operational barriers prevent CLECs from being able to meet  
23 customer expectations. Thus, if the transition to UNE-L were made prematurely,

1 the progress that has been made toward a dynamic, competitive  
2 telecommunications market since the passage of the Act would be destroyed.

3 For UNE-L to be an acceptable service delivery method, it must allow  
4 competitors to meet and even exceed customers' expectations. In particular,  
5 migrations between carriers using UNE-L must be seamless and the systems and  
6 processes of the entire industry – ILECs, CLECs and third parties – must be fully  
7 functional and capable of working together effectively. Today these systems and  
8 processes are highly manual and are untested in a mass market environment.

9 **Q. DO YOU EXPECT THAT IT WILL BE FAIRLY EASY FOR MCI TO**  
10 **MAKE THE TRANSITION TO UNE-L?**

11 A. No. The transition to UNE-L will be extraordinarily difficult. MCI operates in  
12 forty-nine jurisdictions, dealing with the four major ILECs and interfacing with  
13 multiple ILEC OSS systems and with other CLECs across the country. As I  
14 have already noted, MCI has more than 3 million local customers nationally, with  
15 tens of thousands of customers here in Florida. It will be no small challenge to  
16 match our existing local network to our large and dynamic customer base. Doing  
17 so will take time and will require resolving many kinds of operational problems,  
18 not all of which can be anticipated. And because real customers will be involved,  
19 MCI will be required to proceed deliberately and carefully to avoid service  
20 outages and other customer-affecting problems.

21

1 **Q. HAS ANY CARRIER BEFORE ATTEMPTED TO TRANSITION TO AND**  
2 **SERVE A LARGE MASS MARKET RESIDENTIAL CUSTOMER BASE**  
3 **USING UNE-L?**

4 A. No. No carrier has yet attempted the kind of nationwide facilities-based approach  
5 for residential mass markets customers that MCI is envisioning here. Because  
6 this will be a new experience for the industry, many of the problems that arise will  
7 have to be worked out for the first time, which will add to the difficulty of  
8 creating workable solutions. To use UNE-L, MCI's network will need to be  
9 "interconnected" with the ILEC network in a much more integrated fashion than  
10 ever before. Beyond making the changes I describe below that are necessary to  
11 order and support UNE-L, "interconnection" in this sense also means that MCI  
12 will need to physically connect its local network with the ILEC local network in a  
13 much broader manner than ever before to get access to the ILEC loops we will  
14 still need to provide service to customers. That means growing the network that  
15 MCI already has by establishing more collocations and building or leasing more  
16 transport facilities from those collocations to connect to MCI's network. It also  
17 will require capacity upgrades to MCI's and other carriers' E911 trunks and  
18 additional trunking to the ILECs' tandem switches. For example, today a  
19 significant number of calls between ILEC and CLEC customers in the same rate  
20 center are completed in the ILEC's switch. Once customers are moved to UNE-  
21 L, however, these calls will need to route to the ILEC tandem switch to be  
22 completed, potentially increasing the need for tandem switching capacity. MCI's  
23 Network Impairment testimony describes these issues in greater detail

1 **Q. DOES THE TRANSITION TO UNE-L INVOLVE MORE THAN SIMPLY**  
2 **MIGRATING MCI'S EXISTING UNE-P CUSTOMER BASE?**

3 A. Yes, definitely. The move to facilities-based competition is not simply about  
4 customers moving from UNE-P to UNE-L, or even from the incumbent monopoly  
5 to the CLEC. Customers also will move from one CLEC to another. Those  
6 CLECs may be UNE-L CLECs, resellers, cable companies, or UNE-P CLECs.  
7 Today, customers return to the ILEC and migrate back and forth between UNE-P  
8 and resale CLECs on a daily basis. Some customers also try to migrate from  
9 facilities-based providers to UNE-P CLECs, but this process is yet to be seamless.  
10 The key point here is that MCI's move to facilities-based competition will not be  
11 limited to establishing and maintaining the relationship between MCI and the  
12 ILEC; it involves the entire industry -- MCI, the ILEC, and every other CLEC  
13 offering service in the state. And in reality, it involves more than that. As I will  
14 discuss in greater detail later, the move to facilities-based competition will have  
15 implications for third parties that provide necessary, but ancillary, services, such  
16 as E911 providers and the LNP provider.

17 **Triennial Review Order**

18 **Q. DID THE FCC'S TRIENNIAL REVIEW ORDER RECOGNIZE THAT**  
19 **THERE ARE OPERATIONAL BARRIERS TO UNE-L?**

20 A. Yes. Although I am not a lawyer, I have reviewed the *Triennial Review Order*  
21 issued by the FCC with respect to the operational issues it addresses, and the FCC  
22 clearly recognized that operational barriers exist to UNE-L competition today.  
23 *(See In the Matter of Review of the Section 251 Unbundling Obligations of*

1 *Incumbent Local Exchange Carrier*, CC Docket No. 01-338, *Implementation of*  
2 *the Local Competition Provisions of the Telecommunications Act of 1996*, CC  
3 Docket No. 96-98, *Deployment of Wireline Services Offering Advanced*  
4 *Telecommunications Capability*, CC Docket No. 98-147, Report and Order and  
5 Order on Remand and Further Notice of Proposed Rulemaking FCC 03-36 (rel.  
6 Aug. 21, 2003) (“*Triennial Review Order*” or “*Order*”).) The FCC made a  
7 national finding of impairment with respect to unbundled local switching at the  
8 mass market level based on the existence of these operational barriers. (*Order* ¶  
9 419.) In essence, the FCC realized that competitors are currently unable to move  
10 to a UNE-L service delivery method with the processes and procedures that  
11 currently exist. Further, the FCC concluded that, for local competition to exist,  
12 competitors must have access to unbundled local switching until the existing  
13 operational and economic issues with UNE-L are fully identified, investigated and  
14 adequately resolved.

15 **Q. DID THESE OPERATIONAL BARRIERS LEAD TO THE FCC’S**  
16 **FINDING OF IMPAIRMENT WITH RESPECT TO MASS MARKET**  
17 **SWITCHING?**

18 A. Yes. In the *Triennial Review Order*, the FCC explicitly recognized the complex  
19 operational issues currently preventing UNE-L from being a viable local service  
20 delivery method and concluded that these issues were serious enough to find  
21 nationally that competitors are impaired without access to unbundled local  
22 switching. (*Order* ¶¶ 419, 456.) Unlike UNE-P migrations, in which the CLEC  
23 uses the same facilities as the ILEC in providing local service, UNE-L migrations



1 are complicated by the necessity of physically moving the customer's loop to the  
2 CLEC's switch. In addition, more data must be exchanged between local  
3 providers with UNE-L than is required with UNE-P. The FCC recognized that  
4 until these operational issues involving UNE-L are addressed and adequately  
5 resolved – that is, until migrations and service changes in a UNE-L environment  
6 are as seamless and trouble-free as they are with long-distance and UNE-P – a  
7 transition to UNE-L would do nothing but harm competition and consumers.

8 The FCC concluded that the record before it evidenced a wide array of  
9 operational issues that prevent UNE-L from being a realistic local service delivery  
10 method at present. (*See, e.g., Order* ¶¶ 476-478.) As the FCC stated, competitive  
11 carriers may face barriers associated with loop provisioning that may impair their  
12 entry into the mass market. (*Order* ¶ 512.) The FCC asked the states to  
13 determine whether incumbent LECs are providing non-discriminatory access to  
14 unbundled loops. (*Order* ¶ 512.) In making this determination, the FCC  
15 requested the states to consider more granular evidence concerning the ILECs'  
16 ability to transfer loops in a *timely and reliable* manner. (*Order* ¶ 512 (emphasis  
17 added).) Accordingly, before UNE-L can be an operational reality, it must be  
18 possible timely and reliably to transfer loops from ILEC to CLEC as well as  
19 CLEC to CLEC and CLEC to ILEC – both as an operational necessity and to give  
20 customers the reliable, problem-free service they demand and expect.

1 **Q. THE FCC DISCUSSED THE “HOT CUT” PROCESS AT SOME**  
2 **LENGTH.**

3 A. Yes, and with good reason. The FCC noted that a “hot cut refers to a process  
4 requiring incumbent LEC technicians to disconnect manually the customer’s loop,  
5 which was hardwired to the incumbent LEC switch, and physically re-wire it to  
6 the competitive LEC switch, while simultaneously reassigning (*i.e.*, porting) the  
7 customer’s original telephone number from the incumbent LEC switch to the  
8 competitive LEC switch.” (*Order* ¶ 421 n.1294.) Hot cut problems listed by the  
9 FCC included “the associated non-recurring costs, the potential for disruption of  
10 service to the customer, and our conclusion, as demonstrated by our record, that  
11 incumbent LECs appear unable to handle the necessary volume of migrations to  
12 support competitive switching in the absence of unbundled switching.” (*Order*  
13 ¶ 421 n.1294.) The FCC explained that because of the manual, labor-intensive  
14 nature of the hot cut process, “hot cuts frequently lead to provisioning delays and  
15 service outages, and are often priced at rates that prohibit facilities-based  
16 competition for the mass market.” (*Order* ¶ 465.) In other words, the FCC  
17 concluded that the hot cut process posed a prohibitive barrier to UNE-L.

18 **Q. DID THE FCC DISCUSS THE IMPACT OF OPERATIONAL**  
19 **IMPAIRMENT ON CUSTOMERS IN ITS ORDER?**

20 A. Yes. In addition to discussing the technical aspect of these network operational  
21 issues, the FCC also explained how these operational issues negatively affect the  
22 customer’s experience. The FCC noted that the delay that accompanies a UNE-L  
23 migration prevents competitors from providing service in a way that mass-market

1 customers have come to expect. (*Order* ¶ 466.) For example, in Florida a  
2 BellSouth UNE-P migration takes one business day, while migrating the same  
3 customer to UNE-L takes at least five business days, assuming BellSouth has the  
4 ability to schedule the cutover on the requested date. A UNE-L migration using  
5 today's hot cut process always will have the potential to harm a customer more  
6 than a UNE-P migration, because, as the FCC noted, "[f]rom the time the  
7 technician disconnects the subscribers loop until the competitor reestablishes  
8 service, the subscriber is without service." (*Order* ¶ 465 n.1409.) Similarly, the  
9 UNE-L process of "porting" the customer's number from the ILEC switch to the  
10 CLEC switch "also potentially subjects the customer to some period of time  
11 where incoming calls will not be received," because if the number is not ported  
12 properly, calls will not be routed to the customer's new number on the CLEC  
13 switch.

14 The FCC recognized that because "mass market customers generally  
15 demand reliable, easy-to-operate service and trouble-free installation," such  
16 disruptions and delays negatively affect customers' perceptions of the CLEC's  
17 ability to provide service. (*Order* ¶ 467.) Indeed, the FCC found in the *Triennial*  
18 *Review Order* that the record reflected that customers experiencing such  
19 difficulties are likely to blame the CLEC, not the ILEC, even if the problem is  
20 caused by the ILEC. (*Order* ¶ 467.) Moreover, because customers view the  
21 ILEC as a baseline alternative to the CLEC for local service, customers' negative  
22 perception of a CLEC's service directly hampers a CLEC's ability to win and  
23 retain customers. (*Order* ¶ 466.)

1 **Q. WHAT WAS THE FCC'S ULTIMATE CONCLUSION?**

2 A. The FCC found that CLECs are impaired nationally without access to the ILECs'  
3 unbundled local switching. The FCC recognized that numerous operational  
4 impediments make UNE-L currently infeasible, or, at most, possible only to a  
5 limited extent, and then only with a great risk of negative customer experience.  
6 Based on the FCC's reasoning, these operational impediments must be identified  
7 and adequately resolved before UNE-L can be considered a viable service  
8 delivery method.

9 **Customer Expectations**

10 **Q. HOW HAVE CHANGES IN THE TELECOMMUNICATIONS INDUSTRY**  
11 **AFFECTED CUSTOMERS' EXPECTATIONS CONCERNING THEIR**  
12 **ABILITY TO MOVE FROM ONE CARRIER TO ANOTHER?**

13 A. Today's telecommunications consumer is savvier than consumers of the past  
14 because of experience with long distance and local competition. Today's  
15 consumer moves frequently between carriers and expects seamless migrations.  
16 Carriers must be able to provide consumers with seamless and efficient migration  
17 between carriers, as well as timely repair and maintenance. If a carrier is unable  
18 to provide this high level of service to customers, it will not survive as a  
19 competitor.

20 **Q. HOW DOES THE LONG DISTANCE TRANSITION WORK TODAY?**

21 A. Migrations among carriers in the long distance market have set a benchmark for  
22 customers' expectations concerning migration among local providers. Through  
23 years of experience and expense, ILECs and interexchange carriers ("IXCs")

1 developed the Primary Interexchange Carrier (“PIC”) process, using the Customer  
2 Access Record Exchange Interface (“CARE”) interface. It has taken nearly  
3 fifteen years of PIC process improvements since CARE was introduced in 1988  
4 for transitions between long distance providers to be as smooth as they are today.  
5 For the majority of all such transactions, this process is completely automated –  
6 the order comes into the underlying service provider’s computer system  
7 containing customer data, and if the order meets basic criteria, it flows through  
8 the system to the switch, where the PIC is changed, and then a confirmation  
9 message is sent directly to the new IXC. The entire process takes approximately  
10 twelve hours. Thus, because of a standard, automated process that was created  
11 through years of refinement and cooperation, transitioning between long distance  
12 providers is the quick and relatively problem-free process that customers have  
13 come to expect.

14 **Q. IS THERE A SIMILAR EXPERIENCE TODAY IN THE LOCAL**  
15 **SERVICE ARENA?**

16 A. Yes, for most customers, UNE-P transitions are also relatively seamless. CLECs  
17 and ILECs have worked together since the passage of the Act to develop an  
18 automated process for the smooth migration to UNE-P of retail, resale, and  
19 CLEC-served UNE-P local voice customers. Today, the customer does not know  
20 that the process is occurring until it is completed and the new carrier’s features  
21 and functionalities, such as voice mail, appear on his line. Only rarely is there  
22 loss of dial tone, need for coordination between the ILEC and the CLEC, and or  
23 manual intervention at the central office distribution frame. Rather, just as in the

1 long distance world, the CLEC merely sends a request, which is usually  
2 automated, to the ILEC for the migration of the new CLEC customer, and the  
3 change is made. In this way, the UNE-P process is quite similar to the CARE  
4 long distance process, and is indeed no different from the customer's experience  
5 in changing features of its ILEC service without changing providers. As a result  
6 of the industry efforts concerning UNE-P, millions of customers have been  
7 migrated successfully from the ILEC to UNE-P CLECs, and from one UNE-P  
8 CLEC to another UNE-P CLEC, with no loss of dial tone and no need for central  
9 office based installation and maintenance support.

10 **Q. CAN YOU PROVIDE A MORE DETAILED DESCRIPTION OF THE**  
11 **UNE-P MIGRATION PROCESS?**

12 A. Yes. The process of migrating an ILEC customer to CLEC UNE-P service  
13 proceeds as outlined in Exhibit SL-1.

14 **Q. HOW LONG DOES THE UNE-P MIGRATION PROCESS GENERALLY**  
15 **TAKE?**

16 A. The entire retail to UNE-P migration process is typically completed within one  
17 business day, regardless of the features ordered. CLECs can send and receive up  
18 to 2000 transactions (including migrations, disconnections, and feature changes)  
19 per hour, because the process is almost wholly electronic. Most importantly, just  
20 like a long distance PIC change, the UNE-P migration process is relatively  
21 seamless to the customer and allows customers to change carriers whenever they  
22 want to.

1 **Q. IS IT IMPORTANT THAT CUSTOMERS BE ABLE TO CHANGE**  
2 **PROVIDERS RAPIDLY AND SEAMLESSLY?**

3 A. Yes, as noted above, today's consumer changes carriers more frequently than  
4 consumers of the past and expects to be able to do so in an efficient and timely  
5 manner. In the telecommunications industry, this movement of customers to and  
6 from carriers is commonly referred to as "churn." Churn generally describes the  
7 behavior of customers as they move not just from ILEC to CLEC but also from  
8 CLEC to ILEC and from CLEC to CLEC. Migrations between CLECs today  
9 using different service delivery methods (for example, from UNE-P to UNE-L or  
10 UNE-L to UNE-L) are not seamless, quick or efficient. Although procedures for  
11 migrations are being developed in Florida, much additional work will be required  
12 before they are finalized and implemented for all carriers. Without a simple and  
13 seamless method to transfer customers between providers using different  
14 facilities-based service delivery methods, customers may become "stuck" and  
15 unable to exercise their choice to leave one carrier and migrate to another.

16 **Q. IS CHURN A BAD THING OR A GOOD THING?**

17 A. It is really both. Churn is a good thing for consumers, because it allows them to  
18 try new products and services from varying providers. Such consumer movement  
19 encourages carriers to innovate and become more efficient, and, in turn, rewards  
20 that innovation and efficiency. In a very real sense, churn is the proof that the  
21 competitive process is working. Although good for consumers, churn is  
22 problematic for industry players: not only is it expensive when consumers pick a  
23 provider for only a short period of time and then leave for another provider, but

1 churn also complicates both the record keeping and billing processes that  
2 accompany acquiring and losing a customer for both the acquiring carrier and the  
3 underlying network service provider. However, competitors realize that churn –  
4 the customer’s ability to move amongst providers quickly and efficiently – is a  
5 necessary and integral part of a competitive telecommunications landscape.  
6 Consumers cannot be “locked in” to a single provider or “stranded” on a single  
7 service delivery platform. They must be able to make choices and migrate among  
8 providers at will.

9 **Q. IS THERE A LOT OF CHURN IN THE INDUSTRY TODAY?**

10 A. Yes, as I discussed above, customers are more educated and savvy today and  
11 move more frequently among carriers to get better service packages. Churn rates  
12 today are fairly high in the telecommunications industry, in both long distance  
13 and UNE-P local markets. These high churn rates have been enabled by  
14 regulatory requirements and changes in the OSS of the carriers. Specifically,  
15 equal access in the long distance arena, and UNE-P and electronic order  
16 processing in the local service arena, have facilitated customer migrations and  
17 permitted churn to exist and accelerate.

18



1 **Operational Impairment**

2 **Q. ARE THERE UNE-L PROVIDERS SERVING MASS MARKET**  
3 **CUSTOMERS ON A BROAD SCALE TODAY?**

4 A. No. There are virtually no UNE-L providers from which Mass Markets  
5 customers can choose, and those providers that do exist provide service in limited  
6 areas and support a limited range of customers.

7 **Q. WHY NOT?**

8 A. There are a number of economic and operational reasons. One of the operational  
9 reasons is that a migration to and from the UNE-L service delivery method is  
10 anything but simple. The systems and processes involved in a UNE-L migration,  
11 as opposed to a UNE-P migration, are complex, manually intensive and  
12 cumbersome.

13 **Q. WHAT MAKES THE UNE-L MIGRATION PROCESS SO COMPLEX?**

14 A. Unlike UNE-P, UNE-L requires a physical change to the facilities involved in  
15 providing service to the customer because the loop serving the customer must be  
16 physically disconnected from the ILEC/UNE-P facilities and then connected to  
17 the UNE-L carrier's facilities in the ILEC central office. Moreover, UNE-L  
18 requires an unprecedented exchange of information between the multiple parties  
19 involved, including providers not generally involved in the processes reviewed  
20 and tested by the Commission. The process flow shown in Exhibit SL-2  
21 illustrates the pre-ordering, ordering, provisioning, maintenance and repair and  
22 billing steps involved in a typical ILEC retail to CLEC UNE-L migration. The  
23 migration process is described in narrative terms in Exhibit SL-3.

