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January 7, 2004

Mrs. Blanca S. Bayó
Division of the Commission Clerk and
Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 030851-TP

Dear Ms. Bayó:

Enclosed are an original and fifteen copies of BellSouth Telecommunications, Inc.'s Rebuttal Testimony of Kenneth L. Ainsworth, W. Keith Milner, Dr. Debra J. Aron, Alphonso J. Varner, Alfred L. Heartley, Ronald M. Pate, Dr. Christopher J. Pleatsikas, John A. Ruscilli, Milton McElroy, Eric Fogle, A. Wayne Gray and Gary Tennyson which we ask that you file in the captioned docket.

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

Sincerely,

Nancy B. White

Nancy B. White (GA)

Enclosure

cc: Parties of Record
Marshall M. Criser III
R. Douglas Lackey
Meredith Mays

DNs 00296-04 thru 00307-04

520576

CERTIFICATE OF SERVICE
Docket No. 030851-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Electronic MailΔ, Hand Delivery* and FedEx this 7th day of January 2004 to the following:

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(+)signed Protective Agreement
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PUBLIC DISCLOSURE DOCUMENT

BELLSOUTH TELECOMMUNICATIONS, INC.
REBUTTAL TESTIMONY OF KENNETH L. AINSWORTH
BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION
DOCKET NO. 030851-TP
JANUARY 7, 2004

Q. PLEASE STATE YOUR NAME, YOUR BUSINESS ADDRESS, AND YOUR POSITION WITH BELLSOUTH TELECOMMUNICATIONS, INC. ("BELLSOUTH").

A. My name is Ken L. Ainsworth. My business address is 675 West Peachtree Street, Atlanta, Georgia 30375. My title is Director – Interconnection Operations for BellSouth.

Q. ARE YOU THE SAME KEN L. AINSWORTH WHO EARLIER FILED DIRECT TESTIMONY IN THIS DOCKET?

A. Yes.

Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY BEING FILED TODAY?

A. I respond to portions of the direct testimonies of Mr. David E. Stahly on behalf of Supra Telecommunications and Information Systems, Inc. ("Supra"), Mr. James D. Webber and Ms. Sherry Lichtenberg on behalf of MCI, Mr. Mark David Van de

Water on behalf of AT&T, and Mr. Terry L. Alleman on behalf of Sprint with regard to BellSouth's hot cut processes.

A. The Hot Cut Process

Q. WHILE YOU CAN ADDRESS EACH OF THE COMPETITIVE LOCAL EXCHANGE CARRIERS' ("CLECS'") TESTIMONIES SPECIFICALLY LATER IN YOUR REBUTTAL, PLEASE ADDRESS GENERALLY THE MAIN CLEC ALLEGATIONS REGARDING BELLSOUTH'S HOT CUT PROCESS.

A. Certainly. The CLECs generally complain about six (6) aspects of the process, each of which BellSouth has addressed:

(1) Go Ahead Notifications – BellSouth will provide the CLEC with notification via telephone (coordinated cuts) after each cut, or via email or fax (non-coordinated cuts) to allow the CLEC to port the number. For coordinated cuts, BellSouth's data shows that it provides the go-ahead notification, on average, in less than two (2) minutes.

(2) Database impacts – BellSouth's hot cut process will not adversely impact database updates. With respect to E911, the end user's address will remain the same regardless of the end user's local service provider. Consequently, even if for some reason there was delay in updating the local service provider in the E911 database, it would not impact the ability of emergency personnel to find the end user.

(3) After hours cuts – BellSouth will work with the CLECs, via the project management function, to provide after-hours cuts when possible. BellSouth will not dispatch personnel late in the evening for safety reasons – thus, after hours cuts that require dispatch may not be possible.

(4) Provision of all end user lines on same day – one of the benefits of the project management aspect of the batch process is the ability to schedule cuts so that they best meet the needs of all parties involved. BellSouth will make best efforts to schedule work for the same end user on the same day.

(5) Exclusion of certain loop types – BellSouth designed the batch hot cut process to convert UNE-P arrangements to UNE-L arrangements given the predominance of UNE-P arrangements and the Federal Communications Commission's ("FCC's") Order focused on UNE-P conversions.

(6) CLEC-to-CLEC migrations – BellSouth will perform hot cuts for CLEC-to-CLEC migrations. The issues about which the CLECs' complain are issues regarding the CLECs' inability to exchange information amongst themselves. The reliability of the CLECs' information is not a flaw in BellSouth's process.

Go-Ahead Notifications

Q. PLEASE EXPLAIN BELLSOUTH'S "GO AHEAD" NOTIFICATION PROCESS TO CLECs.

A. BellSouth developed the process for "Go Ahead" notifications with the needs of the CLEC in mind. When a CLEC wishes to have real time notification of hot cut completions, BellSouth offers coordinated hot cuts, which include a call to the CLEC upon completion of the hot cut. As I stated in my direct testimony, for the last year, BellSouth has made these notifications on average in less than two (2) minutes after the hot cut is complete.

For CLECs who do not wish to order coordinated hot cuts, BellSouth provides "Go Ahead" notifications either by e-mail or fax. The CLEC determines the method of delivery. BellSouth delivers these notifications at an account level, which means that for each account being converted, a notification is sent. These notifications are driven by the closure of the work steps by the Central Office ("CO") and/or Field Technicians involved in the hot cut. Once the work steps are completed, an automated program is activated to send either the fax or e-mail notification.

Q. MR. STAHLY ASSERTS, ON PAGE 23 OF HIS TESTIMONY, THAT BELLSOUTH IS WILLING TO COMMIT TO "GO AHEAD" NOTIFICATIONS "EVERY COUPLE OF HOURS". [Emphasis in original.] PLEASE COMMENT.

A. Even though BellSouth has no published metric requiring that a technician report or complete his/her work completions within a specified time, the work is done on a timely basis dependent on the type conversion ordered. For example, on coordinated conversions, the completed activity is reported to the Customer Wholesale Interconnection Services ("CWINS") Center immediately upon

completion. The CWINS will immediately post the end time of the cut and notify the CLEC. These times are tracked by the CWINS and currently average less than two (2) minutes from completion of the cut to CLEC notification as stated in my direct testimony. On non-coordinated conversions, there is no CWINS involvement. Based on the volumes being converted, it is not always efficient for the technician to close his work after each conversion. However, BellSouth is willing to commit that, for batch migrations, the time elapsed between the actual cut to the time their work is completed, which generates the CLEC completion notification, will not exceed a two (2) hour interval.

Q. ON PAGE 24 OF HIS TESTIMONY, MR. STAHLY STATES 'RATHER THAN SEND NOTICES LISTING MULTIPLE CUTOVERS ON A SINGLE NOTICE, BELLSOUTH SENDS A SEPARATE E-MAIL NOTICE FOR EACH AND EVERY NUMBER BELLSOUTH CUTS OVER...." DIDN'T SUPRA ADVOCATE EMAIL NOTIFICATION IN ITS RECENT COMPLAINT TO THE FCC REGARDING BELLSOUTH'S HOT CUT PROCESS?

A. Yes. However, BellSouth was already working to implement e-mail notification as the result of a request that Supra made in a meeting between BellSouth and Supra in March 2003. BellSouth implemented e-mail notification on June 20, 2003. Moreover, no CLEC has ever requested BellSouth to send "Go Ahead" notifications for multiple accounts on the same e-mail or fax.

