

**Marguerite McLean**

090430-TP

**From:** Nmsamry@aol.com  
**Sent:** Thursday, November 18, 2010 3:42 PM  
**To:** Filings@psc.state.fl.us  
**Cc:** Tracy Hatch; Adam Teitzman; Pauline Evans  
**Subject:** 09-0430-TP  
**Attachments:** 09-0430-TPSTSFILING11-17-10.pdf

Enclosed please find STS Telecom's Response to Staff's Data Requests of today's date, November 17, 2010.

This was filed with the FPSC on November 17; however, apparently there was a transmission error, therefore, we are resending the same to everyone again in an abundance of caution.

Thank you.

**Nancy M. Samry, F.R.P.**  
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09514 NOV 18 2010

FPSC-COMMISSION CLERK

11/18/2010

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November 17, 2010

**Via Electronic Filing**

Ms. Ann Cole, Commission Clerk  
Office of the Commission Clerk  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

Via E-Mail Only: [filings@psc.state.fl.us](mailto:filings@psc.state.fl.us)

Re: Docket No. 09-0430-TP -- In re: Amended Petition for Verified Emergency  
Injunctive Relief and Request to Restrict or Prohibit AT&T from Implementing OSS-  
Related Releases, by Saturn Telecommunications, Inc.

Dear Ms. Cole:

Attached for electronic filing, please find STS Telecom, LLC's response to questions from Staff in order to facilitate final resolutions of the docket.

Copies have been served to the parties shown below.

Sincerely,

s/James L. Parado

JAMES L. PARADO

**Enclosures**

cc: Adam Teitzman, [ateitzma@psc.state.fl.us](mailto:ateitzma@psc.state.fl.us)  
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DOCUMENT NUMBER-DATE

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FPSC-COMMISSION CLERK

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Keith Kramer  
Executive Vice President  
Legal and Regulatory  
STS Telecom

Re: Pursuant to the FPSC Order No. PSC-10-0253-PAA-TP Response to questions from Staff in order to facilitate final resolutions of the docket.

Date: November 2, 2010

Lisa S. Harvey  
Assistant Director  
Florida Public Service Commission  
Office of Auditing & Performance Analysis

Dear Ms. Harvey,

Thank you for the opportunity to respond to the significant and important questions posed by the Florida Public Service Commission to both STS and AT&T. The substance of the Commission questions and the subsequent answers pertain not only to STS but also to the entire CLEC community.

*Issue 1: LEX does not allow STS to use a Loop Type "Other" for a Commingled DS 0 SL2 Circuit.*

- 1. Could STS order a UNE SL2 DSO commingled arrangement prior to implementation of the LEX ordering interface? If so, please explain the process.**

*Answer:* No. STS could not order a UNE SL2 DS 0 in a commingled arrangement for any existing type loop, either for UNE-P type customers (whether STS' or any other provider) nor could STS migrate an existing loop from another carrier such as AT&T prior to the LEX ordering interface.

**Background**

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FPSC-COMMISSION CLERK

AT&T would only allow CLECs to order a "new" loop without "number portability" for any end-user, whether such end-user existed with the CLEC, or was won through the CLECs' marketing efforts. This was true for STS as well as for all other CLECs in the former BellSouth region using any other ordering method prior to LEX, and the Accessible Letters issued in April of 2010, concerning the "commingling" of voice grade loops with special access.

This is not to say that the Local Exchange Navigation System (LENS) did not have the ability to migrate an existing "voice grade" loop from another provider such as AT&T, rather AT&T did not allow any competitor to order an existing voice grade loop from another provider [such as AT&T] to a commingled arrangement prior to April of this year.

In August 2003, the Federal Communications Commission issued its *Triennial Report Order*, commonly referred to as the TRO. In sections 579 through 583 of the TRO, the FCC required that Incumbent Local Exchange providers allow for Competitive Local Exchange Providers to commingle (or combine) elements that were purchased via "special access" with "Unbundled Network Elements"<sup>1</sup>. To comply with its obligations set forth by the FCC's TRO, in late 2005 three years later, AT&T provided the *"Multi-bandwidth Commingling "new" loops" CLEC User Guide*. Under the terms set by AT&T, a CLEC could only commingle a "new" voice grade loop [REQ TYPE A], provisioned as a SL-2, without "number portability" on the order [Local Service Request or LSR].

Pursuant to a "settlement" agreement between AT&T and STS, executed in November 2006, AT&T provided STS and only STS an extremely limited process, with the understanding that a permanent process would be provided in the near future, to allow for the migration of existing voice grade loops on wholesale UNE-P [REQ TYPE B, re-use of facilities with number portability] to a commingled arrangement. Under the terms of this "confidential settlement agreement" AT&T was to convert no more than 2,500 voice grade loops to STS' commingled arrangement by March 31, 2007 utilizing a work around process. AT&T never complied with their obligations as set forth in the settlement agreement. Moreover AT&T never filed the settlement agreement with the Commission in violation of 47 USC § 252<sup>2</sup>.

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<sup>1</sup> The FCC believed that any restriction on the combining of special access with Unbundled Network Elements, would be considered a violation of sections 251, 201 and 202 respectively of the Telecommunications Act.

<sup>2</sup> A common question which has been asked is: What other CLEC complained to any Commission or Regulatory body concerning any issues with Commingling? Although on its face, this would appear to be a fair question, if one considers the timing of the release of the AT&T *Multi-bandwidth commingling "new" loop CLEC user guide*, and the severe limitations AT&T placed on the commingling process, the question becomes irrelevant. One cannot complain about what one does not know. Therefore AT&T had good reason not to file or make public any process that would allow for

The process that AT&T developed pursuant to the settlement agreement was entitled "UNE - UNE-P to UNE-Loop Commingling" and developed by AT&T in 2006 for one CLEC [STS Telecom], in one state [Florida]. Besides never properly converting lines under this process, AT&T would not let any CLEC other than STS order commingled arrangements utilizing the Bulk Migration Work Around Process. In fact AT&T made sure no other CLEC would ask to utilize the process, as AT&T insisted that the process remain confidential.

The process that AT&T provided to STS is attached [Exhibit A BATES# ATT109872-89], and although marked "confidential" is now publicly available pursuant to the FCC Docket [STS v. AT&T File No. EB-09-MD-008]. Even today, AT&T still refuses to make that process available to any other CLEC.

**2. Can STS currently order a UNE SL 2 DSO commingled arrangement via a manual order process? If so, please explain the process.**

*Answer:* Yes, STS can create a UNE SL 2 DSO commingled arrangement LSR using the Manual Forms. STS "MUST" access the manual forms on AT&T's CLEC On-Line Web site.

**Accessing the Manual Forms;**

- Order taker logs on @ <https://clec.att.com/clec/>
- Order taker clicks on CLEC Handbook (from Menu Bar under CLEC Online)
- Order taker Selects the CLEC Handbook for Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi, North Carolina, South Carolina, Tennessee
- Order taker selects Forms & Templates (from Menu Bar under CLEC Online) a side Menu will appear, the order taker will scroll down and select LSR Manual Forms, the Manual Forms page displays
- Order taker scrolls down and click on Core Product Templates. The Manual Forms page jumps to the Core Product Templates link. The Order taker clicks on the link. The Core Product Templates page will display
- The Order taker scrolls down and clicks on ReqTypeBB. A Dialog box will display with a choice of Open, Save, or Cancel. The Order taker clicks Save and save the form to the Order Taker's PC.

**Notes: The Order taker must keep the following in mind when utilizing the Manual forms: (Per current AT&T documentation posted on CLEC On-Line).**

- In the **Southeast**, (Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi, North Carolina, South Carolina, and Tennessee) manual LSR ordering is based on current versions of the AT&T Local Ordering Handbook (LOH) and

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the migration of existing voice grade loops (UNE loops) to special access, until so requested by the Florida Public Service Commission pursuant to their "audit" of the LEX and LENS OSS systems.

**the 9-State AT&T Local Service Ordering Requirements (LSOR).**

- The manual LSR ordering process is available to CLECs who:
  1. Submit manual LSRs requiring special attention. Manual Ordering Guidelines related to the Remarks field must be followed. (Enter Special Handling in the Remarks field in the Admin Section on the Local Service Request (LSR) Form.)
  2. Order electronically, but submit manual LSRs when OSS systems are unavailable or out of service.
  3. Choose to submit Manual LSR Forms
- The Manual Ordering process is **required** for certain products and services that are not eligible for electronic ordering. Ordering instructions for those products and services 'Special Handling' are located on the CLEC Website in the General Ordering section.
- FOR THE FIELDS THAT ARE REQUIRED WHEN ORDERING A SPECIFIED PRODUCT Refer to your local ordering requirements document: **Southeast: 9-State LSOR or**  
Reference: **Section 3 – Ordering (R/C/O Tables) LOH**
- Data integrity errors occur when carriage returns are entered within data input fields. Use the **Tab Key** to navigate from one field to the next when entering data on the form
- Only **one** occurrence of each form may appear in a multi-form template. Additional forms must be submitted as separate attachments to the email. **IF STS has two or more lines, then a separate attachment for each line has to be attached to the email.** If an optional Directory Listing (DL) Form is required as part of the Local Service Request (LSR), the Order taker must prepare individual DL Forms. These individual (DL) forms should accompany the template as an added attachment to the email.
- AT&T ONLY ACCEPTS FORMS IN MICROSOFT WORD 97-2003 FORMAT (.DOC/.DOT).
- The '**PON**' field is required on manual LSR form pages when ordering data has been input. The '**VER**' field is conditional on manual LSR form pages when ordering.  
The '**PG\_OF\_**' field is optional when ordering data has been input on manual LSR form pages. Page numbers may be entered on the manual LSR forms at the discretion of the CLEC, but are not required.
- The Manual LSR/PON and any attachments are emailed to:  
[attselscrequest@att.com](mailto:attselscrequest@att.com)  
**Email Processing Rules**  
To avoid receipt of Email Server and Super Fatal error messages when emailing Manual LSR Forms, follow the rules below:
  1. Submit only one PON per Email.
  2. Include the Company Code (CC) and Purchase Order Number (PON) in the Subject Line of the email as follows: **CC:xxxx PON:xxxxxxxxxxxxxxxx** (where x = 4 characters associated with CC and maximum of 16 characters associated with PON).
  3. Do not include messages in the body of the Email. They will be

- ignored.
4. Attach only Manual LSR Forms and Core Product Templates displaying the current effective date to emails.
  5. Ensure all Manual LSR Form and Core Product Template email attachments submitted through the Manual LSR process adhere to Manual Ordering Guidelines or they will not be accepted by AT&T.

