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September 8, 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.: 040301-TP
Petition of Supra Telecommunications and Information Systems, Inc. for Arbitration with BellSouth Telecommunications, Inc.

Dear Ms. Bayó:

Enclosed are an original and fifteen copies of BellSouth Telecommunications, Inc.'s Direct Testimony of Kenneth L. Ainsworth and D. Daonne Caldwell, 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,

E Edenfield /RH

E. Earl Edenfield, Jr.

CMP ____
COM 5 + org
CTR ____
ECR ____ Enclosure
GCL 1 cc: All Parties of Record
OPC ____ Marshall M. Criser III
MMS ____ Nancy B. White
RCA ____ R. Douglas Lackey
SCR ____
SEC 1
OTH ____

CCA note: Caldwell testimony was not included in filing.

CERTIFICATE OF SERVICE
Docket No. 040301-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Electronic Mail and U.S. Mail this 8th day of September, 2004 to the following:

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BELLSOUTH TELECOMMUNICATIONS, INC.

DIRECT TESTIMONY OF KENNETH L. AINSWORTH

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

DOCKET NO. 040301-TP

September 8, 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. PLEASE SUMMARIZE YOUR BACKGROUND AND EXPERIENCE WITH BELLSOUTH.

A. I have over thirty-five years experience in the telecommunications industry. My experience covers a wide range of network centers as well as outside plant construction. Specifically, I have managed and/or supported the following network centers: Switching Control Center, Special Service Center, Central Office Operations, Access Customer Advocate Center, Facility Management Administrative Center, Circuit Order Control Center, Network Operations Center, Major Account Center, 911 Center and the Customer Wholesale Interconnection Network Services Center. In addition, I deployed the Work Force Administration

("WFA") system, which is used by these centers to track the status of certain activities performed by BellSouth's Network personnel. I am currently a Director for Interconnection Services directly supporting the Local Carrier Service Center ("LCSC") and Customer Wholesale Interconnection Services ("CWINS") Centers regarding pre-ordering, ordering, provisioning and maintenance activities for the wholesale market. I have participated in and provided technical assistance to numerous Competitive Local Exchange Carrier ("CLEC") workshops for pre-ordering, ordering, provisioning and maintenance of resold services and unbundled network elements.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. In this proceeding, Supra has suggested that different processes are involved in converting BellSouth Retail end-users to Unbundled Network Element Loop ("UNE-L") than for Unbundled Network Element Platform ("UNE-P") to UNE-L conversions, and as such, the Retail to UNE-L non-recurring rates should not apply to UNE-P to UNE-L conversions. My testimony will demonstrate that Supra's assertions are incorrect. My testimony will describe the hot cut processes BellSouth has in place to convert BellSouth's switch-based services to UNE-L services. These switch-based services include BellSouth Retail lines as well as resale services and UNE-P services provided to CLECs. As my testimony will show, BellSouth does not have separate conversion processes for the type of switch-based services described herein. Instead, the processes and associated work steps involved in converting a BellSouth Retail end user to UNE-L, a CLEC's customer served via resale to UNE-L, and/or a CLEC's customer

served via UNE-P to UNE-L, are the same. I will describe three (3) types of hot cut processes, (that is, individual, project, and batch) as well as several types of coordination options that are available to convert BellSouth switch-based services to UNE loops. My testimony will also describe the work activities associated with these hot cut processes.

I. BELLSOUTH'S HOT CUT PROCESSES

A. General Overview of BellSouth's Different Hot Cut Processes

Q. GENERALLY, WHAT TYPES OF HOT CUT PROCESSES AND WHAT TYPES OF COORDINATION LEVELS DOES BELLSOUTH OFFER CLECS?

A. BellSouth provides three (3) different hot cut processes and three (3) different levels of coordination. Despite this variety of service offerings, however, the actual hot cut remains, from a network perspective, a simple, straightforward task – and a task BellSouth can perform at high volumes with a high degree of accuracy and speed.

Q. WHAT ARE THE THREE (3) DIFFERENT TYPES OF HOT CUT PROCESSES BELLSOUTH OFFERS?

A. BellSouth offers CLECs the following types of hot cuts: (1) individual hot cuts; (2) project hot cuts; and (3) batch hot cuts.

Q. PLEASE BRIEFLY DESCRIBE THE INDIVIDUAL, PROJECT, AND BATCH HOT CUT PROCESSES.

A. An individual hot cut service request is used for a particular end-user account and is available for both residence and business service lines. Service requests for individual accounts may include single or multiple lines. Simply put, the individual account service request will process a single order for a single end-user.

The project hot cut is for cuts involving 15 or more lines to a single end-user. To ensure an efficient cut, BellSouth assigns a project manager to coordinate the different work functions. The criteria for project hot cuts can be found at: http://www.interconnection.bellsouth.com/guides/html/other_guides.html

The batch hot cut service request (which is interchangeably referred to as the "bulk" migration process) provides efficient processing for large volume conversions of UNE-P service to UNE-L service and is particularly suited to the conversion of an embedded base of UNE-P circuits to UNE-L circuits. The batch hot cut process applies to conversions of multiple accounts for the same service type within a specific BellSouth wire center. The batch process combines ordering efficiencies and project management support with a proven hot cut provisioning process. BellSouth's batch hot cut process can be found at: http://www.interconnection.bellsouth.com/guides/unedocs/BulkManpkg.pdf

Q. PLEASE DESCRIBE THE DIFFERENT LEVELS OF COORDINATION

BELLSOUTH OFFERS AND THE PROCESSES TO WHICH THEY APPLY.