Database Updates

Q. ON PAGE 27 OF HER TESTIMONY, MS. LICHTENBERG ALLEGES THAT IT REQUIRES "MANUAL COORDINATION" BETWEEN THE ILEC AND THE CLEC "TO CREATE AND ISSUE THE E911, LIDB, CNAM AND LNP TRANSACTIONS" INVOLVED IN A HOT CUT. DO YOU AGREE?

A. As far as E911, LIDB, CNAM, and LNP are concerned, there is no need for any manual coordination. Routing to the number, if it is ported, is a direct result of the download of information from the Number Portability Administration Center ("NPAC"), which is a mechanized process that occurs everyday as numbers port. It is the responsibility of the port-to carrier to notify NPAC that the port has completed. Then, NPAC downloads the information and the routing is changed and no manual activity occurs. For LIDB and CNAM, the CLEC would populate information in their own LIDB and CNAM databases (or a third party's databases if they don't own their own) based on their own schedule. For a ported number the information sent by the port-to carrier to the NPAC should include routing information ((destination port code ("DPC") for the appropriate database)). Once that information is downloaded by NPAC proper routing occurs. Again, no manual effort is required. If it is only a loop involved (i.e. the CLEC is providing the switching with a CLEC number rather than a ported number), then it's entirely up to the CLEC to publish the correct routing instructions through the appropriate Telcordia document LIDB Access Routing Guide ("LARG"), or CNAM Access Routing Guide ("CNARG"). If the number is not ported there is no LNP interaction.

Q. MS. LICHTENBERG ALLEGES, ON PAGES 37-38 OF HER TESTIMONY, THAT THE HOT CUT PROCESS WILL CAUSE ERRORS IN THE E911 DATABASE. IS THIS TRUE?

A. No. Updates to the E911 database are triggered by a disconnect order. Bellsouth has procedures in place that ensure timely issuance and completion of the disconnect order that unlocks the E911 database records. BellSouth's disconnect service order to unlock the E911 database records has the same due date as the CLEC's request to port the number thereby minimizing errors in the E911 database. In the rare event that the completion of the service order is delayed, there will be no impairment to the end user's ability to effectively contact E911 in that the end user's address remains the same – it is only the identity of the service provider that changes. Thus, emergency personnel can obtain the address, regardless of the change in local service providers.

Q. ON PAGE 44 OF HER TESTIMONY, MS. LICHTENBERG COMPLAINS ABOUT BELLSOUTH'S POLICY OF ONLY ALLOWING "AS IS" DIRECTORY LISTING CHANGES FOR THE FIRST MIGRATION IN A BATCH HOT CUT. ARE HER COMPLAINTS VALID?

A. No. BellSouth does allow migration of directory listings "as is" on subsequent requests, when appropriate. All characteristics of the directory listing to be migrated "as is" must remain unchanged. For example, record type ("RTY"), listing type ("LTY"), alpha listing identifier code ("ALI"), listing telephone number, etc. Any change in the way the listing is set up on the existing customer service

record does not qualify for an "as is" migration.

After-Hours Cuts

Q. MR. VAN DE WATER ALLEGES, ON PAGE 22 OF HIS TESTIMONY, THAT BELLSOUTH'S BATCH HOT CUT PROCESS IS FLAWED BECAUSE IT DOES "NOT ALLOW FOR AFTER-BUSINESS-HOURS HOT CUTS." IS THIS CORRECT?

A. No. As I stated in my direct testimony, a CLEC may request work outside of normal business hours, to be handled on a special project basis and negotiated through a Customer Care Project Manager ("CCPM"). As with all special projects handled outside of normal business hours, this work could be subject to overtime billing as specified in the parties' interconnection agreement.

End-user lines

Q. MR. VAN DE WATER ALLEGES, ON PAGE 22 OF HIS TESTIMONY, THAT BELLSOUTH'S BATCH HOT CUT PROCESS IS FLAWED BECAUSE IT DOES NOT INSURE THAT ALL END USERS' LINES WOULD BE PROVISIONED ON THE SAME DAY. PLEASE COMMENT.

A. All lines for an individual end user on a single CSR will be provisioned on the same day. If an end user has multiple accounts, the CLEC can request that the CCPM ensure that all of the accounts for that end user are provisioned on the

same day.

The issues raised here by Mr. Van De Water are precisely why BellSouth has included the CCPM in its batch hot cut process. The involvement of the CCPM adds flexibility to the process to handle these types of issues.

Q. ON PAGE 29 OF HIS TESTIMONY, MR. VAN DE WATER CRITICIZES BELLSOUTH'S ALLEGED "FAILURE" TO IDENTIFY THE QUANTITY OF LOOPS THAT CAN BE PROVISIONED TOGETHER IN THE BATCH PROCESS. PLEASE ADDRESS THIS CONCERN.

A. BellSouth has no predetermined limit on the number of loops that can be provisioned together in its batch hot cut process. Many variables would have to be assumed in order to set such a limitation including whether multiple CLECs submit batch orders at the same time for the same central office and the size of the central office involved. The use of the CCPM and the Network Single Point Of Contact ("SPOC") allows the flexibility necessary to set due dates based on these and other variables. BellSouth in the past has stated to one CLEC that a good rule of thumb to use would be 125 lines per central office per day. However, this is not a hard and fast rule for the reasons stated above. BellSouth has already proven that it can perform hot cuts at a much higher rate than this in some central offices as I stated in my direct testimony.

Q. DO REQUESTS FOR LOOPS GREATER THAN 25-50 PER DAY PER CENTRAL OFFICE REQUIRE "SIGNIFICANT NEGOTIATION" AND

DEPARTURE FROM EXISTING PROVISIONING AND PERFORMANCE INTERVALS AS ALLEGED BY MR. WEBBER ON PAGE 20 OF HIS TESTIMONY?

A. No. BellSouth's individual and project hot cut processes do not require any negotiation and/or departure from existing provisioning and performance intervals unless there are 15 or more lines on the same end user account. Due to the nature of the batch hot cut process, there is negotiation that takes place within BellSouth to establish due dates for the hot cuts. BellSouth has proposed, however, performance measurements that will monitor the period of time between receipt and return of the initial spreadsheet from the CLEC. These procedures are discussed in my direct testimony.

Exclusion of Loop Types

Q. MR. WEBBER, ON PAGE 27 OF HIS TESTIMONY, COMPLAINS BECAUSE CERTAIN (UNSPECIFIED) LOOP TYPES ARE "EXCLUDED" FROM THE HOT CUT PROCESS. PLEASE COMMENT.

A. BellSouth's batch hot cut process includes conversions to both voice and data loops. Both designed and non-designed voice loops are included as well as both designed and non-designed xDSL type loops. The xDSL loops include Asymmetrical Digital Subscriber Line ("ADSL"), High-bit-rate Digital Subscriber Line ("HDSL"), and unbundled copper loops. All non-complex UNE-P services are available for conversions to these loops through the batch hot cut process.

This includes the vast majority of the existing UNE-P accounts that are in place today. BellSouth's records indicate that for the 12-month period December 2002 through November 2003, 99.93% of the UNE-P lines that have been installed are eligible for conversions to UNE-Loops through BellSouth's batch hot cut process. The small percentage, 0.07%, of services or loop types that are not included in the batch hot cut process can be converted through BellSouth's individual or project hot cut processes.