1 **Q. ARE THERE COMPLEXITIES THAT THE DIAGRAM IN EXHIBIT SL-2**  
2 **DOES NOT INCLUDE?**

3 A. Yes, while this process flow outlines the steps in a typical ILEC Retail to CLEC  
4 UNE-L migration, there are several things that it simply cannot illustrate  
5 adequately: (1) at numerous points in this process, manual handling of the UNE-  
6 L migration tasks is required, often resulting in errors and delay; (2) UNE-L flow  
7 through rates are lower than that of UNE-P, causing still more manual work and,  
8 hence, more delay; (3) there is a significant amount of information that must be  
9 exchanged among various parties to the migration, and the failure of this  
10 information to reach its destination in a timely and accurate manner could  
11 significantly affect a customer's service; and (4) the scalability of this process to  
12 meet mass-market volumes is doubtful and untested because loops have never  
13 been migrated at mass market volumes at this time. All four of these issues  
14 individually or in combination if left unresolved have the potential to derail a  
15 competitor's ability to utilize UNE-L to serve mass-market customers.

16 **Q. IS THE UNE-L MIGRATION PROCESS READY FOR MASS-MARKET**  
17 **USE?**

18 A. Absolutely not. If carriers move from a UNE-P to a UNE-L service delivery  
19 method before the processes and procedures are in place to allow migrations to  
20 take place quickly and efficiently, the churn that is a trademark of competition in  
21 the long distance and UNE-P markets will create significant problems both for  
22 carriers and customers. Without seamless and efficient migration processes in all  
23 directions and among all carriers, customers' attempts to migrate away from their

1 existing carriers could overwhelm the ability of carriers to accommodate those  
2 moves. The result could be that as customers are in effect held hostage to  
3 cumbersome untested processes that cannot support the volume of orders being  
4 issued.

5 In addition, the description and process flow discussed above only outlines  
6 the retail to CLEC UNE-L migration. This migration is only one of several  
7 migration scenarios that CLECs will encounter in a dynamic competitive UNE-L  
8 market. The core scenarios (as seen from MCI's perspective) include the  
9 following:

- 10 • Retail to MCI UNE-L migration
- 11 • CLEC UNE-L to MCI UNE-P migration
- 12 • MCI UNE-P to MCI UNE-L conversion
- 13 • CLEC UNE-P to MCI UNE-L migration
- 14 • CLEC UNE-L to MCI UNE-L migration
- 15 • MCI UNE-L to BellSouth retail migration
- 16 • BellSouth retail DSL customer (line sharing or FastAccess) to MCI line  
17 splitting via UNE-L
- 18 • Line-splitting UNE-P CLEC to MCI UNE-L line splitting (voice and data)  
19 migration

20 This list is by no means exhaustive, but illustrates the kinds of migrations  
21 that carriers will need to be able to process on a regular basis. The sheer number  
22 of scenarios that must be handled gives some indication of the complexity that  
23 moving to UNE-L will entail. Moreover, many of these scenarios involve greater

1 complexity than the retail-to-MCI migration, because some involve additional  
2 parties and some involve DSL service. MCI has attached these core migration  
3 process flows to this testimony as Exhibit SL-4. Included in these process flows  
4 are numbered points in the process where potential challenges may well exist as  
5 well as a glossary of relevant acronyms.

6 **Q. PLEASE GIVE SOME EXAMPLES OF THE COORDINATION**  
7 **BETWEEN THE CLEC, ILEC AND THE CUSTOMER THAT IS**  
8 **REQUIRED TO EFFECT A UNE-L MIGRATION.**

9 A. A cutover from an ILEC to a UNE-L CLEC requires manual coordination  
10 between the CLEC and the ILEC to request the physical movement of the loop, to  
11 test the loop once it has been moved, and to create and issue the E911, LIDB,  
12 CNAM, and LNP transactions. Moreover, if a customer is served by IDLC, a  
13 dispatch to the customer premise may be required and the customer will need to  
14 participate, too, by reprogramming features such as speed dial and perhaps  
15 remaining at home for a technician visit to connect the new loop and potentially to  
16 make changes to the inside wire termination at the NID. And a customer served  
17 by IDLC may not be able to receive UNE-L service at all, or may have service  
18 migration delayed until a new circuit can be deployed.

19 **Q. PLEASE DESCRIBE THE COORDINATION THAT IS REQUIRED**  
20 **BETWEEN CLECS TO EFFECT A UNE-L CLEC-TO-CLEC**  
21 **MIGRATION.**

22 A. As an example of the coordination that is required, the winning CLEC has to  
23 work with the losing CLEC to select a date for the migration and they have to

1 ensure that the losing CLEC's "port out" request to the ILEC will "mate" with the  
2 winning CLEC's migration request. If the port out request is rejected, the CLECs  
3 must negotiate a new due date and start all over again.

4 **Q. WHAT NEEDS TO BE DONE TO ADDRESS THE ISSUES OF MANUAL**  
5 **PROCESSING AND MULTIPLE PARTY COORDINATION?**

6 A. MCI recommends that the Commission open a separate docket to address these  
7 issues and additional operational issues such as the ones I raise below. Within  
8 such a docket, the Commission could establish industry workshops in which  
9 operational issues are raised and addressed under the Commission's supervision.

10 **Q. DO YOU EXPECT THERE ARE OTHER OPERATIONAL BARRIERS**  
11 **THAT EXIST FOR UNE-L THAT MCI HAS NOT YET DISCOVERED?**

12 A. Yes. As with the development of UNE-P, operational issues will emerge as  
13 carriers develop their systems to process UNE-L ordering and provisioning.  
14 Today, I am only discussing issues that I am aware as of the time of this filing.  
15 Many new issues can be expected to arise as MCI moves toward UNE-L service,  
16 and the industry and the Commission will need to address those problems during  
17 the process of removing operational barriers to UNE-L.

18 **Q. YOU ALSO MENTIONED OPERATIONAL ISSUES RELATING TO**  
19 **INFORMATION EXCHANGE. PLEASE EXPLAIN WHAT YOU MEAN**  
20 **BY THAT.**

21 A. There are multiple points where there are changes to customer records and  
22 information in both internal and external databases that are required for migration  
23 to a UNE-L service delivery method. Many of these changes result from the fact

1 that the CLEC switch will be used in the provision of service with UNE-L versus  
2 the ILEC switch that is used with UNE-P. Because there is very little mass  
3 market UNE-L competition today there are a great many unanswered questions  
4 surrounding these transfers and information exchanges. These exchanges of  
5 information all represent potential points of failure with UNE-L. These  
6 coordination, database, and ordering issues represent operational barriers that are  
7 of critical importance to both the customer and the service provider.

8 I will describe information exchange issues involving databases relating to  
9 CSRs, LFACS, E911, NPAC, LNP, LIDB, CNAM, DL/DA and printed  
10 directories. Changes to these databases must take place as efficiently and  
11 seamlessly as possible in every UNE-L scenario. In addition, I will discuss the  
12 changes to trouble handling that must take place before MCI can use UNE-L  
13 effectively. After outlining these issues, I also will discuss approaches MCI  
14 recommends for addressing them, which should provide at least a starting point  
15 for resolution.

16 **Q. PLEASE EXPLAIN THE CSR ISSUE.**

17 A. Obtaining accurate and complete customer information is essential to a CLEC's  
18 ability to submit a valid order. CSRs are used to identify address, feature,  
19 directory and other information for migrating customers. CSRs show the most  
20 current customer configuration based on the switch port and the current carrier's  
21 internal billing systems. During the pre-order phase of a migration, the CLEC  
22 representative needs to obtain current customer and service information to create  
23 the order. While this information can be retrieved on a real time basis for ILEC

1 retail customers (and some UNE-P CLEC customers), the systems and processes  
2 required to obtain and share this information have not been developed for all  
3 migration scenarios, most notably CLEC-to-CLEC migrations.

4 **Q. IS THIS AN ISSUE FOR INITIAL MIGRATIONS FROM BELLSOUTH?**

5 A. No. This is not an issue in initial migrations from BellSouth because BellSouth  
6 now allows UNE-P customers to be migrated by telephone number and house  
7 number, both of which are contained in BellSouth's CSRs.

8 **Q. Is this process the same with all migrations?**

9 A. No. Obtaining this type of customer information becomes much more difficult in  
10 a CLEC-to-CLEC UNE-L migration because the ILEC no longer has the current  
11 CSR information. Although the participants in the Florida collaborative have  
12 agreed to a 48 hour timeframe for exchanging CSR data, there is no way to ensure  
13 that this timeframe is met, and numerous problems with the process still exist.  
14 For example, that the "winning" CLEC must contact the "losing" CLEC by e-  
15 mail, fax, through a web site, or most often, by telephone, to obtain the relevant  
16 information. Obtaining information by telephone is not only manually intensive,  
17 but is made all the more difficult because there is no complete list of who and  
18 when to call. The manual nature of the process means it takes a long time (as  
19 opposed to instantaneous transmission for UNE-P) and has a greater margin for  
20 error because as yet, there are no CLEC CSR standards for database integrity.  
21 MCI's small business team has had significant problems in obtaining CSRs from  
22 a number of the CLECs active in the BellSouth territory. To make matters worse,

1 each carrier's CSR looks different and must be interpreted differently, which  
2 gives rise to miscommunication.

3 **Q. IS MORE INFORMATION REQUIRED ON CSRS FOR UNE-L THAN**  
4 **CURRENTLY EXISTS?**

5 A. Yes. Once the customer has migrated to a UNE-L CLEC, additional information  
6 is required to effect a subsequent customer move. For example, the carrier to  
7 whom the customer is migrating needs the customer's "circuit ID," which will be  
8 used by the ILEC to track where the customer exists on the main distribution  
9 frame of the ILEC's switch. The circuit ID generally is not included in the CSR,  
10 but rather is passed to the first UNE-L CLEC when the ILEC returns a firm order  
11 confirmation. The circuit ID is critical, since the winning CLEC will need that  
12 information to ensure that the same physical loop can be used to serve the  
13 customer, and the ILEC needs the circuit ID to provision the customer's existing  
14 loop to the winning CLEC, rather than having to find and provision another loop  
15 that its systems show to be available. Because all of the information needed for  
16 UNE-L migrations is not readily available – either because the ILEC cannot  
17 provide it, or because there are not reliable, comprehensive systems for  
18 transferring this information among CLECs – the CSR system must be revised  
19 and expanded to function properly for UNE-L.

20 **Q. WHAT CSR INFORMATION DOES MCI REQUEST BE INCLUDED?**

21 A. MCI needs the customer's billing telephone number; working telephone number;  
22 billing name and address; directory listing information (including listing type);  
23 complete service address; current PICs (for both inter and intraLATA, including



1 freeze status); local freeze status, if applicable; all vertical features; options (such  
2 as toll blocking and remote call forwarding); tracking or transaction number;  
3 service configuration information (*i.e.*, whether customer is served via resale,  
4 UNE-P, UNE-L, etc.); the identification of the network service provider, and the  
5 identification of any line sharing or line splitting on the line; the ILEC feature  
6 name and USOC for vertical features and blocking options to ensure that CLECs  
7 can understand each other's CSRs; circuit ID information; and identification of  
8 line sharing/line splitting providers.

9 **Q. DO THESE CSR ISSUES AFFECT CLECS' ABILITY TO DEPLOY UNE-**  
10 **L?**

11 A. Yes. This CSR issue must be addressed and the infrastructure developed prior to  
12 the implementation of UNE-L. Otherwise, customers will be stuck where they  
13 land in their first migration or ILECs will be forced to install more and more  
14 facilities to compensate for the inability to identify the current circuit being used.

15 **Q. DOES MCI HAVE A PROPOSAL TO RESOLVE THESE CSR ISSUES?**

16 A. Yes. Going forward, it will be necessary to implement a solution to these  
17 problems. MCI proposes the establishment of a distributed CSR database, shared  
18 and maintained by CLECs and ILECs alike. These database improvements may  
19 take a considerable amount of time, expense, and effort to accomplish, but are  
20 necessary before UNE-L migrations can be handled on the same basis as UNE-P  
21 migrations.

22 **Q. PLEASE EXPLAIN THE DISTRIBUTED DATABASE CONCEPT IN**  
23 **MORE DETAIL.**

1 A. MCI recommends that a central database be maintained to identify the owner of a  
2 particular customer and to support queries to the current provider to retrieve that  
3 customer's service information. The central database would not contain the CSR  
4 information but would function similarly to the current CARE clearinghouse,  
5 directing requests to the proper providers following a single data communications  
6 protocol. CLECs would maintain CSRs in a standard format and would agree to  
7 standard delivery methods and time frames. Companies that did not want to  
8 maintain their own CSRs or could not develop the software necessary to  
9 electronically transmit that information to other carriers could contract with the  
10 third party clearinghouses that would inevitably spring up to support this process.  
11 State commissions would need to develop standards and procedures to ensure that  
12 information was exchanged within the appropriate time frames. Until such a  
13 distributed method is developed, the ILECs should modify their CSR databases to  
14 provide access to the information they have about customers on their networks as  
15 well as the information remaining after a customer leaves the networks.  
16 BellSouth has made a first step in this process by allowing CLECs to allow each  
17 other to view customer information resident in the BellSouth systems, but this  
18 database modification is currently available only via LENS (the BellSouth  
19 graphical user interface), not EDI, and requires CLECs to coordinate with each  
20 other to give permission to view this information.

21 **Q. ARE THERE OTHER DATA BASE ISSUES?**

1 A. Yes, work is required on all the databases used to configure and provide UNE-L  
2 to mass markets customers, including LFACS, E-911, LIDB, CNAM, DA/DL,  
3 and potentially others.

4 **Q. WHAT IS THE PROBLEM WITH LFACS?**

5 A. In the pre-order phase, MCI may submit a loop qualification inquiry to LFACS to  
6 determine loop make-up information. The accuracy of the data retrieved from  
7 this database is critical to the CLEC's ability to determine if it can serve the  
8 customer. For example, the CLEC needs to know if the customer's loop is copper  
9 (and can be unbundled) or is served through an IDLC system, which the ILECs  
10 claim cannot be unbundled, or whether the customer has fiber to the home. The  
11 ILECs require that loops served by IDLC be handled separately and will not  
12 unbundle fiber to the home, so this pre-order information is critical in determining  
13 whether the customer can be migrated to a CLEC's switch.

14 **Q. IS THE DATA CONTAINED IN LFACS ACCURATE?**

15 A. At this point we do not know. There has been evidence in other proceedings,  
16 including various 271 proceedings and the Virginia arbitration proceeding at the  
17 FCC, that LFACS does not contain accurate data. Given the current low level of  
18 UNE-L and DSL competition, it is difficult to know how inaccurate LFACS data  
19 is, despite testing done during the 271 process.

20 **Q. HOW DOES MCI PROPOSE TO RESOLVE THIS ISSUE?**

21 A. MCI proposes that LFACS be audited for accuracy and that a process be  
22 developed to ensure that it is accurately maintained in real time when the ILEC  
23 alters or changes its loop plant. This is particularly important as ILECs take down

1 their copper plant and replace it with fiber. In addition, CLECs must be able to  
2 “reserve” a spare copper facility when a customer is migrating to ensure that that  
3 migration can take place. Currently, while LFACS will allow a CLEC to  
4 determine whether there is spare copper to support the unbundling of the  
5 customer’s service, that copper loop may be “taken” by another CLEC or the  
6 ILEC itself to serve another customer in the process of migrating or changing his  
7 loop to allow the provision of data services.

8 **Q. HOW IS UNE-L TROUBLE HANDLING DIFFERENT THAN TROUBLE**  
9 **HANDLING FOR UNE-P CUSTOMERS?**

10 A. When providing UNE-L service, each company is responsible for maintaining its  
11 respective portions of the network. The CLEC is responsible for its switch,  
12 collocation space and transport. The ILEC is responsible for the loop, frame and  
13 connectivity to the CLEC collocation space. This is a notable difference from  
14 UNE-P where the ILEC is fully responsible for making repairs to the switch and  
15 network.

16 In a UNE-L environment, MCI representatives gather the appropriate  
17 information from the customer and make an initial trouble assessment. To do  
18 this, MCI must “sectionalize” the trouble and determine whether a dispatch in to  
19 the MCI switch, a dispatch in to the BellSouth the frame, or a dispatch out to the  
20 field is required. If the problem is in the CLEC’s portion of the network, the  
21 CLEC either must dispatch a technician to its collocation cage or work with the  
22 ILEC to clear the problem. If no trouble is found on the CLEC’s network,  
23 typically the CLEC will request BellSouth to determine if the problem is with

1 BellSouth's network. If no trouble is found after a "dispatch in" to BellSouth, the  
2 initial ticket may be closed and the CLEC may have to open a new ticket if it  
3 turns out the problem lies at the main distribution frame or the facility running  
4 from the frame to the CLEC's collocation space. This process thus can lead to  
5 increased out of service times and harm customers by putting them in the middle  
6 of "finger pointing" exercises.

7 **Q. WHY IS THIS AN ISSUE?**

8 A. Since few mass markets customers today have UNE-L service, this trouble  
9 handling process has not yet been adapted for a world where customer service  
10 outages must be repaired rapidly so that residential customers can continue to be  
11 able to receive dial tone at the same rates as ILEC customers. In addition, while  
12 test equipment is available to allow CLECs to "see" through the collocation and  
13 out to the customer's premise, CLECs will have to purchase and deploy it and  
14 train their service teams to use it.

15 **Q. HOW DOES MCI PROPOSE TO HANDLE THIS ISSUE?**

16 A. For trouble handling in a UNE-L environment to work properly, CLECs like MCI  
17 need to obtain newer and more advanced test equipment as well as to develop  
18 internal processes to address this trouble handling and the anticipated volumes. In  
19 addition, all parties need to make sure that the dispatch rules surrounding trouble  
20 handling are adequate, function properly and are scaled to mass market volumes.  
21 These kinds of issues lend themselves to a workshop process under Commission  
22 supervision, along the lines I already have discussed.

1 **Q. WHEN A CUSTOMER MIGRATES TO UNE-L ARE THERE CHANGES**  
2 **INVOLVING A CUSTOMER'S E911 INFORMATION?**

3 A. Yes. When a consumer migrates to a UNE-L CLEC, the 911 database must be  
4 updated to reflect the new switch provider. A customer's migration to a UNE-L  
5 CLEC requires the ILEC to "unlock" the E911 database, allowing the CLEC  
6 record to overlay the existing ILEC record with updated information, including  
7 the CLEC company code and 7x24 emergency number as well as the current  
8 customer address information if necessary.

9 **Q. WHAT HAPPENS IF THE CHANGE IS NOT MADE CORRECTLY?**

10 A. If this change is not made correctly, the customer's E911 information in the  
11 Automatic Line Identification ("ALI") database will not include the CLEC's  
12 company ID or the customer's correct address if the customer has moved or the  
13 record required some other correction. It is essential that this change to E911 be  
14 done correctly and also that it be seamless and transparent to the migrating  
15 consumer.

16 **Q. IS THIS CHANGE REQUIRED FOR UNE-P?**

17 A. No such change is required for UNE-P because the ILEC retains control over the  
18 911-database information for the UNE-P CLEC and continues to provide trap and  
19 trace and law enforcement and health and safety functions. Because there is no  
20 change to the E911 database, there is little if any chance for errors to be  
21 introduced and no additional data requirements for the Public Safety Answering  
22 Position ("PSAP") administrators.

1 **Q. COULD YOU EXPLAIN THE NECESSARY E911 CHANGE IN MORE**  
2 **DETAIL?**

3 A. The ILEC in most cases maintains the 911 selective router used for routing a 911  
4 call to the appropriate PSAP. The PSAP dips into the ALI database when a 911  
5 call is received to retrieve the address of the caller. The PSAP is the custodian of  
6 the data required to dispatch emergency personnel. The PSAP must have a record  
7 for each customer a facilities CLEC has and must be able to contact that carrier.  
8 Thus, in a UNE-L environment, there are two orders required for changes to the  
9 911 ALI database. One order must go from the ILEC to the 911 provider to  
10 unlock the record in the ALI database. This allows the CLEC to overlay the  
11 existing record with the updated 911 ALI record, once the migration has been  
12 successfully processed.