Unlike LEX, the Manual Forms do not have Menus, Icon Bar, LSR Header, or an LSR Tree. The Manual Forms are not built in sections that are comprised of other subordinate components, line numbers, tabs, and detail lines that altogether make up a complete request.

The Manual Forms instead lists the Forms with a Form ID, which is utilized by AT & T back end system to validate or reject the Manual LSR. The Forms IDs are grouped according to the section of the Local Service Request (LSR). For example: the End User Section has Form IDs of : 038152 & 038251. While the Loop Service w/Number Portability Request Form has Form ID of: 022149

**Create Manual LSR for requisition type B requisition (Stand Alone Conversion) Bulk Migration Orders is prohibitive for Manual Ordering. specifically:**

The Order taker opens the save ReqTypeBB Form from the PC. Then ENTERS data on the Local Service Request (LSR) Form ID 041182

- PON
- VER
- CCNA
- AN
- SC
- DDD (Standard Interval)
- REQTYP
- ACT
- MI
- CC
- NNSP
- ACTL (No Issue with ACTL on Manual Forms)
- LSO (No Issue with ACTL on Manual Forms)
- TOS
- SPEC
- NC
- NCI STS would like to note that there are three valid NCI Codes<sup>3</sup> for a Commingled UNE SL2 DSO, one of which is valid for STS's commingled network arrangement. However, STS is required to populate the fictitious NCI code

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<sup>3</sup> See Joint Supplemental Declaration of Caryn Diaz and Ronald E. Curry attached paragraphs 42-47.

*provided by AT&T for a REQ TYP B. STS cannot populate the correct NCI Code for a Commingled SL2 DS0, REQ TYP B on either a Manual Form or via LEX GUI Tool. On a manual order, with a REQ TYP B, the AT&T email system will return a Super Fatal Reject if STS populates an NCI code other than the fictitious code provided and required by AT&T for STS's use. However, STS can submit an order with the same NCI code on a REQ TYP A either manually or via the LEX GUI tool and the order will go through. AT&T's backend systems are not coded with the NCI Code that STS utilizes for a UNE SL2 in a Commingled Arrangement with a REQ TYP B. The other (2) of the (3) valid NCI codes can be populated on either a Manual LSR or an LSR submitted via the LEX GUI tool for both REQ TYP's A and B. SECNCI*

Local Service Request (LSR) Form ID 041281

- PON
- BI1
- BAN1
- BI2
- BAN2
- ACNA

Local Service Request (LSR) Form ID 041380

- PON
- INIT
- TELNO
- FAX NO
- EMAIL
- IMPCON
- TELNO (IMPCON)
- ALT IMPCON
- TELNO (ALT IMPCON)
- DSGCON
- TELNO (DSGCON)
- FAX NO (DSGCON)
- STREET (DSGCON)
- FLOOR (DSGCON)
- ROOM (DSGCON)
- CITY (DSGCON)
- STATE (DSGCON)
- ZIP (DSGCON)
- REMARKS *(Special Handling, the Correct CFA per Telephone Number on LSR and Correct NCI Code)*

End User Service Request (EU) Form ID 038152

- PON
- VER
- LOCNUM
- NAME
- SANO
- SASF (If applicable)



- SASD
- SASN
- SATH
- SASS (If applicable)
- LD1 (If applicable)
- LV1 (If applicable)
- LD2 (If applicable)
- LV2 (If applicable)
- LD3 (If applicable)
- LV3 (If applicable)
- CITY
- STATE
- ZIP CODE
- LCON
- TELNO
- ELT
- EATN

End User Service Request (EU) Form ID 038251 (NO DATA ENTERED ON THIS FORM) Loop Service w/Number Portability Request (LNPB) Form ID 022149

- PON
- VER
- NPQTY
- LOCNUM
- LNUM
- LNA
- PORTED NBR
- NPT
- CABLE ID (fictitious information)
- CHAN/PAIR (fictitious information)

The order taker then saves the LSR. Opens the email application on the PC and attach the saved LSR, enter the CC & PON in the subject field of the email and send to AT&T @ [attselscrequest@att.com](mailto:attselscrequest@att.com) If the LSR/PON is successful, the Order taker receives an acknowledgement from AT&T.

**3. If STS cannot order a UNE SL2 DSO commingled arrangement, regardless of the mode of entry (LEX or manual), please explain the alternative loop arrangement that STS orders from AT&T in lieu of the UNE SL2 DSO services. Additionally, please explain why STS would consider the UNE SL2 DSO service to be more beneficial than the alternative arrangement.**

*Answer:* There is no simple answer to this question as propounded by staff; however, STS will attempt to provide an answer based on the significant amount of “discovery” provided to STS by AT&T through the present docket “STS vs. AT&T FCC

*Formal Complaint FCC STS v. AT&T File No. EB-09-MD-008*". First, based on the overwhelming amount of evidence provided to STS, it is STS' position that the requirement of an SL2 UNE loop as the only DS0 loop for a commingled arrangement, and *originally* only provided as a "new" loop was intended by AT&T to be an "economic" barrier to entry because the non-recurring rate, and monthly recurring rate was/is so exorbitant relative to AT&T's UNE SL1 loop that no CLEC would consider it. AT&T's own documents confirm AT&T's position with this regard<sup>4</sup>.

Further, prior to LEX, commingling was functionally only available to STS [and all other CLECs in Florida] for DS 1 or greater *digital* loop types, which would provide the equivalent of 24 or more voice channels. To the extent that "mass market" type customers would have no need for such service, the commingling of UNE and Special Access elements would have a cost that was "prohibitive" for use with "mass market" customers.

STS could have populated end-offices with *collocation arrangements*, but by the time that STS realized that AT&T would not honor its legal obligations regarding the commingling of voice loops, so much time passed and STS lost the great majority of its embedded wholesale UNE-P base to attrition and win-back campaigns that it did not make economic sense to incur the substantial investment in collocation facilities. Clearly AT&T did not want STS or any other CLEC to commingle voice grade loops because that would mean increased competition for the mass market customer.. AT&T only allows the migration of existing UNE-P/wholesale UNE-P customers through collocated facilities and not commingling.<sup>5</sup>

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<sup>4</sup> The requirement of a SL2 loop is a contentious argument between the parties at the FCC. STS provided cost studies to the FCC that BellSouth provided to the FPSC in 2002. The FCC TRO "Commingling" order was subsequent to those cost studies. It is the position of AT&T that it is technically infeasible to "design" an SL1 therefore it is not technically feasible to commingle an SL1 voice grade loop. It is STS' position that it is a voice grade loop that is entered into TIRKS, what AT&T names the voice grade loop once it is entered into TIRKS is irrelevant. Further the additional costs that AT&T added to the Unbundled Voice Grade loop, had nothing to do with whether a voice grade loop could be commingled with special access. Those costs include but not limited to the following: "requiring a CLEC to order and install a "new" loop, installation of "test points", Order Coordination". These are all features of an SL2 loop, but none of these features are a requirement to "commingle" a voice grade loop with special access.

<sup>5</sup> AT&T disingenuously argues that the Bulk Migration hot cut process as well as the "hot cut" process was meant for CLECs with "collocation arrangements". Mr. Milner's more recent testimony to the FCC [FCC STS v. AT&T File No. EB-09-MD-008], states that since "commingling" was never mentioned in the testimony he provided to either the Florida Public Service Commission or the FCC, it was therefore not technically feasible. It must be emphasized that in Mr., Milner's earlier testimony to the FCC and FPSC, he did not state that the "hot cut" process excluded

Also, it became increasingly clear that in many instances, AT&T currently forces CLECs to use SL2 loops, even though the evidence provided in the present case before the FCC, has revealed that such requirement by AT&T is not necessary, and intended as an economic barrier to CLECs wishing to provide service to mass market customers in Florida.

Based upon the overwhelming weight of the evidence, and the clear and convincing proof, STS anticipates that the FCC's determination of STS' complaints against AT&T will be favorable and substantiate all of the allegations made by STS .

Simply stated, the SL2 UNE loops are not beneficial from an economic standpoint as an alternative arrangement for either commingling, or for any other CLEC with a *collocation arrangement*, over the available SL1 UNE or UCL (*unbundled copper loop*). Nor does the SL-2 loop requirement of AT&T offer any material advantage over an SL-1. The requirement of the more expensive SL2, by AT&T, allows AT&T to continue to have an unfair competitive advantage over all CLECs, and their requirement by AT&T has been a fabrication, based on fictitious cost studies, provided years ago, and irrelevant to the present controversy. It also avoids AT&T statutory requirements to provide UNEs at *Total Elemental Incremental Cost (TELRIC)*.

Since STS believes that staff's question to be global in nature and not carrier specific, STS will comment that it is our belief that CLECs are unaware of the issues, that AT&T has buried the commingling process so deep in its documentation that the harsh reality is that it would be difficult if not impossible to discover, but even if a CLEC were to discover and understand the process, the higher cost of the SL2 loops would discourage its use. But that still is not sufficient for AT&T to insure that commingling for DSO loops will not be used for the mass market or for new entrants, the elimination of the "R/C/O" tables will be the proverbial "nail" in the coffin for CLECs use of commingling arrangements for mass market customers.