A. BellSouth offers CLECs three (3) hot cut coordination levels: (1) coordinated / time specific, (2) coordinated, and (3) non-coordinated.

COORDINATED / TIME SPECIFIC hot cuts require BellSouth to convert the CLEC account on a specific date and at a specific time designated by the CLEC.

When the CLEC elects this option, BellSouth contacts the requesting CLEC 24 to 48 hours prior to the due date to verify that BellSouth's service order information agrees with the CLEC's request. At that time, BellSouth also confirms no jeopardy situation exists (for either the CLEC or for BellSouth) that would prevent the successful conversion, validates the specific conversion time requested, and provides to the CLEC the status of any dial tone test (that is, BellSouth's test of dial tone provided by the CLEC's switch).

On the due date, the CWINS Center contacts the CLEC prior to the established conversion time for a final validation that the conversion is still a "go". The BellSouth CWINS technician communicates with the BellSouth's Network groups at the specified conversion time and makes the execution request to perform the hot cut. The CWINS technician stays on the call, awaiting Network completion notification. When the technician in BellSouth's Network group completes the hot cut, that technician notifies the CWINS technician who documents the hot cut completion. At this point, the hot cut is complete in BellSouth's network.

Once the hot cut is complete, the CWINS technician attempts to notify the CLEC for acceptance of the order. "Acceptance" means that the CLEC agrees that the order has been fulfilled successfully and that it is appropriate for BellSouth to close the order as complete. Once BellSouth confirms CLEC acceptance, or default acceptance occurs (e.g., BellSouth never receives a response from the CLEC), the pending service orders are completed in BellSouth's systems by the CWINS technician.

Coordinated/Time Specific is available for individual and project hot cuts.

COORDINATED hot cuts require BellSouth to convert the CLEC's customer account on a date specified by the CLEC and a best effort time frame negotiated by the parties. For coordinated hot cuts, BellSouth contacts the requesting CLEC 24 to 48 hours prior to the due date to verify that BellSouth's service order information agrees with the CLEC's request. At that time, BellSouth also confirms no jeopardy situation exists (either for the CLEC or for BellSouth) that would prevent the successful conversion and provides to the CLEC the status of any dial tone test performed (that is, BellSouth's test of dial tone from the CLEC's switch). Finally, during this call during the 24 to 48 hours prior to the due date, the parties verify the targeted time frame on the due date that the hot cut will be performed.

On the due date, CWINS will contact the CLEC prior to the conversion time for a final validation that the conversion is still a "go". The BellSouth CWINS technician communicates with BellSouth's Network group prior to the conversion

being started. Once all BellSouth personnel are in communication, the CWINS technician will make the execution request to perform the hot cut and stay on the call, awaiting Network completion notification. When the Network technician completes the hot cut, that technician notifies the CWINS technician who documents the completion. At this point, the hot cut is complete within BellSouth's network. The CWINS technician then attempts to notify the CLEC for acceptance. As discussed earlier, acceptance in this sense means that the CLEC agrees that the order has been fulfilled successfully and that is appropriate that BellSouth close the order as complete. Once CLEC acceptance is confirmed or default acceptance occurs, the pending service orders are completed by the CWINS technician.

Coordinated service is available on individual, project, and batch hot cuts.

NON-COORDINATED hot cut requests are converted by BellSouth's Network personnel during normal business at various times on the due date based on the Network technicians' work load activity and schedule.

Once BellSouth network personnel complete the non-coordinated hot cut, the technician completes the work order that, in turn, generates a notification (either by facsimile, by e-mail or by website posting) notifying the CLEC that the conversion is complete.

Non-coordinated service is available on individual, project, and batch hot cuts.

Q. PLEASE EXPLAIN THE BENEFITS OF EACH COORDINATION LEVEL.

A. COORDINATED/TIME SPECIFIC hot cuts allow CLECS to schedule conversions at a CLEC-requested time on the due date. This gives the CLEC an opportunity to schedule a specific conversion time with certain end-user customers based on the business needs of the CLEC or the end-user. The coordinated / time specific hot cut is the most detailed of the three (3) types of conversions and, as the FCC held, is not something BellSouth is required to "provide at no charge." *Georgia/Louisiana Order,* ¶ 222.

COORDINATED hot cuts assure the highest level of monitoring and interaction by BellSouth with the CLEC during the provisioning process culminating in direct completion notification at the completion of the conversion activity. The coordinated hot cut allows CLECs the added value of the coordination functions and direct notification and acceptance activities at the conclusion of the conversion. When CLECs desire coordination assurances, direct notification and acceptance opportunities, the coordinated conversion would be a good choice.

NON-COORDINATED hot cuts, as suggested by the name, provide basic hot cut conversion processing without coordination functionality. This is not meant to suggest that BellSouth's provisioning activities are not internally coordinated for this type hot cut, because they are. However, BellSouth does not coordinate its conversion activities with the CLEC before and after the hot cut. This type of hot cut allows a CLEC to convert its end-user from BellSouth's switch to the CLEC's switch over an unbundled loop (that is, the UNE-L) at the lowest possible cost to

the CLEC. Network non-coordinated provisioning functions are still performed by BellSouth's Network personnel to assure a quality conversion. Completion notification is triggered by service order activity completion by Network personnel, which propagates either a facsimile, e-mail or website posting notification (as specified by the CLEC) indicating to the CLEC that the conversion is complete.