13 The second order must go through the CLEC's vendor (or the ILEC if the  
14 CLEC has contracted with it) to overlay the existing 911 record with the new  
15 record. It is essential that these orders are coordinated so that the ILEC "unlock"  
16 order arrives before the CLEC "create" order to newly populate the database.

17 A critical issue here is the timing of the "unlock" order. In MCI's  
18 experience in providing UNE-L to business customers, we have discovered that  
19 many ILECs do not send the "unlock" order until the CLECs migration order has  
20 actually closed in the ILEC billing system. Since this will necessarily be  
21 sometime *after* the physical completion of the order, there could be a time lag  
22 where the 911 system has incorrect information on the network service provider.  
23 The National Network Numbering Association ("NENA") standard is to send the

1 911 order at the time of port. MCI follows that standard. The discrepancy  
2 between the ILEC and CLEC processes could lead to major problems regarding  
3 911 database accuracy and the ability of CLECs to provide current information to  
4 update the database. The ILEC systems should be revised so that the 911 records  
5 are sent at the time of porting. This change would greatly improve the timeliness  
6 of the 911 record process and further ensure that accurate customer information is  
7 in the 911 database.

8 **Q. WHAT HAPPENS IF THE ORDERS ARE NOT SEQUENCED**  
9 **CORRECTLY?**

10 A. If the sequence of the orders is disrupted, the 911 database cannot be updated.  
11 While the customer will be able to dial 911, the PSAP will only see the old  
12 customer record, which may or may not be accurate and will contain the wrong  
13 company ID for correction or trap and trace requests. As the number of UNE-L  
14 orders increases and particularly during the bulk transition of customers from  
15 UNE-P to UNE-L, the problem will become more severe. In addition, the CLEC  
16 will be required to manually check the PSAP information to determine if the  
17 update has been accepted and has passed the myriad of required edits.

18 **Q. HOW SHOULD THIS PROBLEM BE FIXED?**

19 A. Aside from requiring the ILECs to comport with the NENA guidelines as  
20 discussed above, these critical 911 orders must be coordinated through the various  
21 systems and processes of all industry players in order to ensure that migration to  
22 UNE-L does not result in E911 problems. MCI suggests that these issues be  
23 addressed through a workshop process under the Commission's supervision. As



1 operational barriers to UNE-L are overcome and CLECs transition to that service  
2 delivery method, it will be essential to ensure that the required 911 data are  
3 accurate as well as seamless and transparent to the consumer. In addition, the  
4 Commission, the ILEC, and the CLECs should work with the 911 database  
5 providers to improve the error handling capabilities of the system. Currently, 911  
6 errors are returned to CLECs in batch files rather than in real time. This increases  
7 the potential for late or inaccurate updates to the database.

8 **Q. ARE THERE ISSUES INVOLVING NPAC IN A UNE-L MIGRATION?**

9 A. Yes. The National Number Portability Administration Center handles the data  
10 base updates necessary to determine the “home switch” for each UNE-L customer  
11 -- that is, the switch that customer is associated with.

12 **Q. ARE NPAC CHANGES NECESSARY WITH UNE-P?**

13 A. No. Since UNE-P uses ILEC switching, there is no need to send transactions for  
14 UNE-P migrations to the NPAC, keeping the number administration task to a  
15 manageable level. When CLECs move to UNE-L, however, such transactions  
16 become a necessary and integral part of the process – and one that is currently  
17 untested at mass-market volumes.

18 **Q. PLEASE EXPLAIN.**

19 A. When a customer migrates to UNE-L, a transaction must be sent to NPAC to  
20 identify the “destination” switch for calls to this number. The ILEC initiates this  
21 transaction by creating a “10 digit trigger” in the donor (losing) switch at the time  
22 the UNE-L order is created. The trigger will cause incoming calls to “dip” into  
23 the NPAC database to determine the switch that now houses the number. The

1 CLEC initiates the second step of this process when it receives notification from  
2 the ILEC that the cut has been completed. The CLEC then sends a transaction to  
3 NPAC to claim the number. Until the CLEC claims the number in the NPAC  
4 database, the customer will be unable to receive any incoming telephone calls. If  
5 the NPAC transaction is not completed successfully, for example, if the NPAC  
6 system is down, the request is formatted incorrectly, or the ILEC has not notified  
7 the CLEC that the cut is complete, the customer will not be able to receive calls or  
8 voice mail messages, since calls will be directed to the incorrect home switch. It  
9 is essential that the NPAC process be coordinated and successful. If it is not,  
10 consumers could experience service problems that do not exist today with UNE-P.

11 When the customer changes carriers again, the losing carrier must  
12 “unlock” the existing record to allow the winning carrier to “replace” it with its  
13 destination code. Both churn and the addition of the ability for customers to  
14 migrate their numbers between wireless carriers and from wireline to wireless  
15 carriers will raise the number of transactions processed by the NPAC  
16 tremendously. It is unclear whether NPAC will be able to handle the volumes of  
17 transactions that would occur in a dynamic UNE-L market. In addition, the error  
18 checking rules for the NPAC are unclear and must be tested to ensure that the  
19 correct numbers are ported. If NPAC cannot handle the volumes or error rates are  
20 significant, changes to the NPAC process will undoubtedly prove necessary.

21 **Q. DOES MCI HAVE ANY SUGGESTED RESOLUTION TO THIS ISSUE?**

22 A. MCI recommends that the Commission address this issue in a workshop with the  
23 ILECs, CLECs, the NPAC administrator, Neustar and the organization that

1 develops requirements for the NPAC database (NAMPA), to determine NPAC's  
2 actual capabilities and to develop metrics for the completion of number portability  
3 tasks. Volume testing or scalability analysis also will be required to determine  
4 whether NPAC actually can handle the volumes of numbers that will be ported in  
5 a single day. Since a failure of the NPAC system will have a direct negative  
6 impact on customers, it is critical that the movement to UNE-L for mass markets  
7 customers not take place until all parties are clear that the system can support the  
8 increased volumes.

9 **Q. ARE THERE ISSUES WITH LIDB AND CNAM?**

10  
11 A. Yes. The LIDB and CNAM databases provide information on caller identity and  
12 blocking options. UNE-P customers today use the LIDB and CNAM databases  
13 provided by the ILEC. Unless a customer of the CLEC chooses new blocking  
14 options, no changes are required to the data when a customer migrates. Problems  
15 arise, however, in the UNE-L context.

16 **Q. WHY IS THE SITUATION DIFFERENT FOR UNE-L?**

17 A. Today, when a customer migrates a telephone number to a UNE-L carrier, the  
18 losing company deletes the telephone number's LIDB and CNAM information  
19 from its LIDB and CNAM databases and the acquiring carrier therefore needs to  
20 load the telephone numbers' LIDB and CNAM information internally. MCI, as  
21 the acquiring carrier, loads the data internally and at its LIDB/CNAM vendor,  
22 VeriSign.

23

1 **Q. WHY DOES THE NEED TO LOAD LIDB AND CNAM INFORMATION**  
2 **GIVE RISE TO PROBLEMS?**

3 A. The LIDB and CNAM data entry step is performed while the migration order is in  
4 the order entry stage. CLECs either must create CNAM data from published  
5 sources, which results in a substandard database because not all necessary data is  
6 available publicly, or dip the ILEC systems to receive the data at a per dip  
7 TELRIC rate. In most jurisdictions, CLECs are not entitled to take a download of  
8 the entire database from the ILECs. Under the *Triennial Review Order*, the  
9 database dips referred to above will no longer be at TELRIC pricing. As a result,  
10 CLECs will have to choose between using their substandard databases or dipping  
11 the ILEC's database at a price that may exceed TELRIC.

12 **Q. WHY ARE THESE PROBLEMS SIGNIFICANT?**

13 A. LIDB and CNAM are essential databases. Customer information for migrating  
14 customers whose LIDB and CNAM is not loaded or incorrect will not be  
15 available for caller name display on caller ID, potentially leading to call blocking  
16 by the called party and improper rejection of third party billed calls. Differences  
17 between the ILEC's CNAM information and that provided by the CLEC will  
18 affect customers and cause an increase in the number of "troubles" directed to the  
19 CLEC's service organization, increasing cost and leading to the impression that  
20 the CLECs are providing substandard service.

21 **Q. HOW DOES MCI PROPOSE THAT THIS ISSUE BE RESOLVED?**

22 A. The Commission should ensure that ILECs charge just and reasonable rates for  
23 CNAM and LIDB data dips. In addition (or at least in the alternative), CLECs

1 should be allowed to obtain a “dump” of the ILECs databases, at just and  
2 reasonable rates, to ensure that there is consistency of information and that callers  
3 are provided with the fully functional features that they require.

4 **Q. WHAT ISSUES FOR UNE-L MUST BE RESOLVED CONCERNING**  
5 **DIRECTORY LISTING AND DIRECTORY ASSISTANCE?**

6 A. With UNE-L, CLECs must send directory listing information to the ILEC to  
7 include in both the printed and on-line directories of each company. This step  
8 occurs as part of the UNE-L migration order.

9 **Q. DO CHANGES TO DL/DA OCCUR WITH UNE-P?**

10 A. No. No changes are necessary in a migration to UNE-P.

11 **Q. DO THEY OCCUR FOR UNE-L?**

12 A. Yes. The CLEC completes the directory listing form and sends it with its order to  
13 the ILEC for processing. While an “as is” (i.e., no change) directory listing can be  
14 ordered from the ILEC as part of the “first” retail to UNE-L migration or UNE-P  
15 to UNE-L conversion, “as is” directory listings are not permitted for subsequent  
16 changes, which means that the winning CLEC must provide complete directory  
17 listing information for the customer, which increases the likelihood of errors or  
18 deletions in the directory as it is “opened” to remove listings and “closed” to put  
19 the same listings back in. Again, the sheer volume of directory changes to be  
20 processed if UNE-L were to become a viable mass-market service delivery  
21 method could have significant impacts on the directory publishing and operator  
22 services databases.

23

1 Q. DOES MCI HAVE A PROPOSED RESOLUTION OF THIS ISSUE?

2 A. Yes. MCI recommends that “migrate as is” functionality for directory listings be  
3 available for CLEC-to-CLEC migrations as well as for ILEC-to-CLEC migrations  
4 to limit the number of times that this information must be added and deleted.

5 Q. DO THESE INFORMATION EXCHANGE ISSUES HAVE A  
6 SIGNIFICANT EFFECT ON CUSTOMERS IN A UNE-L  
7 ENVIRONMENT?

8 A. Yes. All of these customer record and information changes must take place as  
9 efficiently and seamlessly as possible in a UNE-L environment. It is critical that  
10 these various orders and transfers of information be coordinated to the greatest  
11 extent possible throughout the various systems and processes of each provider and  
12 between providers. A lack of coordination could result in errors in the customer  
13 records, the loss of customer data and loss of dial tone.

14 **Issue 6: If the triggers in §51.319(d)(2)(iii)(A) have not been satisfied**  
15 **for a given ILEC market and the economic and operational analysis**  
16 **described in §51.319(d)(2)(iii)(B) resulted in a finding that CLECs are**  
17 **impaired in that market absent access to unbundled local switching, would**  
18 **the CLECs’ impairment be cured if unbundled local switching were only**  
19 **made available for a transitional period of 90 days or more? If so, what**  
20 **should be the duration of the transitional period?**  
21

22 Q. THE FCC REQUIRES THE STATES TO APPROVE AND IMPLEMENT  
23 A “BATCH” HOT CUT PROCESS. WHAT IS THE PURPOSE OF THE  
24 “BATCH” HOT CUT PROCESS?

25 A. In an effort to alleviate some of the operational barriers to UNE-L recognized by  
26 the FCC, the *Triennial Review Order* requires that the states approve a batch hot  
27 cut process (“Transition Batch Hot Cut Process”) to transition UNE-P customers

1 to UNE-L by cutting over unbundled loops in high volumes from the ILEC to  
2 CLECs. (*See, e.g., Order ¶¶ 487-490.*) The FCC expected that such a process  
3 would enable groups of UNE-P customers to be transitioned to UNE-L  
4 simultaneously in batches, thus “result[ing] in efficiencies associated with  
5 performing tasks once for multiple lines that would otherwise have been  
6 performed on a line-by-line basis.” (*Order ¶ 489.*) Yet although the FCC  
7 recognized that such “a seamless, low-cost batch cut process for switching mass  
8 market customers from one carrier to another is necessary, at a minimum, for  
9 carriers to compete effectively in the mass market,” it did not view this  
10 transitioning process as a panacea. (*See, e.g., Order ¶¶ 423 (describing the batch  
11 process as mitigating, not necessarily eliminating impairment), 487.*) Indeed,  
12 because this Transition Batch Hot Cut Process only addresses the issue of  
13 transitioning to UNE-L the base of customers that competitors like MCI have  
14 acquired on UNE-P, it is merely a discrete piece of the much larger puzzle that  
15 must be assembled before UNE-L can be seen as a viable service delivery  
16 method. In practical terms, eliminating the operational barriers associated with  
17 the every day hot cut process (“Mass Market Hot Cut Process”) – which will be  
18 used to move customers to and from multiple carriers in a dynamic competitive  
19 market – is far more critical than implementing a Transition Batch Hot Cut  
20 Process that is only useful for simultaneously moving batches of UNE-P  
21 customers to UNE-L.

1 **Q. THE FCC ALSO REFERS TO THE CONCEPT OF “ROLLING ACCESS”**  
2 **IN ITS ORDER. WHAT IS “ROLLING ACCESS”?**

3 A. In the *Triennial Review Order*, the FCC also raises the possibility of a state  
4 commission granting CLECs “rolling access” to mass market switching, if the  
5 state commission determines that such access would cure a finding of CLEC  
6 impairment. (*See Order* ¶¶ 521-524.) With rolling access, CLECs would have  
7 “access to unbundled local circuit switching for a temporary period [at least 90  
8 days], permitting carriers first to acquire customers using unbundled incumbent  
9 LEC local circuit switching and later to migrate these customers to the  
10 competitive LECs’ own switching facilities.” (*Order* ¶¶ 521, 524.) In other  
11 words, rolling access allows CLECs to use UNE-P to acquire customers at the  
12 outset, but then requires that the CLEC transition (i.e., “roll off”) those customers  
13 to UNE-L within a specified time period after acquisition. Theoretically, this  
14 process would enable the CLEC to avoid the delays and disruptions of service that  
15 would occur if a CLEC had to acquire the customer via UNE-L at the outset,  
16 because the customers are first acquired and then transferred to UNE-L via the  
17 Transition Batch Hot Cut Process.

18 **Q. WILL ROLLING ACCESS CURE THE OPERATIONAL BARRIERS**  
19 **FACING A MOVE TO UNE-L?**

20 A. No, as this description makes clear, rolling access does not ultimately alleviate the  
21 operational impairments presented by the everyday Mass Market Hot Cut Process,  
22 because it is simply a delayed batch hot cut process, one which focuses solely on  
23 transferring UNE-P customers to UNE-L. As I discuss above, the Mass Market



1 Hot Cut Process will be essential for all customer transfers other than those from  
2 UNE-P to UNE-L. For instance, even if CLECs have rolling access, they will not  
3 be able to rely on the Transition Batch Hot Cut Process for CLEC-to-CLEC UNE-  
4 L migrations. Therefore, regardless of whether the Transition Batch Hot Cut  
5 Process or rolling access alleviates some aspects of CLEC impairment, it is  
6 critical that state commissions investigate and resolve the substantial operational  
7 barriers associated with the Mass Market Hot Cut process as well.

8 **Q. WHAT THEN SHOULD THE COMMISSION DO WITH RESPECT TO**  
9 **THE HOT CUT PROCESS?**

10 A. Although the Commission must comply with the FCC's requirement that it  
11 evaluate, approve and implement a Transition Batch Hot Cut Process, that task  
12 should not distract the Commission from working toward alleviating the distinct  
13 operational issues associated with the Mass Market Hot Cut Process. The  
14 "Transition Batch Hot Cut Process" will necessarily require a number of  
15 coordinated steps and scheduling with the ILEC, and thus substantial ILEC  
16 involvement and oversight. In contrast, the Mass Market Hot Cut Process will  
17 need to be a standardized, simple, and low-cost process that can take place on a  
18 day-to-day basis. And it will have to function at the same time that the other  
19 migration processes are working as well, including migrations to and from retail,  
20 UNE-P, and resale, disconnections, suspensions, feature additions and changes.  
21 Thus, although a batch hot cut process may be helpful, it simply will not address  
22 the everyday operational barriers that exist in migrating customers from one  
23 UNE-L CLEC to another, from an ILEC to a UNE-L CLEC, and from a UNE-L

1 CLEC to an ILEC. To address these more fundamental difficulties with UNE-L  
2 migrations, the state must streamline the standard Mass Market Hot Cut process  
3 as well, so that it is as effective, efficient, seamless, low cost and scalable as  
4 possible, but without the special scheduling and ILEC handling necessary for the  
5 Transition Batch Hot Cut Process. For it is only when day-to-day migrations  
6 among all carriers, using all service delivery methods, take place quickly,  
7 efficiently and successfully, that a truly competitive market will exist. MCI  
8 discusses in detail its hot cut proposals in its Network Impairment Testimony.

9 **Q. HAS BELLSOUTH SHOWN A WILLINGNESS TO IMPROVE ITS**  
10 **EXISTING MASS MARKET HOT CUT PROCESS?**

11 A. No. BellSouth recently refused to engage in a collaborative process to improve its  
12 batch hot cut process, as illustrated by an email the BellSouth change  
13 management team e-mail sent to CLECs on November 20, 2003. (Exhibit SL-5.)

14 **Q. IS BELLSOUTH'S RESPONSE SUFFICIENT?**

15 A. No. The Commission should order BellSouth to work with CLECs to improve its  
16 batch hot cut process. BellSouth's response demonstrates that Commission  
17 involvement will be required to require BellSouth to make the changes necessary  
18 to make UNE-L operationally workable. Indeed, BellSouth's proposal at the  
19 Florida Batch Hot Cut workshop held on October 28, 2003 was merely to provide  
20 a method for ordering 100 hot cuts on the same LSR. It did not address the timing  
21 for these hot cuts, the information required on the ordering forms, or any  
22 improvements to the process itself. Until BellSouth has a fully developed and  
23 implemented transition batch hot cut process, and until that process is working

1 and metrics are in place, CLECs are impaired without access to unbundled  
2 switching.