Q. WHY DOES BELLSOUTH LIMIT THE BATCH HOT CUT PROCESS TO UNE-P TO UNE-L CONVERSIONS?

A. BellSouth developed its batch hot cut (bulk migration) process with input from the CLEC community through the Change Control Process ("CCP") process. To my knowledge, the CLECs did not request that any other loop types be included in the process. Bellsouth also believes that its batch hot cut process meets the requirements set forth in the Triennial Review Order ("TRO"). The purpose of the batch hot cut process mentioned in the TRO was to convert UNE-Ps to UNE-Loops and BellSouth's process will do that.

Q. DOES LIMITING THE BATCH PROCESS TO CONVERSIONS FROM UNE-P TO UNE-L "MITIGATE THE POTENTIAL BENEFITS OF IMPROVED HOT CUT PROCESSES" AS MR. WEBBER ALLEGES ON PAGE 27 OF HIS TESTIMONY?

A. No. As I stated above, the service or loop types that are not included in the

batch hot cut process constitute a very small percentage of the existing UNE-P accounts.

Q. ON PAGE 20, LINES 17-18 OF HIS TESTIMONY, MR. WEBBER COMPLAINS BECAUSE BELLSOUTH'S HOT CUT PROCESS IS NOT AVAILABLE FOR ENHANCED EXTENDED LINKS ("EELS"). PLEASE COMMENT.

A. BellSouth has a hot cut process to convert retail and/or resale service to EELs. BellSouth's product team is developing an ordering process for UNE-P to EELs. If any CLEC actually ordered this, prior to mechanization, BellSouth will develop a manual workaround.

CLEC-to-CLEC Migrations

Q. MR. WEBBER ARGUES, ON PAGE 20 OF HIS TESTIMONY, THAT BELLSOUTH'S HOT CUT PROCESS IS NOT "AVAILABLE" BECAUSE IT DOES NOT INCLUDE CLEC-TO-CLEC MIGRATIONS. PLEASE COMMENT.

A. Mr. Webber is incorrect. BellSouth will perform CLEC-to-CLEC conversions. BellSouth's CLEC-to-CLEC conversion product is described in the ***CLEC to CLEC Conversion for Unbundled Loops*** document located on the CLEC Guides web site at: http://www.interconnection.bellsouth.com/guides/html/usoc.html. CLEC-to-CLEC loop conversions may be ordered individually or as a project. Bulk Migration is not available for a CLEC-to-CLEC conversion. The Bulk Migration product is

specifically for UNE-P to UNE-Loop conversions by a single CLEC.

Q. WITNESS LICHTENBERG ALLEGES, ON PAGE 30 OF HER TESTIMONY, THAT THE EXCHANGE OF INFORMATION FOR CLEC-TO-CLEC MIGRATIONS HAS NOT BEEN ESTABLISHED. PLEASE COMMENT.

A. As I have testified, BellSouth will perform CLEC-to-CLEC migrations. The issues, about which the CLECs complain, however, are not BellSouth's problems. Rather, CLECs complain about the inability to obtain cooperation or accurate information from one another. Problems presented are related to obtaining accurate end-user information from other CLECs' Customer Service Records ("CSRs"); difficulty obtaining CSRs from CLECs; and difficulties in obtaining circuit ID information from other CLECs as preparation to migrating an end-user between CLECs. The CLECs need to fix those problems, not BellSouth. That being said, BellSouth is currently participating with other ILECs and CLECs in a Florida End User Migration collaborative to identify and propose resolutions for CLEC-to-CLEC end-user migration issues.

Q. IS IT PRACTICAL TO ALLOW A "MIGRATE AS IS" FUNCTIONALITY FOR DIRECTORY LISTINGS FOR CLEC-TO-CLEC MIGRATIONS AS MS. LICHTENBERG ADVOCATES ON PAGE 45 OF HER TESTIMONY?

A. No, it is not practical to allow a "migrate as is" functionality for directory listings for CLEC-to-CLEC migrations. In case of standalone directory listings, migrating from one CLEC to another, BellSouth has a manual process, which allows the

submission of one Local Service Request ("LSR"); however, the CLEC does have to provide complete directory listing information. In support of this manual process, Change Control 1108 was submitted, accepted, and prioritized by the CLEC community to mechanize BellSouth's manual process. To my knowledge, no request was received from any CLEC to include "migrate as is" functionality in this process.

Other Issues

Q. MR. VAN DE WATER CONTENDS, ON PAGE 22 OF HIS TESTIMONY, THAT BELLSOUTH LACKS A PROCESS FOR TIMELY RESTORAL OF CUSTOMER SERVICE IN THE EVENT OF A PROBLEM WITH THE HOT CUT. DO YOU AGREE?

A. No. In the rare event that there is a problem encountered during a hot cut, BellSouth will work to resolve the problem if it is in the BellSouth portion of the network. If the problem is in the CLEC portion of the network, the CLEC has an opportunity to either correct its problem or request that BellSouth delay the hot cut as long as the CLEC has not performed number porting activity and the BellSouth service orders have not been completed. Once the order is closed, the UNE-P records are purged and the only way to address a trouble on the unbundled loop is via a trouble ticket. This requirement for a trouble ticket is the same for retail and wholesale service.

Q. MR. STAHLY STATES, ON PAGE 20 OF HIS TESTIMONY, THAT BELLSOUTH'S BATCH CUT INTERVALS SHOW THAT "BELLSOUTH IS INCAPABLE OF CUTTING OVER COMMERCIAL VOLUMES OF CUSTOMERS." DO YOU AGREE WITH MR. STAHLY?

A. Absolutely not. The intervals in the batch hot cut process are designed to allow the project manager the opportunity to schedule the cuts so that they will occur in the most efficient manner possible. It is important to remember that the batch process applies to conversion of an embedded base – it is not applicable to daily load. Thus, there is ample time to schedule the cuts assuming proper planning and scheduling by the CLEC.

Moreover, as BellSouth witness Milton McElroy discusses in his rebuttal testimony, BellSouth's third party test of its batch hot cut process shows its capability to move large quantities of customers from BellSouth's switches to a CLEC's switches in a single day. Further, BellSouth's commercial experience with Supra demonstrates that the third party auditor's (Price Waterhouse Cooper) attestations are borne out in the "real world" to which Mr. Stahly refers.

Q. WHAT IS THE HIGHEST SINGLE DAY / SINGLE OFFICE VOLUME OF HOT CUTS THAT BELLSOUTH HAS PERFORMED FOR ONE CLEC IN FLORIDA?

A. On December 22, 2003, one (1) CLEC in Florida had 655 scheduled conversions in nine (9) different central offices. The highest single office volume occurred on the same day with 264 conversions scheduled in Perrine. 263 of the 264 orders

were completed for the one (1) CLEC in Perrine on the due date. There was one (1) order missed due to CLEC reasons. Out of 655 total scheduled conversions on this date, BellSouth successfully completed 648. Three (3) orders were missed for BellSouth facility reasons and four (4) orders were missed due to CLEC reasons, which resulted in a BellSouth due date performance of over 99% for the one (1) CLEC in Florida on this date.

