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January 28, 2005

**BY OVERNIGHT DELIVERY**

Ms. Blanca Bayó, Director  
The Commission Clerk and Administrative Services  
Room 110, Easley Building  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, Florida 32399-0850

Re: Docket No. 000121A-TP – BellSouth Performance Measurements

Dear Ms. Bayó:

Enclosed for filing are an original and fifteen (15) copies of the CLEC Coalition's Response to Action Items from the January 13, 2005 SQM Six-Month Review conference call in the above-referenced docket.

Please acknowledge receipt of this letter by stamping the extra copy of this letter "filed" and returning the same to me. Thank you for your assistance with this filing.

Sincerely yours,

Tracy W. Hatch

TWH/scd  
Enclosure  
cc: Parties of Record

DOCUMENT NUMBER-DATE  
01077 JAN 31 08  
FPSC-COMMISSION CLERK

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a true and correct copy of the foregoing has been furnished by U.S. mail on this 28th day of January 2005 to:

(\*) Blanca S. Bayo  
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Tracy Hatch

CLEC RESPONSE TO ACTION ITEMS  
JANUARY 28, 2005

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

IN RE: )  
 )  
PERFORMANCE MEASUREMENTS ) DOCKET NO. 000121A-TP  
FOR TELECOMMUNICATIONS )  
INTERCONNECTION, UNBUNDLING ) JANUARY 28, 2005  
AND RESALE )  
\_\_\_\_\_ )

**CLEC COALITION'S RESPONSE TO ACTION ITEMS**

Competitive Local Exchange Carriers ("CLECs"), AT&T Communications of the Southern States, LLC; DIECA Communications Company d/b/a Covad Communications Company ("Covad"); ITC^DeltaCom Communications, Inc. ("ITC^DeltaCom/BTI"); MCImetro Access Transmission Services, LLC, MCI WorldCom Communications, Inc. and Nuvox Communications hereinafter collectively referred to as the "CLEC Coalition," hereby provides the following responses to the Florida Public Service Commission Staff's ("Staff's") request that answers be supplied for the following Action Items from the January 13, 2005 SQM Six-Month Review conference call:

CLEC RESPONSE TO ACTION ITEMS  
JANUARY 28, 2005

Issue 1: Parties to provide definition of a process change request and a software change request.

Response: BellSouth, through its CCP team, is hosting a call to collaboratively develop a definition. Prior to the call, a strawman definition will be provided by BellSouth for the purpose of beginning the discussion. The call will be scheduled in early February.

Also see CCP September 22, 2004 meeting minutes included as Attachment 1 for examples of each type of change request.

CLEC RESPONSE TO ACTION ITEMS  
JANUARY 28, 2005

Issue 2: CLECs to provide a copy of Bulk Migration Guidelines in order to determine for which products bulk migrations can occur.

Response--This action item resulted from a discussion of the exclusions to Rejection and FOC measures (O-8, O-9, and O-11). BellSouth had proposed that only UNE-P to UNE-L bulk migrations be exempted from the "project" exclusion. CLECs contended that BellSouth had agreed to include other types of conversions in bulk migrations, and that these should also be exempted from the "project" exclusion.

Attached are three BellSouth documents that address this issue:

Attachment 2-Testimony of BellSouth witness Ken Ainsworth, which states that BellSouth has agreed to include (in addition to UNE-P to UNE-L)

- CLEC to CLEC UNE-L to UNE-L migrations
- hot cuts to EELs, in addition to analog loops.

Attachment 3 – Minutes to August 5, 2004 CCP Meeting regarding Bulk Migrations. In this document BellSouth provides a matrix that describes migration types, and whether they will be available on an individual or bulk basis, or both. This document states that the following scenarios will be available for bulk migration (in addition to UNE-P to UNE-L:

- Resale to EEL
- Resale to Loop
- UNE-P to EEL
- UNE-L to EEL

Attachment 4-BellSouth's CLEC Information Package for bulk migrations from UNE-P/DS0 Wholesale Local Platform to UNE-Loop Migration

As existing BellSouth documentation provided to CLECs indicates that scenarios other than UNE-P to UNE-L are currently available, or will be available for bulk migration, CLECs believe that BellSouth's proposed wording is inappropriately restrictive, and recommend that the following language be used instead:

"with the exception of Project Ids for bulk migrations"

CLEC RESPONSE TO ACTION ITEMS  
JANUARY 28, 2005

Issue 3: CLECs to provide examples of loss of functionality outages as defined in the OSS Availability measure.

Example 1 – CLEC can query RSAG by telephone number, but not by street address.

Example 2 – CLEC can access customer service records for North Carolina, but not for Florida.

Example 3 – CLEC using TAG interface for ordering can issue orders for UNE-P services, but not for UNE-L services.

CLEC RESPONSE TO ACTION ITEMS  
JANUARY 28, 2005

Issue 4: CLECs to provide comments on Staff's proposed changes to performance measures titles.

Response: CLECs can support Staff's proposal. (The code for FOC timeliness needs to be corrected.)

CLECs also recommend that Special Access Measures be added to the table of contents.



CLEC RESPONSE TO ACTION ITEMS  
JANUARY 28, 2005

Issue 5: CLECs to recommend benchmark for UNE design loop for interval measures.

Response: BellSouth's Interval Guide states for UNE-Design and a quantity of 1-9 the interval is 4 business days, 10-14 is 6 business days, and 15+ is negotiated.

Therefore, the CLECs recommend the following:

1-9 Lines	4 business days
10-14 lines	6 business days
15+lines	Retail business dispatch

CLECs recommend a threshold of 97% within interval.

CLEC RESPONSE TO ACTION ITEMS  
JANUARY 28, 2005

Issue 6: CLECs to propose language for reposting policy to include ability for CLECs to raise data accuracy issues.

Response: Include the following as item 2 of the reposting policy and re-number the remainder of the items as 3 through 10. "CLECs may raise data accuracy issues which they believe to be candidates for reposting to BellSouth and the Commission. Upon review of the evidence provided by the CLEC, the Commission, in consultation with BellSouth and the CLEC, will decide whether to proceed further with implementation of the reposting policy. In the event that further analysis reveals that the thresholds described in items 3, 4 or 5 have been met for the performance data of the CLEC raising the issue, SQM data will be re-run and SEEM payments recalculated at both the CLEC, and CLEC aggregate level."

CLEC RESPONSE TO ACTION ITEMS  
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Issue 7: CLECs to provide recommendations regarding the parameters of the reposting policy. Response: In Attachment 1 of the CLEC Coalition's filing of October 25, 2004, (Reply to action items from 10/7/04 informal telephone call regarding BellSouth's SQM 6-month review), the CLEC Coalition objected to BellSouth's proposed reposting policy on the grounds that it "inappropriately limits conditions under which identification of data errors will lead to recalculation and reposting of SEEM results." The conditions for reposting are inadequate because: (1) they are based on statewide, as opposed to CLEC specific, results; (2) for parity comparisons, the statistical calculations use simple SQM comparisons, as opposed to SEEM's like-to-like comparisons and reaggregation using truncated z; and (3) out-of-parity determinations use a fixed critical value of -1.645, as opposed to SEEM's balancing critical value. Consequently, SEEM results could change substantially (by almost any definition) for one or more CLECs without triggering any reposting for a submeasure.

It is our understanding that BellSouth has proposed basing conditions on SQM calculations primarily because of the complexity of redoing the SEEM statistical calculations for parity submeasures. Consequently, Staff requested the CLEC Coalition to propose changes to the reposting policy that might address the CLECs' concerns without involving the SEEM parity calculations. This response proposes specific changes in the conditions that would trigger future repostings.

### **Benchmark Sub-Metrics**

For benchmark submeasures, the CLECs' concern is that while a data error may not trigger the overall conditions required for reposting, data for specific CLECs may produce large declines that result in changes from in parity to out of parity (or from out of parity to far out of parity).<sup>1</sup> However, better aligning the reposting policy more closely with SEEM results does not require dealing with cells or complex statistical calculations. Therefore, the CLECs simply propose, for benchmark measures, that the conditions for reposting be applied to individual CLECs.

2. SQM Performance sub-metric calculations that result in a shift ~~in the statewide aggregate performance~~ from an "in parity" condition to an "out of parity" condition in the statewide aggregate performance for a parity sub-metric or in the CLEC-specific performance for a benchmark sub-metric will be available for reposting.
3. SQM Performance sub-metric calculations with benchmarks where ~~statewide aggregate CLEC-specific~~ performance is in an "out of parity" condition will

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<sup>1</sup> In its October 25, 2004 filing, the CLEC Coalition wrote, "For example, consider a 95% benchmark metric for which CLEC A has 100 transactions and the other CLECs combined have 900 transactions. Assume that in the original posting, the reported success rate was 100% for CLEC A and 96% for the other CLECs combined—for an overall rate of 96.4%. Furthermore, assume that after the original posting, BellSouth discovers that the correct success rate for CLEC A was 90%. Because the corrected overall rate of 95.4% would still be above the benchmark, BellSouth would not repost SEEM results for CLEC A, even though its results would then fall well below the benchmark."

CLEC RESPONSE TO ACTION ITEMS  
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be available for reposting whenever there is a  $\geq 2\%$  decline in BellSouth's performance ~~at the sub-metric level.~~ for that specific CLEC.