3 **Q. PLEASE BRIEFLY SUMMARIZE YOUR TESTIMONY.**

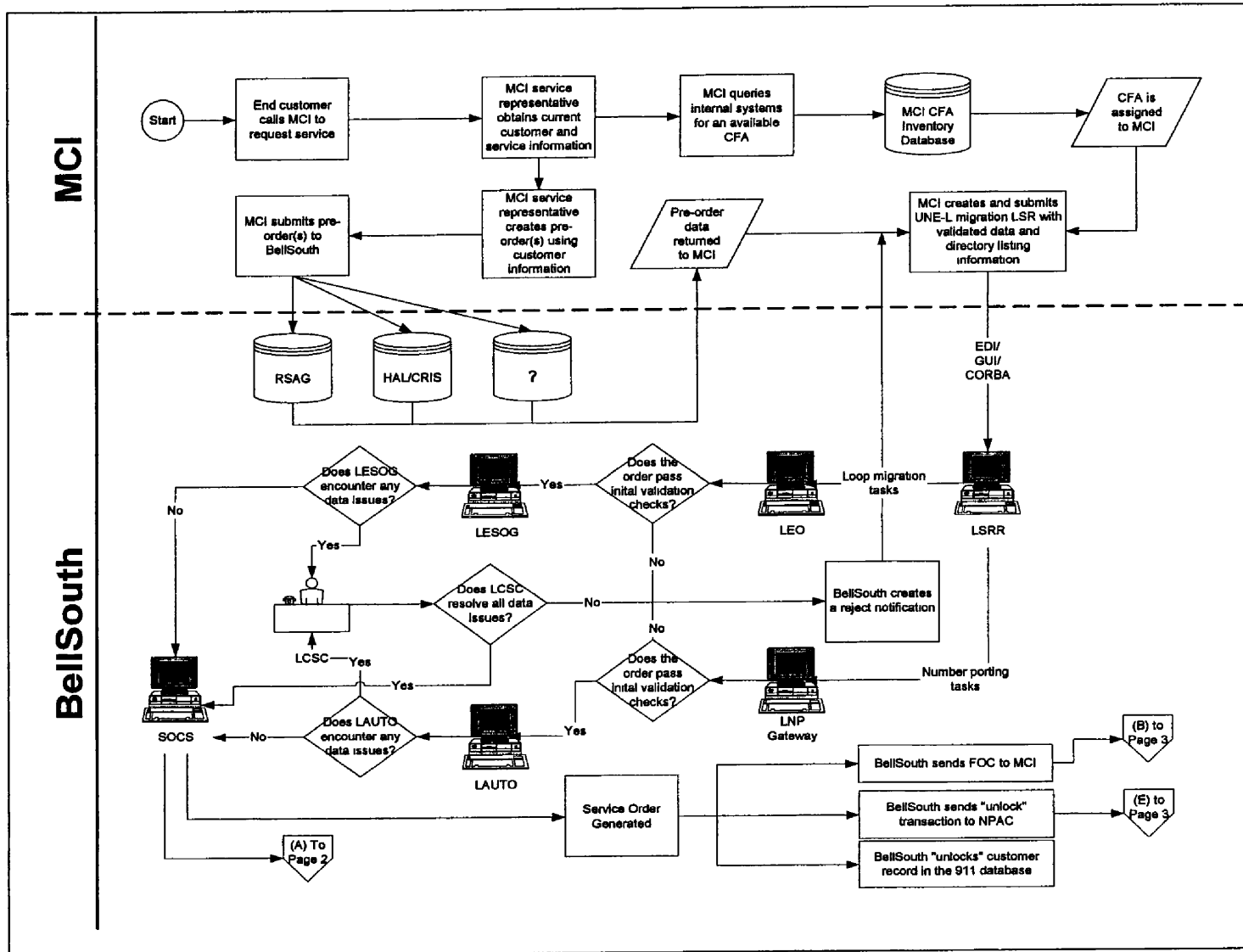
4 A. One of the major issues in this proceeding is whether operational impairment  
5 exists. For the reasons I have outlined, and the ones described in MCI's Network  
6 Operational Testimony, it clearly does. But determining that operational  
7 impairment exists is the easy part of the Commission's job. The more difficult  
8 part is working with the industry to ensure that the barriers are removed. I have  
9 presented some approaches to known operational problems that should help the  
10 Commission and the industry progress toward making UNE-L operationally  
11 feasible for CLECs. As these problems and new ones that arise are addressed and  
12 remedied, the industry can begin to make UNE-L a reality.

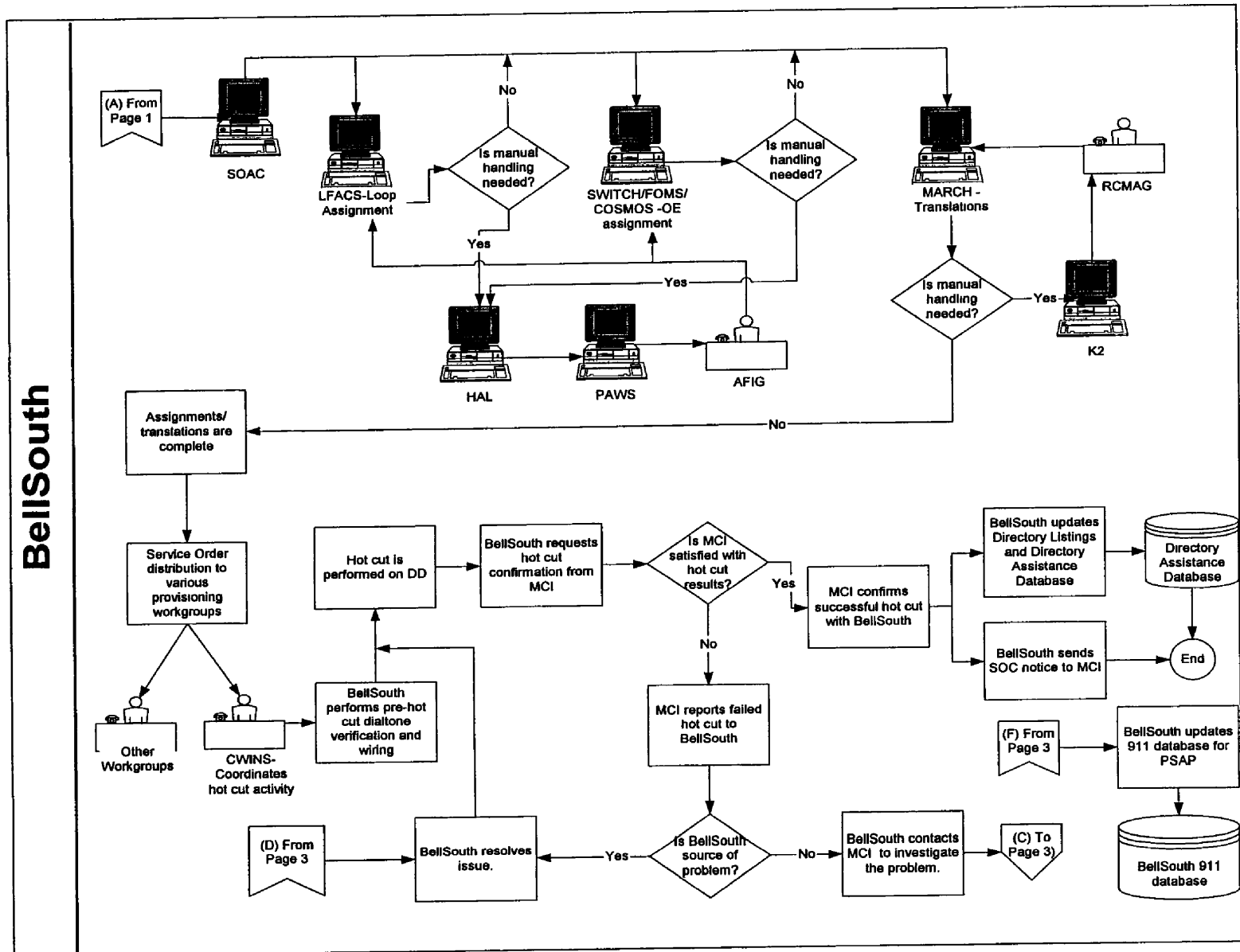
13 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

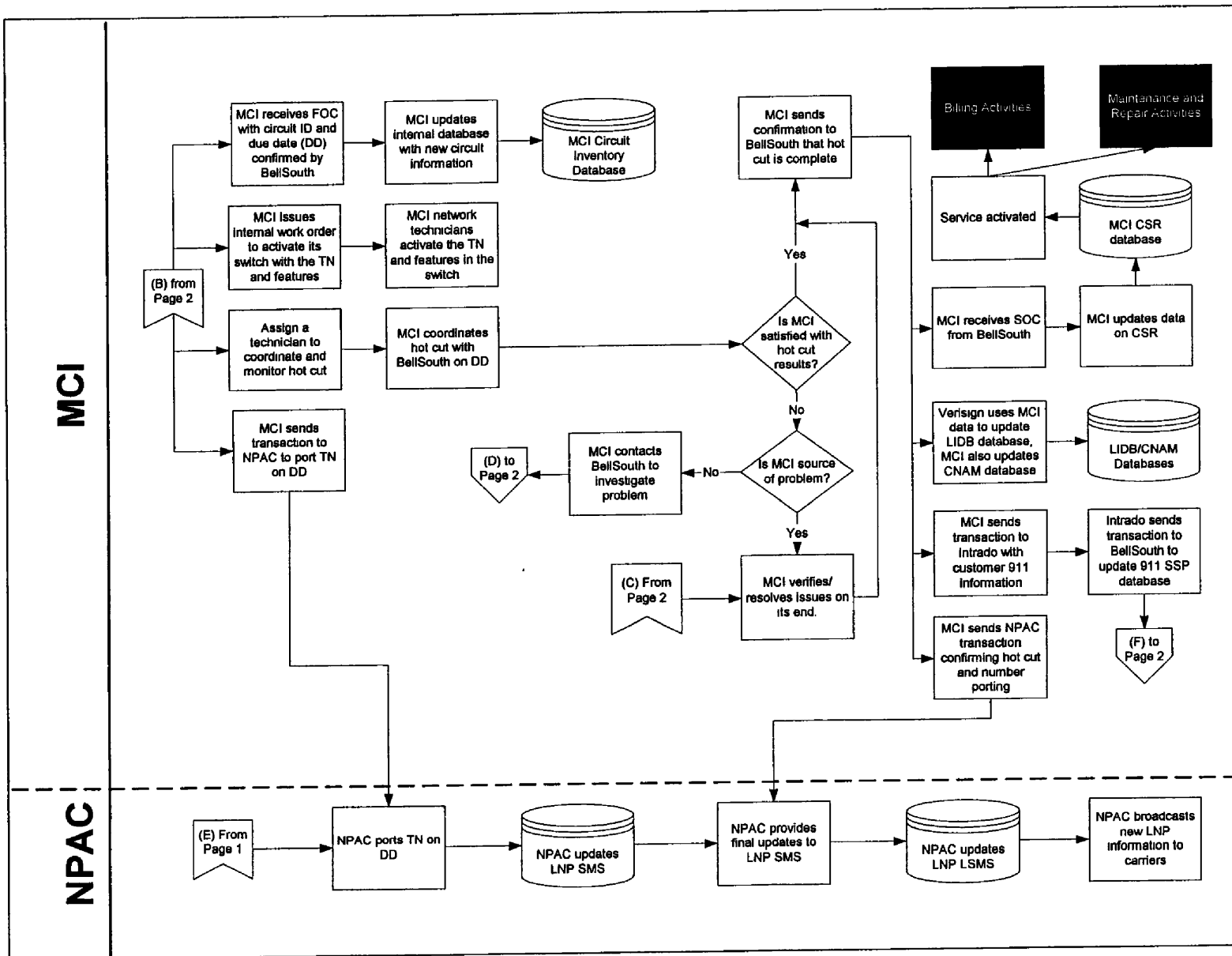
14 A. Yes, it does.

## **Retail to UNE-P Migration**

- The CLEC issues a single UNE-P local service request (“LSR”) to the ILEC following the prescribed Ordering and Billing Forum (“OBF”) procedures. This LSR is issued using electronic data interface (“EDI”) or the ILEC-provided graphical user interface (“GUI”). The CLEC need only provide the customer’s name and telephone number. Directory listings can remain the same, and service address information and E911 information are not required by the ILEC.
- The ILEC EDI translator checks the order to ensure that key fields are correct and, via the same computer system, returns a Firm Order Confirmation (FOC) or an electronic error message (reject or clarification) to the CLEC. The FOC provides the due date for the completion of the programming necessary to complete the order.
- If an error message is issued, the CLEC must resubmit the order, restarting the process.
- The order then electronically “flows through” to the ILEC service order processor, where the internal service orders necessary to make the switch programming changes and billing changes necessary for the migration to UNE-P are generated. Flowthrough ensures that errors are minimized by allowing the service orders to be created mechanically, rather than typed by a service representative. Most ILECs are now achieving well more than 90% flowthrough for standard UNE-P POTS service orders.
- The ILEC internal service orders initiate the internal service order provisioning process, including the implementation of switch feature changes. Migration orders do not require the dispatch of technicians to the frame because the programming changes are made at the switch and can be completed totally electronically. The physical facilities (loop and cross connect) are not changed in any way.
- Once the switch translations work is complete, the internal ILEC systems send the CLEC a Service Order Completion (“SOC”) notifier. At this point, the customer has “migrated” to the CLEC.
- The ILEC completes its internal migration process by updating its internal customer service records (“CSR”) and billing records to stop billing the customer directly and to begin issuing wholesale bills to the CLEC. Some ILECs also send a second notifier, the Billing Completion Notifier, (“BCN”) to the CLEC. This final notifier is generally sent between 1 to 5 days after the internal ILEC billing systems are updated and confirms to the CLEC that the customer has been migrated and billing can begin.







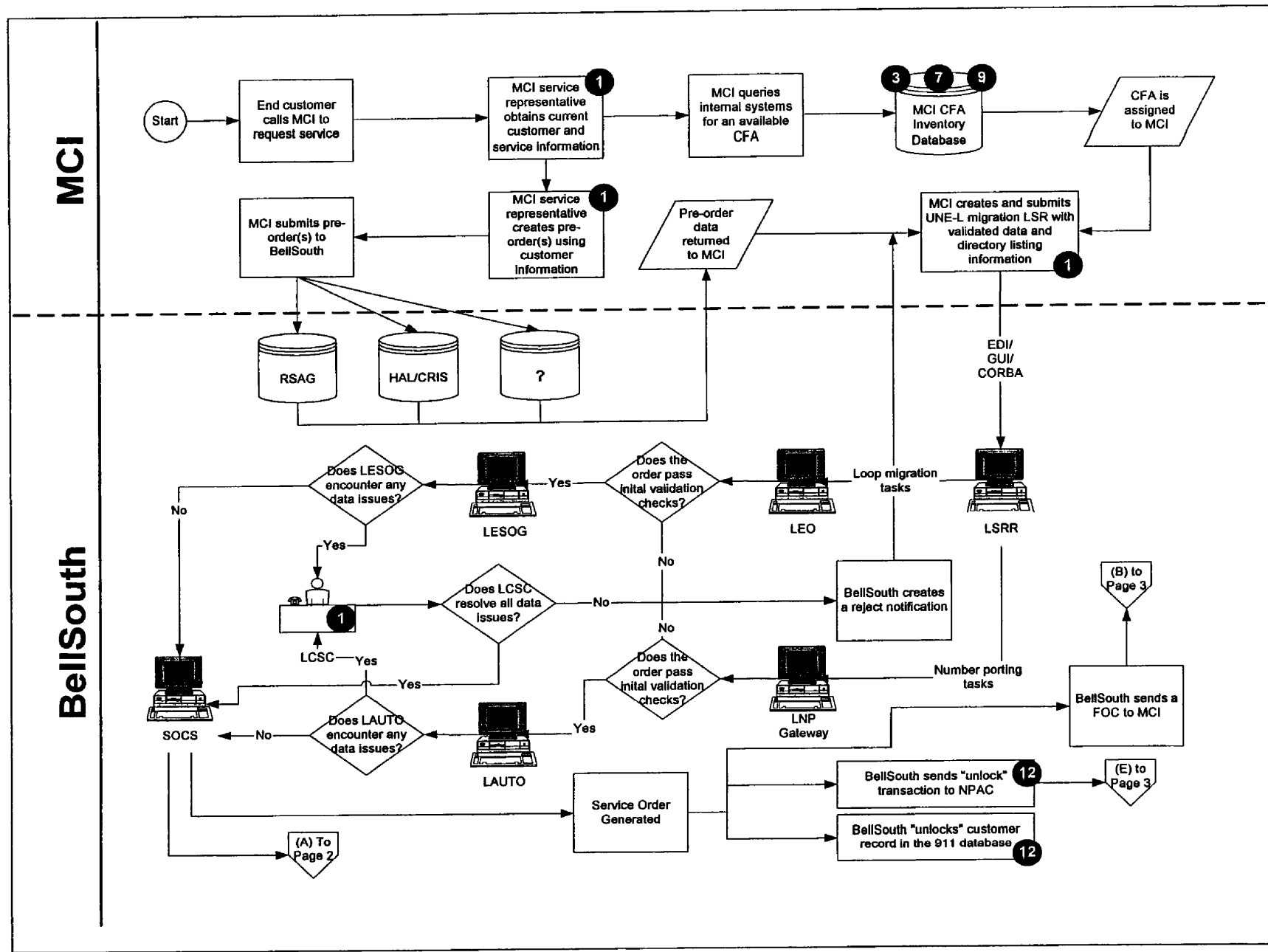
## **Retail to UNE-L Migration**

- The CLEC issues an electronic order to the ILEC requesting that the customer be moved from the ILEC switch to the CLEC switch. Unlike a UNE-P order which requires only the customer's name and telephone number and the features that the customer will be purchasing, the UNE-L order must include the customer's name and telephone number (some companies may require more), and information on the collocation cage to which the loop will be transferred and the channel facility assignment (pair) to which the loop will be terminated.
- The CLEC also will create internal orders to send to the National Number Portability Assignment Center, the LIDB provider, and the E911 center serving the customer to establish ownership of the customer's number at the appropriate time. These orders must be timed to coordinate with the orders issued by the ILEC. For example, the ILEC order to unlock the E911 database should be complete prior to the CLEC order to accept responsibility for the record and lock the database. These orders may fall out at any time causing additional customer problems.
- The ILEC EDI translation software will accept or reject the order and return a FOC or clarification/reject to the CLEC. The ILEC service order processor may now be able to create the internal orders necessary to migrate the customer to UNE-L. If it cannot, the orders will need to be entered manually by service center personnel. Fallout rates for UNE-L orders are higher than those for UNE-P. If the order does not flow through the system, the ILEC service order personnel will need to type the orders. Unlike a UNE-P migration, multiple related service orders must be created for a UNE-L transition – generally, the local service center personnel must create a Disconnect (D) order to remove the customer from the ILEC switch; a New (N) order to move the loop from the MDF to the CLEC collocation equipment; and a Change (C) order to change the billing to the CLEC from UNE-P to UNE-L. Directory listing orders may also have to be created, as well as a request to unlock the E911 data base to allow the CLEC to “claim” the customer and a “trigger” order to route calls to the customer via the local number portability data base rather than the ILEC switch.
- The internal ILEC service orders are routed to the technicians responsible for the UNE-L cutover. These technicians must “find” the customer's circuit at the main distribution frame by manually clipping onto the loop and “listening” for dial tone, wire in a jumper cable which will allow the loop to be extended to the CLEC's collocation equipment, and prepare for the cutover. The frame personnel should also check for dial tone at the CLEC end of the collocation, ensuring that the CLEC switch will have dial tone for the customer when he/she migrates.