Q. MR. STAHLY PROVIDES, ON PAGE 24 OF HIS TESTIMONY, AN "EXAMPLE" OF THE CHRONOLOGY OF A CUTOVER. DO YOU AGREE WITH HIS "EXAMPLE"?

A. No. First, why would Mr. Stahly resort to a fictitious "example" when he could easily have cited to one particular telephone number of the 2,400 hot cuts he states on page 21 of his testimony BellSouth has provided to Supra that adhered to the timeframes in his "example"?

Q. IN MR. ALLEMAN'S TESTIMONY, ON PAGES 5-6, HE DESCRIBES SPRINT'S HOT CUT PROCESS. HOW DOES SPRINT'S PROCESS COMPARE TO BELLSOUTH'S PROCESS?

A. Although the Sprint and BellSouth hot cut processes are similar, BellSouth offers enhancements not included in Sprint's process that provide multiple system access types for submitting a service request, coordinated and non-coordinated conversion options to migrate an end-user, and multiple communication opportunities between BellSouth and the CLEC to ensure a successful

conversion. See Exhibit KLA-4 for an itemized comparison between the hot cut processes used by Sprint and BellSouth.

Q. ON PAGE 10 OF HIS TESTIMONY, MR. ALLEMAN TESTIFIES THAT SPRINT'S HOT CUT PROCESS DOES NOT GIVE RISE TO IMPAIRMENT IN ITS TERRITORY. SHOULD HIS CONCLUSION APPLY TO BELLSOUTH'S PROCESS AS WELL?

A. Yes. Unlike Sprint, BellSouth has developed a batch hot cut process. This along with its existing proven individual and project hot cut processes does not give rise to impairment. If Mr. Alleman is correct that Sprint's hot cut process does not give rise to impairment (and I believe that he is correct), then BellSouth's process, whose robustness is about ten times that of Sprint's process (as confirmed by BellSouth's independent third party auditor) likewise does not give rise to impairment.

B. BellSouth's Hot Cut Performance

Q. PLEASE COMMENT GENERALLY ON THE CLECS' ALLEGATIONS REGARDING BELLSOUTH'S PERFORMANCE OF ITS HOT CUT PROCESS.

A. Certainly. What is most noteworthy about the CLECs' comments as a whole is their lack of credible evidence to support their allegations. This Commission should not make the same mistake made by the FCC in the Triennial Review proceeding and rely on uncorroborated anecdotal evidence. Rather, this

Commission should look at the facts, all of which support BellSouth's high level of performance.

Mr. Stahly's testimony offers a good example of the CLEC's lack of corroborating evidence. Mr. Stahly offers extensive inflammatory rhetoric, but does not offer one scrap of evidence to support his rhetoric. Thus, rather than waste this Commission's time rebutting specific unsupported allegations, I submit that the Commission should disregard this testimony as a whole. To the extent the Commission does consider Mr. Stahly's testimony, despite his complete failure to provide any meaningful information in this regard, I do have relevant facts regarding BellSouth's responsiveness to Supra's requests and will provide those specifics later in this testimony.

Q. ON PAGE 10 OF HIS TESTIMONY, MR. STAHLY STATES "ALTHOUGH SUPRA TELECOM HAS ALREADY STARTED THE PROCESS OF CUTTING OVER ITS CUSTOMERS TO ITS OWN SWITCHES, OVER 95% OF SUPRA'S MASS MARKET CUSTOMERS ARE STILL SERVED BY UNE-P" INFERRING THAT THE FAULT LIES WITH BELLSOUTH. IS THAT INFERENCE CORRECT?

A. No. To my knowledge, Supra installed and has made operational ********** ********** PROPRIETARY ********** ******** central offices in 2001 and 2002, respectively. Only recently, however, has Supra actually begun the process of moving its customers to its own switches. According to Mr. Stahly's testimony, Supra has requested and

BellSouth has provided a total of 2,400 unbundled loops, which Supra used to serve its customers over Supra's switches.

Q. DO YOU HAVE PERFORMANCE DATA DEMONSTRATING BELLSOUTH'S HOT CUT PERFORMANCE FOR SUPRA AND REBUTTING HIS UNCORROBORATED ALLEGATIONS ABOUT "SERVICE DISRUPTIONS"?

A. Yes. Per published Performance Measurement and Analysis Platform ("PMAP") results during the months of July 2003 through October 2003, BellSouth converted ******* of Supra's UNE-P services over to UNE loops. The due date performance was 100% for these 4 months, indicating no BellSouth misses. Even though, at the time of this filing, November PMAP data was not available, I can provide results per our local operations reports. During November 2003, BellSouth had orders for a total of ********* conversion orders for Supra. Of the ********* orders, ****** due dates were missed for BellSouth reasons and ***** due dates were missed due to Supra reasons. This reflects a Bellsouth due date performance of 98%.

Q. MR. STAHLY STATES, ON PAGE 19 OF HIS TESTIMONY, THAT CUSTOMERS SHOULD EXPERIENCE LESS THAN THREE MINUTES OF SERVICE DISRUPTION. DOES BELLSOUTH MEET THAT STANDARD?

A. Yes. BellSouth's performance measures for coordinated hot cuts performed for CLECs this year reveals that the average interval when the loop was detached from BellSouth's switch but not yet attached to a CLEC's switch as 2:39 which

falls within Mr. Stahly's recommendation of "less than three minutes." Notably, Mr. Stahly suggests that only BellSouth might, through the hot cut process, cause service disruption. As Mr. Stahly acknowledges, however, Supra has significant responsibility to ensure minimal service disruption. For example, Supra must provision its own switch port and assure dial tone is present and that all required switch-based features are translated in its switch at the time of cutover. Once the cutover of the loop from BellSouth's switch to Supra's switch is effectuated, Supra must launch messages to begin the porting of calls bound for that telephone number to Supra's switch. Obviously, BellSouth is not and cannot be responsible for Supra's actions or inactions regarding the hot cut process.

Q. MR. STAHLY SUGGESTS, ON PAGE 19 OF HIS TESTIMONY, THAT "UNTIL RECENTLY" SUPRA'S CUSTOMERS WERE NOT ABLE TO RECEIVE CALLS FROM CELLULAR CARRIERS. PLEASE COMMENT.

A. In a meeting BellSouth had with Supra in September 2003, Mark Neptune (Supra) asked about the inability of cellular carriers to reach ported numbers. The example Supra gave was an AT&T Wireless customer not being able to reach the telephone number of one of their employees whose number was ported. Supra only cited a couple of wireless carriers who had experienced the problem, and in both cases, the situation was remedied by working with the wireless carrier. Nevertheless, Mr. Stahly infers the problem was BellSouth's. However, in this case, BellSouth was asked to investigate why this was happening. After some review, a letter was sent by BellSouth to Supra

explaining that this issue could not be a BellSouth problem, as the same database is used to route calls for BellSouth's own landline customers as well as calls from any carrier, wireless or otherwise, that reaches BellSouth's network unqueried. That, combined with the fact that the problem was remedied by the wireless carrier, is evidence that the issue was not with BellSouth. Either the wireless carrier had not updated their LNP routing database, or, more likely, they had no routing built for the NPA/NXX of Supra's Local Routing Number ("LRN") for their switch. This could be a wireless carrier problem or a problem with the information Supra placed in the Local Exchange Routing Guide ("LERG"). Since some wireless carriers were able to route, it is more than likely that it is a problem with the wireless carrier's LNP database. It is surely not a problem with Bellsouth.