**Parity Sub-Metrics**

For parity sub-metrics, mismatches between the likely impact of data errors and the BellSouth's proposed conditions for reposting may arise due to either the use of statewide data or the SQM statistical calculations. In order to reduce the likelihood that substantial changes in results will not meet the reposting conditions, the CLEC Coalition proposes loosening the parameters that constrain reposting. While these changes will not guarantee that all substantial changes are reposted, we expect that the changes will reduce the frequency of this problem without requiring undue data processing for BellSouth.

4. SQM Performance sub-metric calculations with retail analogues ~~that are in an "out of parity" condition for which~~ aggregate CLEC performance is inferior to that for BellSouth will be available for reposting whenever there is a degradation in performance as shown by an adverse change of  ~~$\leq -0.5$~~   $\geq 0.25$  in the z-score at the sub-metric level.

The phrase "CLEC performance is inferior to that for BellSouth" refers to a straight comparison of means or proportions, without any statistical test. In the last sentence of #4, " $\leq$ " is changed to " $\geq$ " to correct an apparent error.

**Recalculations that Reflect Improved Performance**

For consistency with the changes proposed above, CLECs propose the following changes to the policy for recalculations that reflected improved performance.

5. Any data recalculations that reflect an improvement in BellSouth's performance will be reposted at BellSouth's discretion. However, statewide CLEC-specific performance must improve by at least 2% for benchmark measures and the z-score must improve by at least ~~0.5~~ 0.25 for retail analogs at the sub-metric level to qualify for reposting.

CLEC RESPONSE TO ACTION ITEMS  
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Issue 8: CLECs to provide copies of change requests that requested improvements in flow-through.

Response: See CR 1739, included as Attachment 5, which was rejected by BellSouth.

CLEC RESPONSE TO ACTION ITEMS  
JANUARY 28, 2005

Issue 9: MCI to provide examples of non-completed call DUF files.

Response: Despite escalations with BellSouth, MCI receives thousands of call attempt records it does not need. Approximately 246,000 such calls BellSouth regionwide have been received within the last 90 days. MCI does not bill end user customers for calls that do not complete. (Some of the call attempts include operator service usage time that may also be on our carrier invoices in addition to the OSS-cost recovery charges for transmitting these unwanted records to MCI.) Emails are attached that explain the issue and addressing MCI's initial escalation of this matter with BellSouth after these records began erroring out of MCI's billing systems in April 2004 .

MCI does not need and certainly does not want to pay for these records, which it considers useless. So long as BellSouth keeps sending MCI thousands of such unwanted records, the records are part of the metric. MCI believes these records should be excluded from the metric. Unlike the part of the DUF that is useful in determining rates for customers and billing certain special charges, the uncompleted call records are made part of this metric and may be helping BellSouth meet its benchmark by increasing on time performance. **Even small fractions of difference can put something in the pass versus fail territory.** Because the metric is calculated using the sent time point that MCI does not record, MCI has no way of knowing whether there are differences in sending records on time for these versus completed calls.. While an operational decision of not sending MCI unwanted calls would make the issue moot, as long as this practice continues, MCI wants this measure to focus only on what CLECs need in a timely manner. According to our DUF subject matter experts, BellSouth is the only ILEC sending forward records for these uncompleted calls.

Also the email messages attached state that BellSouth charges its end users for call attempts. MCI respectfully requests that BellSouth review the accuracy of that response. The question asks about the DUF rather than the ADUF. MCI would accept limiting the proposed exclusion to the DUF. If, however, BellSouth's response is correct, this means that Florida end users are billed for uncompleted calls. The call attempt records populate the terminating number with the originating number so MCI does not even know what type of end user call this would be even if MCI did bill for such call attempts. **As mentioned in discussion of a previous metric on usage accuracy, BellSouth is the only large ILEC that has no process (known as out-collect) for CLECs to electronically return records they believe are not accurate or should not have been sent to them.** Clearly this is useless information that should not be part of a metric where the focus is on the timeliness of useful information.

See Attachment 6 for escalations of the issue and the two spreadsheets for examples of the call attempt records at issue.

Attachment 1

9/22/04 CCP Meeting Minutes

SEPTEMBER 22, 2004

## Change Management (CCP) – Change Review- Prioritization Meeting MEETING MINUTES

<small>MEETING NAME</small>	<small>MINUTES PREPARED BY:</small>	<small>DATE PREPARED</small>
Change Review/Monthly Status Meeting	Steve Hancock– Change Management Team	09/22/04

### BST Participants

<small>PARTICIPANT</small>	<small>COMPANY</small>
Steve Hancock	BST – CCP
Rick LaGrange	BST – CCP
Gary Jones	BST – Flow Through Manager
Janet Miller Fields	BST – Customer Care
Joyce Ratliff	BST-CSM
Chuck Houston	BST-CSM
Pam Moore	BST – CSM
John Bosworth	BST - IT
Kathy Ray	BST – Customer Care
Jeremiah Studdard	BST – Flow Through Team
Sherry Porter	BST – LCSC Documentation

<small>PARTICIPANT</small>	<small>COMPANY</small>
Brenda Files	BST - CCP
Cherie Bolden	BST - CCP
Doyle Mote	BST – LCSC Documentation
Kathy Rainwater	BST- Release Mgt
Pattie Knight	BST – CSM
Michael Wilson	BST – Flow Through Team
Kevin McCall	BST - Requirements
Byron Franklin	EC Support
Brian Bradley	BST – E-Commerce Account Team
John Griffin	BST – Project Mgt.
Chris Smitherman	BST – Flow Through Team

### CLEC/Other Participants

<small>PARTICIPANT</small>	<small>COMPANY</small>
Tyra Hush	MCI
Sherry Lichtenberg	MCI
Joanne Baxter	Network Telephone
Jordana Jureidini	AT&T
Peggy Rubino	ZTel
Bob Buerrosse	XO
Mary Conquest	ITC DeltaCom
Colette Davis	Covad
Mya Mistry	AMS
Kevin Phillips	Advance Tel

<small>PARTICIPANT</small>	<small>COMPANY</small>
Nicole Kisling	Birch Telecom
John Fury	New South/Nuvox
Rick Williams	Access Integrated
Jason Lee	MCI
Fran Thomas	Talk America
Carol Frike	Sprint
Emmy Brown	Time Warner
John Bossier	Covad
Benni Almas	Neustar
Janice Johnson	Launch Now



**SEPTEMBER 22, 2004**  
**Change Management (CCP) – Change Review-  
Prioritization Meeting**  
**MEETING MINUTES**

Dale Donaldson	Epb	Ron Curry	STS Telecom
Andy Mozingo	MegaGate Broadband	Altro Tate	MegaGate Broadband
Peggy McKay	Momentum	Rosa Aros	STS Telecom
Nancy Thompson	Visor	Jeannie Santrock	Sparks Comm.
Elizabeth Ramos	Sparks Comm.		

**Meeting Information History**

DATE

09/22/04

START TIME

9:30 - AM EDT

END TIME

4:30 PM EDT

<b>OPENING</b>
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Steve Hancock (BCCM) welcomed all participants to the CCP CLEC Change Review Meeting.

Brenda Files (CCP) facilitated the meeting. Brenda reviewed the agenda items to be discussed:

- Welcome/Introductions/Review Agenda
- Prioritization Preparation
  - Capacity
  - Review the list of Change Requests to be prioritized/Originators present new Accepted/Held (AH) CRs
  - Review Voting Rules/Identify which CLECs will be voting
- Review Outstanding Action Items
- Flow Through Status
- Documentation Working Group Update
- Release Management & Implementation Status
- Report of Infrastructure Changes
- Prioritization Output
- Technical Issues - No Technical Issues were submitted
- Review Change Request Log
- Report of Type 1 System Outages
- Summary of Regulatory Change Requests
- Open Discussion
- Review New Action Items
- Upcoming Meetings

SEPTEMBER 22, 2004

**Change Management (CCP) – Change Review-  
Prioritization Meeting  
MEETING MINUTES**

**PRIORITIZATION PREPARATION**

**CAPACITY** – Kathy Rainwater (BST) reviewed the Rolling Release Schedule. She stated that for Release 17.0 & 18.0, the scope is adding the following in 17.0: (1) Type 5 – CR1452, (7) Type 6’s – CR1966, 1962, 1995, 1987, 2013, 1990 & 2034. In 18.0, the scope is adding the following: (1) Type 2 – CR2026, (3) Type 5’s – CR1569, 0958 & 1853, (2) Type 6’s – CR1841 & 2006. Kathy added that the 19.0 column will not change until the Release meeting occurs in October.

Jordana Jureidini (AT&T) asked what is the mandate associated with CR2026. Kathy responded that this request is a mandate that is already implemented in two other states. Tyra Hush (MCI) asked if this request is only dealing with GA, or is it like the mandate in KY & IA. Sherry Lichtenberg (MCI) added that this mandate should be mirroring the IA order.

**ACTION ITEM:** BellSouth to investigate if CR2026 will be implemented in GA exactly as it was implemented in IA.  
**Status:** BellSouth responded that CR2026 will be implemented in GA exactly as it was in IA.

Tyra Hush (MCI) suggested that BellSouth should change CR2026 to reflect GA only on the Rolling Release Schedule. Kathy Rainwater agreed.

Kathy reported that there were currently no changes to the Appendix IA document. Kathy added that in the Detail Capacity Report for Release 15.1, the actuals were added. In the Release 16.0 report, the final scope and actuals will be reported in a subsequent report. The 17.0 & 18.0 report reflects the changes that have already been reported. Kathy added that the final estimates for 17.0 have been computed, however were not available in time to post in the meeting package. A revised Detailed Capacity report will be distributed with the minutes.