B. BellSouth's Individual Hot Cut Process

Q. PLEASE EXPLAIN BELLSOUTH'S INDIVIDUAL HOT CUT PROCESS.

A. BellSouth has a seamless individual hot cut process that ensures minimal end-user service outage. A flow-chart of the individual hot cut process is attached to my testimony as Exhibit KLA-1. BellSouth's process provides for the following:

1. Pre-wiring and pre-testing of all wiring prior to the due date
2. Verification of dial tone from the CLEC's switch
3. Verification of correct telephone number from the BellSouth and CLEC switch using a capability referred to as Automatic Number Announcement ("ANAC")
4. Monitoring of the line prior to actual wire transfer to ensure end-user service is not interrupted
5. Notification to the CLEC that the transfer has completed

In addition to the activities listed above, coordinated hot cuts (including coordinated/time specific hot cuts) also include:

1. Notification to the CLEC of CLEC wiring errors, dial tone, or Automatic Number Identification ("ANI") problems
2. Verification of end-user information with the CLEC prior to the conversion
3. Verification with the CLEC of cut date and or time 24 – 48 hours prior to the conversion date
4. Joint acceptance testing, if requested by the CLEC.

Q. DOES BELLSOUTH CHECK FOR DIAL TONE PRIOR TO A HOT CUT?

A. Yes. BellSouth's processes require that a dial tone check be performed prior to a hot cut. Hot cuts involving designed loops are tested for CLEC dial tone 24-48 hours before due date. If no dial tone is found, the CWINS Center technician notifies the CLEC of the problem in order for the CLEC to have time to correct the problem prior to the due date and not jeopardize the hot cut. Coordinated hot cuts involving non-designed loops are tested for CLEC dial tone by the central office ("CO") technician when they perform the pre-wiring for the hot cut. If no dial tone is found, the CO technician places the order in jeopardy and the CWINS technician notifies the CLEC of the problem in order for the CLEC to have time to correct the problem prior to the due date and not jeopardize the hot cut.

For non-coordinated hot cuts, it is the CLEC's responsibility to ensure dial tone is provided from the CLEC's switch. Nonetheless, BellSouth checks for dial tone before the due date but does not notify the CLEC of a no dial tone problem. BellSouth's CO personnel check for CLEC dial tone when they perform pre-due date wiring functions. The CO technician places the order in jeopardy if no CLEC

dial tone is present. The BellSouth CO technician checks again for CLEC dial tone on the due date and, if dial tone is present, the CO technician performs the hot cut. If on the due date, there is no CLEC dial tone, the hot cut does not go forward and the BellSouth technician codes the order as a Missed Appointment ("MA") due to CLEC problems. The CLEC is then notified (either electronically, if the CLEC placed its Local Service Request ("LSR") electronically, or by fax if the CLEC placed its LSR manually) that the order is in MA status and that the CLEC must either supplement its order for a new due date or cancel its order. Even in non-coordinated cuts, the customer is not taken out of service if there is no dial tone on the receiving end of the cut.

Regardless of which type of hot cut is ordered by the CLEC, BellSouth also performs a check for CLEC dial tone immediately prior to the hot cut to ensure that dial tone is present.

Q. DOES THE HOT CUT PROCESS CAUSE SERVICE DISRUPTIONS? IF SO, DOES THAT MEAN THAT BELLSOUTH'S PROCESS IS NOT SEAMLESS?

A. The very nature of a hot cut is that there is a physical transfer of the loop facility serving the end-user from the existing central office switch (that is, BellSouth's switch) to the CLEC's switch. This physical transfer interrupts dial tone and the end-users ability to place or receive calls during this process only during the time the loop is disconnected from BellSouth's switch but is not yet connected to the CLEC's switch. BellSouth performs pre-conversion work which includes placing the new jumpers and making them ready for the conversion. This minimizes the

amount of time that the end-user is out of service during the conversion. The CLEC performs required number porting activities once the transfer from BellSouth's switch to the CLEC's switch is effectuated.

Q. PLEASE ADDRESS HOW THE PROCESS CHANGES WHEN COSMIC FRAMES OR MULTIPLE FRAMES ARE INVOLVED IN THE CUT.

A. First, let me explain that the so-called "COSMIC" frame is a newer style modular Main Distributing Frame ("MDF") whose assignment records are housed in a system called SWITCH/FOMS ("Frame Order Management System"). Using a "punch down tool" on this style frame, temporary connections referred to as "jumpers" are made by punching the jumper wire onto special terminals that strip the insulation and cut off any excess jumper wire in one stroke. This takes less time than for older style frames that required soldered connections or so-called "wire wrapped" connections. Wire wrapped connections required a special tool that wound the jumper wire around a metal terminal once the technician had removed the plastic insulation from the jumper wire. SWITCH/FOMS also contains assignment algorithms meant to minimize the length of jumpers connecting loops and switch ports thereby reducing work times required to place jumpers. Thus, work times to complete required activities for an unbundled loop order and the number of wiring connections that have to be made in the CO vary depending on the frame type and/or the location of the demarcation point in a particular CO between BellSouth's network and the CLEC's collocation arrangement.

Q. HOW IS A CLEC NOTIFIED THAT BELLSOUTH HAS COMPLETED ITS PORTION OF THE HOT CUT AND THAT THE CLEC SHOULD COMMENCE ACTIVITIES TO PORT THE TELEPHONE NUMBER FROM BELLSOUTH'S NETWORK TO THE CLEC'S NETWORK?