**Issue 2:** *The sequence in which the LSR and the End User Forms are processed by CLEC's can cause the ACTL and LSO page to need to be re-populated.*

- 1. For requisition types A and B, please explain in detail the step-by-step process STS uses in LEX which causes the ACTL and LSO fields to be re-populated on the LSR page.**

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commingling nor did he limit it to collocation arrangements. Thus a person would reasonably conclude that Mr. Milner's testimony included commingling, especially in light of the FCC rules on commingling that were in existence, and the undisputed fact that Mr. Milner is well seasoned and experienced expert witness for BellSouth and AT&T. STS' would further point out that due to the "confidential settlement agreement" and pursuant to the "accessible letter" provided to the CLECs in April of this year, the Bulk Migration Process and the "hot cut" process is not only feasible for commingled arrangements, but that STS has demonstrated its feasibility on numerous occasions over the past few months.

*Answer:* STS would like to point out that requisition type C does not have this issue. Also per the LEX User Guide, Forms are at the highest level in the LSR Tree. In the example on this page, LSR, End User, Loop with NP, and DL are all forms. Some forms, such as LSR and End User, are made up of multiple sections. The sections are grouped together in a folder, just as a collection of papers and documents are grouped together in a paper file folder. Other forms, such as Loop with NP, do not include sections and, thus, reside at the highest level without a folder.

The main work area of the LEX application is the LSR Workspace. The Workspace is used to enter and view LSR information and to make changes to information using LSR forms. To display a form in the Workspace, you click the form in the LSR Tree, as described in the previous section. While an LSR is made up of multiple forms, some forms, in turn, are made up of multiple sections, which are secondary input areas.

STS has issues with the ACTL and the LSO fields on the LSR ADMIN page of a LSR (Local Service Request) *“the main LSR Workspace”* which are confined to requisition types A (Loop) and B (Stand Alone Conversions) and Bulk Migration (Single LSRs in a Bulk Arrangement - BSLA).

STS creates a new LSR using the LEX GUI Tool Interface following the flow of the GUI. STS “MUST” first ENTER data on the LEX AT&T Southeast Region **Create LSR Screen for requisition type A (Loop) specifically:**

- PON
- Service Type
- Activity Type
- Company Code
- Type of Service (TOS)
- Area
- Loop Type
- Click on the OK radio button

The LEX GUI takes the STS Order taker to the LSR ADMIN page of the LSR. The LSR ADMIN Page is the natural progression of the LSR per LEX GUI Tool with the NEXT field of the workspace for Data Entry being displayed. The STS Order Taker continues to populate the Data for the LSR on the LSR ADMIN (**Local Service Request-Administration**) Workspace page.

- AN
- DDD (Standard Interval)
- SC
- ACTL
- LSO
- SPEC
- NC
- NCI
- SECNCI
- Remarks (Special Handling) for Commingled LSRs.

The STS Order Taker then Clicks on Bill from the LSR Tree and LEX displays the

**Local Service Request Bill** Workspace Page. The Order Taker populates the Data for this page

- BAN1

The STS Order Taker then Clicks on Contact from the LSR Tree and LEX displays the **Local Service Request Contact** Workspace page. The Order Taker populates the Data for this page.

- INT
- TEL NO
- FAX NO
- IMPCON
- TEL NO
- ALT IMPCON
- TEL NO
- DSGCON
- TEL NO
- FAX NO
- STREET
- FLOOR
- ROOM
- CITY
- STATE (Drop Down)
- ZIP

The STS Order Taker then clicks on the plus sign (+) preceding the End User form folder on the LSR Tree to open the End User Sections. The Order Taker then Clicks on Location and LEX displays the **End User Location** Workspace page. The Order Taker Click the Address Validation Link on the page and performs an Address Validation for the LSR. Once the Address is validated via the link, the Order Taker click on the Submit to LEX radio button (at the bottom of the validated address page) LEX, loads the Address into the End User Location workspace. The Order Taker continues to enter the remaining Data on the workspace.

- NAME
- LCON
- TEL NO
- ACC (Optional)
- NCON (if needed due to Address)

The Order Taker Clicks on Loop and the Loop workspace displays. The Order Taker continues to enter the Loop Data.

- LNA
- CFA

The Order Taker has now completed all LSR forms to issue the LSR to AT & T. The Order Taker Reviews the LSR and has to RE-SUBMIT the ACTL and LSO Data information on the LSR ADMIN page. After the information is Re-submitted, the Order Taker clicks on Actions (in the Menu Bar) and Drop down to Close Edit. LEX displays a dialog box, which the Order Taker clicks OK to save the changes. The Order Taker again clicks on Action (on Menu Bar) and drops down to Issue LSR.

LEX displays a dialog box, which the Order Taker clicks OK to issue the LSR to Bellsouth/AT&T Southeast.

STS creates a new LSR using the LEX GUI Tool Interface following the flow of the GUI. STS "MUST" first ENTER data on the LEX AT&T Southeast Region **Create LSR Screen for requisition type B (Stand Alone Conversion) specifically:**

- PON
- Service Type
- Activity Type
- Company Code
- Type of Service (TOS)
- Area
- Migration Indicator
- Loop Type
- Click on the OK radio button

The LEX GUI takes the STS Order taker to the LSR ADMIN page of the LSR. The LSR ADMIN Page is the natural progression of the LSR per LEX GUI Tool with the NEXT field of the workspace for Data Entry being displayed. The STS Order Taker continues to populate the Data for the LSR on the LSR ADMIN (**Local Service Request-Administration**) Workspace page.

- AN
- DDD (Standard Interval)
- SC
- NNSP
- ACTL
- LSO
- SPEC
- NC
- NCI (fictitious information-STS would like note that of the three valid NCI Codes for Commingling a UNE SL2 DSO ONLY the NCI Code that STS utilizes requires the fictitious information)
- SECNCI
- Remarks (Special Handling, the Correct CFA per Telephone Number on LSR and Correct NCI Code)

The STS Order Taker then Clicks on Bill from the LSR Tree and LEX displays the **Local Service Request Bill** Workspace Page. The Order Taker populates the Data for this page

- BAN1
- BAN2
- BI1
- BI2

The STS Order Taker then Clicks on Contact from the LSR Tree and LEX displays the **Local Service Request Contact** Workspace page. The Order Taker populates the Data for this page.

- INT

- TEL NO
- FAX NO
- IMPCON
- TEL NO
- ALT IMPCON
- TEL NO
- DSGCON
- TEL NO
- FAX NO
- STREET
- FLOOR
- ROOM
- CITY
- STATE (Drop Down)
- ZIP

The STS Order Taker then clicks on the plus sign (+) preceding the End User form folder on the LSR Tree to open the End User Sections. The Order Taker then Clicks on Location and LEX displays the **End User Location** Workspace page. The Order Taker Click the Address Validation Link on the page and performs an Address Validation for the LSR.

Once the Address is validated via the link, the order taker clicks on the "Submit to LEX" radio button (at the bottom of the validated address page) LEX, loads the Address into the End User Location workspace. The order taker continues to enter the remaining Data on the workspace.

- NAME
- LCON
- TEL NO
- ELT
- EATN

The order taker Clicks on Loop with NP and the Loop with NP workspace displays. The order taker continues to enter the Loop and the Telephone Number Port Data.

- LNA
- PORTED NBR
- NPT
- CABLE ID (fictitious information)
- CHAN/PAIR (fictitious information)

The order taker has now completed all LSR forms to issue the LSR to AT & T. The order taker Reviews the LSR and has to RE-SUBMIT the ACTL and LSO Data information on the LSR ADMIN page. After the information is Re-submitted, the order taker clicks on Actions (in the Menu Bar) and Drop down to Close Edit. LEX displays a dialog box, which the Order Taker clicks OK to save the changes. The order taker again clicks on Actions (on Menu Bar) and drops down to Issue LSR. LEX displays a dialog box, which the order taker clicks OK to issue the LSR to Bellsouth/AT&T Southeast.

STS creates a new LSR using the LEX GUI Tool Interface following the flow of the GUI. STS "MUST" first ENTER data on the LEX AT&T Southeast Region **Create LSR Screen for requisition type B (Single LSRs in a Bulk Arrangement - BSLA)**.  
**specifically:**

- PON
- Service Type
- Activity Type
- Company Code
- Type of Service (TOS)
- Area
- Migration Indicator
- Loop Type
- Click on the OK radio button

The LEX GUI takes the STS order taker to the LSR ADMIN page of the LSR. The LSR ADMIN Page is the natural progression of the LSR per LEX GUI Tool with the NEXT field of the workspace for Data Entry being displayed. The STS order taker continues to populate the Data for the LSR on the LSR ADMIN (**Local Service Request-Administration**) Workspace page.

- AN
- DDD (Standard Interval)
- NOR
- PROJECT
- SC
- NNSP
- ACTL
- LSO
- SPEC
- NC
- NCI (fictitious information-STS would like note that of the three valid NCI Codes for Commingling a UNE SL2 DSO ONLY the NCI Code that STS utilizes requires the fictitious information)
- SECNCI
- BOPI
- Remarks (Special Handling, the Correct CFA per Telephone Number on LSR and Correct NCI Code)

The STS order taker then Clicks on Bill from the LSR Tree and LEX displays the **Local Service Request Bill** Workspace Page. The order taker populates the Data for this page

- BAN1
- BAN2
- B11
- B12

The STS order taker then Clicks on Contact from the LSR Tree and LEX displays the **Local Service Request Contact** Workspace page. The order taker populates the Data for this page.



- INT
- TEL NO
- FAX NO
- IMPCON
- TEL NO
- ALT IMPCON
- TEL NO
- DSGCON
- TEL NO
- FAX NO
- STREET
- FLOOR
- ROOM
- CITY
- STATE (Drop Down)
- ZIP

The STS Order Taker then clicks on the plus sign (+) preceding the End User form folder on the LSR Tree to open the End User Sections. The order taker then Clicks on Location and LEX displays the **End User Location** Workspace page. The order taker Click the Address Validation Link on the page and performs an Address Validation for the LSR.