Kathy Rainwater also presented CR2049 which BST has created as a process change dealing with the Appendix IA “Notes”. In Note A – the language is being changed because Type 2 change requests are no longer being created for Flow Through changes. Furthermore, BellSouth is recommending the removal of Note D from the process document because BST sums all the categories. BellSouth stated that they would proceed with balloting this process change if there were no objections. None were expressed by the CLECs.

Jordana Jureidini (AT&T) asked if the current two (2) CR’s that are related to the Line Loss are still targeted for Release 19.0. Kathy responded that they are.

**REVIEW OF LIST OF CR’S TO BE PRIORITIZED**

Brenda Files (BST) reviewed the agenda to explain the steps associated with prioritization.

**REVIEW OF ELIGIBLE REQUESTS**

CR1896 & CR1907 – Gary Jones (BST) presented. Gary explained it was determined that these requests should be Type 4 requests and have been altered to reflect the path that the CLEC community decided to use regarding the single LSR in the Bulk Migration arrangement. Gary added that CR1896 and CR1907 were both prioritized in the June prioritization meeting, however due to the requirements being changed; need to be re-prioritized in today’s meeting.

Jordana Jureidini (AT&T) asked if it is BST’s intent to implement these CR’s together or separate. Gary stated that based on the change or requirements, BST intends to implement these according to their prioritization outcome. Gary later in the meeting clarified that CR1907 will need to be implemented either before or at the same time as CR1896; therefore BST’s plans will be to implement these two CR’s at the same time.

SEPTEMBER 22, 2004

**Change Management (CCP) – Change Review-  
Prioritization Meeting  
MEETING MINUTES**

CR1980 (Supra) - Brenda Files (BST) presented. Brenda added that the preliminary sizing is "Medium". Tyra Hush (MCI) asked if this request was for a physical address or the CLLI code address. Gary Jones (BST) clarified that it is the CLLI address attached to the CLLI code.  
and this will be going away with the implementation of these requests.

CR2021 (Birch) - Nicole Kisling presented. Cherie Bolden (BST) added that BellSouth had accepted this request with the following caveat: *BellSouth will add RUF and circuit information to HELD/HN status orders as soon as they receive the information from CWINS and when circuit information is available.* Jordana Jureidini (AT&T) asked when CWINS provides this information.

**ACTION ITEM:** BellSouth to investigate when CWINS will provide the RUF and Circuit information to HELD/HN status associated with CR2021.

Mary Conquest (ITC/Deltacom/BTI) stated that she was not sure that it is appropriate to prioritize this item since it is impacting CSOTS only. Kathy explained that even though no capacity is being used from the Encore capacity totals for this request, it is still appropriate, according to the process, to move forward with prioritizing it.

↙ CR1885 (Network Telephone) - Cherie Bolden presented.  
Cherie Bolden (BST) explained that this CR was originally submitted in May and was pulled from the June Prioritization. She added that BellSouth committed in June to enhance the manual process. Meetings were held in July and August and again on September 15. No issues were received from the CLECs during this trial. At the September meeting, it was recommended that we move from the trial process. As of today, Cherie stated that this will be managed as a process documentation change.

Fran Thomas (Talk America) asked where this manual process will be listed in the LOH. Sherry Porter (BST) responded that it would be placed in the General Section in Section 3 under "Ordering" with the other current T&F information. Fran asked when this would be implemented into the LOH. Sherry stated that it would appear in the next Release publication, which is 18.0, on 11/19/04. Jordana asked if it would also be included in both the 17.0 & 18.0 documents. Sherry responded that it would.

Mary Conquest (ITC/Deltacom/BTI) stated that it was her understanding that during a calendar year, there are 3000 total capacity units available. She added that in her calculations, there are several units still not assigned. Mary asked if there are any available units that can be slotted for 2004.

**ACTION ITEM:** BellSouth to investigate if there are any available units that can be used to slot additional CR's for 2004.

The CLECs requested to have a "side bar" meeting to discuss the requests being prioritized. During this time, the CLECs provided their prioritization vote.

**REVIEW OF OUTSTANDING ACTION ITEMS**

AI-348 - CLOSED on 08/04/04.

AI-350 - CLOSED on 08/05/04. Bulk Migration conference call held with CLECs. All three CR's will remain Type 4's and 5's.

AI-358 - CLOSED on 08/09/04.

AI-359 - CLOSED on 09/09/04.



**CHANGE REVIEW PRIORITIZATION  
FINAL VOTING TALLY  
09/22/04**

**CATEGORY: PRE-ORDERING/ORDERING**

CHANGE REQUEST	TITLE	ORIGINATOR	CLEC INTERFACE(S) IMPACTED <sup>1</sup>	BST SYSTEM(S) IMPACTED <sup>2</sup>	PRELIMINARY FEATURE SIZING <sup>2</sup>	RANKING <sup>3</sup>
CR1896	CLEC to CLEC Conversions for REQTYP A via Bulk Order Package	Bellsouth	LENS, TAG, EDI	N/A	Large	2
CR1907	Electronic Ordering of CLEC to CLEC Conversions for REQTYP A	Bellsouth	LENS, TAG, EDI	N/A	Large	1
CR1980	LENS-Return Central Office Address and Central Office Switch Type in addition to the current address validation information when validating address by TN or Address.	Supra	LENS	N/A	Medium	3
CR2021	Birch Telecom is requesting the circuit ID information and re-use of facilities FID (RUF) appear on service orders that are in "Held/HN" status for LNP to UNEP/Resale orders.	Birch	CSOTS	N/A	N/A	4

**CATEGORY: MANUAL/DOCUMENTATION**

CHANGE REQUEST	TITLE	ORIGINATOR	CLEC INTERFACE(S) IMPACTED <sup>1</sup>	BST SYSTEM(S) IMPACTED <sup>2</sup>	PRELIMINARY FEATURE SIZING <sup>2</sup>	RANKING <sup>3</sup>
CR1885	Protecting F orders on Transfers	Network Telephone	N/A	N/A	N/A	1

NOTE 1: As shown on Change Request Form.

NOTE 2: As shown on Appendix H.

NOTE 3: FORCED RANKING FROM 1 - "N" WITH "1" BEING THE HIGHEST RANKED.

Attachment 2  
BellSouth Testimony

1 BELL SOUTH TELECOMMUNICATIONS, INC.  
2 REBUTTAL TESTIMONY OF KENNETH L. AINSWORTH  
3 BEFORE THE NORTH CAROLINA UTILITIES COMMISSION  
4 DOCKET NO. P-100, SUB 133q  
5 FEBRUARY 16, 2004  
6

7 Q. PLEASE STATE YOUR NAME, YOUR BUSINESS ADDRESS, AND YOUR  
8 POSITION WITH BELL SOUTH TELECOMMUNICATIONS, INC.  
9 ("BELL SOUTH").

10  
11 A. My name is Ken L. Ainsworth. My business address is 675 West Peachtree  
12 Street, Atlanta, Georgia 30375. My title is Director – Interconnection Operations  
13 for BellSouth.

14  
15 Q. ARE YOU THE SAME KEN L. AINSWORTH WHO EARLIER FILED DIRECT  
16 TESTIMONY IN THIS DOCKET?

17  
18 A. Yes.

19  
20 Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY BEING FILED  
21 TODAY?

22  
23 A. I respond to portions of the direct testimonies of Mr. James D. Webber and Ms.  
24 Sherry Lichtenberg on behalf of MCI, and Mr. Mark David Van de Water on  
25 behalf of AT&T with regard to BellSouth's hot cut processes.

1 (LICHTENBERG TESTIMONY AT PAGE 28). IS THIS NECESSARY?

2

3 A. While under ordinary circumstances BellSouth fully supports collaborative  
4 improvements to its processes (See Line Sharing Collaborative), BellSouth  
5 cannot support the CLPs' requests for collaboration in this instance. First, the  
6 CLPs' requests for collaboration only have occurred after the commencement of  
7 the state impairment cases. Further, and most importantly, the CLPs have  
8 admitted that no matter how many improvements BellSouth makes to its manual  
9 process, the CLPs will continue to argue they are impaired without an eight (8)  
10 billion dollar retrofit of BellSouth's network to allow for automated hot cuts.  
11 Finally, the CLPs' arguments are disingenuous in that despite the fact that the  
12 Florida collaborative on CLEC-to-CLEC migrations and BellSouth's Line Sharing  
13 Collaborative addressing migrations with line splitting are on-going; the CLPs  
14 have chosen to raise the issues in those collaboratives in this hearing. These  
15 facts seem to evidence that the CLECs themselves will not rely on collaboratives.  
16 Given the CLPs' positions, it does not make sense for BellSouth to devote time  
17 and resources to a doomed process.

18

19 However, BellSouth has always stated that it was willing to consider specific  
20 process changes proposed by the CLPs. While the CLPs have chosen to make  
21 these suggestions via this docket, as opposed to through operational channels,  
22 BellSouth has listened. In an effort to be responsive, BellSouth has agreed to  
23 make the following enhancements (which address virtually all of the CLPs'  
24 concerns) to its effective and seamless batch hot cut process:

- 1 • Batch process will be applicable to CLP-to-CLP migrations (UNE-P to
- 2 UNE-L);
- 3 → • Batch process will be applicable to CLP-to-CLP migrations (UNE-L to
- 4 UNE-L) at such time as necessary systems changes can be made;
- 5 • Batch process will guarantee that an end user's account will all be cut on
- 6 the same day;
- 7 • Batch process will include after-hours and Saturday cuts;
- 8 • Batch process will guarantee a four-hour time window for coordinated hot
- 9 cuts;
- 10 • Batch process will include a timely restoral process if there is a problem
- 11 with the cut;
- 12 • BellSouth will implement a web-based communication system for non-
- 13 coordinated hot cuts similar to that implemented by Verizon and SBC;
- 14 • BellSouth will reduce the 14-day provisioning interval in the batch process
- 15 to 8 days;
- 16 • BellSouth will implement a scheduling tool similar to SBC's;
- 17 → • Batch process will include hot cuts to DS0 EELs.