A. For coordinated hot cut conversions, the CLEC is directly notified by a telephone call from CWINS Center personnel. This notification occurs after the conversion has been completed.

For non-coordinated conversions, BellSouth notifies the CLEC via facsimile, e-mail or website posting (whichever the CLEC requests) at the completion of BellSouth's Network technician's work activity.

Q. HAS THE COMMISSION REVIEWED BELLSOUTH'S HOT CUT PROCESS BEFORE?

A. Absolutely. This Commission, as well as the FCC, reviewed BellSouth's hot cut process during BellSouth's Section 271 applications and determined that BellSouth's hot cut process provided CLECs with nondiscriminatory access to unbundled loops. The provisioning process I discuss here is the same process reviewed during the 271 case and filed with the Commission in the TRO case.

Q. IS BELLSOUTH'S INDIVIDUAL HOT CUT PROCESS EFFECTIVE?

A. Yes. This Commission and the FCC confirmed the effectiveness of BellSouth's

hot cut process during BellSouth's Section 271 Application approval process. This Commission, eight other state commissions, and the FCC all found BellSouth's hot cut process nondiscriminatory, timely, accurate, and effective.

Q. WAS THE HOT CUT PROVISIONING PROCESS REVIEWED DURING THE FLORIDA OPERATIONAL SUPPORT SYSTEM ("OSS") THIRD PARTY TEST?

A. Yes. BearingPoint, formerly KPMG Consulting, did review the hot cut provisioning process during the Florida Test. They assessed it from a process standpoint in the PPR-9 Test Report Section which can be found beginning on page 423 of the Florida Test Final Report. Additionally, they observed live hot cuts both from a BellSouth and a CLEC perspective in the TVV-4 Test Report which can be found beginning on page 448 of the Florida Test Final Report. The evaluation criteria or test points for the hot cut observations can be found beginning on page 458 of the report. BearingPoint determined that BellSouth had an adequate and effective loop conversion or hot cut process.

C. BellSouth's Project Hot Cut Process

Q. PLEASE DESCRIBE BELLSOUTH'S PROJECT HOT CUT PROCESS.

A. Project conversions are available when the CLEC seeks to convert 15 or more lines to the same end-user. When the CLEC requests a project conversion for fifteen or more loops to be provisioned on a single individual order, a CWINS Center technician and a Project Manager are assigned to the order and the order

is identified in the WFA system for Due Date tracking. The CWINS Center technician or Project Manager reviews the order for accuracy and queries associated systems for order status. The CWINS Center technician or Project Manager contacts the CLEC prior to the due date to confirm or negotiate the actual due date conversion time. The CWINS Center technician or Project Manager then contacts any associated work group to schedule the conversion.

The Pre-Due Date provisioning process is the same as described for the individual hot cut process.

On the Due Date, the CWINS technician verifies that the required personnel are scheduled for the conversion time. The CWINS Center technician sets up communications with required conversion personnel to begin service cutover to the CLEC. BellSouth notifies the CLEC upon completion of the cutover activity. With CLEC concurrence, the service order is completed.

Any trouble conditions, made known by the CLEC, related to the conversion are resolved with the CLEC before the order is completed. The CWINS Center technician completes the order in BellSouth's systems after concurrence of the CLEC.

D. BellSouth's Batch Hot Cut Process

Q. PLEASE DESCRIBE BELLSOUTH'S BATCH HOT CUT PROCESS.

A. BellSouth's "UNE-P to UNE-L Bulk Migration" is a batch hot cut process that CLECs may use when migrating existing multiple non-complex UNE-P services to a UNE-L offering. The batch hot cut process offers electronic ordering capability and adds project-management services to the basic proven hot cut provisioning process.

As stated, CLECS can submit the Bulk Migration Request electronically, which allows the conversion of multiple UNE-Ps to a UNE-L offering without submitting individual LSRs.

Q. HOW DOES THE BATCH HOT CUT PROCESS WORK?

A. During the pre-ordering process, the CLEC submits a Notification Form to BellSouth's Customer Care Project Manager ("CCPM") for UNE-P accounts to be converted to UNE-L within a single wire center. The CCPM reviews the Notification Form for errors and assigns a Bulk Order Project Identifier ("BOPI") and forwards the Notification Form to the Network Single Point of Contact ("SPOC") who assigns due dates to accounts and returns the Notification Form to the CCPM, who then returns the Notification Form to the CLEC.

Q. DURING THE PRE-ORDERING PROCESS, ARE THERE SPECIFIC INTERVALS FOR THE RETURN OF THE NOTIFICATION FORM TO THE CLEC?

A. Yes. Those intervals are as follows:

- Up to 99 Telephone Numbers, 4 business days
- 100 – 200 Telephone Numbers, 6 business days
- >200 Telephone Numbers, the CCPM will negotiate the interval with the CLEC

Q. WHEN IS THE FIRST DUE DATE ASSIGNED?

A. The first due date to be assigned by the SPOC will be a minimum of 11 business days after the Notification Form is returned to the CLEC. In other words, there are 3 days for the CLEC to submit a clean batch hot cut LSR into the CLEC's electronic system and then there is a minimum of 8 days after the LSR is submitted to the first service order due date. BellSouth's LCSC will use its normal process to handle orders that fall out for manual or partial handling.