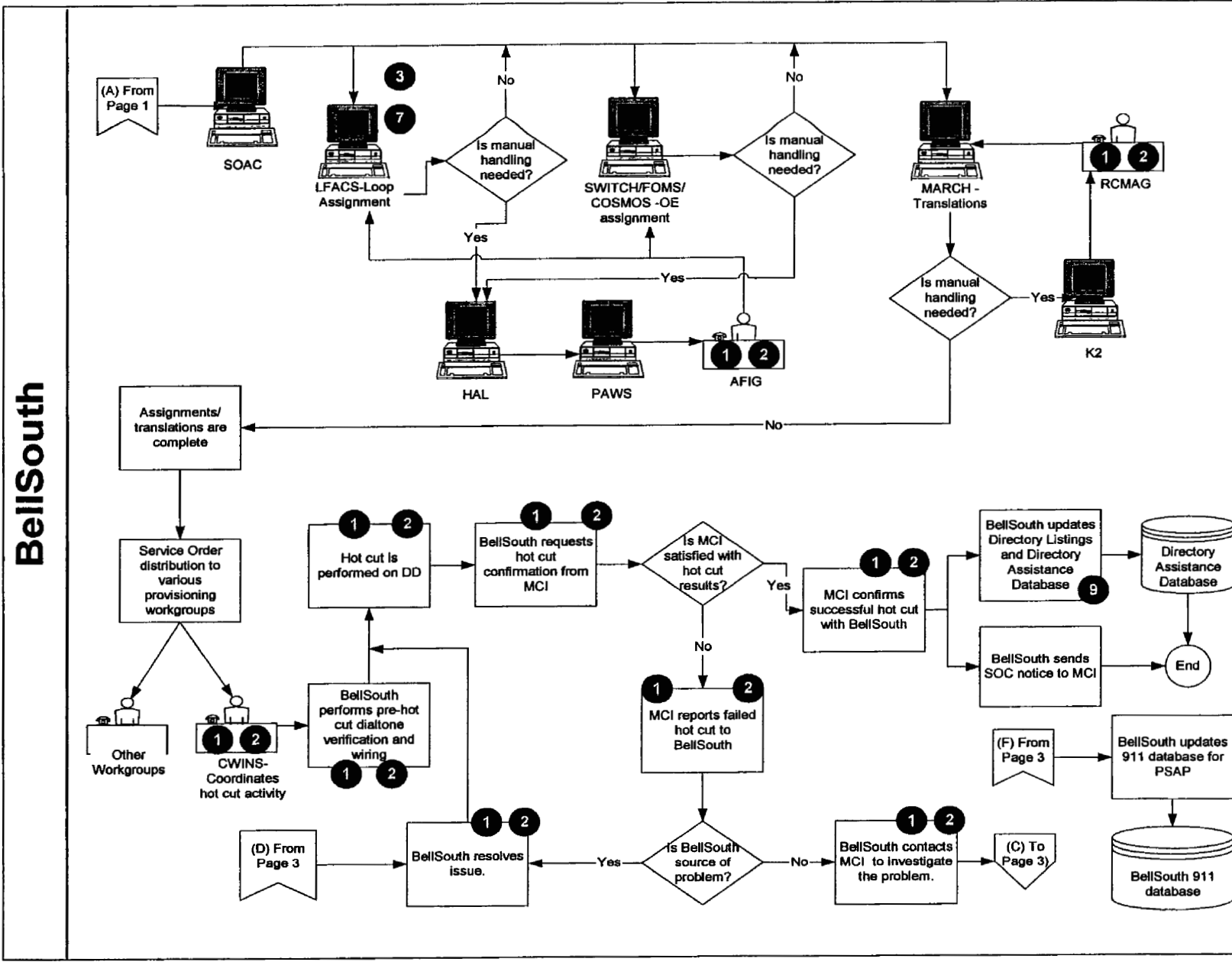


- “claiming” order to the NPAC. The customer will have dial tone during this process but will be unable to receive calls until the NPAC transaction is completed.
- The ILEC will issue a service order completion notification to the CLEC.
- The ILEC will complete the internal work required to change the billing to the CLEC from UNE-P to UNE-L. The customer’s CSR will be removed from the ILEC systems.

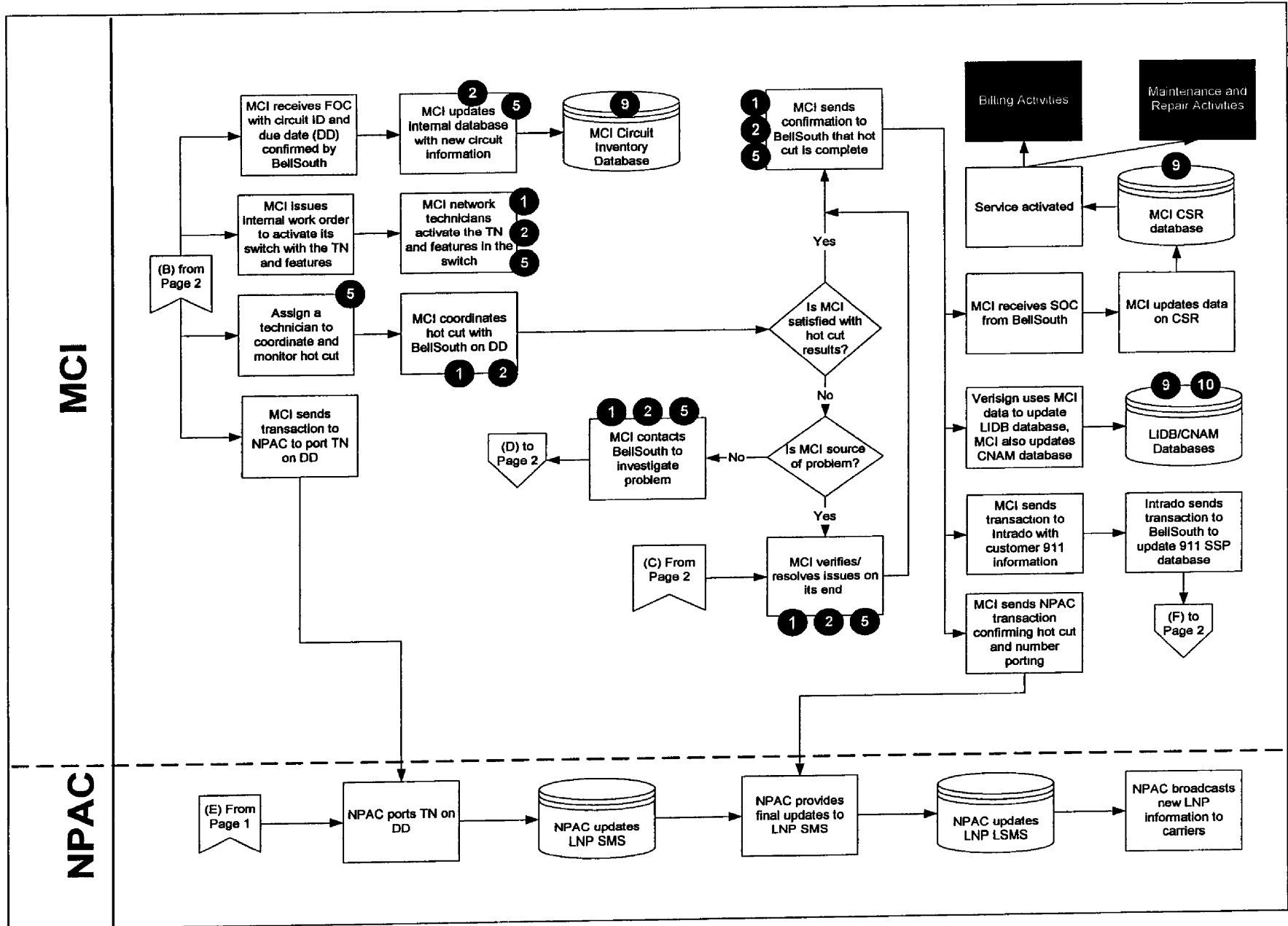
### BellSouth Retail to MCI UNE-L Migration



BellSouth Retail to MCI UNE-L Migration



### BellSouth Retail to MCI UNE-L Migration



## BellSouth Retail to MCI UNE-L Migration

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### Assumptions:

- 1) All customers migrating to MCI call into an MCI service center to order service.
- 2) All customers port their numbers.
- 3) MCI switches will provide all MCI UNE-L customer features.
- 4) Customers are not moving to new locations.
- 5) MCI uses a vendor, Intrado, to load 911 records to the PSAP.
- 6) MCI will maintain its own LIDB and CNAM databases. MCI uses a vendor, Verisign, to load LIDB data.
- 7) Scenarios are represented as "ideal" (not necessarily zero-defect): Each party has sufficient resources; each party sufficiently manages its responsibilities; no "one-off" circumstances are involved.
- 8) When translations are performed, BellSouth sets the AIN trigger.
- 9) As part of MCI's agreement with BellSouth, line loss reports will only be generated for loss of lines to other carriers. If MCI is converting customers from one UNE type to another, line loss reports will not be generated.
- 10) Provisioning flows are based in part on information obtained from the KPMG Consulting BellSouth-Florida OSS Report.
- 11) Only processes and systems that directly impact MCI or BellSouth are outlined.
- 12) For migrations involving DSL, voice and data are pre-wired together in MCI's collocation (DSLAM and Splitter), and inventoried and assigned as one assembly with one CFA.

### Challenges:

(The following challenges are based on the UNE-L Operational Analysis: Activity Two reports.)

- 1) Challenges associated with manual handling throughout ordering and provisioning processes.
- 2) Challenges associated with high steady-state provisioning volumes and the impact on systems and processes.
- 3) Challenges associated with facility availability.
- 4) Challenges associated with facility re-use.
- 5) Challenges associated with expanded MCI Provisioning Group responsibilities for UNE-L service.
- 6) Challenges associated with ordering and provisioning when IDLC service is present.
- 7) Challenges associated with data management specifically related to facility assignment and inventory.
- 8) Challenges associated with insufficient CLEC-to-CLEC interfaces and processes.
- 9) Challenges associated with data integrity.
- 10) Challenges associated with MCI LIDB/CNAM data management responsibilities.
- 11) Challenges associated with batch migration of customers from UNE-P to UNE-L service.
- 12) Challenges associated with number unlocking procedures for 911 and LNP.

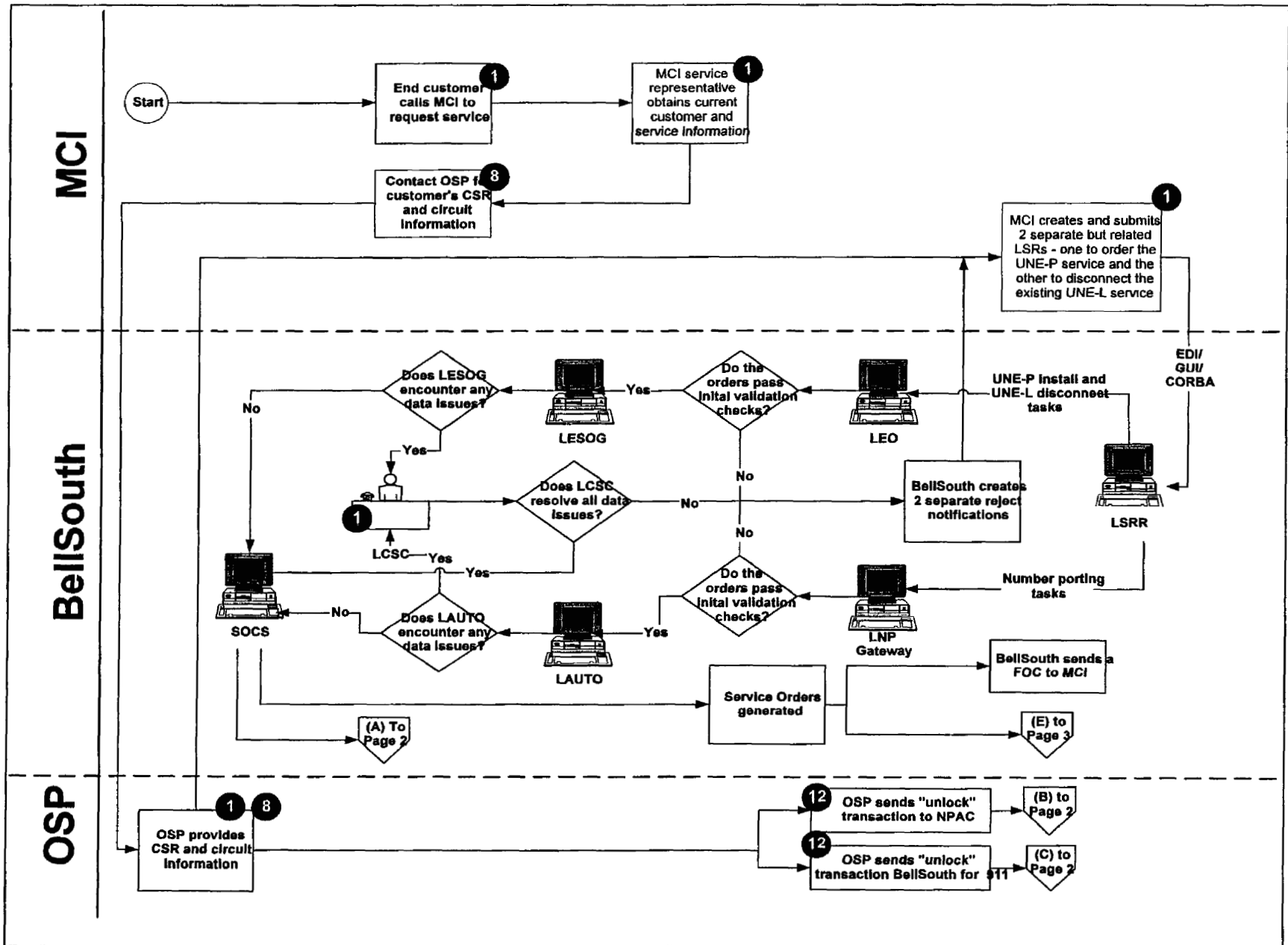
## BellSouth Retail to MCI UNE-L Migration

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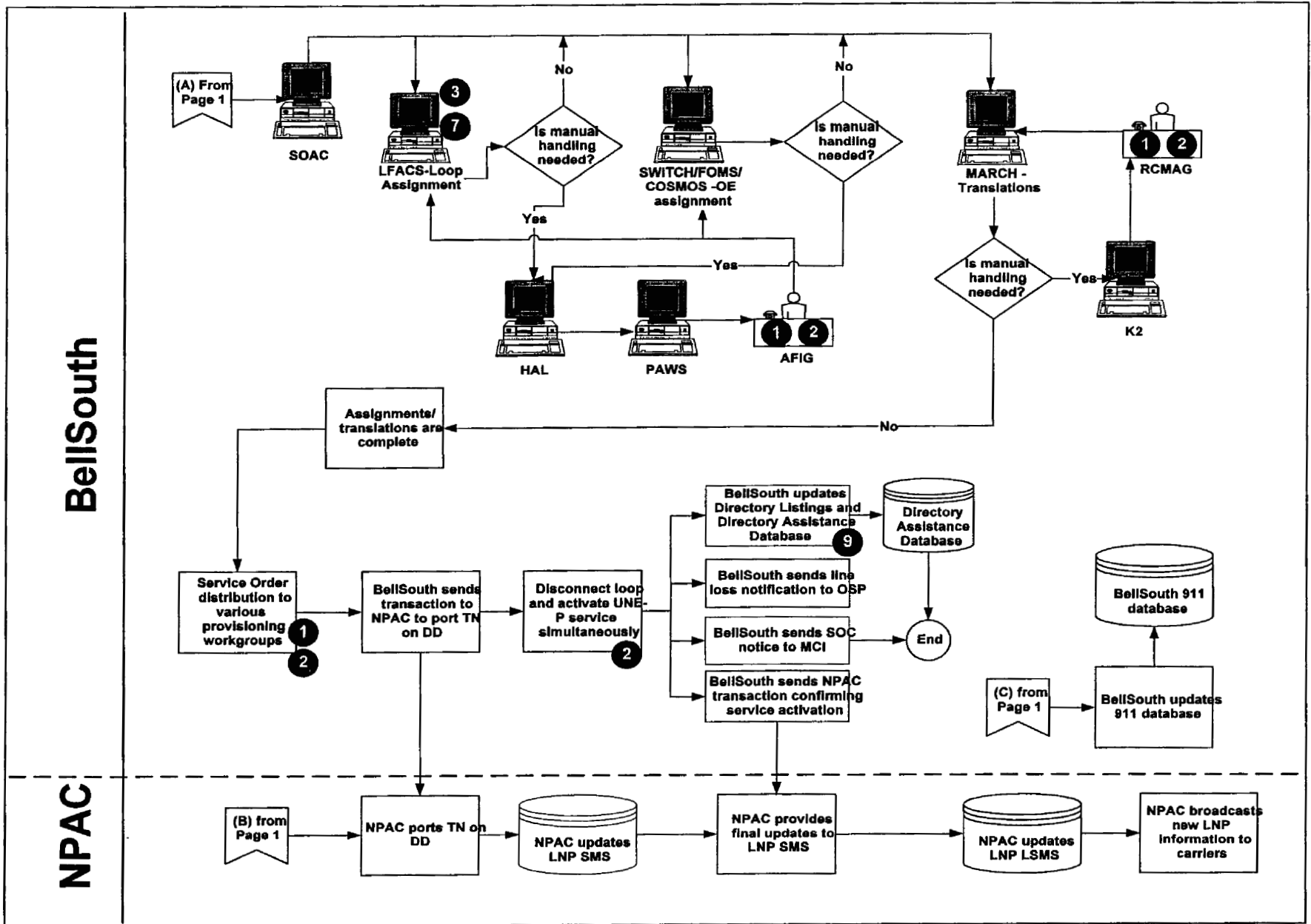
### Glossary:

CAFE: Carrier Access Front End  
CFA: Connecting Facility Assignment  
CNAM: Customer Name Database  
CORBA: Common Object Request Broker Architecture ordering interface  
CPSS: Circuit Provisioning Status System  
CPSS-TA: Circuit Provisioning Status System-Trouble Administration  
CSOTS: CLEC Service Order Tracking System  
DD: Due date  
DSAP: Direct Order Entry (DOE) Support Application  
ECTA: Electronic Communications Trouble Administration  
FOC: Firm Order Confirmation  
GUI: Graphical User Interface  
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LSMS: BellSouth's LNP database, containing downloads from NPAC's LSMS  
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OE: Office Equipment  
OSP: Old Service Provider, also known as the "Losing CLEC"  
PAWS: Provisioning Analyst Workstation System provisioning system  
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CLEC UNE-L to MCI UNE-P Migration (BellSouth)



CLEC UNE-L to MCI UNE-P Migration (BellSouth)





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## CLEC UNE-L to MCI UNE-P Migration (B...

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### **Assumptions:**

- 1) All customers migrating to MCI call into an MCI service center to order service.
- 2) All customers port their numbers.
- 3) MCI switches will provide all MCI UNE-L customer features.
- 4) Customers are not moving to new locations.
- 5) MCI uses a vendor, Intrado, to load 911 records to the PSAP.
- 6) MCI will maintain its own LIDB and CNAM databases. MCI uses a vendor, Verisign, to load LIDB data.
- 7) Scenarios are represented as "ideal" (not necessarily zero-defect): Each party has sufficient resources; each party sufficiently manages its responsibilities; no "one-off" circumstances are involved.
- 8) When translations are performed, BellSouth sets the AIN trigger.
- 9) As part of MCI's agreement with BellSouth, line loss reports will only be generated for loss of lines to other carriers. If MCI is converting customers from one UNE type to another, line loss reports will not be generated.
- 10) Provisioning flows are based in part on information obtained from the KPMG Consulting BellSouth-Florida OSS Report.
- 11) Only processes and systems that directly impact MCI or BellSouth are outlined.
- 12) For migrations involving DSL, voice and data are pre-wired together in MCI's collocation (DSLAM and Splitter), and inventoried and assigned as one assembly with one CFA.

### **Challenges:**

(The following challenges are based on the UNE-L Operational Analysis: Activity Two reports.)