18

19 These enhancements to BellSouth's already-compliant Batch Hot Cut Process

20 should address virtually all of the CLP's alleged criticisms of the process.

21

22 **G. UNE-L Performance**

23

24 Q. IS MS. LICHTENBERG'S CHARACTERIZATION, ON PAGES 35-36 OF HER

25 TESTIMONY, OF INCREASED OUT OF SERVICE TIMES AND CUSTOMER



Attachment 3

8/5/04 CCP Meeting Minutes



AUGUST 5, 2004

# Change Management (CCP) – Bulk Migration Meeting MEETING MINUTES

MEETING NAME: <b>Bulk Migration Meeting</b>	MINUTES PREPARED BY: Steve Hancock– Change Management Team	DATE PREPARED: 08/06/04
--	--	----------------------------

### BST Participants

PARTICIPANT	COMPANY
Steve Hancock	BST – CCP
Rick LaGrange	BST – CCP
Janet Miller Fields	BST – Director – Customer CARE
Brenda Smith-Owens	BST – Process Systems Development
Glen Miller	BST – Process Systems Development
Kathy Rainwater	BST – Release Mgt

PARTICIPANT	COMPANY
Brenda Files	BST - CCP
Gary Jones	BST – Flow Through Mgr
Rodney Strawter	BST – LCSC Staff
Eddie Owens	BST – Process Systems Development
Kevin McCall	BST – Requirements

### CLEC/Other Participants

PARTICIPANT	COMPANY
Amy Shirley	MCI
Nicole Kisling	Birch Telecom
Bennie Almas	NeuStar
Jordana Jureidini	AT&T
Mel Wagner	Birch Telecom
Butch Broussard	FL PSC
Mercedes Oteiza	IDS

PARTICIPANT	COMPANY
Colette Davis	Covad
Deb Hayward	MCI
Mark Vandewater	AT&T
Sharon Norris	AT&T
Kevin Phillips	Advanced Tel
Janice Johnson	Launch Now/Accenture
Jermaine Johnson	IDS

### Meeting Information History

DATE	START TIME	END TIME
08/05/04	12:30 - AM EDT	1:30 PM EDT

AUGUST 5, 2004

## **Change Management (CCP) – Bulk Migration Meeting MEETING MINUTES**

### **OPENING**

Steve Hancock (BCCM) welcomed all participants to the CCP/CLEC Bulk Migration Meeting. Rick Lagrange (BST) explained the purpose of the meeting was to continue to collaborate jointly the direction of Bulk Migration in the BST region. Rick explained that the agenda for the meeting would include three basic items:

- Updating the CLEC community on the status of AI-350 from the June 23 Prioritization Meeting
- Latest status regarding the Bulk Migration enhancements
- CR1737 Discussion

Rick stated that during the June 23 Prioritization meeting, there was a request to change three (3) change requests from Types 4 & 5 to Type 2 Regulatory due to the Triennial Review Order (TRO) and Gary Jones (BST) will provide an update on that issue. Rick also stated that the second item of the agenda would include discussion from Brenda Smith-Owens (BST), Rodney Strawter (BST), Glen Miller (BST) and Kevin McCall (BST). This team met with the CLEC community during the March 24, 2004 Prioritization meeting. That meeting led to two additional collaborative meetings on April 6 and 12 where Bulk Migration was the major topic of discussion. During those meetings, BST made a commitment to keep the CLEC community stasued on the Bulk Migration enhancements. Finally, Rick stated that discussion would be held regarding the details of CR1737, which was recently accepted by BellSouth and pertains to the Single LSR. Rick stated that BST would like the CLECs' input and feedback on this process to ensure that everyone understands the direction being taken.

### **STATUS OF ACTION ITEM #350**

Gary Jones (BST) stated that during the March Prioritization meeting, the CLECs asked that BellSouth change the Type on three (3) CR's: CR1737, CR1896 & CR1907 from Types 4-5 to Type 2. Gary stated that BellSouth has reviewed these requests along with the content and BellSouth sees no Regulatory Request or Mandate associated with these three requests. BellSouth has implemented a Bulk Migration Process that meets the TRO requirements. BellSouth feels that the three CR's in question are above and beyond what the TRO required. Therefore, BellSouth cannot support changing these to a Type 2 request. These requests will remain as they were as Types 4 and 5.

There were no questions from the CLEC community.

### **STATUS OF BULK MIGRATION ENHANCEMENTS**

Brenda Smith-Owens (BST) stated that in the previous Bulk Migration meetings, BST and the CLECs have worked collectively together to keep everyone up-to-date on the Bulk Migration enhancements. She stated that BST has provided both long-term deliverables and short-term deliverables. Brenda pointed out that BST wants to keep the CLECs up-to-date on where we are and make sure that BST is on the right track going forward on the scheduling tool.

On July 26, 2004, a Carrier Notification Letter was posted which updated the Bulk Migration package. In this update, there were two (2) major things that occurred: the notification tool was placed on-line and the interval was reduced.

Brenda explained that the notification tool was made available on July 26, however it is not just for Bulk Migration, but also for individual SL1 non-coordinated cuts as well. Brenda pointed out that this is another way for the CLECs to see the same things that BST sees in a "real time" mode. In addition, Brenda stated that the overall interval was reduced from 21 days to 15 days. As of July 26, BellSouth is operating at the 15-day interval. Going forward, when the scheduling tool is rolled-out for the Bulk Migration scheduling in October 2004, BST will reduce this interval once again to an 8-day interval. The testing phase will begin sometime in the September timeframe. Brenda stated that BST would also like to offer this testing to the



AUGUST 5, 2004

## Change Management (CCP) – Bulk Migration Meeting MEETING MINUTES

CLECs for their assistance prior to the rollout in October.

Amy Shirley (MCI) asked if there were instructions included in the Carrier Notification Letter that was posted on July 26, on how to use this tool. Brenda responded that the website URL is provided which includes a tutorial on the Notification Tool. Amy also asked what date in October the scheduling tool will this officially be made available? Brenda responded that no specific date has been confirmed at this time.

Sharon Norris (AT&T) asked how will access to the scheduling tool work. Brenda responded that it would be accessed through PMAP. She added that once the scheduling tool is implemented, it would give the CLECs a 120-day lookout. Brenda also stated that BST would make anyone on her team available to assist the CSMs and CLECs once this is rolled out. Sharon asked when would the three (3) CR's be scheduled. Rodney Strawter (BST) stated that CR1737 is currently scheduled for Release 19.0 (July 2005). Gary Jones (BST) responded that the remaining two requests (CR1896 & CR1907), recently prioritized in June, would be scheduled according to the 60-week interval.

Amy Shirley (MCI) asked what CR1896 is concerning. Brenda responded that this CR concerns UNE to UNE loop.

### REVIEW OF CHANGE REQUEST CR1737

Brenda Smith-Owens (BST) stated that another issue that BST would like to discuss concerns CR1737 - Single LSR. The Bulk Migration process was originally developed because of a request from the CLECs. Brenda stated that as the CLECs moved forward, the emphasis changed and now the CLECs are requesting that Bulk be available in a single individual bulk LSR arrangement. Brenda added that once the orders are submitted in the single LSR Bulk environment, the system breaks these down into separate individual LSR's today. The main point that BST wants to emphasize today is that we ensure that we are not going to be moving down resource exhausting parallel paths. Brenda explained that the CLECs and BST need to be in agreement that everything, going forward, will be ordered on a single individual LSR on the Bulk rules. The single LSR Bulk Migration process, as it is today, will not continue to be enhanced; rather everything from this point on will be centered on the single individual LSR Bulk arrangement.

Sharon Norris (AT&T) stated that what BellSouth is proposing is what AT&T would prefer.

Jordana Jureidini (AT&T) asked if CLECs will be able to use the BOPI fields. Brenda responded yes; the only difference will be rather than submitting a single bulk LSR representing multiple accounts - now a single individual LSR will have a BOPI. Sharon Norris (AT&T) asked what kind of window of time will these be available for input of all individual LSRs without encountering a problem. Brenda stated that the CLECs would want to build in a "cushion" when submitting the LSRs. Sharon Norris asked if she submits 50 LSR's with a BOPI and 5 of them reject, will BST work the other 45. Rodney Strawter (BST) responded that yes; if the rejects occur in the first level of editing, BST will send back the individual ones, allowing the CLEC the ability to resubmit the ones in error. If the order passes the first level of editing and fails in the second tier of edits, it would still not impact the bulk package. In other words, BST will continue to process the "clean" LSR's. If the 5 LSR's that failed did not get resubmitted within the 8-day window, these LSR's would not be processed.

**ACTION ITEM:** BellSouth to investigate if there will be a "greater than one-hour window" for single LSR submission on bulk migration ordering and what will be the maximum timeframe allowed.

**Status:** Further investigation underway. Tentatively working with requirements to extend up to a 4-hour window.

Sharon Norris (AT&T) asked if BST is including migration from Resale to EELs in bulk. Brenda responded that yes; this is manually available as of July 26 as well as UNE-P to EELs. Brenda also stated that the mechanized part of this would not occur prior to Release 19.0. Amy Miller (MCI) asked if the recent Carrier Notification Letter outline the process for EELs as well as the pricing. Rodney Strawter responded that it did.