Q. PLEASE DESCRIBE THE ROLE THE PROJECT MANAGER PLAYS IN THE BATCH HOT CUT PROCESS AND THE EFFICIENCIES GAINED FROM PROJECT MANAGEMENT.

A. The role of the project manager in the batch hot cut process is to be the SPOC between the CLEC and network operations. Project Managers coordinate due dates, advise of potential delays or problems, and advise of completion of the project. In the batch hot cut provisioning process, the BellSouth CCPM also provides CWINS and the network operations group with notification of planned batch hot cut activity, monitors status of the order(s), interfaces with the CLEC

and Bellsouth groups during the process, and tracks orders and the project until it is complete. The project manager is the party responsible for ensuring successful completion of the process.

Q. PLEASE DESCRIBE THE PROVISIONING PROCESS IN THE BATCH HOT CUT PROCESS.

A. The batch hot cut provisioning process is technically the same as the individual hot cut provisioning process. The benefits of the batch hot cut process are in the ability to schedule and dedicate technicians to more efficiently convert high order volumes.

Q. WILL BELLSOUTH PROVIDE THE CLEC A WINDOW OF TIME WITHIN WHICH BATCH HOT CUTS WILL BE COMPLETED?

A. Yes. Because the batch hot cut process provides the assistance of the CCPM, a CLEC may request, through the project manager, that some of their coordinated conversions, such as business accounts, be converted within a specified window of time. The project manager will work with the centers and network groups to make best efforts to accommodate the request.

A CLEC also may request work outside normal business hours, to be handled on a special project basis and negotiated through a CCPM. As with all special projects, this work would be subject to overtime billing as specified in the parties' interconnection agreement.

Q. IS THE BATCH HOT CUT PROCESS MORE EFFICIENT FOR THE CONVERSION OF AN EMBEDDED BASE OF UNE-P ORDERS TO UNE-L ORDERS?

A. Yes, because it was designed specifically to handle large conversions of UNE-P to UNE-L.

Q. DOES BELLSOUTH'S BATCH HOT CUT PROCESS INCLUDE LOOPS SERVED BY INTEGRATED DIGITAL LOOP CARRIER ("IDLC")?

A. Yes. IDLC is a special version of DLC that does not require a host terminal in the central office, sometimes referred to as the Central Office Terminal ("COT"), but instead terminates the digital transmission facilities directly into the central office switch. In its Texas Section 271 Decision, the FCC found that "the BOC must provide competitors with access to unbundled loops regardless of whether the BOC uses integrated digital loop carrier (IDLC) technology or similar remote concentration devices for the particular loops sought by the competitor." Memorandum Opinion and Order, *Application by SBC Communications Inc., et al., Pursuant to Section 271 of Telecommunications Act of 1996 to Provide In-Region, InterLATA Services in Texas*, 15 FCC Rcd 18354, ¶ 248 (2000) ("*Texas Order*"). BellSouth provides access to such IDLC loops via the following methods:

- Alternative 1: If sufficient physical copper pairs are available, BellSouth will reassign the loop from the IDLC system to a physical copper pair.
- Alternative 2: Where the loops are served by Next Generation Digital Loop

Carrier ("NGDLC") systems, BellSouth will "groom" the integrated loops to form a virtual Remote Terminal ("RT") arranged for universal service (that is, a terminal which can accommodate both switched and private line circuits). "Grooming" is the process of arranging certain loops (in the input stage of the NGDLC) in such a way that discrete groups of multiplexed loops may be assigned to transmission facilities (in the output stage of the NGDLC). Both of the NGDLC systems currently approved for use in BellSouth's network have "grooming" capabilities.

- Alternative 3: BellSouth will remove the loop distribution pair from the IDLC and re-terminate the pair to either a spare metallic loop feeder pair (copper pair) or to spare universal digital loop carrier equipment in the loop feeder route or Carrier Serving Area ("CSA"). For two-wire Integrated Services Digital Network ("ISDN") loops, the Universal Digital Loop Carrier ("UDLC") facilities will be made available through the use of Conklin BRITEmux or Fitel-PMX 8uMux equipment.
- Alternative 4: BellSouth will remove the loop distribution pair from the IDLC and re-terminate the pair to utilize spare capacity of existing Integrated Network Access ("INA") systems or other existing IDLC that terminates on Digital Cross-connect System ("DCS") equipment. BellSouth will thereby route the requested unbundled loop channel to a channel bank where it can be de-multiplexed for delivery to the requesting CLEC or for termination in a DLC channel bank in the central office for concentration and subsequent delivery to the requesting CLEC.
- Alternative 5: When IDLC terminates at a switch peripheral that is capable of serving "side-door/hairpin" capabilities, BellSouth will utilize this switch

functionality. The loop will remain terminated directly into the switch while the "side-door/hairpin" capabilities allow the loop to be provided individually to the requesting CLEC.

- Alternative 6: If a given IDLC system is not served by a switch peripheral that is capable of side-door/hairpin functionality, BellSouth will move the IDLC system to switch peripheral equipment that is side-door capable.
- Alternative 7: BellSouth will install and activate new UDLC facilities or NGDLC facilities and then move the requested loop from the IDLC to these new facilities. In the case of UDLC, if growth will trigger activation of additional capacity within two years, BellSouth will activate new UDLC capacity to the distribution area. In the case of NGDLC, if channel banks are available for growth in the CSA, BellSouth will activate NGDLC unless the DLC enclosure is a cabinet already wired for older vintage DLC systems.
- Alternative 8: When it is expected that growth will not create the need for additional capacity within the next two years, BellSouth will convert some existing IDLC capacity to UDLC.