Once the Address is validated via the link, the order taker click on the Submit to LEX radio button (at the bottom of the validated address page) LEX, loads the Address into the End User Location workspace. The Order Taker continues to enter the remaining Data on the workspace.

- NAME
- LCON
- TEL NO
- ELT
- EATN

The order taker Clicks on Loop with NP and the Loop with NP workspace displays. The order taker continues to enter the Loop and the Telephone Number Port Data.

- LNA
- PORTED NBR
- NPT
- CABLE ID (fictitious information)
- CHAN/PAIR (fictitious information)

The order taker has now completed all LSR forms to issue the LSR to AT & T. The order taker Reviews the LSR and has to RE-SUBMIT the ACTL and LSO Data information on the LSR ADMIN page. After the information is Re-submitted, the order taker clicks on Actions (in the Menu Bar) and Drop down to Close Edit. LEX displays a dialog box, which the Order Taker clicks OK to save the changes. The order taker again clicks on Actions (on Menu Bar) and drops down to Issue LSR. LEX displays a dialog box, which the order taker clicks OK to issue the LSR to Bellsouth/AT&T Southeast.

STS discovered that LEX Completely Removes the ACTL and LSO information during the Address Validation Process causing STS LSR to received a Clarification. This resulted in STS having to resubmit LSRs and delays service to its end users.

**2. Has STS submitted a change request through CMP regarding this issue? If so, what was AT&T's response?**

*Answer:* It was STS Telecom understanding from the directions of Florida PSC Staff to AT&T July 7, 2010 via a conference call, **Staff requested AT&T** to move this item to Change Control.

On September 15, 2010 CMP Meeting AT&T stated; "LEX – ACTL and LSO Fields "AT&T stated that LEX is form driven and that CLECs can input data in the order that works for them". STS stated that for requisition types A and B they had to start with the end user form, otherwise the ACTL and LSO field are overwritten with BLANK Information and have to be retyped. AT&T agreed that during address validation the ACTL and LSO field are populated with the information from the pre-order system, which is what is used by most CLECs.

STS asked if AT&T planned to open a defect. AT&T stated that it did not consider this a defect. STS did not open a CR (Change Request). Instead, STS is relying on Florida Staff and the Commission to address this concern with AT&T.

**Issue 3:** *The R/C/O tables contained within the LOH will not be retained in the same format when converted to the LSOR.*

1. Please explain why a Microsoft Word copy of the R/C/O data is not acceptable to STS.

*Answer:* STS would like to explain that the R/C/O Tables contained in the LOH is a valuable tool used by STS and Southeast Region CLECs to support placing Error Free Local Service Orders to Bellsouth/AT&T Southeast in a efficient and timely manner. STS has provided a demo to the Florida PSC Staff and AT& T demonstrating the loss of a major functionality of submitting successful LSRs (Local Service Requests) to Bellsouth/AT&T Southeast. STS would also like to point out, that under the recommendation of staff , Bellsouth/AT&T retired the LENS OSS System a "Linear operational structure" and replaced it with LEX.

Staff went on to say; "Staff believes the LEX interface is not as user-friendly when compared to the LENS linear process." "However, staff acknowledges that CLECs may prefer the flexibility provided in LEX." STS brought in to this concept with the knowledge of certain other tools (e.g. R/C/O Tables) are available to help STS facilitate submitting clear error free LSRs to Bellsouth/AT&T in an efficient and timely manner. Further, staff concerns with any minimal delays in processing LSRs would increase significantly if the R/C/O Table vs. the 9 State LSOR were needed in the LSR creations process. LEX without the on-line Edit-Checking Capability and

upfront 1<sup>st</sup> level validations is cause enough for AT&T to maintain and update the R/C/O Tables.

For example: LENS on an REQ TYP B UNE SL2 in a Commingled Arrangement (use the WAP) would not allow the Order Taker to leave the LSR Admin Screen without the ACTL and or the LSO Fields to be populated. The LENS on-line, interactive, menu driven system would alert the order taker that these are REQUIRED Fields (taken directly from the R/C/O Tables) and once the Order Taker populated the Data in the Fields. The Order Taker could continue to populate the remainder of the LSR, submit it and not to go back for any reason. LEX would allow that same LSR to be submitted and be returned an Manual Error from the LSC (with takes about 14 business Hours) and then have to research each field the ACTL and the LSO. Correct the LSR and resubmit.

STS obtained a copy of the "Microsoft Word copy of the R/C/O data" from an interested CLEC with these comments

*"So they are providing data that is not updated for the November '09, and March and July '10 releases??"*

STS replied Yes....

STS reviewed the copy and found it to be unacceptable for the below reasons

- 1 Outdated information (document does no go for current LEX Business Rules)  
Example: an LSR to remove the LSF on an UNE-P/WLP or Resale (LEX will process the order if the CLEC populates the EATN Field or if the CLEC does not populate the EATN Field) Per the 9 state LSOR the EATN is Prohibitive. STS can provide examples upon request. The Problem is the How would a CLEC that ADDs a New Line to current Service populate the LSR if the EATN Field is Prohibitive and the ATN Field is Conditional but the condition of Adding a New Line to Existing Service is NOT listed in the 9-State LSOR. There is NO Product/LSR Example listed on CLEC Online.
- 2 Format-Not Tabs (the CLEC would have to scroll through 2,455 pages) to find the specific REQ TYP before scrolling to the R/C/O Table
- 3 In its' current status, it violates STS ICA.

STS is NOT the only CLEC that take issue with the removal of the R/C/O Table.

Although, STS does not have the permission to those CLECs their comments should be taken into consideration.

*"I had a recent conversation with my internal M&P team and they agree with you that we need the RCO Tables. Apparently I didn't make it clear enough to them as to what we would be losing without the tables when this discussion came up long ago."*

*"I'm with you all the way in keeping the R/C/O Tables since LENS is no longer available."*

*"We have recently expanded to the SE region. I was not familiar with the R/C/O tables, but appreciate knowing about this resource. I will be reviewing and referring to our*

*M&P group as well. Thanks for including me on these emails. You have directed me to an additional resource with which I was not familiar."*

These comments were in the content of a "CLECs Only" emails. Further, 13 states only CLECs with access to an abundant amount of resources are using an end around processes by providing hundreds of one off templates that has to be updated with each major release. STS is a small business and is entitled to what is agreed to in our ICA. Per our ICA Agreement,

**PRE-ORDERING, ORDERING, PROVISIONING, MAINTENACE AND REPAIR**

**1. Quality of Pre-Ordering, Ordering, Provisioning, Maintenance and Repair**

1.1 BellSouth shall provide to STS nondiscriminatory access to its OSS and the necessary information contained therein in order that STS can perform the functions of pre-ordering, ordering, provisioning, maintenance and repair, and billing. BellSouth shall provide STS with all relevant documentation (manuals, user guides, specifications, etc) regarding business rules and other formatting information as well practices and procedures necessary to ensure request are efficiently processed. All documentation will be readily accessible at BellSouth's Interconnection Web site. BellSouth shall ensure that its OSS are designed to accommodate request for both current and projected demands of STS and other CLECs in the aggregate.

It is our assertion that removing the R/C/O Tables is inconsistent with the practices and procedures necessary to endure STS request are efficiently processed.

Further, BellSouth Retail does not have such an issue thereby creating an un-fair advantage not only for STS by for all Florida CLEC with similiar language in their ICAs. STS asserts that if FPSC Staff was to review BellSouth Retail RNS System in the content of the R/C/O Tables that "NO" such issue exists for BellSouth Southeast Region Retail. Nor, does BellSouth Retail have to access ordering information on a per screen/form field by field basis to determine requirements, conditions, or options when placing an order to RNS.

STS points to the Statement from the LENS User Guide to further assist in understanding the concept of the R/C/O Table. AT&T has created the Local Exchange Navigation System (LENS) to provide a simple and "economical" way for CLECs to process service requests for Local Exchange telephone service, directory listings, port/loop combination UNEs, and loop UNE service (with or without Interim Number Portability). LENS may be used either to gather specific telecommunications information from AT&T's existing databases, or to place orders for telecommunications products and services. The R/C/O Tables provide the mapping information for placing orders utilizing the LENS now LEX and Email Manual Orders.

2. Has STS submitted a change request through CMP regarding this issue? If so, what was AT&T's response?

*Answer:* Yes On March 26, 2010, STS submitted Change Request **CR2826** to have the R/C/O tables retained in the LSOR. CR2826 did not go to the CLEC executive steering committee for discussion. Instead, AT&T sent the CR directly to its SMEs for review.

At the following change control meeting held on April 7, 2010, AT&T listed CR2826 as "being evaluated for acceptance".

On April 12, 2010 AT&T unilaterally denied STS' Change Request due to **COST**. On April 12, 2010 STS requested the CR to be escalated and was advised it was escalated. STS has not been contacted by any CMP Escalation Management as of the date of this letter regarding CR#3766/2826. AT&T marked "Closed" on 9-7-2010 under a Type (4) Change Request (which are AT & T initiated Change Request) on a CLEC Type (5) Request.

STS believes that AT&T has not adequately notified the CLEC Community of its intent to discontinue the R/C/O tables and that the rest of the CLEC Community would support STS' request for AT&T to retain and maintain the R/C/O tables, if the CLEC Community is properly notified of AT&T's plans to retire them. In fact, in spite of the absence of proper notification, one CLEC has already contacted STS expressing concerns.

(CR#3766/2826 STS requested to Add the R/C/O Table to the 9 States LSPOR)  
Per ATT CMP on The attached change request is shown as not approved due to cost. The LSOR is developed by an external software application. This application would require modification to create the R/C/O tables which only duplicates information that is already included within a field's Notes, Conditions and Data Entry Conditions. The R/C/O tables do not eliminate the need to view the individual fields because the rules are within the aforementioned Notes, Conditions and Data Entry Conditions.

AT&T then suggested the "Microsoft Word copy of the R/C/O data", but AT&T would not keep them updated. Which brings to light that maybe the cost was not the issue on the CR. AT&T did not present \$1.00 of the cost of the adding R/C/O Tables in the LSOR.