Q. MR. STAHLY ASSERTS, ON PAGE 21 OF HIS TESTIMONY, THAT 5% OF THE CUTOVERS HAD NO DIAL TONE REQUIRING DISPATCHES OF BELLSOUTH'S AND THIRD PARTY'S TECHNICIANS TO CORRECT THE PROBLEM. DO YOU KNOW HOW MR. STAHLY ARRIVED AT THE LEVEL OF "5%" AND DO YOU AGREE WITH MR. STAHLY'S ASSESSMENT OF THE BLAME?

A. No. I do not know how Mr. Stahly arrived at 5%, but let's look at the facts. I would assume that Mr. Stahly is referring to those conversions that required a BellSouth dispatch to change from integrated subscriber loop carrier facilities to a suitable universal or copper facility. In such cases, BellSouth's technician verifies both the old facility is working on the BellSouth switch and, after conversion,

again verifies the new facility is working on the CLEC switch. If there is a problem with dial tone, the technician will not complete that order until the no dial tone problem is resolved (changing pairs, etc). It is true that these new 'cut to' pairs could go into a maintenance problem after the conversion has been completed. However, this is not an issue that is unique to Supra, as this also applies to BellSouth's own retail customers on new services, transfer of services, changes, etc. This fact is supported by looking at the published PMAP data for dispatched trouble reports within 30 days of an order completion for BellSouth's retail residence and business combined for < 10 circuits. During the months of April through October 2003, the retail PT30 results ranged from 9.72% to 10.86%. Noting that Mr. Stahly complains that 5% of Supra's conversions later experienced some no dial tone problems, that volume is clearly under the volume experienced by BellSouth's own customers.

Q. NEXT, ON PAGE 23 OF HIS TESTIMONY, MR. STAHLY ASSERTS THAT 47% OF THE CUTOVERS HAD NUMBER PORTING PROBLEMS CAUSED BY BELLSOUTH. IS HE CORRECT?

A. Absolutely not. Here again, let's look at the facts. BellSouth provides Supra timely completion notices. Supra, however, does not timely port the number. See Exhibit KLA-5 containing comparisons of BellSouth Go-Ahead completion notices and Supra porting activity. This exhibit shows Supra's porting activity significantly lags behind BellSouth's Go-Ahead message delivery. For example, on November 24, 2003, BellSouth provided ******* Go-Ahead notices while Supra ported only ******* telephone numbers. The remaining port backlog caused

Supra to continue activations for the next five (5) days, including Saturday. This is while Supra continued to provision other orders during that same period. This delay also increases as Supra's daily order activity increases. It is Supra's lack of timely porting, due to no fault of BellSouth, which is responsible for their customer delays in correctly receiving calls. As further evidenced by the attached Exhibit KLA-6, Supra has had minimal contact with BellSouth concerning so-called porting problems caused by BellSouth. The exhibit contains the call logs maintained by the LCSC for the months of October and November, which are related to LNP issues. As represented on this log, the calls total ****** over a 2-month period which, even if these were all Bellsouth issues (which they were not), would only represent 2% of the volume of orders converted for Supra during the period. Certainly, this does not equate to anything close to the 47% Mr. Stahly alleges. In reality, the 47% would be closer to the volumes of lines that Supra failed to port timely after the conversion and the BellSouth go ahead port notification.

Q. MR. STAHLY STATES, ON PAGE 22 OF HIS TESTIMONY, THAT "SUPRA HAS LOST AT LEAST 16 CUSTOMERS OVER THE PAST MONTH DUE TO BELLSOUTH'S INABILITY TO PERFORM ACCEPTABLE HOT CUTS. THIS IS RUB.???" [sic] WHAT DOES "THIS IS RUB.???" MEAN?

A. Only Mr. Stahly knows for sure. Were I to translate what "This is rub.???" means, I would suggest that the interchange between Mr. Stahly and his apparent editors was that Mr. Stahly's preceding statement was "rubbish".

Q. NEXT, MR. STAHLY STATES "THE ILEC CANNOT HOT CUT THE CLEC's NEW CUSTOMERS TO THE CLEC's SWITCH IN A TIMELY MANNER." DO YOU AGREE WITH HIS CONCLUSION?

A. No. As I showed in my direct testimony in this proceeding (as did BellSouth's witness Al Heartley), BellSouth can scale its operations and personnel to accommodate even a "worst case" scenario. Here, Mr. Stahly refers to "new" customers, which I assume to be a reference to customers acquired after this Commission reached a finding of no CLEC impairment. To calculate load, I used the highest level of inward UNE-P movement that BellSouth has encountered at any time in the last 33 months (at the time I filed by direct testimony in this proceeding) and assumed that that level of inward movement would be repeated every single month going forward. The bottom line is that, even assuming that volume as well as making other upward adjustments to the load volume, BellSouth can accommodate those projected volumes.

Q. MS. LICHTENBERG ALLEGES, ON PAGE 18 OF HER TESTIMONY, THAT A UNE-L MIGRATION "TAKES AT LEAST FIVE DAYS." IS SHE CORRECT?

A. No. BellSouth's intervals for individual hot cuts range from 3-4 days depending on whether or not the loops are designed or non-designed and if non-designed, whether they are coordinated or non-coordinated.

Q. MS. LICHTENTBERG ALLEGES, ON PAGE 25 OF HER TESTIMONY, THAT BECAUSE BELLSOUTH'S HOT CUT PROCESS IS MANUAL, IT "OFTEN

RESULT[S] IN ERRORS AND DELAYS." DOES THE DATA CONFIRM HER POSITION?

A. Absolutely not. Ms. Lichtenberg makes several unfounded allegations without any data to support her erroneous claims. As the FCC and nine state commissions have found, the mere absence of a mechanized process does not indicate that an ILEC is non-compliant or that CLECs are impaired. Please see the testimony of Alphonso Varner for details relating to BellSouth's hot cut performance.

C. Scalability

Q. MR. STAHLY, ON PAGE 27 OF HIS TESTIMONY, DISCUSSES WHAT WOULD HAPPEN WERE THIS COMMISSION TO IMPLEMENT RELIEF FROM UNBUNDLED LOCAL SWITCHING. IS THE 6-MONTH TIMEFRAME MR. STAHLY SUGGESTS ACCURATE?

A. No, and this Commission should not be concerned with such a contrived circumstance which, in any event, will never occur. As I pointed out in my direct testimony, if this Commission were to reach a finding that CLECs are not impaired without unbundled local switching, the conversion of Supra's (and other CLECs') embedded base of customers served by UNE-P would not commence until August 2005 (over a year and a half from the time this testimony is filed) and then would be migrated to the CLECs' own switches over a 21 month transition period as set out by the FCC in its Triennial Review Order. Thus, BellSouth has

a year and a half to get ready for something that will occur over an almost two-year period. I showed calculations in my direct testimony (as did BellSouth witness Al Heartley) deriving the personnel BellSouth would have to hire and train even in a "worst case" scenario. I also testified regarding the steps BellSouth would take to accommodate such a scenario. I would note, however, that my "worst case" scenario was predicated on a finding that all the Commissions in BellSouth's nine-state region would find that CLECs were impaired in no markets in BellSouth's region and that BellSouth and no CLECs reached agreement whereby the CLEC's customers would remain on BellSouth's switches at market rates. My calculations considered even such an unlikely outcome and concluded that BellSouth could accommodate the volumes of hot cuts resultant from such an outcome.