Q. HAS THIS COMMISSION REVIEWED THESE EIGHT (8) ALTERNATIVES PREVIOUSLY?

A. Yes. All nine of BellSouth's states and the FCC considered and approved these eight (8) alternatives for providing unbundled loops served via IDLC during BellSouth's Section 271 applications.

Q. HAS BELLSOUTH'S BATCH HOT CUT PROCESS BEEN TESTED BY A THIRD PARTY?

A. Yes. BellSouth engaged PricewaterhouseCoopers ("PwC") to provide an attestation on the effectiveness of BellSouth's batch hot cut process. BellSouth selected PwC because of the Commission's familiarity with PwC's work resulting from the regionality testing PwC conducted as part of BellSouth's Section 271-approval process. This Commission, along with the FCC, relied upon PwC's objective and professional findings as part of its 271 decision. PwC's testing ultimately validated the sufficiency of BellSouth's Bulk Migration Process and the results provided quantifiable proof that BellSouth's process is effective in allowing CLECs to migrate large numbers of their customers from UNE-P to a variety of UNE-L services.

As I noted earlier in this testimony, BellSouth's hot cut process was also tested by KPMG (now known as BearingPoint) during the Florida Third Party Test. KPMG's finding was the same as PwC's; namely, that BellSouth technicians provisioned the hot cuts in accordance with documented methods and procedures.

Q. SUPRA ALLEGES IN ITS COMPLAINT THAT A "TRUCK ROLL" IS UNNECESSARY FOR UNE-P TO UNE-L CONVERSIONS. IS THIS CORRECT?

A. No. Supra's allegation is at the very least misleading. The likelihood of needing

to dispatch a BellSouth technician outside, what Supra refers to as a truck roll, to perform a UNE-P to UNE-L conversion is exactly the same as that for performing a resale to UNE-L conversion or a Retail to UNE-L conversion. The situations that necessitate an outside dispatch are no different for any of these conversions.

Q. HAS BELLSOUTH PERFORMED HOT CUTS FOR UNE-P TO UNE-L CONVERSIONS UNDER SUPRA'S CURRENT INTERCONNECTION AGREEMENT ("ICA")?

A. Yes. Under Supra's current ICA, BellSouth has converted large volumes of UNE-P to UNE-L. During the months of November 2003 to March 2004, BellSouth converted over 18,000 UNE-P lines to UNE-L for Supra. During this time frame, BellSouth consistently maintained a high success rate with migration volumes exceeding 250 per day in a single office and over 1,000 per day in multiple offices.

II. SUMMARY

Q. YOU HAVE DESCRIBED IN DETAIL THE VARIOUS HOT CUT PROCESSES THAT BELLSOUTH HAS MADE AVAILABLE TO THE CLECS. IS THERE ANY DIFFERENCE IN THE AMOUNT OF WORK THAT MUST BE PERFORMED WHETHER CONVERTING A BELLSOUTH RETAIL CUSTOMER TO UNE-L OR CONVERTING A UNE-P CUSTOMER TO UNE-L IN ANY OF THESE PROCESSES?

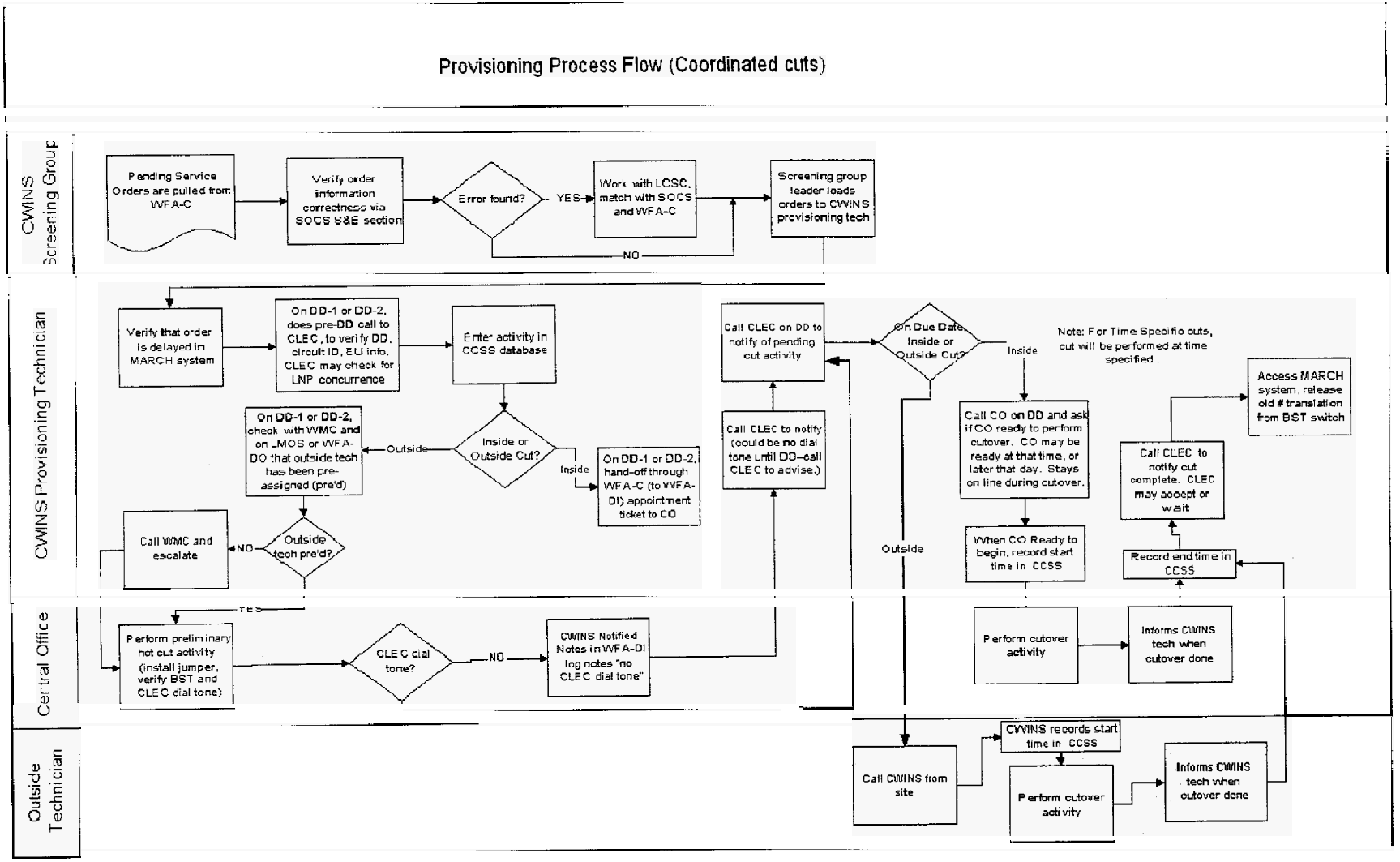
A. No. The work content is exactly the same. In any of these situations, BellSouth is effectuating a conversion which moves the end-user's service from a BellSouth switch to a CLEC's switch.