STS also has concerns with the Business Rules for the November 13, 2010 Release at CLEC Online for AT&T 9-State -GUIDE TO LOH SECTION CONTENTS "Ordering Guide (includes General Local Service Ordering Information section, R/C/O Tables and Appendix) [9-State LSOR Volumes III and IV contain high-level Field Usage tables, for *specific* Account-level and line-level (LNA) field application, please

continue to refer to the R/C/O Tables]”. The AT&T 9-State LOH Document is all but impossible to navigate. AT&T NO Longer is provided the Index Tabs which allows the CLEC to navigate the 1, 707 page document. This is also the one of the issues with the “Microsoft Word copy of the R/C/O data”.

Further, the November Release LOH on the *Required, Conditional, Optional (R/C/O), Not Supported (NS), and Prohibited* the CLEC is directed to 9 state LSOR Volume II, Section 3a. Form Descriptions; and under LSOR Volume III, Section 6.3 LSR Form Fields and all other Product Forms. How could STS or any CLEC follow such a confusing maze to place an order? It is certainly not what BellSouth Retail Reps utilizing RNS has to partake in to place an order.

The R/C/O Tables are constantly changing. AT&T is the source for many Southeast Region/Florida CLECs to provide Telecommunications services. The changes from the Industry, Regulatory, CLECs, and AT&T affect the R/C/O Tables one way or the other. STS has notice is the past 3 years, AT&T has put in place a vast amount of changes that affect the R/C/O Tables.

The LOH was NOT the only place that CLEC doing business with BellSouth in the Southeast Region could Access the R/C/O Tables. The Local Ordering handbook Search Tool @ <http://tools.interconnection.bellsouth.com/bbrlo/control/getVersions?type=rco> was another place the CELC could obtain the R/C/O Table Information. Maybe this tool could be use as a compromise with AT&T keeping the information updated.

Respectfully submitted,

/s Keith Kramer

Keith Kramer  
Execute Vice President  
STS Telecom

EXHIBIT A

**Gurdian, Manuel**

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**From:** Berard, Tina L  
**Sent:** Friday, September 19, 2008 3:23 PM  
**To:** Gurdian, Manuel; Culpepper, Robert  
**Subject:** WORD Copy of LSC M&P's  
**Attachments:** Copy\_STS\_M&P.doc

Here is a copy of the M&P's we have discussed.

**Tina Berard Rice**  
**Sr. Quality / M&P / Process Manager**  
**AT&T Wholesale Contract Management**  
**205 714-0298**  
**[tb7205@att.com](mailto:tb7205@att.com)**

**AT&T Proprietary (Internal Use Only)** Not for use or disclosure outside the AT&T companies except under written agreement

9/19/2008

ATT109871

# EXHIBIT A

## UNE - UNE-P to UNE Loop Commingling

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for document content questions.

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### Introduction

#### Purpose

This document provides work instructions to the LCSC Service Reps on how to process requests for a UNE-P to UNE Loop Commingling.

#### Version Information

Converted SOE from Word to verbatim.

#### Table A. Revision History

Chapter	Action Request #	Date / Issue	Description	Change Requested By / Made By
Service Order Exhibits	N / A	January 31, 2007 / 1_corrected	Converted SOE from Word to verbatim.	Danny Mann
All	N / A	November 30, 2006 / 1	Initial Issue	Tina Berard / Keri Lynn Morgan / Lynn P. Burkett

### Chapter 1. Overview

#### 1.1 Overview



## EXHIBIT A

A Commingled circuit allows for a UNE Loop to be connected to a wholesale service. For purposes of connecting UNE Loops, commingling will be defined as a stand-alone Unbundled Loop connected to a BellSouth Wholesale Tariff service

The CLEC must establish the higher-level Special Access (SPA) and associated multiplexing equipment in the same SWC where the local loop will terminate.

The Central Office Channel Interface (COCI), which includes the low speed card and jumper, will be a part of the UNE Loop order. The COCI replaces the collocation cross-connect.

The Commingled DS0 Loop will be terminated to the MDF and then connected, using the appropriate DS0 COCI, to the DS0 side of a D4 Channel Bank.

The same features and capabilities allowed for the DS0 analog Loops will also be allowed for the Commingled Loop including reuse of facilities (when available) as with this process.

The UNE Loops that are commingled with SPA services will continue to be supported by the same processes and centers as the loops are today. There is no difference in the way the UNE Loop is provisioned except that the UNE Loop is delivered to the CLEC at a Mux or D4 Channel Bank in the EU SWC instead of a Collocation arrangement. The same UNE Loop capabilities, measurements and options will apply to the Loop circuit portion of the commingled circuit.

---

### **Chapter 2. Applicable States/Effective Dates**

#### **2.1 Applicable States/Effective Dates**

UNE-P to UNE Loop Commingling is available only in 1 state and for 1 CLEC.

**Note:** The CLEC must have the appropriate rate elements (USOC's) in their Interconnection Agreement.

# EXHIBIT A

State	Applicable	Effective Date	CLEC	Company Code
Florida	Y	November 2006	STS	645A

## Chapter 3. LOH (Local Ordering Handbook)

### 3.1 Ordering, Data Dictionary, Due Date Interval Guide

To view the current version of the LOH, please click below:

[LOH \(Local Ordering Handbook\)](#)

## Chapter 4. Restrictions/Requirements

### 4.1 Product Restrictions

The following items are not available for UNE Loop Commingling:

<b>Product Specific</b>
SIG does not apply.
Mileage does not apply to this product.
Service Inquiry form (SI) is not needed.
Product not to be used to provision wireless service.
Cable & Pair is not applicable for this product, but will be used to submit the order via LENS

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T3TIE CFA is not applicable for this product.

SAW does not apply.

### 4.2 Billing Information

The following table shows the restrictions and/or requirements that pertain to billing information.

Billing	Applies (Y/N)	Special Instructions
Minimum Bill Requirements	Y	A minimum of one month of billing/billed in CABS
Billing Guarantees	N	No action needed by service rep
<b>Additional Information:</b> Y=YES, N=NO		

### 4.3 Order Charges

The following table shows restrictions and/or requirements that pertain to ordering charges.

Charges	Applies (Y/N/C)	Special Instructions
Manual Coordination	Y	Manual Coordination is included in the one (1) time non-recurring charge.
SOMAN/SOMEK	Y	SOMEK only  Link to <a href="#">Matrix of Applicable Charges by State</a>
Expedite Charges	N	Click <a href="#">HERE</a> to learn more about Expedite Charges.
Overtime Rates	N	Overtime rates apply for work outside of 8:00 AM and

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5:00 PM local time

**ADDITIONAL INFORMATION:** Y=YES, N=NO, C=CONDITIONAL

### 4.4 LSR Requirements

LSR Requirements		
Section	Item	Definition
<b>LSR</b>	CC	645A
	BAN1	CABS BAN for Loop
	BAN2	Listing Q Account
	REQTYP	BB
	ACT	V
	NC Codes	STS will submit NC Codes for a non-Commingled SL2 Loop.
<b>LSNP</b>	Cable ID	PXXX1
	Pair	00
<b>RMKS</b>	CFA	STS will provide a <b>CFA in Remarks</b> . The format will either be ST01.  Ex: 88888 ST01 3 CLMBGAMTWD1 RSWLGAMA
<p><b>Additional Information:</b> Any other entries are considered business as usual.</p>		

### 4.5 Service Order Requirements

Order Requirements		
Section	Item	Definition
<b>IDENT</b>	SPO	Service Provisioning Overall Measurement contains 4 to 5 alphanumeric, recapped on CABS "C" type service orders. See SPO chart below for more information.
	AECN	Required on Designed Service Orders. This information is placed in the <i>Unfielded Ident</i> section of the service orders.
	ACTL	The ACTL the CLEC submits on the LSR will be 11 characters. It will be the ACTL CLLI of the BST wire center where the CLEC is collocated.

## EXHIBIT A

	APPT	An Appt (appointment) Code is required on UVL-SL2 loop order. <a href="#">Click here to learn how to apply the correct Appt Code to the order.</a>
	BCS	The Basic Class of Service used on the order will be: NTCVG - Voice Grade Loop
	FDT	Frame Due Time: If you are unsure which FDT to use, please refer to the FDT Requirements for UNE Orders document by clicking: <a href="#">UNE-FDT Requirement for UNE Orders</a>
<b>S&amp;E</b>	SOME C	SOME C will always be on the order.
	NC Code	Same NC Code from LSR
	NCI Code at CKL-1	
	NCI Code at CKL-3	Same as from LSR
	CKL Locations	<p>Commingled Loop orders will have 3 CKL locations:</p> <ul style="list-style-type: none"> <li>• <b>CKL1</b> Address of BST central office</li> <li>• <b>CKL2</b> End User SWC CLLI (also known as MUX)</li> </ul> <p><b>CKL3</b> End User Address</p> <p><b>Note:</b> If the CFA is a T3Z, a CKLT will be needed. The End User address will then become CKL3.</p>
	XPOI	This FID is floated at CKL1 and is the ACTL EXAMPLE: /XPOI AGSTGAMTXFX
	CKLT	The data that follows the CKLT 2 is the 8 character CLLI code of the End Users SWC.  EXAMPLE: IG2 CKLT 2-RSWLGAMA
	CKR	A field from the LSR. The CKR is used by CPG on the Design Layout Report (DLR) that is sent to the CLEC. Additionally, CWINS and I&M can use the CKR during testing.
CFA	The CLEC will provide a CFA in Remarks. The format will be ST01	

## EXHIBIT A

		The Cable ID and Pair generated on the Loop order needs to be deleted and the CFA from Remarks added to the S&E.
	Circuit ID Format	The circuit ID for the type of Commingled Loop ordered will be the same as a non-commingled DS0 level loop. EXAMPLE: 38.LYFU.123456..SB would be used for the SL2 Commingled Loop for these orders.
	WACD	This FID will be used on ALL Commingled Loop orders. It is floated at CKL1 on the order. <b>/WACD Commingled Non Transpt</b> is used on all new Commingled Loop orders.
<b>RMKS</b>	Remarks section of Order	If a service rep needs to update a pending service order, the service rep should always update the remarks section of the order to explain what was done:  .Ex: 12-11 Updt ordr to chng dd per sup 2.....Tina

**Additional Information:** Please refer to service order exhibits contained in this document for service and equipment formats specific to this product.