Q. MR. STAHLY CONTENDS, ON PAGE 27 OF HIS TESTIMONY, THAT BELLSOUTH WOULD HAVE TO CUT OVER 1,200 OF SUPRA'S CUSTOMERS PER DAY IN ORDER TO MIGRATE SUPRA'S BASE OF CUSTOMERS CURRENTLY SERVED BY UNE-P. CAN BELLSOUTH CUT OVER 1,200 LOOPS PER DAY?

A. Without a doubt. First, let me again note that under the FCC's guidance, the embedded base of customers served by UNE-P would be migrated not in twelve months as Mr. Stahly incorrectly suggests, but rather in 21 months. For the sake of argument, however, let's assume that Mr. Stahly is correct and that BellSouth would have to migrate Supra's customers to Supra's switches in twelve months. As BellSouth witness Milton McElroy testifies, BellSouth's third party test of its

batch hot cut process affirms that BellSouth can successfully migrate at least 125 loops per central office per day. BellSouth operates 198 central offices in Florida. Doing the sort of quick math that Mr. Stahly apparently prefers reveals that BellSouth could cutover 24,750 loops per day (125 * 198). Assuming an embedded base of 300,000 Supra customers, BellSouth could (assuming Supra is likewise prepared to do the work required on its part to effectuate the cutovers) migrate those customers to Supra's switches in a little over twelve (12) days, not twelve (12) months. I would note that today Supra's ********** switches in service possess nowhere near the capacity needed to effectuate such a transition, thus the commencement of the migration (were it to take place at all) is dependent on Supra's augmenting its switching capacity which, to my knowledge, has not even begun.

Q. ON PAGES 6-9 OF HIS TESTIMONY, MR. ALLEMAN CALCULATES A WORST-CASE LOAD SCENARIO OF UNBUNDLED LOCAL SWITCHING IS ELIMINATED. DOES BELLSOUTH AGREE WITH HIS METHODOLOGY?

A. Yes. BellSouth used similar methodology in calculating its "worst case" scenario that is described in my direct testimony and in the direct testimony of Al Heartley.

D. IDLC

Q. ON PAGE 20, LINES 15-16 OF HIS TESTIMONY, MR. WEBBER ARGUES THAT IDLC LINES ARE NOT AVAILABLE TO BE CUT VIA THE HOT CUT PROCESS. IS HE CORRECT?

A. No. IDLC lines are available to be cut via the hot cut process. IDLC lines require that the line be cut to a new facility, and thus require a field dispatch. This does not mean, however, that the line is not available to be cut via the hot cut process. I described the IDLC conversion options at length in my direct testimony.

Q. ON PAGE 25 OF HIS TESTIMONY, MR. STAHLY DISCUSSES INTEGRATED DIGITAL LOOP CARRIER ("IDLC") EQUIPMENT AND COMPLAINS THAT 39 OF SUPRA'S REQUESTED HOT CUTS IN A PARTICULAR BELLSOUTH CENTRAL OFFICE WERE FULFILLED USING SL-2 LOOPS. WHAT ARE SL-2 LOOPS AND WHY WERE THEY PROVIDED TO SUPRA?

A. First, let me explain that IDLC equipment allows connecting loops directly to switching equipment without intervening equipment referred to as Central Office Terminals or "COTs". In older forms of Digital Loop Carrier ("DLC") equipment, the individual loops are multiplexed onto high-speed transmission facilities at the DLC Remote Terminal ("RT") for transport to the serving central office. At the central office, the high-speed transmission facilities are de-multiplexed back to discrete pairs (one for each customer loop). With IDLC, there is a device referred to as the COT but it does not perform the de-multiplexing back to discrete loops. Rather it is used for administrative purposes. This means that the high-speed transmission facilities (usually operating at DS-1) containing the multiplexed loops are connected directly to the switching equipment and other means for providing unbundled loops must be utilized. Some of those methods (for example, the use of so-called "side door" or "hair pin') must be designed so as to make sure all required assignments are performed. It is this circuit

designing that requires that certain unbundled loops be provisioned as SL-2 loops. This Commission has previously addressed and set the rates that BellSouth may charge CLECs for SL-2 loops.

Q. ON PAGE 25 OF HIS TESTIMONY, MR. STAHLY ALLEGES "AS OF DECEMBER 2, 2003, BELLSOUTH HAS NOT GIVEN A REASON FOR REJECTING THE ORDERS." DID BELLSOUTH INFORM SUPRA AS TO WHY FOUR (4) OF THE REQUESTED 99 UNBUNDLED LOOP ORDERS WERE CANCELLED?

A. Yes. BellSouth notified Supra's representative by e-mail on November 17, 2003, that there were no compatible facilities available to provision four (4) of the lines on this particular batch request to either SL-1 or SL-2 loops. I have attached a copy of the e-mail as Exhibit KLA-7.

Q. ON PAGE 26 OF HIS TESTIMONY, MR. STAHLY OPINES THAT THE NO DIAL TONE PROBLEMS ENCOUNTERED BY SUPRA'S CUSTOMERS WERE BECAUSE OF BELLSOUTH'S USE OF IDLC EQUIPMENT. DOES THAT MAKE SENSE?

A. No. Obviously, Supra's customers have dial tone while they are connected to BellSouth's switch. Because the loop (including those provided via IDLC equipment) does not provide dial tone, it is apparent to me that the source of the alleged dial tone problems are attributable to problems in Supra's switch at the time of the hot cut.

Q. ON PAGE 28 OF HIS TESTIMONY, MR. STAHLY DISCUSSES ISSUES THAT WOULD ALLEGEDLY PREVENT SUPRA FROM SERVING CUSTOMERS OVER ITS OWN FACILITIES EVEN SETTING ASIDE HIS COMPLAINTS REGARDING BELLSOUTH'S HOT CUT PROCESS. FIRST HE STATES "THE ILEC CANNOT CUT OVER ALL OF THE CLEC'S EXISTING CUSTOMERS TO THE CLEC'S SWITCH BASED ON TECHNICAL OR OPERATIONAL CONSTRAINTS SUCH AS MASS DEPLOYMENT OF INTEGRATED DIGITAL LOOP CARRIER SYSTEMS AND FIBER." DO YOU AGREE WITH HIS CONCLUSION?

A. No, for the reasons set forth in Mr. Tennyson's rebuttal testimony.

Q. MR. WEBBER FURTHER ALLEGES, ON PAGE 32 OF HIS TESTIMONY, THAT THE PROCESS OF REASSIGNING THE FACILITY IS "ANYTHING BUT SIMPLE," AND "CAN CAUSE NUMEROUS SERVICE-IMPACTING PROBLEMS" FOR THE END-USER. PLEASE COMMENT.

A. Mr. Webber's allegations are without merit and he provides no evidence to support them. The process that Mr. Webber speaks of certainly is simple and is something that ILECs perform on a daily basis. The process of which he speaks simply is moving a given end user from one facility to another (i.e. moving from IDLC to copper). BellSouth performs these tasks on a routine basis and does so without incident. As I stated earlier and in my direct testimony, BellSouth's performance measures for coordinated hot cuts demonstrate that the average out of service time for hot cuts is 2:39 minutes. This includes hot cuts where

facility changes are involved.