- 1) Challenges associated with manual handling throughout ordering and provisioning processes.
  - 2) Challenges associated with high steady-state provisioning volumes and the impact on systems and processes.
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  - 4) Challenges associated with facility re-use.
  - 5) Challenges associated with expanded MCI Provisioning Group responsibilities for UNE-L service.
  - 6) Challenges associated with ordering and provisioning when IDLC service is present.
  - 7) Challenges associated with data management specifically related to facility assignment and inventory.
  - 8) Challenges associated with insufficient CLEC-to-CLEC interfaces and processes.
  - 9) Challenges associated with data integrity.
  - 10) Challenges associated with MCI LIDB/CNAM data management responsibilities.
  - 11) Challenges associated with batch migration of customers from UNE-P to UNE-L service.
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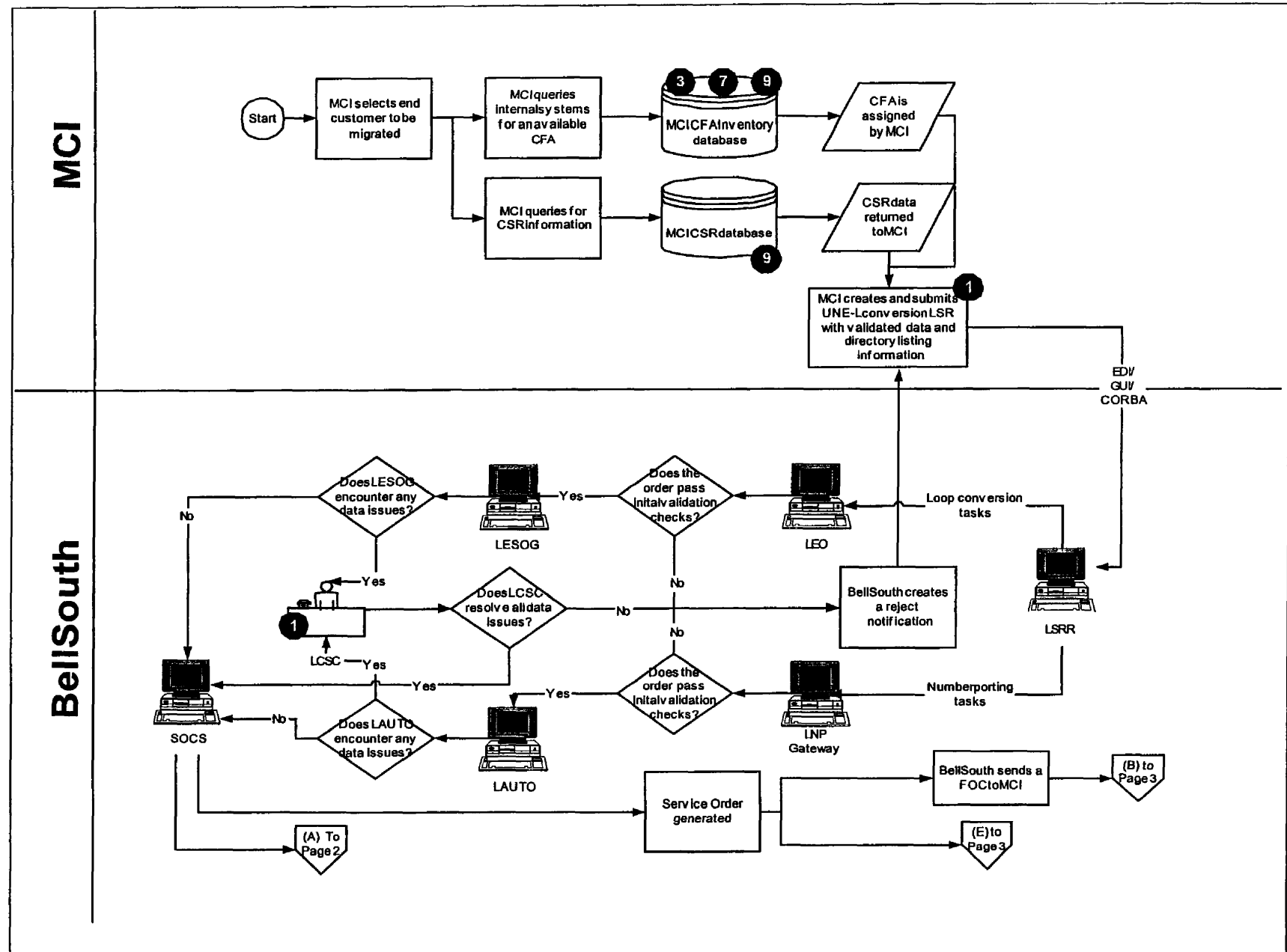
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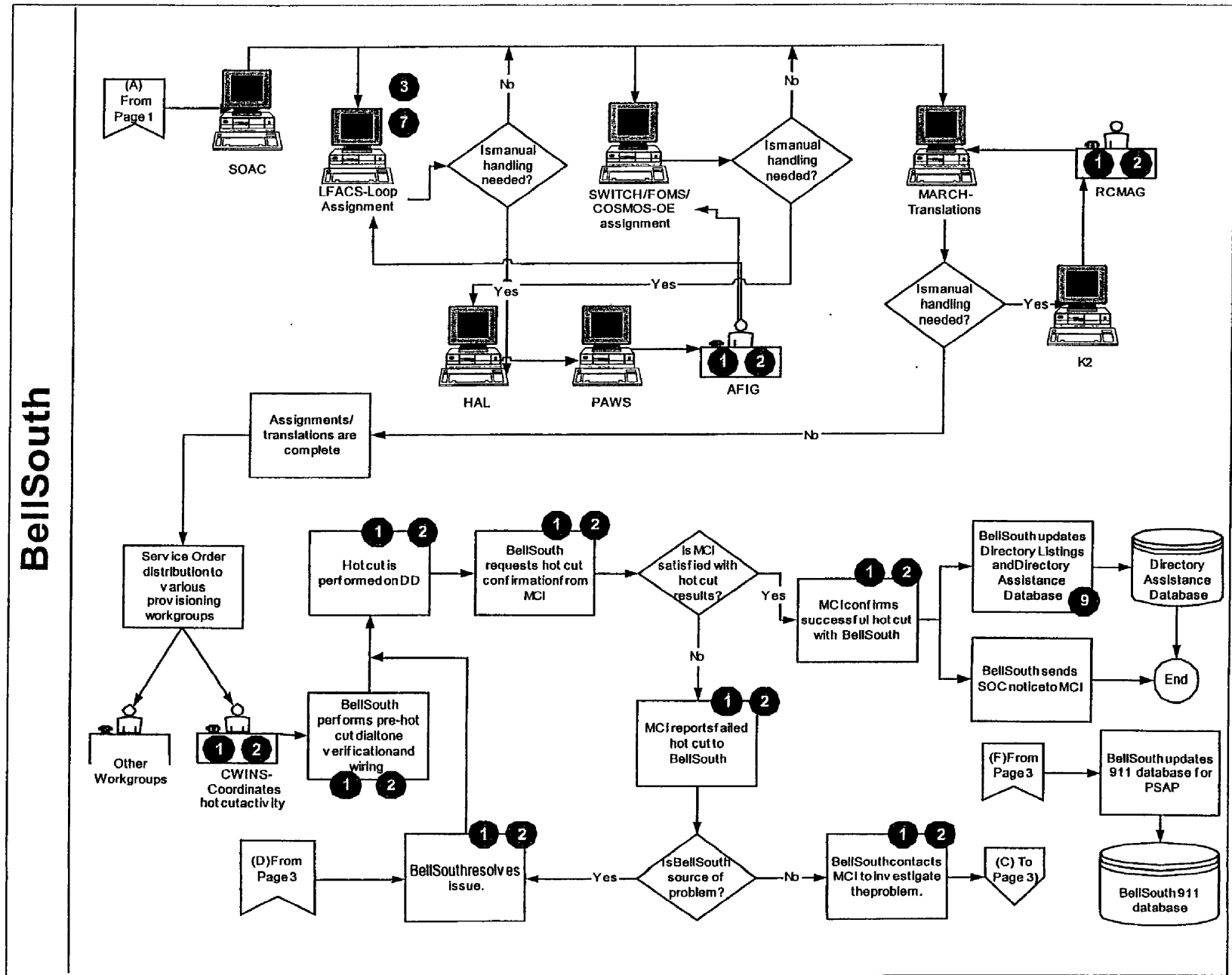
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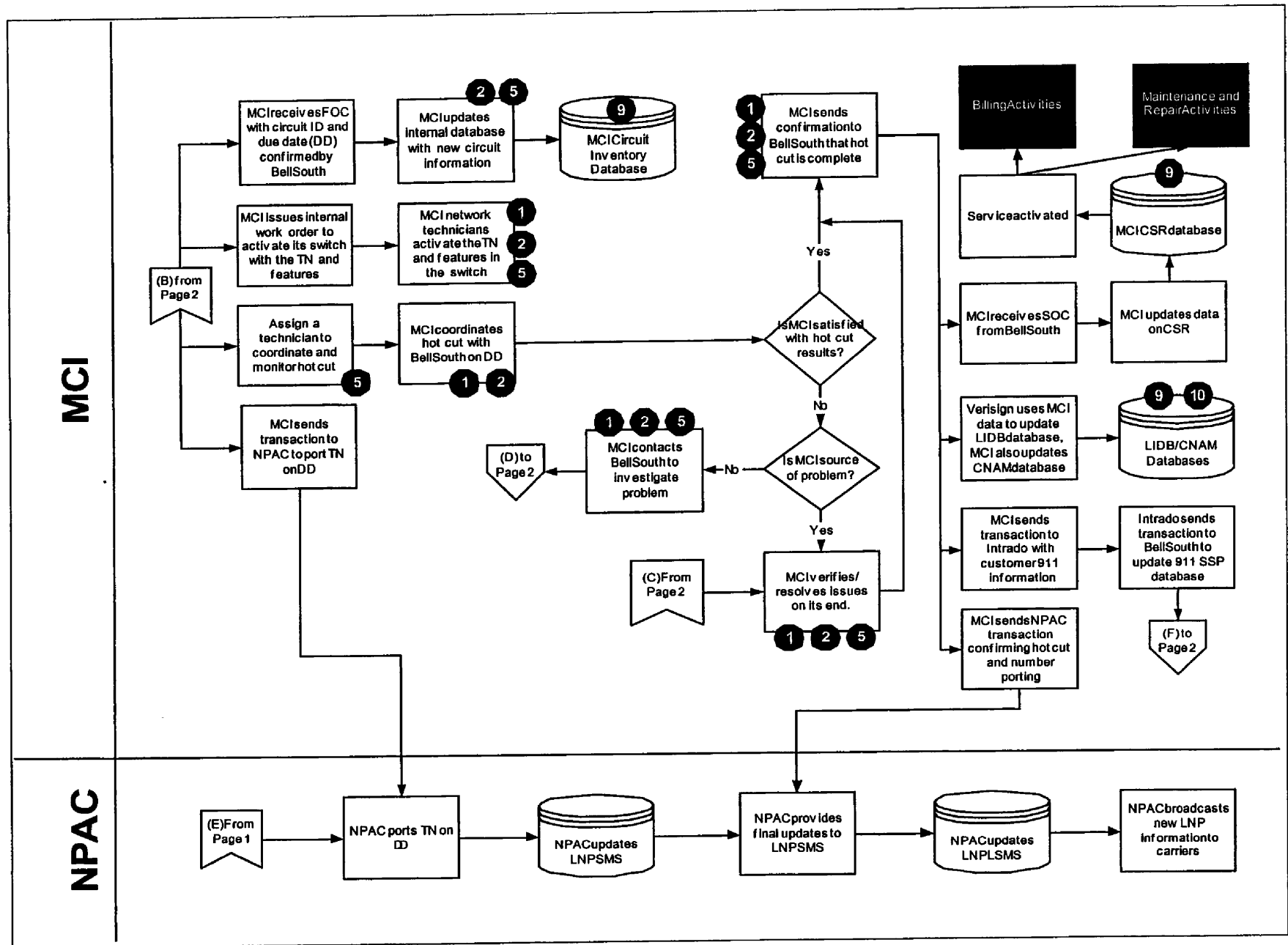
MCI UNE-P to MCI UNE-L Conversion (Individual Customer) (BellSouth)



MCI UNE-P to MCI UNE-L Conversion (Individual Customer) (BellSouth)



MCI UNE-P to MCI UNE-L Conversion (Individual Customer) (BellSouth)



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**MCI UNE-P to MCI UNE-L Conversion (Individual Customer) (BellSouth)**

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**Challenges:**

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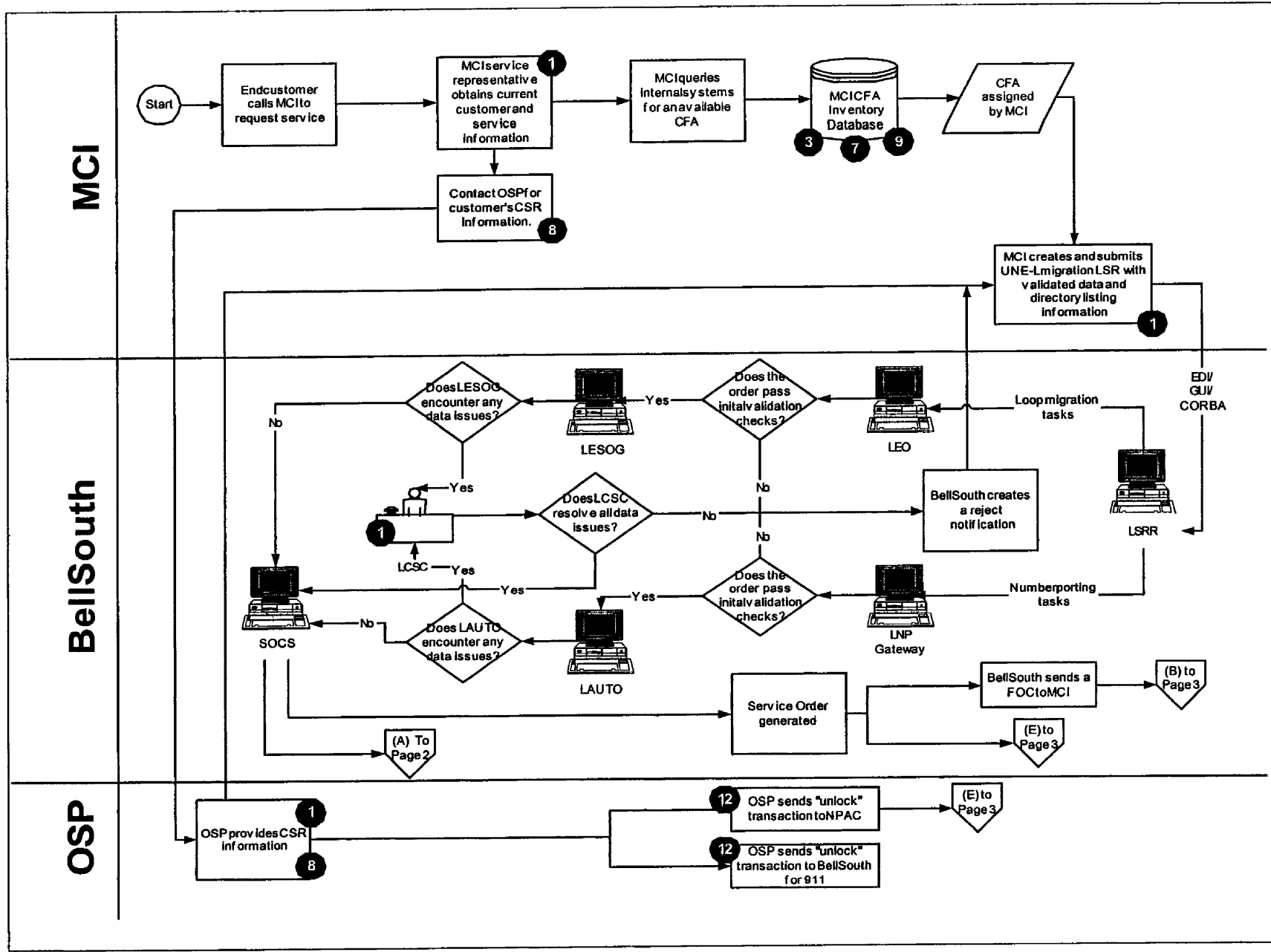
**MCI UNE-P to MCI UNE-L Conversion (Individual Customer) (BellSc**

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**Glossary:**

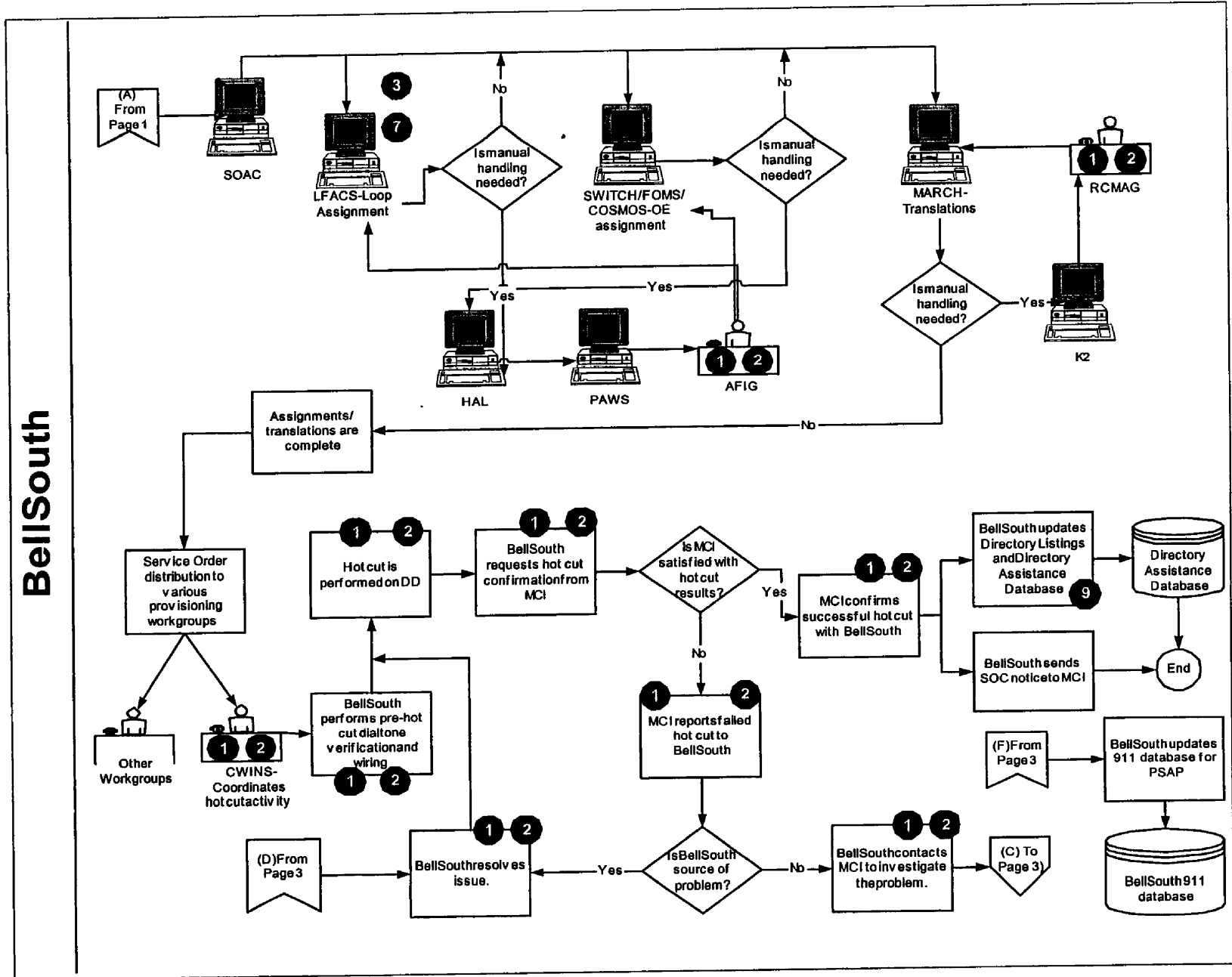
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CLEC UNE-P to MCI UNE-L Migration (BellSouth)