Table B. SPO Codes

SPO Codes		
<b>First Character</b>	M	Used for Adds or Rearrangements
	N	Used for Disconnects
...		
<b>Second Character</b>	F	ALWAYS
...		
<b>Third Character</b>	X	ALWAYS
...		
<b>Fourth and Fifth Character</b>	Number of Circuits being Added, Rearranged or Disconnected.	

# EXHIBIT A

## Chapter 5. Types/Options

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### 5.1 Types

Only one type of Commingled Loop is available for this process:

- 2 Wire Unbundled Analog Voice Designed (SL2)

### 5.2 Options

There are no additional options available at this time.

---

## Chapter 6. Validations

---

### 6.1 Validations

**Note: When validating a CFA of (T3Z) if the NC codes does not match on the LSR, please clarify.**

Please click below to link to the validation process documents:

Process
<a href="#">Address Validation</a>
<a href="#">ORION User's Guide</a>
<a href="#">BAN Verification</a>
<a href="#">LCSC Toolkit Job Aid</a>

---

# EXHIBIT A

## Chapter 7. Forms

---

### 7.1 Forms

The following forms are required to be sent by the CLEC:

- Local Service Request
- End User Form
- Loop Service Number Portability Form

**Note:** A Service Inquiry (SI) form is not needed for this product.

---

## Chapter 8. Collocation Verification

### 8.1 Collocation Verification

Follow these steps for determining if collocation is physical or virtual:

- Log into appropriate TN3270 site
  - Clear the screen and type **/ICLOC screen**
  - Type the 11 character ACTL CLLI in the Location CLLI Field
  - Hit PF1
  - Look in the Type Field
  - If a C is populated, use physical collocation USOC
  - If anything besides a C is populated or is blank, use virtual collocation USOC
- 

## Chapter 9. Exact Programming

---

### 9.1 Project Code

The project code to be used in EXACT depends on the product being ordered.

The Loop order should be generated electronically, but if an order must be issued manually through EXACT, the following Project Code should be used:

- NTCVG



# EXHIBIT A

[Click here to access the UNE-EXACT Programming document in CDIA for a complete list of codes.](#)

## Chapter 10. NC Code Matrix

### 10.1 2 Wire Voice Grade Commingled Loop

NC Code	NCI Code	SECNCI Code
LY—	04DS9.15 04DS9.1K 04DS9.15B 04DS9.1S	02LS2 02GS2 02RV2.T

**Note:** The same NC Code and SECNCI Codes that are applicable to a Non-Commingled Analog Voice Grade Loop (SL2) are applicable to the Commingled Loop. Only the NCI Code is different.

### 10.2 4 Wire Voice Grade Commingled Loop

NC Code	NCI Code	SECNCI Code
LY—	04DS9.1 04DS9.1K 04DS9.15 04DS9.1S	04LS2 04GS2

**Note:** The same NC Code and SECNCI Codes that are applicable to a Non-Commingled Analog Voice Grade Loop (SL2) are applicable to the Commingled Loop. Only the NCI Code is different.

## Chapter 11. USOC's

## EXHIBIT A

### 11.1 Unbundled Voice Grade Commingled USOC's

Commingled Voice Grade Loop USOC's			
BCS	USOC at CKL 1	USOC at CKLT2	USOC at CKL 3
NTCVG	HTN	1D1VG	UEAL2 for 2 Wire UEAL4 for 4 Wire

## Chapter 12. Project Management

### 12.1 Project Management

All LSR's will be sent with a pre-assigned Due Date.

Click the following to learn more about Project Management: [Project Management Guidelines \(CDIA\)](#)

To obtain a list of contacts click [Project Management Website](#)

## Chapter 13. CRO, RRSO, and SEQ

### 13.1 CRO, RRSO, and SEQ

Please click below to view CRO, RRSO, and SEQ document:

[CRO, RRSO, and SEQ](#)

# EXHIBIT A

Not intended to be a complete Service Order Exhibit, please fill in appropriate fields.

<pre> SR RG VN 001 SI 770422 RC MOD PD - - AC N TI SOI RG TN *** ***_**** SA CC *** CD - - EX AD - - HU 0000 ID 00-00 ORD C***** CS NTCVG SLS YAXQ*** DD - - AC AP * MA ()                 </pre>	<p>AP=W, L or x (see appointment code document) BCS = NTCVG</p>
<pre> ---IDENT LAT SPO MFK* ZRTI \$,QS,800 773-4967,***,205714 ADSR IAECN 645A, NTCVG FDT 900P                 </pre>	<p>SPO=Check SPO doc under UNE Reference Links to confirm correct SPO code. ***=Service Rep initials</p>
<pre> ---LIST ACN CLEC Name ACA 1-ACTL's Address ACTL 1-ACTL from LSR                 </pre>	
<pre> ---CTL SID **_**_**/LAM **_**_** /DLRD **_**_** RID ---**_**/DVA **_**_** WOT **_**_**/FCD **_**_** PTD **_**_** WCO CIS/OCO *** ECO *** DSG IMP SLSN LCSC Rep Name/CTN 800 ***_****                 </pre>	
<pre> ---BILL IPON ***** MAN U645A                 </pre>	<p>PON=Retrieve from LSR MAN=STS CompanyCode</p>
<pre> ---S&amp;E IG1 CLS ** LYFU.*****.*** /NC LY - - /CKR ***** /PIU 0/PLU 100 /SSP/SMPL *** I1 *****                 </pre>	<p>CLS=Circuit Id NC=Use NC code from LSR CKR=Use CKR from LSR if new loop. BCS = NTCVG</p>

# EXHIBIT A

## Chapter 14. UNE – Order Reference Links

### 14.1 UNE – Order Reference Links

For information on Routing Codes, Switching Indicators, System Request Codes, Disconnect Reasons, Appointment Codes, Service Inquiry forms and FPI Indicators, please click below:

For more detailed definitions of the previously mentioned terms, click below to view the TR73572 Expanded Interconnection Services DS1 and DS3 Level Network Interface Specifications:

[UNE -- Order Reference](#)

## Chapter 15. Quick List of Service Order Exhibits

### 15.1 Quick List of Service Order Exhibits

Exhibit Number	Description
<a href="#">Exhibit 1</a>	New Install with CFA

## Chapter 16. Service Order Exhibits

### 16.1 Exhibit 1: UNE-P to UNE Commingled Loop

To view additional information on USOCs, refer to the [DS1 Interface USOC Table](#).

This exhibit represents the UNE Commingled Loop order portion of the UNE-P to UNE Commingled Conversion.

# EXHIBIT A

<p>SUB 1-*** **</p> <p>IG2 CKL 1-POP Address, City, State /LSO *** **/TAR ***,**** /NCI *****/**/ /CFA *** ** * POPCLLlCode MUXCLLlCode /ZNEA /ACTL * /XPOI POPCLLlCode /WACD COMMINGLED NON TRANSPT</p> <p>I1 HTN</p> <p>IG2 CKLT 2 - *****</p> <p>I1 *****</p> <p>SUB 2-*** **</p> <p>IG2 CKL 3-End User Address, City, State /LSO *** **/TAR ***,*** /SN End User Name /NCI *****/**/ /TAR ***, ***/LCON End User or</p> <p>CLEC IMPCON NPA NXX-****</p> <p>I1 UEAL2 /LSO</p> <p>I1 UNECN/ZRCI CLEC Name, *** *- ****,</p> <p>CLEC IMPCON Name</p> <p>I1 DND</p> <p>I1 SOMEC</p>	<p>CFA=Retrieve from Remarks on LSR ACTL=* same as ACTL number in LIST section</p> <p>CFA = ST01</p> <p>CKLT2 = First 8 characters of the ACTL This USOC will be: 1D1VG Refer to Chapter 12</p> <p>SEC NCI=Retrieve from LSR</p> <p>USOC at CKL-3 are same as the non- commingled version of the type of loop....UEAL2....Refer to Chapter 12</p> <p>DND used for UNE-P to UNE Commingled Conversion.</p>
<p>---RMKS RMK Commingled Loop</p>	

## Chapter 17. UNE SOR Checklist

### 17.1 UNE SOR Checklist

Please click below to view the SOR checklist for this product:

[UNE SOR checklist](#)

# EXHIBIT A

## Chapter 18. MSOC

### 18.1 Clairvoyant - MSOC Module Job Aid

To view information on ESM, Activity Summary and Details, MSOC Tally Sheets, DWOR, and MOR, please click below to view the Clairvoyant - MSOC Module Job Aid:

[Clairvoyant - MSOC Module Job Aid](#)

### 18.2 MSOC Job Aids

Please click below to view the MSOC Job Aids:

To view information on Basic, Fundamental and Advanced MSOC Job Aids, please click below to view these job aids:

[MSOC Job Aids](#)

## Chapter 19. Definitions & A.K.A.'s (Also Known As)

### 19.1 Terms and Definitions

Term	Definition
COCI	Central Office Channel Interface

## EXHIBIT A

SPA	Special Access
COM	Commingled
DSX	Digital Cross Connect
OC-TS	Order Coordination-Time Specific
LCM	Local Contract Manager
LSM	Local Support Manager
IOF	Inter Office
ICSC	Interconnection Carrier Service Center
ACAC	Access Customer Advocacy Center

### Chapter 20. Frequently Called Numbers

#### 20.1 Frequently Called Numbers

Center	Contact Information
AFIG	<a href="#">AFIG Job Aid</a>
Center Contacts	<a href="#">Center Contacts</a>
Employee Locator	<a href="#">Employee Locator</a>
SAC	<a href="#">Service Advocacy Center</a>
WMC	<a href="#">Work Management Center</a>

### Chapter 21. FAQs & Troubleshooting

#### 21.1 FAQs

This section is currently under construction. If you have any information relating to the topic please submit via the Action Request System (AR).