E. Automation of the Hot Cut Process

Q. ON PAGE 34 OF HIS TESTIMONY, MR. STAHLY SUGGESTS THAT "THE COMMISSION SHOULD REQUIRE BELLSOUTH TO ESTABLISH AN **AUTOMATED** BATCH HOT CUT PROCESS FOR ALL WIRE CENTERS WHERE THE COMMISSION FEELS FLORIDA TELECOMMUNICATIONS USERS SHOULD HAVE A CHOICE OF LOCAL PHONE COMPANIES." [Emphasis in original.] PLEASE RESPOND.

A. First of all, this Commission has already decided that Florida's citizens should have a choice of local phone companies and, indeed thousands of those citizens have chosen CLECs operating in Florida for their local phone service needs. Second, while Mr. Stahly only suggests an "automated" process, he does not articulate what that automated process should be, nor does he name commercially available software or other devices that would effectuate such automation. Finally, he makes no suggestion as to how such automation would be funded. I can only assume that he intends for ILECs such as BellSouth to fund such automation and that BellSouth would not be allowed to recover its outlays were such an automation implemented. Nonetheless, in his testimony, BellSouth witness Gary Tennyson explains why an automated process as suggested by AT&T in this proceeding is unworkable.

Q. AT&T ARGUES (VAN DE WATER TESTIMONY AT PAGE 19) THAT THE MANUAL HOT CUT PROCESS "IS INHERENTLY INCAPABLE OF SUSTAINING VOLUMES" NECESSARY TO SUPPORT UNE-L. DOES THIS PREMISE ACCORD WITH THE *TRIENNIAL REVIEW ORDER*?

A. No, it does not. AT&T argued that the FCC should require Electronic Loop Provisioning and the FCC rejected that argument. Despite its unsubstantiated finding that the hot cut process causes impairment, the FCC directed the states to implement a process that would alleviate impairment, presuming that such a manual process was achievable. This holding, in conjunction with the FCC's explicit rejection of AT&T's ELP process, undermines Van de Water's argument that a manual process is "inherently incapable of sustaining volumes." BellSouth witness Gary Tennyson addresses the infeasibility of the CLECs' electronic processes in more detail.

F. Miscellaneous Issues

Q. MR. WEBBER CLAIMS, ON PAGE 27 OF HIS TESTIMONY, THAT BELLSOUTH HAS ONLY "COMMUNICATED [ITS] PLANS [FOR HOT CUTS] TO THE INDUSTRY THROUGH WORKSHOPS HELD AT THE COMMISSION'S OFFICES ON OCTOBER 28, 2003." IS HE RIGHT?

A. No. BellSouth posted the CLEC information package for its mechanized bulk migration process to the CLEC website prior to the rollout of the process in March 2003. Prior to that, BellSouth had posted the CLEC information package

for its manual bulk migration process in 2002. As with any posting to the CLEC website, a carrier notification was also sent to the CLECs advising of the posting and availability of this process. Please see the rebuttal testimony of Ronald Pate for additional information regarding discussions of this process with the CLEC community through the CCP.

Q. MCI ADVOCATES THE ESTABLISHMENT OF A COMMISSION WORKSHOP TO ADDRESS ALLEGED ISSUES WITH BELLSOUTH'S HOT CUT PROCESS (LICHTENBERG TESTIMONY AT PAGE 28). IS THIS NECESSARY?

A. While under ordinary circumstances BellSouth fully supports collaborative improvements to its processes (See Line Sharing Collaborative), BellSouth cannot support the CLECs' requests for collaboration in this instance. First, the CLECs' requests for collaboration only have occurred after the commencement of the state impairment cases. Second, while the CLECs purport to want improvements to the process, they have failed to point to any reasonable, specific improvements or suggestions. Finally, and most importantly, the CLECs have admitted that no matter how many improvements BellSouth makes to its manual process, the CLECs will continue to argue they are impaired without an eight (8) billion dollar retrofit of BellSouth's network to allow for automated hot cuts. Given the CLECs' positions, it does not make sense for BellSouth to devote time and resources to a doomed process.

G. UNE-L Performance

Q. IS MS. LICHTENBERG'S CHARACTERIZATION, ON PAGES 35-36 OF HER TESTIMONY, OF INCREASED OUT OF SERVICE TIMES AND CUSTOMER HARM FOR TROUBLES IN A UNE-L ENVIRONMENT ACCURATE?

A. No, quite the contrary. BellSouth's performance data demonstrates that the Maintenance Average Duration time for 2 Wire Analog Loops is less that it is for UNE-P. For the period November 2002 through October 2003, the average duration time for trouble reports for 2 Wire Analog Loops Non-Designed was 14.01 hours while the average duration time for trouble reports for 2 Wire Analog Loops Designed was 5.52 hours. For this same period, the average duration time for trouble reports for UNE-P was 18.64 hours. (Please see Exhibit KLA-8) This data demonstrates that CLECs are not impaired due to increase out of service times and customer harm in the UNE-L environment as Ms. Lichtenberg states. Mr. Varner discusses BellSouth's performance in more detail.

Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?

A. Yes.

Comparison of Sprint and BellSouth Conversion Process

Item	Activity	Sprint (per Mr. Alleman's testimony)	BellSouth
1	Conversion Types: • coordinated Hot Cuts o **Timed / Time Specific** o **Non-Timed / Non-Time Specific** • non-coordinated Hot Cuts o None / non-time-specific	**Timed** and **Non-timed coordinated conversions**	All three types of conversion/migration are available
2	CLEC may submit request via: • mechanized system (TAG,EDI, and LENS) • web-based • manual (facsimile)	Web-based access offered	CLECs may submit requests via a mechanized, manual, or (as on Nov 23, 2003) web-based application.
3	Central Office and (if required) outside technician notified of pending cut	For **Timed** coordinated cuts, notification occurs >48 hours before the due date.	For **Time-Specific** or **Non-time-specific** coordinated cuts, coverage in the CO or field is confirmed 24 to 48 hours before the due date. For **Non-coordinated** cuts, the CO or field technician's work is loaded on the day before the due date.
4	CLEC contact prior to due date	For **Timed** cuts, Sprint confirms conversion when contacted by CLEC 48 hours prior to due date.	For **Time-Specific** or **Non-time-specific** coordinated cuts, BellSouth contacts CLEC 24 – 48 hours prior to coordinated cut due date to confirm service order content such as number of circuits to cut, CLEC cross-connect assignments, and start time when Time-specific.
5	Perform pre-due date wiring work steps in Central Office	For **Timed** cuts, Central Office is wired and presence of CLEC dial tone is tested one day prior to due date For **Non-timed** cuts, Central Office is wired and presence of CLEC dial tone is tested prior to due date	**All cut types** are wired in the Central Office between 24 and 48 hours before due date. For **Time-Specific** or **Non-time-specific** coordinated cuts, telephone number on CLEC dial tone is verified against service order content.