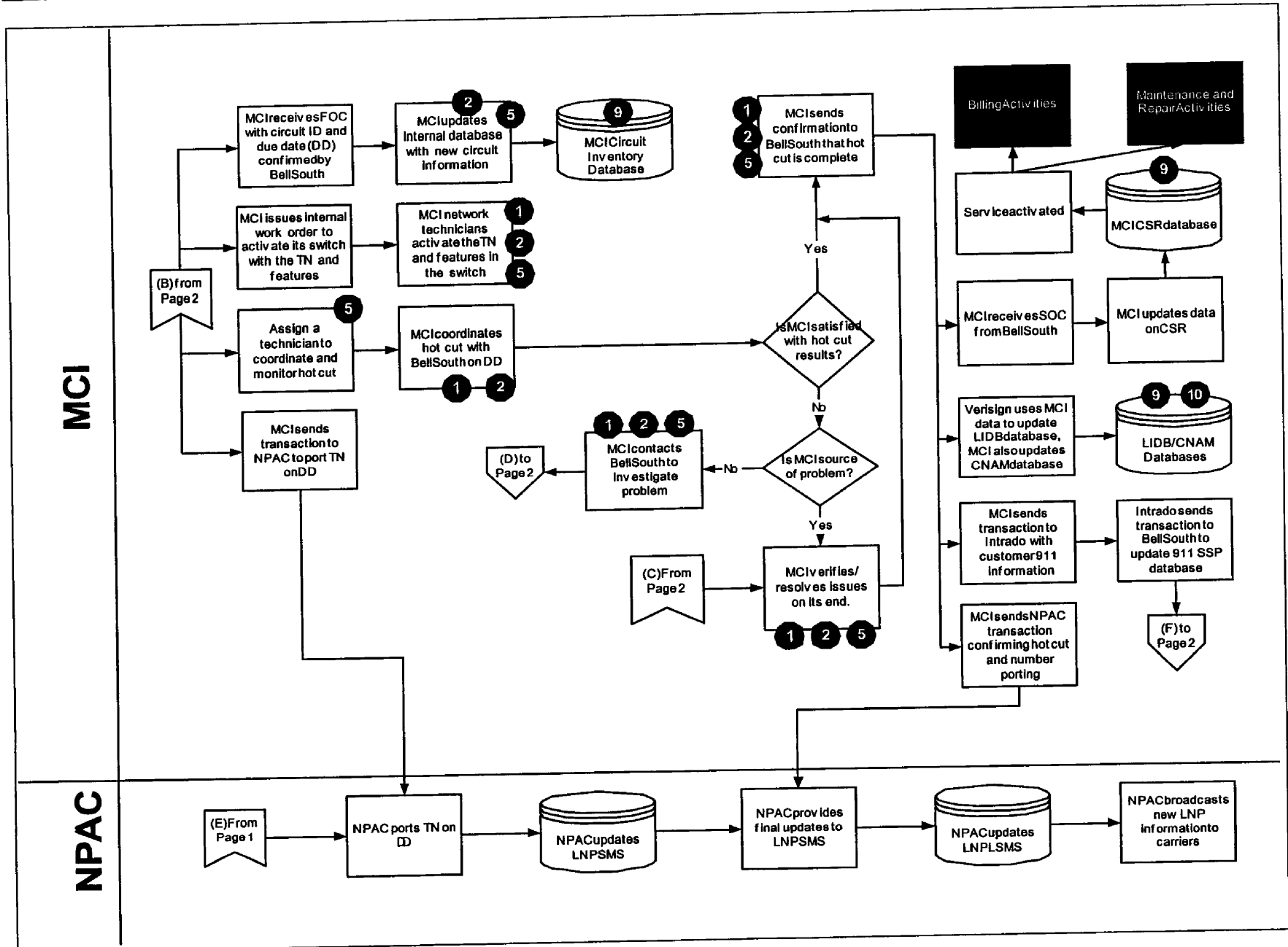




CLEC UNE-P to MCI UNE-L Migration (BellSouth)



CLEC UNE-P to MCI UNE-L Migration (BellSouth)



## CLEC UNE-P to MCI UNE-L Migration (BellSouth)

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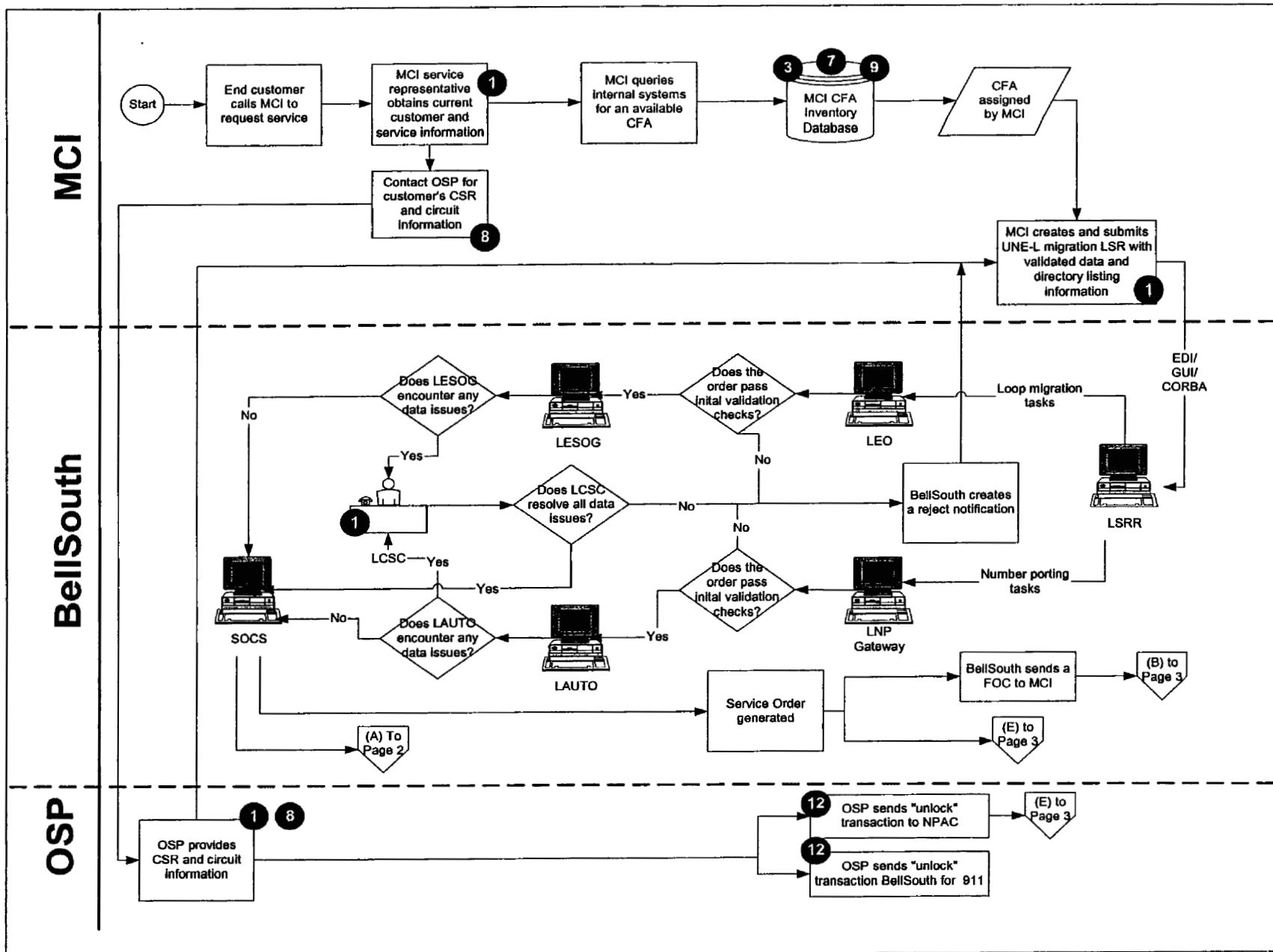
**CLEC UNE-P to MCI UNE-L Migration (BellSouth)**

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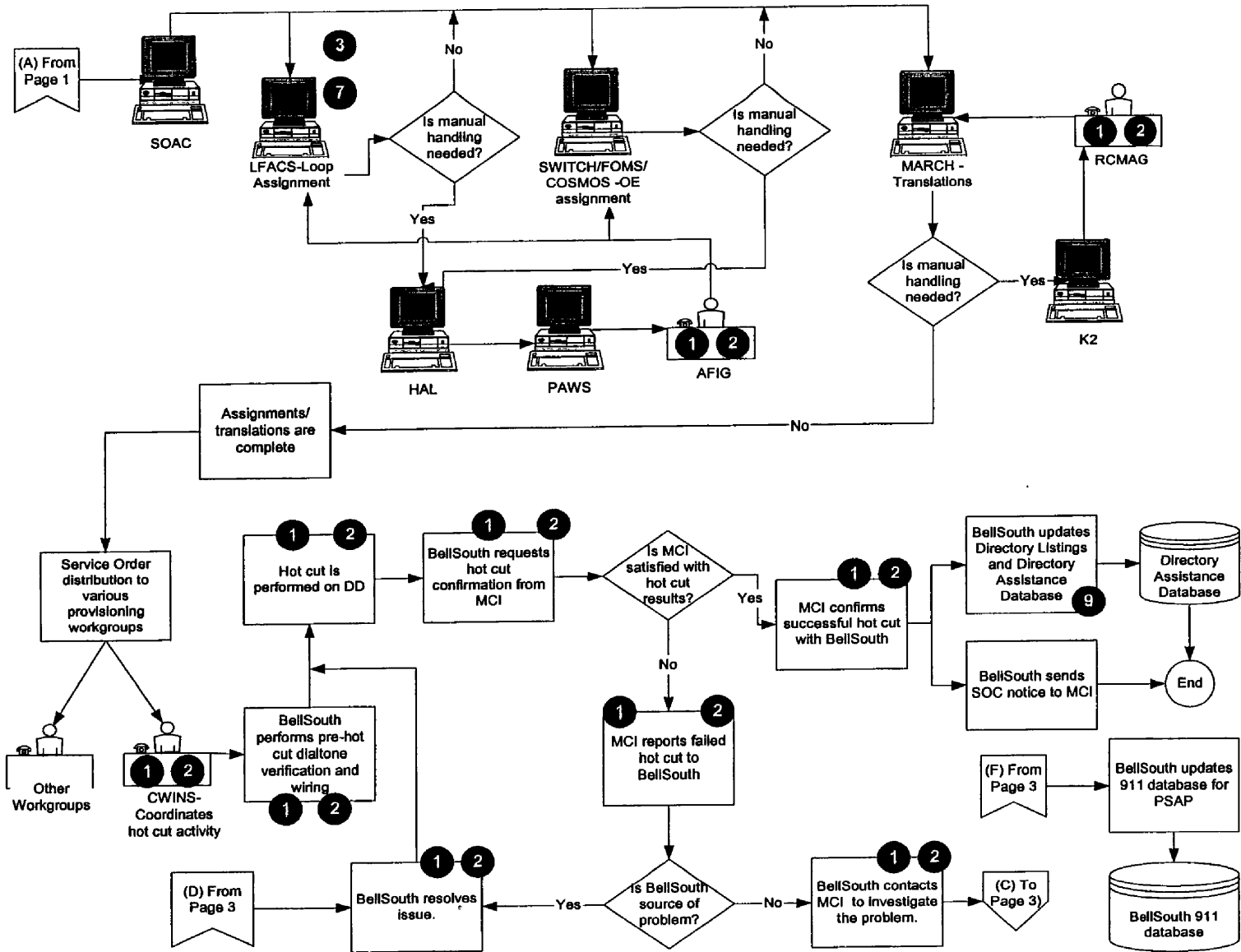
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CLEC UNE-L to MCI UNE-L Migration (BellSouth)

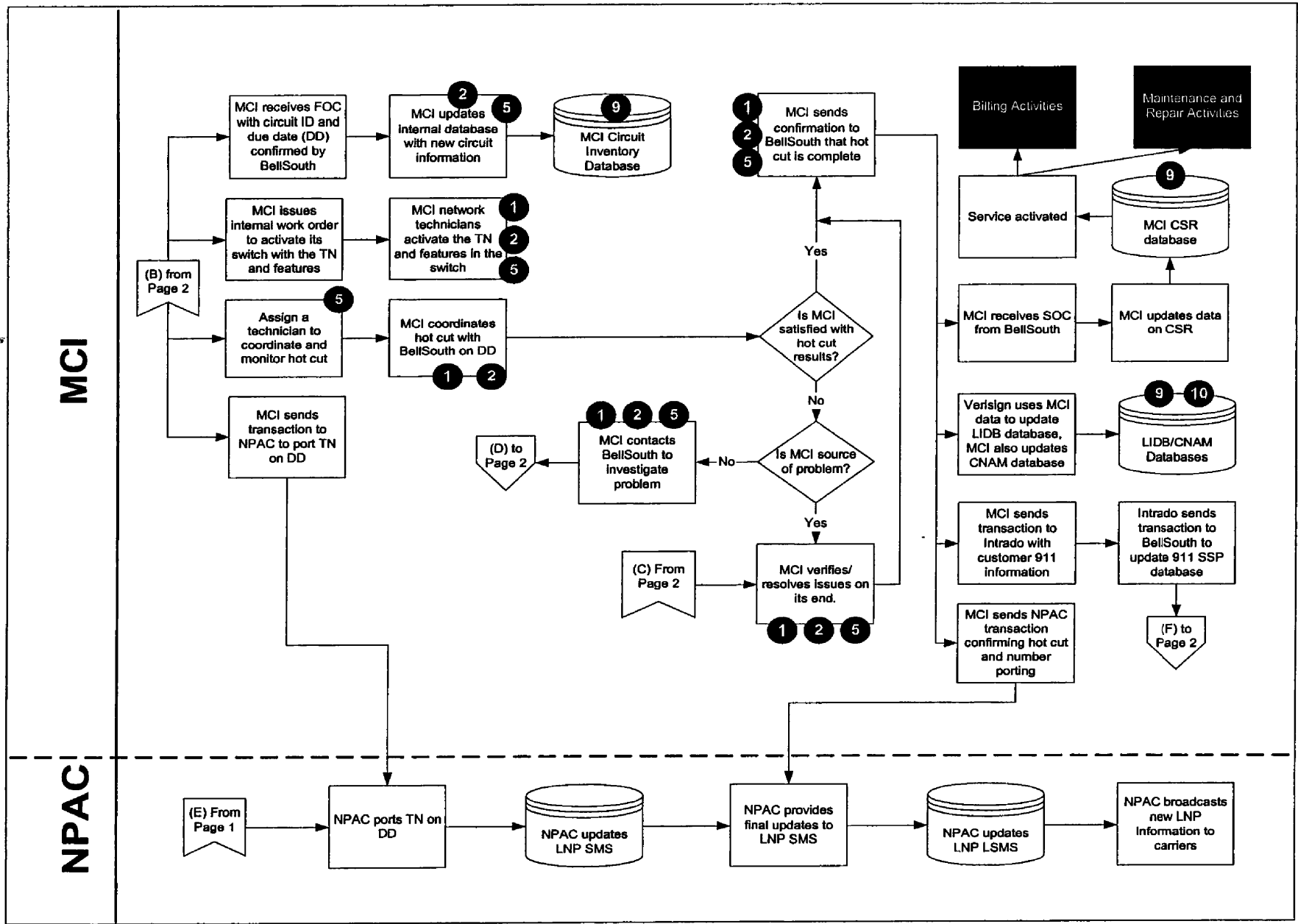


CLEC UNE-L to MCI UNE-L Migration (BellSouth)

BellSouth



CLEC UNE-L to MCI UNE-L Migration (BellSouth)



## CLEC UNE-L to MCI UNE-L Migration (BellSouth)

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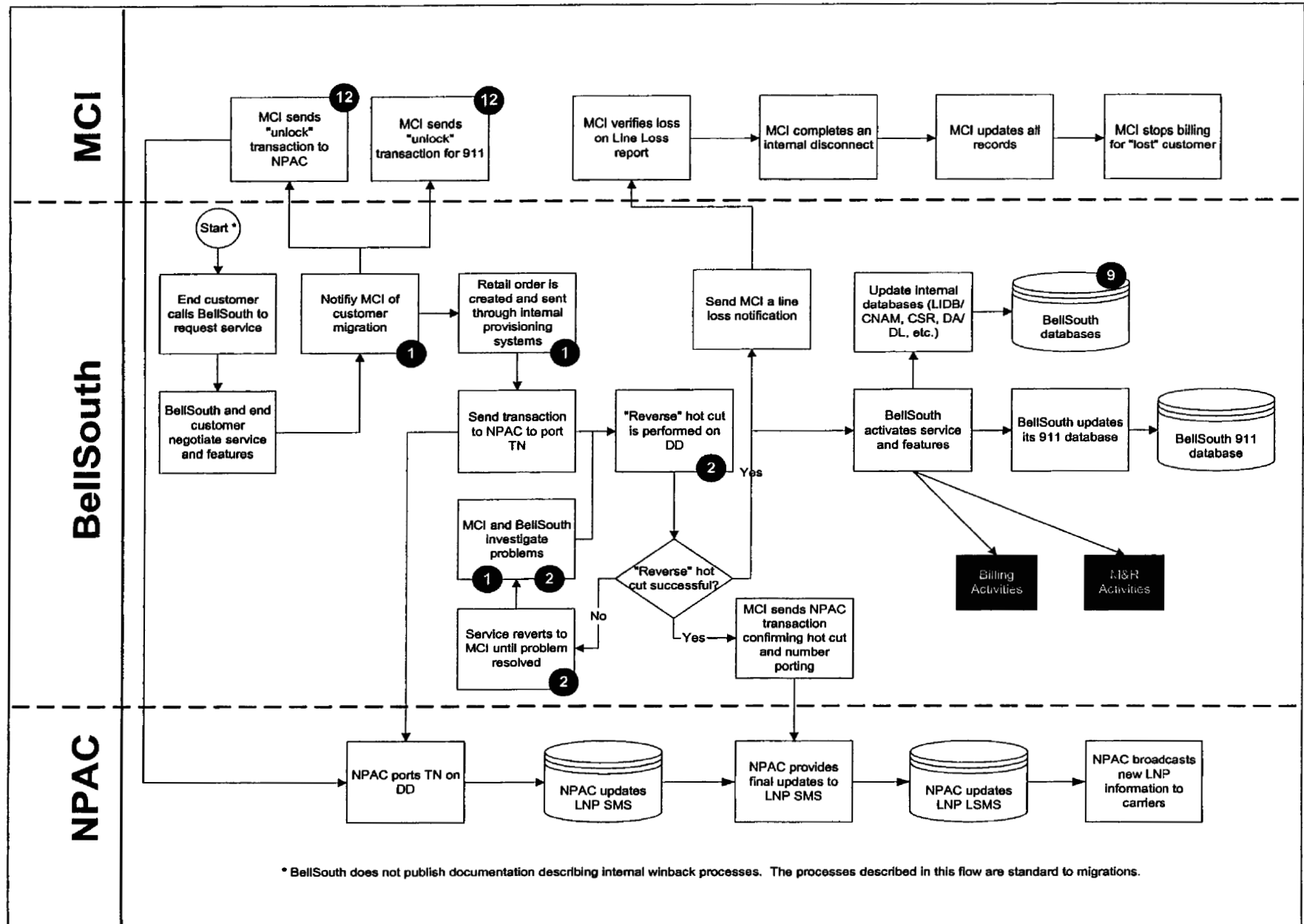
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Winback - MCI UNE-L to BellSouth Retail Migration