# EXHIBIT A

## 21.2 Troubleshooting

This section is currently under construction. If you have any information relating to the topic please submit via the Action Request System (AR).

### 21.2.1 Maintenance & Repair

Maintenance and Repair issues will be handled thru the CWINS center.

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## Chapter 22. Quick Reference Links

### 22.1 Quick Reference Links

For links to the most common look up tools, (USOC Look Up Tool , NC NCI Codes, etc.), please select below:

[Quick Reference Tools](#)

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## Chapter 23. Corrective Action / Feedback

### 23.1 Corrective Action / Feedback

Corrections to this document should be submitted via the ISO approved Action Request System (ARs). Please click [here](#) to access the AR system via the Interconnection Gateway.

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ATT109888



# EXHIBIT A

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Last Updated: January 31, 2007

**REDACTED VERSION FOR PUBLIC INSPECTION  
(Pursuant to Protective Order, File No. EB-09-MD-008)**

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
SATURN TELECOMMUNICATION	)	
SERVICES, INC., a Florida	)	
Corporation,	)	
	)	
Complainant,	)	File No. EB-09-MD-008
	)	
v.	)	
	)	
BELLSOUTH	)	
TELECOMMUNICATIONS, INC., a	)	
Florida corporation, d/b/a AT&T	)	
FLORIDA,	)	
	)	
Respondent.	)	

---

**JOINT SUPPLEMENTAL DECLARATION OF  
CARYN DIAZ AND RONALD E. CURRY**

---

State of Florida  
County of Broward

}  
}§§  
}

**BEFORE ME** the undersigned authority personally appeared, CARYN DIAZ and RONALD (RON) E. CURRY, who after first being duly sworn depose and say:

**I. INTRODUCTION**

- 1) We are the same Caryn Diaz and Ronald (Ron) E. Curry who filed a declaration in this proceeding on July 21, 2009.
- 2) We are both over the age of eighteen (18) and making this affidavit under penalties of perjury. The following information is true and correct and based upon our personal knowledge.
- 3) The purpose of our "Supplemental Declaration" is to provide collaborative information to FCC Staff and Commissioners regarding the ordering rules, processes and systems made available to Saturn Telecommunication Services, Inc. ("STS") by BellSouth Telecommunications, Inc. d/b/a AT&T Florida ("AT&T") outside of the Bulk Migration Work Around Process for the purpose of ordering commingled DS0 Voice Grade Loops in support of STS' recent filings in these proceedings.
- 4) To provide Staff and the Commissioners with a better understanding of the different order types, we will briefly discuss some basic ordering rules, terminology and ordering systems so that Staff and Commissioners can become familiar with the terms that will be used throughout this declaration. These statements are based on the AT&T Southeast Region's ordering rules and CLEC information packages.

### Manual vs. Mechanized Order Submission

- 5) Orders for UNE products are submitted to AT&T either by a spreadsheet<sup>1</sup> or on a Local Service Request (LSR).<sup>2</sup> The LSRs can be submitted either by manual or mechanized (i.e. electronic) method. Prior to AT&T's April 2008 release,<sup>3</sup> manual orders could be submitted via fax or e-mail. After the April 2008 release, AT&T required that all manual orders only be submitted via e-mail. Manual orders are created on blank LSR forms<sup>4</sup> and the fields are not pre-populated.
- 6) A mechanized order is one that is submitted electronically. Prior to May 2010, mechanized orders could be submitted via AT&T's LENS GUI tool, TAG/XML<sup>5</sup> and EDI. After May 2010, electronic orders could only be submitted via LEX, and 22-State XML.<sup>6</sup> When the order is being submitted electronically, i.e. via LEX or its predecessor LENS, the population of certain fields is limited to those options listed in a drop down menu for that particular field.<sup>7</sup> In electronic submission, the order processor at the CLEC

<sup>1</sup> See Exhibit M Bates CDRC00533

<sup>2</sup> See Exhibit H Bates CDRC00412-413, CDRC00448

<sup>3</sup> In April 2008, AT&T provided an "up-grade" to its OSS systems that in part allowed the manual process to be e-mailed instead of by facsimile. See Accessible Letter (Exhibit CC Bates CDRC00852)

<sup>4</sup> See exhibit G Bates CDRC00367 and CDRC00381

<sup>5</sup> LENS refers to Local Exchange Navigation System using the internet for access to this OSS system; TAG/XML refers to Telecommunications Access Gateway See exhibit C BATES: CDRC00008 - CDRC00050, The March 2010 "The State of Florida Public Service Commission's {Evaluation of AT&T's Local Service Request (LEX) and Local Exchange Navigation System (LENS)}" page 21, Section 4.3.1 LENS Ordering, and page 20 Section 4.2.1 LENS Pre-Ordering.

<sup>6</sup> See exhibit DD Bates CDRC00892

<sup>7</sup> See Exhibit C Bates CDRC00008-CDRC00050.

(i.e. STS) does not have the ability to override these fields and populate them freely as it could on a manual order.<sup>8</sup>

- 7) There is also a substantial cost difference in the non-recurring charges associated with a manual service order (SOMAN) and a mechanized or partially mechanized service order (SOMEK), with the SOMEK charges being less than the SOMAN charges.<sup>9</sup>

**Single Local Service Requests (LSRs) vs.  
Bulk Migration Bulk Single LSR Arrangements (BSLAs)**

- 8) LSRs can be submitted to AT&T either singularly or in a bulk arrangement for the conversion of LWC ("Local Wholesale Complete") lines to a CLEC's switch facilities. Prior to the LEX release in November 2009, a single LSR would be submitted either manually or electronically depending on the business rules for that product type.<sup>10</sup> For example, except for the defective WAP<sup>11</sup>, prior to November 2009 all commingled orders were required to be submitted manually and electronic ordering was not permitted.<sup>12</sup> After the release of LEX, AT&T announced that orders for all products could be submitted electronically via LEX.<sup>13</sup>

<sup>8</sup> See Exhibit C BATES: CDRC00033- CDRC00035 The March 2010 "The State of Florida Public Service Commission's (Evaluation of AT&T's Local Service Request (LEX) and Local Exchange Navigation System (LENS)" page 20 Section 4.3 Ordering: "However, some orders may fall out of the electronic flow-through for a number of reasons as defined in various AT&T business rules. These partially-mechanized orders that fall out will require manual handling by AT&T's Local Service Center (LSC) representatives located in Birmingham, Alabama."

<sup>9</sup> See Exhibit DD BATES CDRC00891 The ICA Section 2, Exhibit A "rates"

<sup>10</sup> See exhibit DD Bates CDRC000892

<sup>11</sup> The Bulk Migration Work Around Process ("WAP") was a defective process limited to STS in the State of Florida. On its face it was limited to up to 2,500 lines, however arbitrary restrictions by AT&T limited the WAP to approximately 1,600 lines. The WAP was never made available to a CLEC other than STS and was designed by AT&T to avoid AT&T's legal obligation to make SQM/SEEM Remedy Payments.

<sup>12</sup> See BATES\_RC000646 The Multi-bandwidth User Guide "new" loops page (8)

<sup>13</sup> See Exhibit C BATES CDRC00047 March 2010, The Florida Public Service Commission's Evaluation of AT&T's Local Service Request Exchange (LEX) and Local Navigation System

- 9) LSRs submitted via a Bulk LSR Arrangement, including without limitation, orders for UNE voice grade SL2 loops via commingled arrangements in bulk, are submitted electronically in a bulk package. Prior to the LEX release in November 2009, except for the defective WAP, any products that were limited to manual ordering could not be submitted in a Bulk Migration Single LSR Arrangement ("BSLA") because the published Bulk Migration Process was and is only an electronic process.<sup>14</sup>
- 10) All Bulk Migration orders in a Bulk Arrangement are project managed by an AT&T Project Manager.<sup>15</sup>
- 11) All bulk migrations submitted in a bulk LSR arrangement are not intended to "flow through" AT&T's systems electronically. Per note 4 of the March 2010 AT&T Southeast Region Flow Through Matrix: "The following list of items will not flow through: LSRs with project fields populated..."<sup>16</sup> Since the Project field is required on a LSR in a BSLA arrangement, the LSRs associated with a valid BOPI in a BSLA will not flow through AT&T's systems electronically.

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(LENS) OSS Interfaces Section 5.2: "With the implementation of the LEX ordering interface in November 2009, AT&T stated that all local services and products (all Activity Types and all Request Types) are designed to be submitted electronically through LEX."

<sup>14</sup> See exhibit BB Bates CDRC00827 REQ TYP B – BULK MIGRATION PROCESS per the LOH Section 3, Ordering: "Bulk Single LSR Arrangement (BSLA) The single LSR Bulk Migration option is an electronic process designed to allow CLEC customers to submit a minimum of 2 and up to and including a maximum of 99 individual LSR requests in a bulk arrangement with a specified timeframe to migrate existing non-complex services [Residence/Business] Port/Loop Combinations (UNE-P/WLP-LWC) / Resale to Loop with LNP."