Jordana Jureidini (AT&T) responded that this proposal is the preferred route for AT&T, however she would like to socialize this information with her systems people.



AUGUST 5, 2004

## Change Management (CCP) – Bulk Migration Meeting MEETING MINUTES

**ACTION ITEM:** BellSouth to provide details in the minutes of what is currently manual and what will be available in the electronic environment.

**Status:** The following matrix is provided:

MIGRATE			
From:	To:	INDIVIDUAL	BULK
<b>Retail</b>	<b>EELS</b>	Y – Manual 7/26/04, Mech. Target 19.0	N
<b>Retail</b>	<b>UNE-Loop</b>	Y – Manual & Mech.	N
<b>Resale</b> Same CLEC Diff. CLEC	<b>UNE-Loop</b>	Y - Manual & Mech.	Mech. Target 19.0
<b>Resale</b> Same CLEC Diff. CLEC	<b>EEL</b>	Y – Manual 7/26/04, Mech. Target 19.0	Y – Manual 7/26/04, Mech. Target 19.0
<b>UNE-P</b> Same CLEC Diff. CLEC	<b>UNE-Loop</b>	Y – Mech.	Y – Mech.
<b>UNE-P</b> Same CLEC Diff. CLEC	<b>EEL</b>	Y – Manual 7/26/04, Mech. Target 19.0	Y – Manual 7/26/04, Mech. Target 19.0
<b>UNE-Loop</b> Diff. CLEC	<b>UNE-Loop</b>	Y – Manual, Mech. Currently not Targeted	Mech.—Currently not Targeted
<b>UNE-Loop</b> Same CLEC Different CLEC	<b>EEL</b>	Y-Manual 7/26/04	Y – Manual, Mech. –Currently not Targeted

**CLEC ACTION ITEM:** CLECs to socialize, within their respective companies, what direction they would prefer BST to proceed - either in the current bulk process or the single LSR submission by August 27, 2004.

Jordana Jureidini (AT&T) asked what kinds of test cases would be available regarding the scheduler. Brenda responded that we would support either CLEC or BST test cases. CLECs that are interested in participating in the scheduling tool test are asked to contact the CCP Team. The CCP Team will pass that information on to Brenda Smith-Owens (BST).

Meeting adjourned.

Attachment 4

CLEC Information Package  
UNE-P to UNE-L Bulk Migration

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**UNE-P to UNE-L Bulk Migration**

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***Unbundled Network Element Platform (UNE-P)/DSO Wholesale  
Local Platform Service to UNE-Loop (UNE-L)  
Bulk Migration***

***CLEC  
Information Package***

**Version 4  
October 15, 2004**

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## UNE-P to UNE-L Bulk Migration

### 1. Introduction & Scope

This Product Information Package is intended to provide CLECs general ordering information specific to the *UNE-P/DSO Wholesale Local Platform Service to UNE-L Bulk Migration* process described herein. Any UNE-P references, USOC definitions and procedures describe in this document and in other guides on the BellSouth Interconnection Web Site will also apply to the equivalent DSO Wholesale Local Platform Services. The DSO Wholesale Local Platform Service was formerly known as DSO Wholesale Local **Voice** Platform Service. This Information Package applies to both services.

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

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

### 2. Contract Requirements

The CLEC must have an Interconnection Agreement (IA) that includes terms and conditions for Bulk Migration. The IA must also include the terms, conditions and rates for each loop type to which the UNE-P service is migrated. The IA must be in effect for all states where the CLEC plans to order these unbundled loops.

The information contained herein applies to Bulk Migration and is part of the standard IA. The general offering is in accordance with BellSouth policies, procedures and regulatory obligations as well as the IA. The general offering does not address specific contract issues within a CLEC's IA that may be different from the general offering. Where specific contract language differs from the information provided here, the contract provisions will prevail for the term of the specific CLEC IA. Otherwise, the general offering provisions will apply.

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## UNE-P to UNE-L Bulk Migration

### 3. Revisions

#### 3.1 Version 4 Revisions

- 1) **Section 4, Service Description** – modified to remove references to BellSouth Customer Care Project Manager providing due dates to the CLEC.
- 2) **Section 5, Requirements** – modified to remove references to the Project Notification form and to add references for the Bulk Migration Scheduling Tool.
- 3) **Section 6.2, After Hours/Weekend Migrations** – modified to include the Special Handling option in the Scheduling Tool for requesting after hours or weekend migrations; removed references to Project Notification form.
- 4) **Section 6.4, Time Windows for Coordinated Conversions** – modified to include Special Handling option in the Scheduling Tool for requesting time windows; removed references to Project Notification form.
- 5) **Section 6.5.1, Coordinated or Non-Coordinated 'Completed' UNE-L order** (Restoral Process section) – updated to remove Atlanta Fax server number.
- 6) **Section 6.6, Same-Day End-User Account Migrations** – modified to include Special Handling option in the Scheduling Tool for requesting same-day end-user migrations; removed references to Project Notification form.
- 7) **Section 6.7, CLEC to CLEC Migration of UNE-P to UNE-L** – modified to remove Project Notification form requirement for obtaining BOPI; included Scheduling Tool requirement for BOPI.
- 8) **Section 7, Bulk Migration Submission/Flow Process** – revised to remove Project Notification form requirement; added Scheduling Tool requirement.
- 9) Old **Section 8, BellSouth UNE-P to UNE-L Bulk Migration Project Notification Process** section deleted.
- 10) New **Section 8, Bulk Migration Scheduling Tool** – added new section that describes the Scheduling Tool.
- 11) **Section 11.1 & 11.2, Intervals** – deleted and replaced with **Section 11, Bulk Request Service Order Intervals** which references eight (8) business days as the interval.

#### 3.2 Version 3 Revisions

- 1) Modified **section 1 Introduction and Scope** to include the DSO Wholesale Local Platform Service reference.
- 2) Added **section 2 Contract Requirements** section.
- 3) Updated **sub-section 6.3 Two hour Go Ahead Notification** to include the Notification Tool reference.
- 4) Added new **sub-section 6.3.2 Web Based Notification Tool**.
- 5) Updated **section 11 Intervals** to reflect the reduction in the provisioning interval from 14 business days to 8 business days.

---

## UNE-P to UNE-L Bulk Migration

### 3.3 Version 2 Revisions

1) Following are the revisions in section 5 "Bulk Migration Options" that are enhancements to the Bulk Migration process as referenced in Carrier Notification Letter SN91083967.

- After Hours/Weekend Migrations
- Two-Hour Go Ahead Notifications for SL1 non-coordinated migrations
- Time Windows for coordinated conversions
- Pre and Post order completion restoral process (Throwback)
- Same-Day end-user account migration
- CLEC to CLEC migration (UNE-P to UNE-L)

2) Additional revisions include interval reductions in the table in section 10.1 "**Bulk Migration Project Notification Interval**".

- For a "Maximum of 99" telephone numbers the CCPM interval has been reduced from 7 business days to 4 business days.
- For "100-200" telephone numbers, the CCPM interval has been reduced from 10 business days to 6 business days.

---

## UNE-P to UNE-L Bulk Migration

### 4. Service Description

The Unbundled Network Element – Port/Loop Combination (UNE-P) to Unbundled Network Element – Loop (UNE-L) Bulk Migration process may be used by a CLEC when migrating existing multiple non-complex UNE-P Services to a UNE-L offering. This allows migration of multiple UNE-P end-users to a UNE-L offering without submitting individual Local Service Requests (LSRs). All Bulk Migration orders will be project managed by a BellSouth Project Manager.

UNE-P and UNE-L are defined below:

#### 4.1 UNE-P

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

#### 4.2 UNE-L

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

### 5. Bulk Migration Requirements

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

- Bulk Migration is available for migrating existing **non-complex** Port/Loop Combination services to Unbundled Loops with Local Number Portability (LNP).
- A UNE Loop will be provided for each ported telephone number formerly associated with the UNE-P Service.
- Complex UNE-P accounts are prohibited on Bulk Requests. Examples of Complex UNE-Ps are 2 Wire ISDN/BRI Digital Loop & Port UNE Combination, 4 Wire ISDN/PRI Digital Loop & Port UNE Combination, UNE-P Centrex, Digital Direct Integration Termination Service (DDITS), etc.
- The UNE-Ps that can be migrated are listed in the **UNE-P USOC** section.
- UNE-Ps can be migrated to the UNE-Ls listed in the **UNE-L USOC** section.
- Bulk Requests that require a change in existing loop facilities to a type of facility that is not available, resulting in a Pending Facility (PF) status on Due Date –4 days, must be cancelled by the CLEC and removed from the Bulk Request.
- All Existing Account Telephone Numbers (EATNs) on the Bulk Request must use the existing Regional Street Address Guide (RSAG) valid end-user address.
- All EATNs must be served from the same BellSouth Serving Wire Center (SWC).
- All UNE-Ps on a Bulk Request must be migrated to a single UNE-L type.