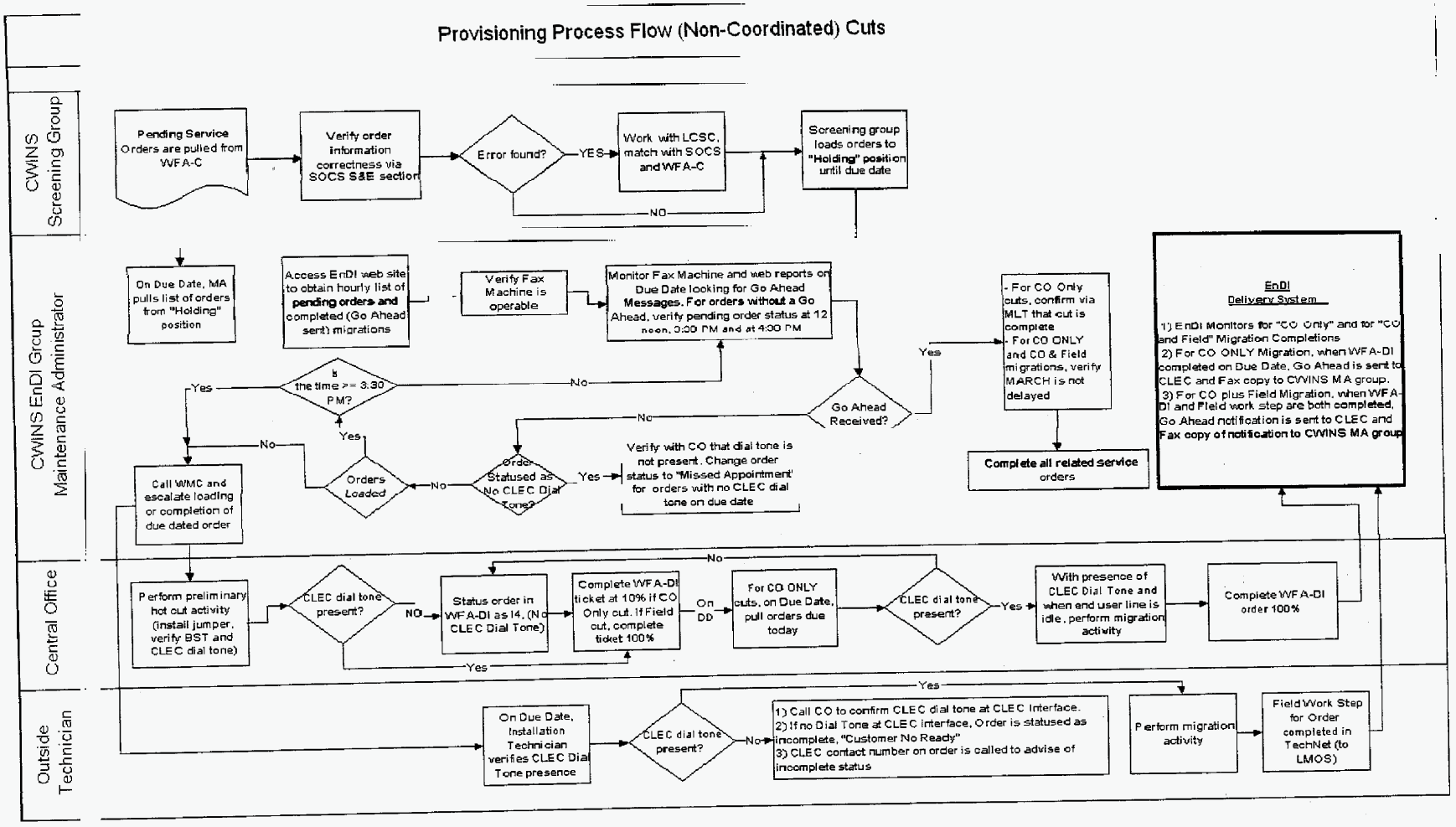
Q. WITH THE WORK CONTENT BEING THE SAME, SHOULD THIS COMMISSION FIND THAT THE RATE FOR A UNE-P TO UNE-L CONVERSION BE ANY DIFFERENT THAN THE APPROVED RATE FOR A RETAIL TO UNE-L CONVERSION?