6	CLEC contacts on due date	For **Timed** cuts, on due date, at the specified time, a conference call is initiated that includes Sprint and CLEC personnel to coordinate cut activi ty. CLEC remains on call until cut is complete. For **Non-timed** cuts, the CLEC is notified when the conversion is complete	Prior to starting the cut, for **Time-Specific** and **Non-time-specific** coordinated cuts the CLEC is called on due date to confirm conversions details are still current. If there is no CLEC dial tone at the CLEC cross-connect point, the CLEC is contacted to provide an opportunity to provide dial tone. Immediately after the completion of the cut, the CLEC is notified of the completion and requested to test and accept the completion. For **Non-coordinated** cuts, the CLEC is provided either a facsimile or email notification after the cut is complete
7	Conversion activity on the due date	**Timed** and **Non-timed** conversion connections and disconnects are made at the appropriate block and pin.	For **all types** of conversion or migration, connections are made at the appropriate block and pin. Disconnect activity is completed after CLEC notification.

BellSouth Telecommunications, Inc.
Florida Public Service Commission
Docket No. 030851-TP
Exhibit KLA-5

PUBLIC DISCLOSURE DOCUMENT

BellSouth Telecommunications, Inc.
Florida Public Service Commission
Docket No. 030851-TP
Exhibit KLA-6

PUBLIC DISCLOSURE DOCUMENT

-----Original Message-----
From: Blackstock, Sam
Sent: Monday, November 17, 2003 7:55 PM
To: 'Bette.Smith@STIS.com'
Cc: Smith, Don R
Subject: RE: Bulk Migration

Bette,

I have attached the spreadsheet that you sent me with due dates and a BOPI.
Several of these are not SL1 compatible and need to be removed from this spreadsheet. I have highlighted these in blue and put "***" in the due date field. These are SL2 compatible. Also, there are 4 that I have highlighted in red with a NFA in the due date field. This means that there are no facilities available(SL1 or SL2), and will also need to be removed from the BOPI.
Don and I would like to talk to you about this spreadsheet. I will call you in the morning to set up a short call.

Thank you,

Sam Blackstock
Project Manager
BellSouth
404-927-5247

BellSouth Telecommunications, Inc.
Florida Public Service Commission
Docket No. 030851-TP
Exhibit KLA-7b

PUBLIC DISCLOSURE DOCUMENT

State	Maintenance and Repair Products	Nov-02	Dec-02	Jan-03	Feb-03	Mar-03	Apr-03	May-03	Jun-03	Jul-03	Aug-03	Sep-03	Oct-03	Average
FL	2W Analog Loop Non-Design	13.49	13.64	11.43	10.85	12.51	12.80	13.06	15.92	14.74	14.91	15.46	15.67	13.71
GA	2W Analog Loop Non-Design	11.49	10.72	9.79	8.50	9.56	8.20	9.73	11.42	10.14	8.37	9.37	14.18	10.12
KY	2W Analog Loop Non-Design		13.00			5.00		15.50	12.26	4.32	2.51	23.92	2.52	9.88
LA	2W Analog Loop Non-Design								7.39			0.43	7.72	5.18
MS	2W Analog Loop Non-Design	1.00	2.20	37.00	8.25	2.60	14.50	22.20	25.83	13.32	16.93	13.15	9.63	13.88
NC	2W Analog Loop Non-Design	11.60	19.17	2.50	17.00	17.67	14.00	13.40	7.31	2.08	15.00	18.05	16.23	12.83
SC	2W Analog Loop Non-Design	28.71	15.91	24.00	4.00	30.00	17.00	16.29	17.47	28.14	26.93	9.05	21.73	19.94
TN	2W Analog Loop Non-Design	2.00	34.50	4.00	15.75		3.60	46.58	36.83	13.48	24.90	28.27	8.79	19.88
Region	**2W Analog Loop Non-Design**	**11.38**	**15.59**	**14.79**	**10.73**	**12.89**	**11.68**	**19.54**	**16.80**	**12.32**	**15.65**	**14.71**	**12.06**	**14.01**
AL	2W Analog Loop Design	6.04	4.28	5.16	4.24	5.99	6.17	9.12	4.81	5.30	4.72	5.33	3.84	5.42
FL	2W Analog Loop Design	**5.33**	**5.55**	5.34	4.99	5.81	4.89	5.15	6.05	5.32	5.87	5.51	5.68	5.46
GA	2W Analog Loop Design	4.94	4.35	3.53	5.03	4.89	5.01	6.69	5.34	7.02	5.27	6.02	5.34	5.29
KY	2W Analog Loop Design	3.06	4.07	4.05	5.14	7.38	6.68	4.75	4.24	7.83	4.25	3.78	3.49	4.89
LA	2W Analog Loop Design	4.10	5.32	4.83	5.55	5.01	8.86	5.16	4.99	4.93	8.27	4.64	5.10	5.56
MS	2W Analog Loop Design	7.19	7.33	6.17	6.06	7.15	5.31	7.49	6.89	6.20	6.78	5.95	3.30	6.32
NC	2W Analog Loop Design	4.06	6.85	3.81	5.81	4.43	5.59	4.81	4.14	4.58	4.25	4.15	4.75	4.77
SC	2W Analog Loop Design	4.02	4.64	5.24	5.02	6.64	4.83	5.55	3.97	5.29	4.76	6.79	3.68	5.04
TN	2W Analog Loop Design	6.11	6.48	5.24	6.87	6.50	4.84	8.24	6.14	9.61	9.75	6.73	7.13	6.97
Region	**2W Analog Loop Design**	**4.98**	**5.43**	**4.82**	**5.41**	**5.98**	**5.80**	**6.33**	**5.18**	**6.23**	**5.99**	**5.43**	**4.70**	**5.52**
AL	UNE Loop + Port Combinations	25.86	20.51	17.62	16.83	19.50	17.09	27.62	27.65	28.83	29.13	28.63	21.44	23.39
FL	UNE Loop + Port Combinations	12.60	13.36	11.22	10.96	14.33	13.02	14.58	16.82	17.29	18.45	17.45	16.52	14.72
GA	UNE Loop + Port Combinations	14.73	13.61	10.88	11.25	11.85	11.12	14.95	14.89	16.35	17.57	15.95	14.00	13.93
KY	UNE Loop + Port Combinations	18.08	16.22	13.52	19.66	16.24	17.22	21.59	26.32	29.08	28.65	31.87	23.66	21.84
LA	UNE Loop + Port Combinations	36.15	20.70	18.64	17.32	21.92	16.50	14.33	17.88	23.66	20.53	23.83	18.71	20.85
MS	UNE Loop + Port Combinations	48.84	25.80	24.01	22.28	21.17	18.38	23.43	23.30	26.77	29.78	28.05	20.01	25.98
NC	UNE Loop + Port Combinations	11.01	18.99	8.44	8.75	10.59	9.54	11.75	12.83	13.00	13.48	13.09	11.10	11.88
SC	UNE Loop + Port Combinations	15.71	16.35	12.58	11.68	13.33	11.45	14.10	13.62	17.28	26.93	17.33	16.53	15.58
TN	UNE Loop + Port Combinations	14.86	13.54	10.63	17.35	13.83	12.09	26.77	23.57	25.69	33.39	25.16	17.72	19.55
Region	**UNE Loop + Port Combinations**	**21.98**	**17.68**	**14.17**	**15.12**	**15.86**	**14.05**	**18.79**	**19.65**	**21.99**	**24.21**	**22.37**	**17.75**	**18.64**