---

## UNE-P to UNE-L Bulk Migration

### Requirements (continued)

- No end-user moves or changes of address will be allowed on the Bulk Request.
- Non-Recurring rates for the specific loop type being requested will be charged.
- Service order charges for mechanized orders (SOMEK) will be charged based on the current rules for individual Local Service Requests (LSRs) created per EATN of a Bulk Request.
- CLEC must obtain a Bulk Order Package Identifier (BOPI) and reserve due dates and numbers of lines to be migrated through the Bulk Migration Scheduling Tool (see Section 8).
- A BellSouth Customer Care Project Manager (CCPM) will project manage the Bulk Request.
- A minimum of two (2) EATNs and up to a maximum of ninety-nine (99) EATNs can be placed on a single Bulk Request.
- A maximum of twenty-five (25) end-user telephone numbers per EATN can be placed on a Bulk Request.
- No additional EATNs or end-user telephone numbers may be added to the Bulk Request once it has been submitted with due dates and BOPI obtained from the Bulk Migration Scheduling Tool.
- Order Coordination-Time Specific option is not applicable for a Bulk Request.
- UNE-Ls that require a Service Inquiry and/or Unbundled Loop Modification are excluded from the Bulk Request process.
- A Reservation Identification (RESID) (also referred to as a Facility Reservation Number (FRN)) is required on the Bulk Request for Unbundled ADSL Compatible Loops, HDSL Compatible Loops and Unbundled Copper Loop - Designed (UCL-D). Refer to the **Unbundled ADSL and Unbundled HDSL Compatible Loop, UCL-Designed CLEC Information Packages and Loop Make-Up CLEC Information Package** for RESID/FRN requirements.
- When a Mechanized Loop Make Up with Facility Reservation Number (FRN) is requested, the CLEC must submit the Bulk Request with the FRN to BellSouth within 24 hours of receiving FRN.
- Firm Order Confirmation (FOC) will be sent on individual LSRs generated from the Bulk Request.
- Upon receipt of a Reject (1<sup>st</sup> level validation), CLEC must re-submit a corrected Bulk Request or submit a cancellation of the Bulk Request BOPI within the scheduling tool.

## UNE-P to UNE-L Bulk Migration

### 6. Bulk Migration Options

#### 6.1 Order Coordination (Coordinated Hot Cut)

- Order Coordination (OC) is available in situations where the UNE-L is provisioned over an existing circuit that is currently providing service (reuse of existing facilities) to the end-user.
- OC is included with the UVL-SL2, 2 Wire ADSL and 2/4 Wire HDSL Loops at no additional charge.
- OC is available as a chargeable option for conversions to UVL-SL1, UCL-Non Designed and UCL-Designed Loops. An OC charge will be applied to each loop on the EATN for which OC has been requested.

#### 6.2 After Hours/Weekend Migrations

- Migrations will typically be completed during normal working hours of 8 a.m. – 5 p.m. However, for CLECs that have customers who need cutovers completed outside of normal business hours, after hours/weekend migrations are available at the CLECs request.
- Bulk Requests for “out of normal business hours” migrations may be scheduled by use of the Special Handling option within the Scheduling Tool.
- The CLEC will identify the Bulk Migration Handling type as “Special Handling” by use of a drop-down box. The CLEC may then select one of the After Hours/Weekend Migrations Special Handling options according to the table below.
- The CCPM will recognize the Bulk Migration Request for Special Handling and contact the CLEC to coordinate the requested migration activity.

Days	After-hours Time-Windows	Minimum Lines	Maximum Lines	Special Considerations	Add'l charges
Mon – Fri <sup>1</sup>	7 a.m. – 8 a.m.	10	25	NA	Per CLEC's IA <sup>3</sup>
Mon – Fri <sup>1</sup>	5 p.m. – 7 p.m.	10	50	NA	Per CLEC's IA <sup>3</sup>
Saturday <sup>1</sup>	8 a.m. – 5 p.m.	50	100	UVL-SL1 Non-Coordinated only	Per CLEC's IA <sup>3</sup>
Mon-Fri <sup>2</sup>	7 p.m. – 12 midnight 6 a.m. – 7 a.m.	Individual Case Basis	Individual Case Basis	CO work only – no outside dispatches	Yes Overtime

<sup>1</sup> Extended Basic Hours

<sup>2</sup> Extended Overtime Hours

<sup>3</sup> Interconnection Agreement

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## UNE-P to UNE-L Bulk Migration

### Bulk Migration Options (continued)

#### 6.3 Two (2) Hour Go Ahead Notification (For Non-Coordinated Bulk Migrations)

The Go Ahead Notification can be provided using one of three methods. The first and second methods are by facsimile or email. The third method is through a web based Notification Tool. These methods are described below:

##### 6.3.1 Facsimile or Email

- For *non-coordinated* non-designed migrations, the CLEC will be notified within a maximum of two (2) hours of the cutover.
- A Go Ahead Notification will be sent to the CLEC by facsimile\* or email for UVL-SL1 and UCL-ND non-coordinated migrations.
- Once the CLEC is notified of the cutover completion, the CLEC can then complete the necessary number porting activities.

\***Note:** To change from fax to email notification, the CLEC should contact its BellSouth Local Contract Manager (LCM) and provide its Alternate Exchange Carrier Number (AECN) and email address.

##### 6.3.2 Web Based Notification Tool

The Notification Tool provides service order provisioning status associated with a non-coordinated migration for Non-Designed UNE-Ls. Additional information and access to the Notification Tool is via the Operations Report menu within the Performance Measurement and Analysis Platform (PMAP) web site located at:

<http://pmap.bellsouth.com>

#### 6.4 Time Windows for Coordinated Conversions

Time Windows for Coordinated Conversions are available for bulk migration orders at the CLEC's request as follows:

- There are two (2) time window options:
  - 8 a.m. – 12 p.m.
  - 1 p.m. – 5 p.m.
- Bulk Requests for "Time Windows for Coordinated Conversions" may be scheduled by use of the Special Handling option within the Scheduling Tool.
- The CLEC will identify the Bulk Migration Handling type as "Special Handling" by use of a drop-down box. The CLEC may then select one of the Time Windows Special Handling options.
- The CCPM will recognize the Bulk Migration Request for Special Handling and contact the CLEC to coordinate the requested conversion activity.
- Prior to the due date, the BellSouth CCPM will coordinate with Customer Wholesale Interconnection Network Services (CWINS) to ensure that CWINS and Network forces are scheduled and loaded to perform the migration in the designated 4-hour time window.
- On the due date, the coordinated cutover will take place using current provisioning processes.

## UNE-P to UNE-L Bulk Migration

### Bulk Migration Options (continued)

#### 6.5 Pre and Post Order Completion Restoral Process (or Throwback Process)

- The restoral process (also referred to as a throwback process) is available at the CLEC's request due to out-of-service issues and when the CLEC requires a restoral/throwback back to the UNE-P service.
- *The restoral/throwback process can only occur within a twenty-four (24) hour window of the UNE-L order Due Date.*
- The CLEC will use follow the requirements in 6.5.1 or 6.5.2 or 6.5.3 below depending on whether the order is (1)coordinated/non-coordinated *completed* UNE-L order; (2)coordinated *not* completed UNE-L order; (3)non-coordinated *not* completed order:

##### 6.5.1 Coordinated or Non-Coordinated '*Completed*' UNE-L order

- CLEC submits Expedited LSR to the Local Carrier Service Center (LCSC) using the Birmingham Fax Server number 888-792-6271.
- The LSR Package requesting a throwback to UNE-P must contain the following information:

LSR Fields	Field information
LSR Remarks	Restoral UNE-L to UNE-P
REQTYP	M
Local Service Request Page	ACT = V MI = C, D
Port Service Page	LNA = V, G FA=N UNE-P Telephone Number
Port Service Page - ECCKT Field	UNE-L associated Loop Circuit ID
Directory Listing	Fill out as any other ACT=V migration request
EXP	Y

- The CLEC must advise the BellSouth CCPM of the restoral/throwback request.
- UNE-P Non-Recurring, Recurring and Expedite rates will be charged if applicable.

##### 6.5.2 Coordinated '*Not Completed*' UNE-L Order

- CLEC calls the CWINS Provisioning Group to request restoral/throwback to the UNE-P and if the number porting has been completed, the CLEC requests port-back activity.
- Refer to the **CWINS Location and Hours** web site for CWINS telephone numbers.
- Orders will be placed in Missed Appointment (MA) status.
- CLEC submits supplemental (sup) order to cancel or reschedule conversion request.
- After receipt of the sup order FOC, the CLEC will create a new Subscription Version (SV).
- The CLEC must advise the BellSouth CCPM of the restoral/throwback request.



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## UNE-P to UNE-L Bulk Migration

### Bulk Migration Options (continued)

#### 6.5.3 Non-Coordinated 'Not Completed' UNE-L order

- CLEC emails CWINS Enhanced Delivery (EnDI) Group to request restoral/throwback.
- CWINS EnDI email address is [cwins.inp@bellsouth.com](mailto:cwins.inp@bellsouth.com)
- Orders will be placed in MA status.
- If the number porting has been completed, the CLEC will call the Fleming Island LCSC Call Center at 800-872-3116 to request port-back activity before the CLEC submits a sup order.
- LCSC will advise the CLEC of port-back process.
- CLEC submits sup order to cancel or reschedule conversion request.
- After receipt of the sup order FOC, the CLEC will create a new Subscription Version (SV).
- The CLEC must advise the BellSouth CCPM of the restoral/throwback request.

#### 6.6 Same-Day End-User Account Migrations

- Same day End-user Account Migrations are available upon CLEC request.
- Same day end-user account migration means that all lines associated with an end-user from the same Serving Wire Center will be assigned the same due date.
- CLEC will request Same-Day End-User migrations through the Special Handling option in the Scheduling Tool.
- After Scheduling Tool activities are completed, the BellSouth CCPM will contact the CLEC via email/telephone and will coordinate with the appropriate internal groups to ensure that all end-user account migration activity is performed on the same due date.