A. No. As stated above, the Retail and UNE-P conversion to UNE-L activities are identical which supports identical process cost. For this reason, the Commission should not find the conversion rates for UNE-P any different than Retail conversion rates.

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes.


Provisioning Process Flow (Coordinated cuts)
CWINS Screening Group
Pending Service Orders are pulled from WFA-C
Verify order information correctness via SOCS S&E section
Error found?
YES
Work with LCSC, match with SOCS and WFA-C
NO
Screening group leader loads orders to CWINS provisioning tech
CWINS Provisioning Technician
Verify that order is delayed in MARCH system
On DD-1 or DD-2, does pre-DD call to CLEC, to verify DD, circuit ID, EU info. CLEC may check for LNP concurrence
Enter activity in CCSS database
On DD-1 or DD-2, check with WMC and on LMOS or WFA-DO that outside tech has been pre-assigned (pre'd)
Outside
Inside or Outside Cut?
Inside
On DD-1 or DD-2, hand-off through WFA-C (to WFA-DI) appointment ticket to CO
Call WMC and escalate
NO
Outside tech pre'd?
YES
Call CLEC on DD to notify of pending cut activity
Call CLEC to notify (could be no dial tone until DD--call CLEC to advise.)
On Due Date Inside or Outside Cut?
Inside
Note: For Time Specific cuts, cut will be performed at time specified.
Call CO on DD and ask if CO ready to perform cutover. CO may be ready at that time, or later that day. Stays on line during cutover.
When CO Ready to begin, record start time in CCSS
Access MARCH system, release old # translation from BST switch
Call CLEC to notify cut complete. CLEC may accept or wait
Record end time in CCSS
Outside
Central Office
Perform preliminary hot cut activity (install jumper, verify BST and CLEC dial tone)
CLEC dial tone?
NO
CWINS Notified Notes in WFA-DI log notes "no CLEC dial tone"
Perform cutover activity
Informs CWINS tech when cutover done
Outside Technician
Call CWINS from site
CWINS records start time in CCSS
Perform cutover activity
Informs CWINS tech when cutover done


Provisioning Process Flow (Non-Coordinated) Cuts
CWINS Screening Group
CWINS EnDI Group Maintenance Administrator
Central Office
Outside Technician
Pending Service Orders are pulled from WFA-C
Verify order information correctness via SOCS S&E section
Error found?
YES
NO
Work with LCSC, match with SOCS and WFA-C
Screening group loads orders to "Holding" position until due date
On Due Date, MA pulls list of orders from "Holding" position
Access EnDI web site to obtain hourly list of pending orders and completed (Go Ahead sent) migrations
Verify Fax Machine is operable
Monitor Fax Machine and web reports on Due Date looking for Go Ahead Messages. For orders without a Go Ahead, verify pending order status at 12 noon, 3:00 PM and at 4:00 PM
Is the time >= 3:30 PM?
Yes
No
Go Ahead Received?
Yes
No
- For CO Only cuts, confirm via MLT that cut is complete
- For CO ONLY and CO & Field migrations, verify MARCH is not delayed
Complete all related service orders
EnDI Delivery System
1) EnDI Monitors for "CO Only" and for "CO and Field" Migration Completions
2) For CO ONLY Migration, when WFA-DI completed on Due Date, Go Ahead is sent to CLEC and Fax copy to CWINS MA group.
3) For CO plus Field Migration, when WFA-DI and Field work step are both completed, Go Ahead notification is sent to CLEC and Fax copy of notification to CWINS MA group
Call WMC and escalate loading or completion of due dated order
Orders Loaded
No
Yes
Order Statused as No CLEC Dial Tone?
No
Yes
Verify with CO that dial tone is not present. Change order status to "Missed Appointment" for orders with no CLEC dial tone on due date
Perform preliminary hot cut activity (install jumper, verify BST and CLEC dial tone)
CLEC dial tone present?
NO
Yes
Status order in WFA-DI as I4, (No CLEC Dial Tone)
Complete WFA-DI ticket at 10% if CO Only cut. If Field cut, complete ticket 100%
On DD
For CO ONLY cuts, on Due Date, pull orders due today
CLEC dial tone present?
No
Yes
With presence of CLEC Dial Tone and when end user line is idle, perform migration activity
Complete WFA-DI order 100%
On Due Date, Installation Technician verifies CLEC Dial Tone presence
CLEC dial tone present?
No
Yes
1) Call CO to confirm CLEC dial tone at CLEC Interface.
2) If no Dial Tone at CLEC interface, Order is statused as incomplete, "Customer No Ready"
3) CLEC contact number on order is called to advise of incomplete status
Perform migration activity
Field Work Step for Order completed in TechNet (to LMOS)