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**Challenges:**

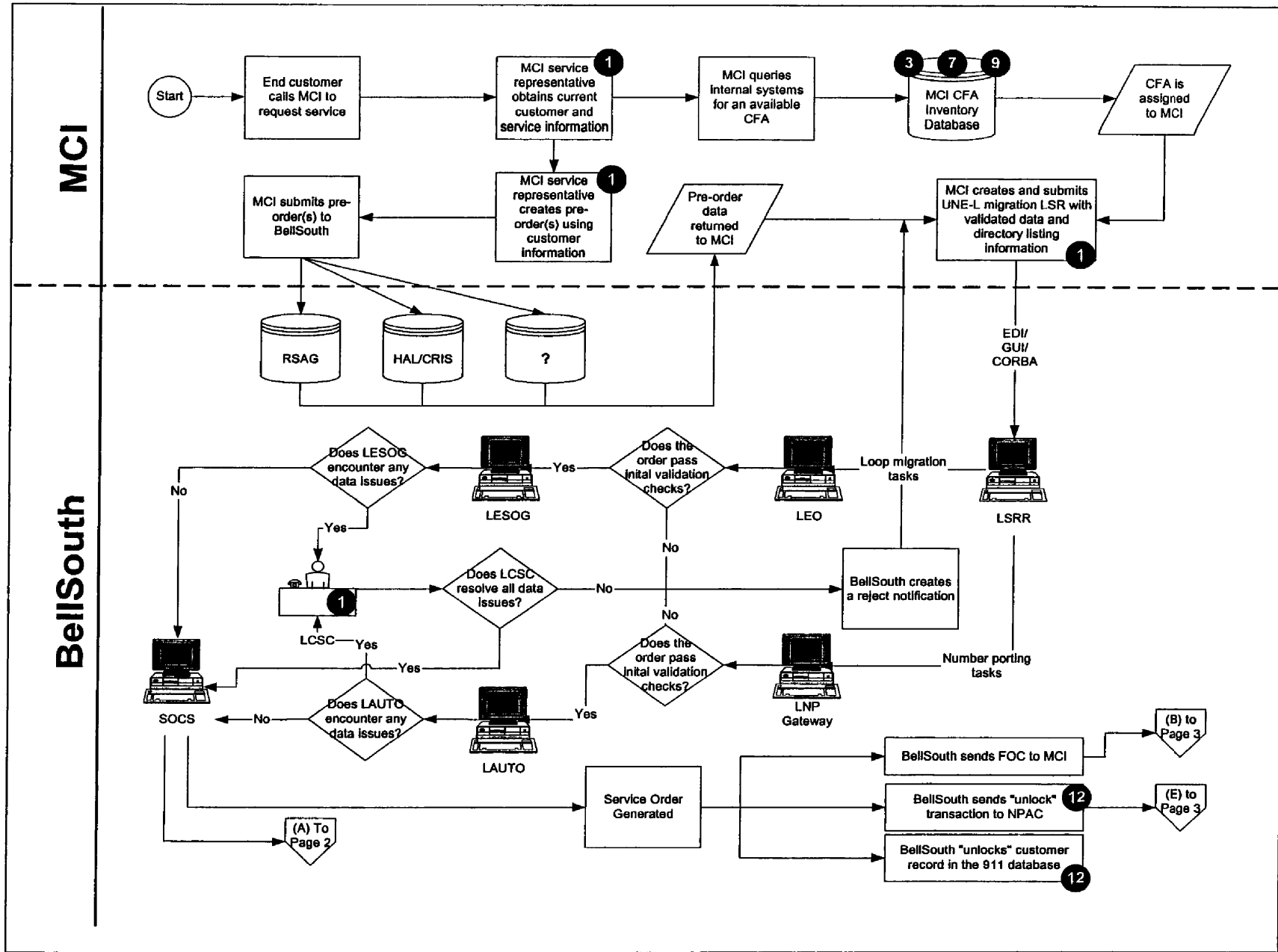
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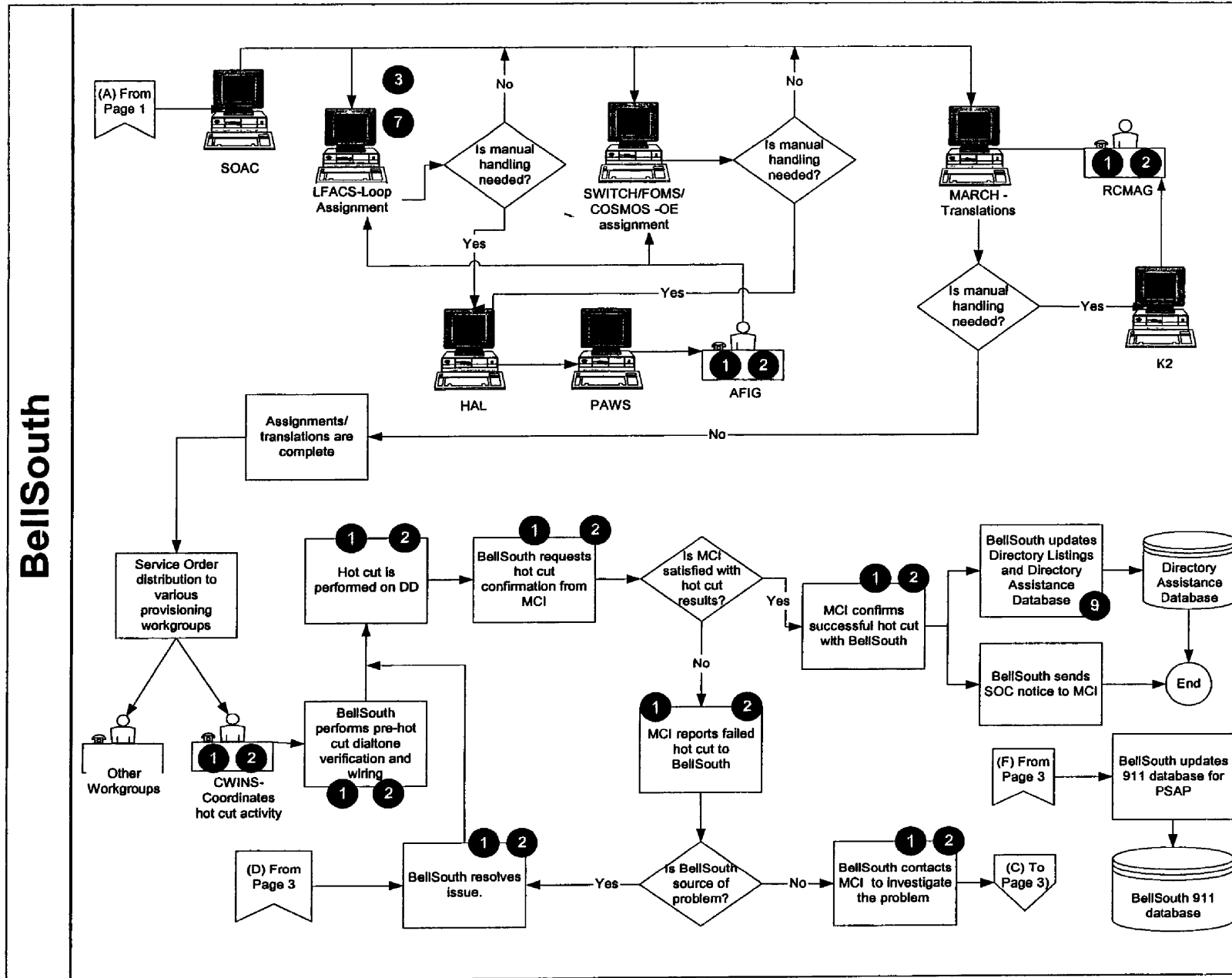
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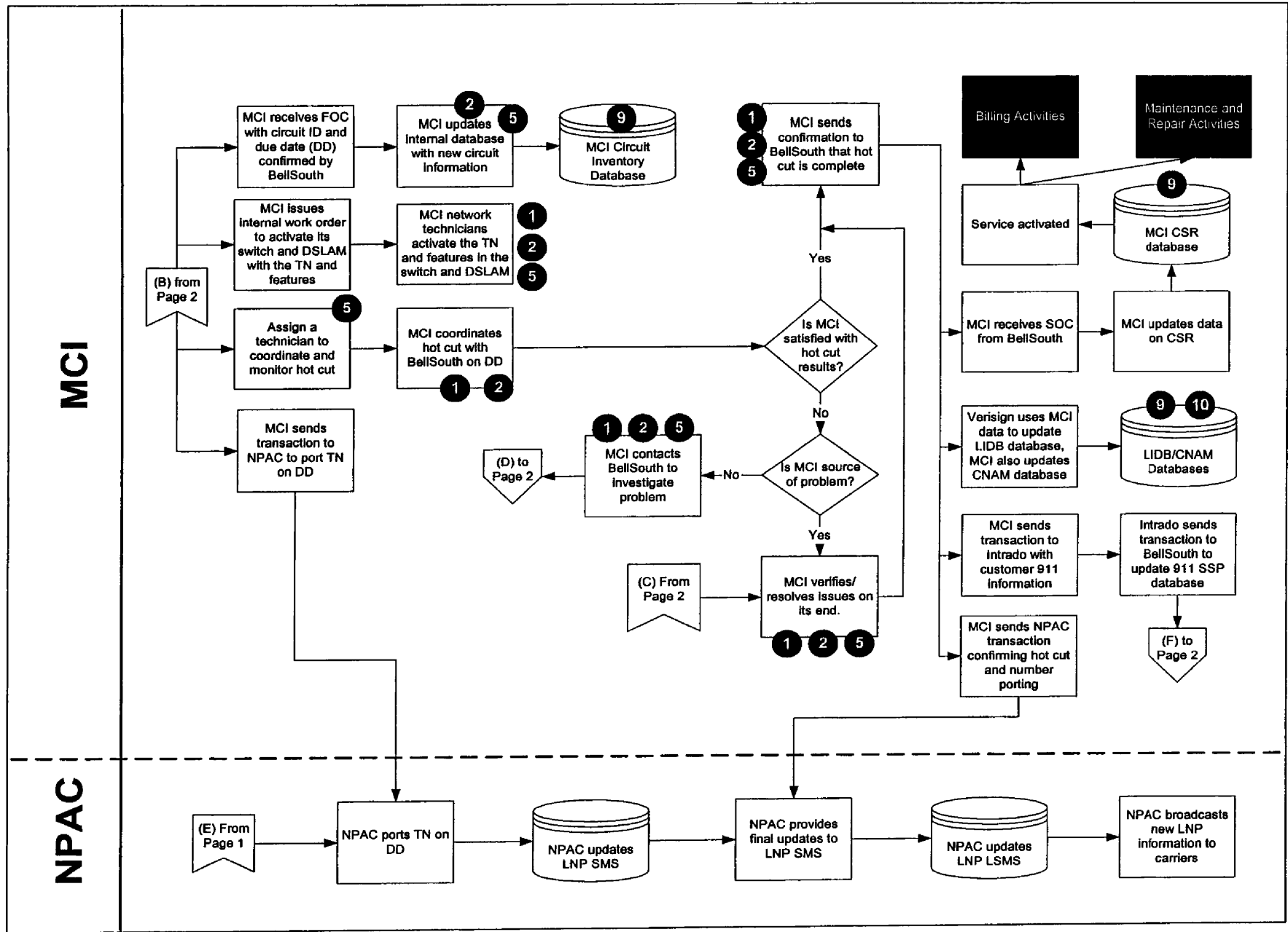
BellSouth Retail DSL-Capable Loop to MCI DSL-Capable Loop Migration



BellSouth Retail DSL-Capable Loop to MCI DSL-Capable Loop Migration



BellSouth Retail DSL-Capable Loop to MCI DSL-Capable Loop Migration



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- 1) All customers migrating to MCI call into an MCI service center to order service.
- 2) All customers port their numbers.
- 3) MCI switches will provide all MCI UNE-L customer features.
- 4) Customers are not moving to new locations.
- 5) MCI uses a vendor, Intrado, to load 911 records to the PSAP.
- 6) MCI will maintain its own LIDB and CNAM databases. MCI uses a vendor, Verisign, to load LIDB data.
- 7) Scenarios are represented as "ideal" (not necessarily zero-defect): Each party has sufficient resources; each party sufficiently manages its responsibilities; no "one-off" circumstances are involved.
- 8) When translations are performed, BellSouth sets the AIN trigger.
- 9) As part of MCI's agreement with BellSouth, line loss reports will only be generated for loss of lines to other carriers. If MCI is converting customers from one UNE type to another, line loss reports will not be generated.
- 10) Provisioning flows are based in part on information obtained from the KPMG Consulting BellSouth-Florida OSS Report.
- 11) Only processes and systems that directly impact MCI or BellSouth are outlined.
- 12) For migrations involving DSL, voice and data are pre-wired together in MCI's collocation (DSLAM and Splitter), and inventoried and assigned as one assembly with one CFA.

**Challenges:**

(The following challenges are based on the UNE-L Operational Analysis: Activity Two reports.)

- 1) Challenges associated with manual handling throughout ordering and provisioning processes.
  - 2) Challenges associated with high steady-state provisioning volumes and the impact on systems and processes.
  - 3) Challenges associated with facility availability.
  - 4) Challenges associated with facility re-use.
  - 5) Challenges associated with expanded MCI Provisioning Group responsibilities for UNE-L service.
  - 6) Challenges associated with ordering and provisioning when IDLC service is present.
  - 7) Challenges associated with data management specifically related to facility assignment and inventory.
  - 8) Challenges associated with insufficient CLEC-to-CLEC interfaces and processes.
  - 9) Challenges associated with data integrity.
  - 10) Challenges associated with MCI LIDB/CNAM data management responsibilities.
  - 11) Challenges associated with batch migration of customers from UNE-P to UNE-L service.
  - 12) Challenges associated with number unlocking procedures for 911 and LNP.
-



**BellSouth Retail DSL-Capable Loop to MCI DSL-Capable Loop Migration**

**Glossary:**

CAFE: Carrier Access Front End  
 CFA: Connecting Facility Assignment  
 CNAM: Customer Name Database  
 CORBA: Common Object Request Broker Architecture ordering interface  
 CPSS: Circuit Provisioning Status System  
 CPSS-TA: Circuit Provisioning Status System-Trouble Administration  
 CSOTS: CLEC Service Order Tracking System  
 DD: Due date  
 DSAP: Direct Order Entry (DOE) Support Application  
 ECTA: Electronic Communications Trouble Administration  
 FOC: Firm Order Confirmation  
 GUI: Graphical User Interface  
 HAL/CRIS: Hands-off Assignment Logic/Customer Record Information System  
 LAUTO: LNP Automation System  
 LCSC: Local Carrier Service Center  
 LFACS: Loop Facility Assignment and Control System  
 LENS: Local Exchange Navigation System (GUI ordering system)  
 LEO: Local Exchange Ordering System  
 LESOG: Local Exchange Service Order Generator  
 LIDB: Line Information Database  
 LNP: Line Number Portability  
 LSMS: BellSouth's LNP database, containing downloads from NPAC's LSMS  
 LSR: Local Service Request  
 LSRR: Local Service Request Router  
 MARCH: Memory Administration Recent Change History  
 NPAC: Number Portability Administration Center: Manages the LPN process  
 OE: Office Equipment  
 OSP: Old Service Provider, also known as the "Losing CLEC"  
 PAWS: Provisioning Analyst Workstation System provisioning system  
 PO: Pre-order  
 PSAP: Public Service Answering Point that receives and dispatches 911 calls  
 "Reverse" Hot Cut: Hot cut performed when ILEC "wins back" customer from CLEC, and reinstates retail service.  
 RSAG: Regional Street Address Guide  
 SMS: Service Management System: NPAC's system containing routing and LNP information  
 SOAC: Service Order Analysis and Control System  
 SOC: Service Order Confirmation  
 SOCS: Service Order Confirmation System  
 SSP: 911 Service Provider  
 SWITCH/FOMS: Frame Operations Management System  
 TAFI: Trouble Analysis Facilitation Interface  
 TAG/RoboTag: Telecommunications Access Gateway/Robust TAG

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

From: Change Control [mailto:Change.Control@BELLSOUTH.COM]  
Sent: Thursday, November 20, 2003 2:21 PM  
To: 80ta; a lee; a vincent; adsl technician; Alan Flanigan;  
alejandro; Amanda Hill; Annette Cook; Annette Hardy; asanjuan; B Murdo;  
B Shafer; B Stewart; B Swager; Becky Gorman; Bette Smith; Beverly  
Posey; Bill Czolba; Bill Gaboriski; Bill Grant; Bill York; Bob  
Buerrosse; Brenda Gant; Brian Feller; BSNotes; BSTCarrier; C & M; C  
Ashford; C Cassel; C Chiavatti; C Flanigan; C Larson; C Miller; C  
Smallwood; C Soptic; Caren Schaffner; Carol Asenjo; Catherine Gray;  
Cedric Cox; Change Control; Cheryl Acosta; Cheryl Haynes; Chris  
Iacovelli; Christy Markley; Cindy Schneider; Colette Davis; Colleen  
Sponseller; Connie Nathan; Craig Davis; D Burt; D Feinberg; D Kane; D  
Mitchell; D Nathanson; D Parobeck; D Petry; Daddy Max; Dale Donaldson;  
Darrin McClary; Dave Townsend; David Burley; David Lee; DDL; Denise  
Berger; Desiree; Don; Donna Poe; E Goldberg; E Singleton; Ed; Elliott  
Wrann; Erick Melgarejo; Eyu; Gary; Ggotimer; H Carlton; Hawn Nguyen;  
Heather Thompson; J Britton; J David; J Johnson; J Mclau; J Nugent; J  
Oliver; J Perry; J T Wilson; J Wilwerding; Jake Hayes; James Childress;  
Janice Johnson; Jason Bahr; Jason Lee; Jay Bradbury; jean Cherubin;  
Jeff Walker; Jennifer S; Jerry; Jerry Hill; JG6837; Joanne Baxter; John  
Boshier; John Duffey; John Fury; Jordana Jureidini; K Branch; K  
Pollard; K Turner; Karen Grim; Kraig Nielsen; Kyle Kopytchak; L  
Hopkins; L Looney; L Mitchell; L Ortega; Lacy Hamlin; Launch Now; Leon  
Bowles; Linda Minasola; Louis Toyama; Lorna Richards; Lorraine Watson;  
Louise Wilds; M Boner; M Connolly; M Dossey; M Mathews; Margaret Ring;  
Maria Aquino; Mark; Mark Ozanick; Mary Conquest; Maya Mistry; Mel  
Wagner; Mer; Michael Britt; Michael Dekorte; Micki Jones; Midge  
Houghtaling; Mike Young; Mnoshay; Morgan Halliday; N Dreier; Nancy  
Thompson; Natalie Franklin; Neustar; Nicole Crauwels; Notifications  
(Ernest Group); One Point; OSS; P Barker; P Kinghorn; P McKay; P  
Pinick; Patricia D; Peggy Rehm; Peggy Rubino; Phil Nixon; Pmcole; R  
Bennett; R Breckin; R Cairnes; R Harsila; R Maimon; R Munn; R Wilson;  
Rae Couvillion; Rebecca Baldwin; Regina McDay; Rick Williams; Robert;  
Robert Scordato; Ron Johnson; Ross Martin; Rubye; S Cogburn; S Sarem;  
Sandra Hendricks; Sandra Kahl; Schula Hobbs; Scott Emener; Scott  
Harper; Scottme; Sharon Eleazer; Sherry Lichtenberg; Steve Brown; Steve  
Moore; Steve Taff; Susan Sherfey; T Aziz; T Barton; T Carter; T Fry; T  
Norvell; T Wimmerstedt; TagTeam; Tim; Todd; Todd Sorice; Tom Hyde;  
Toni; Tonyam; TS1336; Tyra Hush; W Fletcher; Walter Carnes; Wendy  
Hernandez

Subject: BellSouth Response to Question re: Bulk Migration  
Collaborative

CLECs,

In response to the question from Benni Almas (Neustar) regarding  
BellSouth's plans to establish a Bulk Migration collaborative with the  
CLEC community:

BellSouth has an effective, seamless Bulk Migration process in place.  
Consequently, BellSouth has no plans to establish a Bulk Migration  
collaborative at this time.

If this changes in the future, CCP will forward the invitation to the CLEC community.

Thanks,

Change Management Team

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