#### 6.7 CLEC to CLEC Migration of UNE-P to UNE-L

This process is available with the Bulk Migration process as follows:

- CLEC (CLEC A) to CLEC (CLEC B) Migration of UNE-P to UNE-L is defined as a facility based CLEC (CLEC B) that is migrating the UNE-Ps, previously held by another CLEC (CLEC A), to UNE-Ls.
- CLEC B will utilize the Scheduling Tool to obtain a BOPI for input on their LSR using the same Bulk Migration requirements as specified within this document.
- CLEC B must have an end-user letter of authorization (LOA) on file (it must be available if requested).

## UNE-P to UNE-L Bulk Migration

### 7. Bulk Migration Submission/Flow Process

The Bulk Request must be submitted according to the guidelines contained in the LOH. Below are the steps in the process :

Step #	Action
1	The CLEC will first reserve due dates and schedule numbers of lines by Central Office through the Bulk Migration Scheduling Tool according to the guidelines in Section 8 below. CLEC will also obtain a Bulk Ordering Package Identifier (BOPI) per Bulk Migration request.  <i>Note: BellSouth recommends that before the Scheduling Tool is accessed to reserve due dates the CLEC should identify the current UNE-P facilities as IDLC or non-IDLC, for each of the UNE-P lines to be migrated. This will ensure the accurate scheduling of UNE-P-on-IDLC migrations.</i>
2	Upon completion of the Scheduling Tool process to obtain the BOPI, CLEC then submits Bulk Request package with BOPI and reserved dates for each EATN/PON via the electronic ordering interface.
3	At this point, the Bulk Request package will be processed for 1 <sup>st</sup> level validation and any rejects will be mechanically generated to the CLEC.
4	The electronic ordering systems will accept the Bulk Request package, break the individual PONs into separate LSRs and populate the remaining required LSR fields from Operation Support System (OSS) systems prior to sending the individual LSRs downstream to the Local Number Portability (LNP) Gateway.
5	The LNP Gateway will perform 2 <sup>nd</sup> level validations and provide any fallout, per "business as usual" processes. The Local Carrier Service Center (LCSC) will handle all fallouts as normal. Any of the individual PONs that must be clarified will be sent back to the CLEC, business as usual.
6	After LNP Gateway issues the service orders, the LCSC will handle all manual service order fallouts as normal. The BellSouth Service Representative will send any PF and Missed Appointments (MA) to the CLEC via a jeopardy notice.
7	LNP Gateway will send a FOC on each individual PON associated with the Bulk Request package, to the CLEC.
8	If the CLEC wants to supplement (SUP) (01,02,03) an individual PON, the request <u>must</u> be sent through the same electronic ordering system as the original Bulk Request.
9	The Project Manager will monitor PON, Service Order and Porting Statuses associated with the Bulk Request package. BellSouth's Service Representative and Project Manager will monitor the LNP gateway for the "Number Ported" messages and the Service Representative will handle manual port out order processing if required

---

## UNE-P to UNE-L Bulk Migration

### 8. Bulk Migration Scheduling Tool

#### 8.1 Scheduling Tool Description

The Bulk Migration Scheduling Tool is a web-based tool that replaces the Project Notification Form spreadsheet process to schedule Bulk Migration due dates. The CLEC will select the due dates based on BellSouth Bulk Migration Network availability that will be displayed in the Scheduling Tool. The Tool will also allow the CLEC to request special handling options such as time windows, after-hours cutovers, etc., as described in section 6.

#### 8.2 Scheduling Tool Capabilities

- BellSouth Network will establish Bulk Migration capacity for each CO per business day as follows:
  - 200 lines total per day per CO for all CLECs combined
  - A single CLEC may schedule a maximum of 125 lines of the 200 total
  - Of the 200 total, IDLC conversions may not exceed 70 per CO, per day, for all CLECs combined
- The tool will display a calendar of days for the next 120 days that can be scheduled for that CO. Clicking on a date within the calendar will display the number of lines available for that day.
- Special Handling request options may be selected for the following:
  - Time Windows – AM or PM (coordinated only)
  - After-hours or Saturday cutovers (Saturday cuts are for non-coordinated migration only)
  - Same-Day End-User Account Migrations

#### 8.3 Scheduling Tool Process

CLECs using the Bulk Migration process must access the Scheduling Tool to obtain due dates and a single BOPI per Bulk Migration request. To access the Scheduling Tool, follow the steps below:

- Access the PMAP web site at:  
<http://pmap.bellsouth.com/>
- After logging in to PMAP, choose the Bulk Migration Tool option on the Welcome page
- The Welcome page will include a description of the Scheduling Tool and will also provide a link to the 'Scheduling Tool Tutorial'
- The CLEC should review the Tutorial for information to help the CLEC navigate and use the Tool
- After the CLEC provides the necessary information in the required Scheduling Tool fields, a BOPI will be returned to the CLEC for input to the Bulk Request mechanized system in the Project Id field.

## UNE-P to UNE-L Bulk Migration

### 9. UNE-P USOCs

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

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

### 10. UNE-L USOCs

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

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

### 11. Bulk Request Service Order Intervals

The BellSouth interval requirement is the eight (8) business day provisioning interval. The CLEC must submit the Bulk Request and it must be accepted by the mechanized system at least eight (8) business days in advance of the earliest scheduled due date.

**Note:** With the implementation of the Scheduling Tool, the prior requirement for a pre-order CCPM interval to obtain a due date has been eliminated. After the CLEC accesses the Scheduling Tool referenced in Section 8, the CLEC may schedule their desired due date(s) and obtain the Bulk Request BOPI for input on the LSR.

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## UNE-P to UNE-L Bulk Migration

### 12. Acronyms

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

Attachment 5

Change Request 1739

Request for improved flow-through



# CHANGE MANAGEMENT

## CCP CHANGE REQUEST FORM (RF-1870)

DATE SENT:	2/23/04
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CHANGE REQUEST #:	1739
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STATUS:	R
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REQUEST TYPE

Check appropriate field:

TYPE 2 (REGULATORY)	TYPE 3 (INDUSTRY)	TYPE 4 (BST)	TYPE 5 (CLEC)	<input checked="" type="checkbox"/>	TYPE 6 (DEFECT)
---------------------	-------------------	--------------	---------------	-------------------------------------	-----------------

PRIMARY CLEC CHANGE MANAGEMENT POINT OF CONTACT INFORMATION  
(Originator of Request and contact for additional details/questions or to whom response will be made)

NAME:	CLEC Coalition (Mary Conquest, Tyra Hush, Jordana Jureidini)	TEL NO:	
EMAIL:	mconquest@itcdeltacom.com Tyra.Hush@mci.com jureidini@att.com	FAX #:	
COMPANY NAME:	CLEC Coalition (AT&T, ITC^Deltacom, and MCI)	OCN	

SECTION 2 TO BE COMPLETED BY INITIATOR OF REQUEST:

TITLE OF REQUEST:	Increased flow-through for Bulk Migrations
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Check appropriate field:

ASSESSMENT OF IMPACT:	HIGH	<input checked="" type="checkbox"/>	MEDIUM	LOW
-----------------------	------	-------------------------------------	--------	-----

PRE-ORDERING	ORDERING	<input checked="" type="checkbox"/>	MAINTENANCE	MANUAL
--------------	----------	-------------------------------------	-------------	--------

INTERFACES IMPACTED:	LENS	<input checked="" type="checkbox"/>	TAG / XML	<input checked="" type="checkbox"/>	CSOTS	EDI	<input checked="" type="checkbox"/>	EC-TA	TAFI
----------------------	------	-------------------------------------	-----------	-------------------------------------	-------	-----	-------------------------------------	-------	------

TYPE OF CHANGE:

Check appropriate field(s):

SOFTWARE	<input checked="" type="checkbox"/>	PRODUCT & SERVICES	DOCUMENTATION	HARDWARE
----------	-------------------------------------	--------------------	---------------	----------

REGULATORY	INDUSTRY STANDARDS	PROCESS	<input checked="" type="checkbox"/>	NEW OR REVISED EDITS
------------	--------------------	---------	-------------------------------------	----------------------

DEFECT	EXCEPTION FEATURE	OTHER	<input checked="" type="checkbox"/> - Flow-through
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Attachment A-1

(Jointly Developed by the Change Control Sub-team comprised of BellSouth and CLEC Representatives)

Submit completed form to the BST CCP email box at: [change.control@bellsouth.com](mailto:change.control@bellsouth.com)



# CHANGE MANAGEMENT

## CCP CHANGE REQUEST FORM (RF-1870)

DETAILED DESCRIPTION OF REQUESTED CHANGE OR DEFECT DESCRIPTION	
<p>In order to better handle the volumes potentially associated with Bulk Migrations, BellSouth to reduce designed fallout, BellSouth caused fallout, and BellSouth system errors, increasing mechanization and flow-through for non-complex UNE loop with LNP orders. This should improve the flow-through of individual service orders, including those created via bulk migration order.</p> <p>Designed fallout and BellSouth error percentages should be reduced, at a minimum, to the levels currently experienced for UNE-P Orders. For example, in the March 04 flow-through report, UNE-P migrations experienced an achieved flow-through rate of 87.98% and UNE with LNP experienced a flow-through rate of 58.11%. In this example, we would expect UNE with LNP to attain an achieved flow-through rate near 88%.</p>	
REQTYP(s) IMPACTED:	
ACT TYP(s) IMPACTED:	
PON EXAMPLES:	
ERROR MESSAGE:	
ELECTRONIC MAP VERSION AFFECTED BY CHANGE OR DEFECT:	TCIF9 ELMS6

**BELLSOUTH USE ONLY:**

<p>BELLSOUTH CHANGE REVIEW MEETING RESULTS (Types 2-5 Only):</p>	<p>02/26/04: Being reviewed by BellSouth</p> <p>03/01/04: BellSouth is placing this CR in clarification. We are requesting an explanation of what is meant by "eliminate designed fallout" BellSouth's UNE to UNE Bulk Migration process does not have designed fallout</p> <p>03/01/04: Received this question from , ITC^Deltacom. Are you saying there is no line limits? I recall one of our orders with 2,000 lines locked the systems down?</p> <p>03/09/04: Answered , ITC^Deltacom's question: Currently with UNEP to UNEL Bulk Migrations, the line limit is a minimum of 2 and up to 99 EATNs (each EATN can house up to 25 TNs).</p> <p>05/21/04 Change request description updated to reflect new information provided by CLEC. Request moved to New status</p> <p>06/01/04: BellSouth is unable to support this due to Cost/Technical Infeasibility.</p> <p>The following criteria was taken into consideration when making this decision:</p>
--	---

**Attachment A-1**

*(Jointly Developed by the Change Control Sub-team comprised of BellSouth and CLEC Representatives)*

**Submit completed form to the BST CCP email box at: [change.control@bellsouth.com](mailto:change.control@bellsouth.com)**



	<ul style="list-style-type: none"> <li>• Due to the complex differences in UNE Loop with LNP and UNE-P ordering requirements and processing flows, it is not technically feasible to dictate the same error percentage for fallout for two separate entities.</li>   <li>• Due to the nature of some of the categories of designed fallout, it is both cost prohibitive and technically infeasible to eliminate all designed fallout.</li>   <li>• Analysis of designed fallout reflects large portions of fallout by design is related to Pending Service Order activity initiated by CLECs. Thus, this fallout is totally within the control of the CLECs.</li>   <li>• BellSouth's flow through results are excellent. Flow-Through for April 2004 is as follows:             <ul style="list-style-type: none"> <li>- LNP – 96.58%</li> <li>- Residence – 98.62%</li> <li>- Business – 90.64%</li> <li>- UNE – 95.80                 <ul style="list-style-type: none"> <li>▪ UNE L – 88.30%</li> <li>▪ UNE P – 95.93%</li> </ul> </li> </ul> </li> </ul> <p>BellSouth will continue to assess opportunities for improvement of overall LNP flow-through.</p>
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DEFECT VALIDATION RESULTS (Type 6 Only):	
---	--

DEFECT WORKAROUND (Type 6 Only):	
-------------------------------------	--

VALIDATED DEFECT SEVERITY LEVEL:	2		3		4	
----------------------------------	---	--	---	--	---	--

CLARIFICATION SENT:	
---------------------	--

TARGET IMPLEMENTATION DATE:	
ACTUAL IMPLEMENTATION DATE:	

**Attachment A-1**

*(Jointly Developed by the Change Control Sub-team comprised of BellSouth and CLEC Representatives)*

**Submit completed form to the BST CCP email box at: [change.control@bellsouth.com](mailto:change.control@bellsouth.com)**

Attachment 6

Response to Item No. 9

Attachment 6  
Uncompleted Call Exclusion

EMAIL STRING CUT AND PASTED BELOW.

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

**From:** Don Bussell [mailto:don.bussell@mci.com]

**Sent:** Wednesday, July 07, 2004 2:16 PM

**To:** 'Alhagi Mbowe'; 'tyra.c.hush'

**Cc:** 'Elise Teeter'; 'Don Bussell'

**Subject:** RE: 7/07/04 Conf. Call - MCI Invalid Attempt records in BellSouth

Alhagi,

There are currently 331,049 calls erring from Bell South due to the record being marked as an attempt record, unanswered call, yet having conversation time populated on the record. The rate class definitions are below. The attachment has a list of the calls by date, and the different rate classes.

There are 239,600 calls with a rate class of 6 out of the total above.

Attachment 6  
Uncompleted Call Exclusion

**Rate Class**

A one-position numeric field that identifies the field of a tariff used for rating the message based on whether the message was person or station and customer dialed, carried on an IP network, operator-handled or mechanization was used in the completion of a call. The acceptable values are:

- 1 = Person 0- [Local/Toll Operator dialed called number and Local/Toll Operator Work Time populated]
- 2 = PCB (Person Call Back)
- 3 = Operator Station 0- [Local/Toll Operator dialed called number and Local/Toll Operator Work Time populated]
- 4 = Dial station 1+ [Customer dialed, no Local/Toll Operator Work Time populated for both Domestic and International DDD]
- 5 = Local/Toll Operator Completed Dial Rate Applied 0- [Local/Toll Operator dialed called number, Local/Toll Operator Work Time populated and Local/Toll Operator invoked customer dial rate]
- 6 = Fully-automated Station 0+ Calling Card, Collect or Third Number billing [At bong tone customer fully mechanizes call and no Local/Toll Operator Work Time populated]
- 7 = Semi-automated Station 0+ Calling Card, Collect or Third Number billing [At bong tone customer over rides to Operator for completion and Local/Toll Operator Work Time populated]
- 8 = Semi-automated Person 0- [At bong tone customer over rides to Operator for Person service and billing, Local/Toll Operator Work Time populated]
- 9 = IP Dialed station, populated for Domestic and International calls

Don Bussell  
LTF A  
Vnet 653-1914  
Don.Bussell@mci.com

-Original Message-----  
From: Gentle, Cynthia [mailto:Cynthia.Gentle@BellSouth.com]  
Sent: Friday, June 11, 2004 9:59 AM  
To: tyra.hush@mci.com  
Plummer, Andy; Heard, Mary; Mitchell, Denise; Bunn, Charleen B  
Subject: FW: MCI Invalid Attempt records in BellSouth

Tyra,

I apologize. I attempted to respond to you on the questions that you sent to Andy Plummer. However the message was forwarded to me and your address was not in the "reply to all" option and I did not realize that until I received your forwarded message today.

Attachment 6  
Uncompleted Call Exclusion

Below is my original response. Thanks.

Cynthia Gentle  
205/321-4159  
Wholesale Usage

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

**From:** Gentle, Cynthia  
**Sent:** Monday, June 07, 2004 3:50 PM  
**To:** Plummer, Andy; Mitchell, Denise; Heard, Mary  
**Cc:** Bunn, Charleen B  
**Subject:** RE: MCI Invalid Attempt records in BellSouth

Tyra,

As to your questions below, I'll answer as best that I can.

- Is BST charging MCI DUF charges for these records? Yes.
- Is BST charging MCI Local/Toll Operator time on these calls? I do not know. This is on a contract basis. I suggest that you speak with your Contract Manager.
- Does BST charge its customers for attempt calls of this type? Yes.

Andy Plummer and Alison Duff, MCI, had a conversation on this. After that conversation, we all looked at your concern and what we are populating. We determined that there is some confusion in the EMI document on Rate Class in Section 4. We do not see any mention of conversation time in the ATIS/OBF documentation on Rate Class. The EMI refers to Local/Toll Operator work time and we can find no mention of this in section 4.

Since this area has so much confusion we will consider implementing a change to modify our current code so that no conversation time is populated for attempt records. We may also bring a new issue to OBF to clarify this language.

Thanks.

Cynthia Gentle  
205/321-4159  
Wholesale Usage

Attachment 6  
Uncompleted Call Exclusion

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

**From:** tyra.c.hush [mailto:tyra.hush@mci.com]

**Sent:** Thursday, June 03, 2004 2:38 PM

**To:** Plummer, Andy

**Cc:** Bunn, Charleen B; Don Bussell; Pat Woods

**Subject:** FW: MCI Invalid Attempt records in BellSouth

Andy,

After further analysis, of the now 254k attempt records erring in MCI's systems because they have conversation time populated 69K are "rate class 3" and 185.K are "rate class 6". Both the Rate Class of 6 and the attempt indicator being sent are indications that there should be no valid conversation time populated on these records.

- Is BST charging MCI DUF charges for these records?
- Is BST charging MCI Local/Toll Operator time on these calls?
- Does BST charge its customers for attempt calls of this type?

Attempt records are unanswered calls and rate class 6 says no time will be populated, this is not compliant with ATIS/OBF guidelines. MCI sees this only happening in BellSouth, no other ILEC/state sends this type of record. Has BST given the CLEC community any notification as to why they are sending records that are not within the guidelines of ATIS/OBF?

Please advise if you would prefer scheduling a call to answering these questions.

Thank you,

Tyra Hush  
MCI - Carrier Relations  
(703) 749-7129



























			000	000	Reserved
			0	0	Treatable Ind.
			0	0	21
			1	1	22
			0	0	23
			0	0	24
			0	0	25
			0	0	26
			0	0	27
			0	0	28
			0	0	29
			0	0	30
			000	000	Reserved
			000	000	Billing RAO
			00	00	Reserved
					Overflow Data

Indicators

























0000	0000	Reserved
0000	0000	Treatable Ind.
0000	0000	21
0000	0000	22
0000	0000	23
0000	0000	24
0000	0000	25
0000	0000	26
0000	0000	27
0000	0000	28
0000	0000	29
0000	0000	30
0000	0000	Reserved
0000	0000	Billing RAO
0000	0000	Reserved
		Overflow Data