<sup>15</sup> See Exhibit BB Bates CDRC00828 REQ TYP B – BULK MIGRATION PROCESS per the LOH Section 3, Ordering: "The following general business rules apply to Bulk Single LSR Arrangement: All Bulk orders are project managed"

<sup>16</sup> See Exhibit CC Bates CDRC00874

- 12) Unless otherwise specified, all REQ TYP "B" orders are eligible for submission via individual LSRs in a bulk arrangement per the LOH section 3-Ordering "REQ TYP B - Bulk Migration Process".<sup>17</sup>
- 13) The bulk migration BSLA process is simply a method to submit individual LSRs in a bulk arrangement. The ordering rules found in the LOH still apply to the individual LSRs in a bulk arrangement. There are no technical limitations in LENS or LEX that would prohibit the use of the published Bulk Migration Process and the bulk migration scheduling tool. A technical limitation in LENS or LEX could only prohibit the submission of the individual LSRs, but not the ability to obtain a valid BOPI and Project ID via the Bulk Migration Scheduling Tool in PMAP.<sup>18</sup>
- 14) Per section 5.g. of the Bulk Migration (Single LSR/Bulk Arrangement) CLEC information package, which has been published since 2004, "CLECs must obtain a Bulk Order Package Identifier (BOPI) and reserve due dates and number of lines to be migrated through the Bulk Migration Scheduling Tool".<sup>19</sup>
- 15) The bulk scheduling tool is accessed to obtain a BOPI.<sup>20</sup> The valid Project ID consists of the 12 character BOPI obtained via the bulk scheduling tool, plus the word "BULK"

<sup>17</sup> See Exhibit BB Bates CDRC00827 REQ TYP B - BULK MIGRATION PROCESS per the LOH Section 3, Ordering: "Unless otherwise specified, Bulk Single LSR Arrangement (BSLA) will be based upon existing REQ TYP B rules found in the 9-state LSOR."

<sup>18</sup> "PMAP" Performance Measurement Analysis Platform

<sup>19</sup> See exhibit BB Bates CDRC00821 "Bulk Migration (Single LSR/Bulk Arrangement) CLEC Information Package Version 4 May 10, 2010 Section 8 Bulk Migration Scheduling Tool, 8.1 Scheduling Tool Description and 8.2 Scheduling Tool Capabilities"

<sup>20</sup> "BOPI" Bulk Order Project Identifier

added to the end of the BOPI (totaling 16 characters) and is required to be populated in the Project ID (PRJID) field of each LSR in the Bulk arrangement.<sup>21</sup>

- 16) Project ID's are used in at least two distinct situations: on a "Project Order" and on a Bulk Migration Single LSR. A "Project Order" is defined as a customer request for service where (i) the quantity is greater than the AT&T Southeast Region standard, (ii) the request is for non-standard equipment, or (iii) the request is for non-standard facilities.<sup>22</sup> A CLEC must refer to the LOH Interval Guide, Section 9,<sup>23</sup> to determine if a service request meets "Project Order" criteria. If a CLEC's service request meets "Project Order" criteria, the CLEC then requests a Project ID via e-mail. In Florida, LSRs identified as "Projects" are excluded from certain measurements in the Service Quality Measurement (SQM) Plan<sup>24</sup>. However, Project IDs obtained for a Bulk Migration via the Bulk Scheduling Tool in PMAP are considered "valid" Project IDs. LSRs with valid Project IDs for Bulk Migrations are included in the SQM Plan.<sup>25</sup> The fact that the order is for a commingled arrangement does not remove the order from the SQM Plan.
- 17) Per the SQM Performance Metrics, requests for Bulk Migrations including, without limitation, those bulk requests for UNEs via commingled arrangements, come into AT&T via Global Requests. The Global Request is broken down into individual LSRs. These

<sup>21</sup> See exhibit BB Bates CDRC00822 "Bulk Migration (Single LSR/Bulk Arrangement) CLEC Information Package Version 4 May 10, 2010 Section 8.3 Scheduling Tool Process"

<sup>22</sup> See exhibit BB Bates CDRC00831 "Project Management per LOH Section 3: Ordering

<sup>23</sup> See exhibit BB Bates CDRC00831 "Project Management per LOH Section 3: Ordering

<sup>24</sup> The (SQM) was developed to respond to the requirements of the communications Act of 1996 (96 Act) which required BellSouth to provide non-discriminatory access to Competitive Local exchange Carriers (CLECs).

<sup>25</sup> See exhibit W Bates CDRC00654, CDRC00656, CDRC00658 "Exclusions: LSR's identified as "Projects" with the exception of valid "Projects IDs" for Bulk Migrations"



individual LSRs are used for the measurements and are reported within the correct product disaggregation for each measure.<sup>26</sup>

#### LSR Forms/Screens and Fields

- 18) An LSR consists of multiple forms/screens.<sup>27</sup> Forms are referred to when submitting an order manually and screens are referred to when submitting an order electronically. These forms and screens are comprised of fields. These forms/screens and fields are standard in the telecommunications industry as set by the ATIS sponsored Ordering and Billing Forum (OBF)<sup>28</sup>.
- 19) Per the Required/Conditional/Optional (R/C/O) tables found in the Local Ordering Handbook (LOH), certain forms/screens as well as the fields that make up these forms/screens are required, conditional, optional and/or prohibited depending on the order type.<sup>29</sup> The LOH guidelines incorporate the following requirements for the population of fields:
- **Required** is defined as the field *MUST* be populated and when populated incorrectly/incompletely, the LSR will be clarified.
  - **Conditional** is defined as the *field is dependent upon the relationship to another entry* as specified in the usage statement and is *dependent upon the presence, absence or combination of other data entries* and if populated incorrectly/incompletely, the LSR may be clarified.

<sup>26</sup> See exhibit W Bates CDRC00654, CDRC00656, CDRC00658 "Business Rules – Bulk Migrations"

<sup>27</sup> See Exhibit C BATES CDRC00032-CDRC00043, March 2010 Florida Public Service Commission's Evaluation of AT&T's Local Service Request Exchange (LEX) and Local Exchange Navigation System (LENS) OSS Interfaces Section 4.3.1 and Section 4.3.2.

<sup>28</sup> See exhibit AA Bates CDRC00803

<sup>29</sup> See exhibit AA Bates CDRC00804

- **Optional** is defined as the field *may or may not* be populated and if populated incorrectly/incompletely, the LSR may be clarified.
  - **Not Supported** is defined as this field *is not used* by BellSouth® and when populated will be ignored by BellSouth®. The Not Supported fields will not be shown in the Required, Conditional and Optional (R/C/O) tables, but will be reflected in the Data Dictionary.
  - **Prohibited** is defined as this field *must NOT* be populated and when populated, the LSR will be clarified by BellSouth®. The Prohibited fields are not shown in the Required, Conditional and Optional (R/C/O) tables, but "prohibited" occurrences are defined in the Data Dictionary.
- 20) Although there are many forms/screens and fields applicable to many different order types, we will cover only those that pertain to the purpose of this declaration.

**Requisition Types (REQTYPs)**

- 21) There are various REQTYPs<sup>30</sup> used in AT&T's Southeast Region for ordering local service. For the purpose of this declaration, we will focus on two REQTYPs:
- i. REQTYP "A" – Loop Service
  - ii. REQTYP "B" – Loop with Local Number Portability (LNP)
- 22) The difference between REQTYP "A" and "B" is mainly that REQTYP "B" allows for the ordering of a loop with local number portability (LNP) whereas REQTYP "A" allows for the ordering of a loop without local number portability (LNP).
- 23) However, there are additional differences between REQTYP "A" and "B".
- REQTYP "A" is Prohibitive for Bulk Migration Ordering.

<sup>30</sup> See exhibit AA Bates CDR00805

• REQTY "B" is the "ONLY" Requisition Type to facilitate a Bulk Migration of LWC, "aka" UNEP lines or POTS Lines, "aka" Resale lines, to UNELs (UNE Loops) or EELs.

• REQTY "B" can "only" have an account level activity type (ACT) of "V" which is a conversion of service to new Local Service Provider (LSP).

REQTYP "A" can have multiple ACTs.

24) REQTYPs are combined with ACTs. The different levels of relevant activities are discussed in the next section.

#### Account Level Activities (ACT)

25) Generally there are two distinct levels of activity types that apply to most of the REQTYPs: Account (ACT)<sup>31</sup> and Line Level (LNA)<sup>32</sup> activities.

26) Account Level Activities (ACTs) apply to all of the Request Types (REQTYPs). ACTs apply to the entire account. There are multiple valid ACTs. For the purpose of this declaration, we will discuss two ACTs:

i. ACT "N" – New installation and/or account

ii. ACT "V" – Conversion of service to new Local Service Provider (LSP)

27) Line Level Activities (LNA)<sup>33</sup> apply to the specified line/loop only. There are multiple valid LNAs. For the purpose of this declaration we will discuss two LNAs:

i. LNA "N" – New installation and/or account

ii. LNA "V" – Conversion of service to a new LSP as specified.

<sup>31</sup> See exhibit AA Bates CDRC00806 "Account Level Activities"

<sup>32</sup> See exhibit AA Bates CDRC00806 "Line Level Activities"

<sup>33</sup> See exhibit AA Bates CDRC00806 "Line Level Activities"

28) Per AT&T's Local Ordering Handbook (LOH), various combinations of these fields (REQTYP, ACT, LNA) are allowed. The combinations of these fields reflect the CLEC's desired request; for example, if a CLEC wanted to convert an existing POTS line with LNP from another LSP,<sup>34</sup> the CLEC would submit an LSR to AT&T with the following combination of REQTYP/ACT/LNA:

- i. REQTYP "B" – Loop with local number portability
- ii. ACT "V" – Conversion of service to new local service provider
- iii. LNA "V" – Conversion of service to new local service provider as specified.

29) A CLEC would reference the LOH and/or CLEC information package for specific UNE ordering scenarios and the valid REQTYPs/ACTs/LNAs allowed for each scenario.

**AT&T's "manual" process made available to STS for the Commingling of an SL2 Loop**

30) During the 2007 time frame, except for the defective Bulk Migration Work Around Process, there were no other processes permitted by AT&T for STS to utilize to convert a customer with existing POTS (Plain Old Telephone Service using voice grade loops) or UNE/WLP service type service to STS's commingled network on a Single LSR. This was true whether the request was submitted manually, electronically, or via a Bulk Migration Single LSR arrangement.

31) In fact, not one of the seven (7) AT&T Southeast Region CLEC Information Packages available at the time that related to commingling addressed migrating a CLEC's embedded base of UNEP/WLP lines and or POTS (Retail) lines to Voice

<sup>34</sup> LNP "Local Number Portability" and LSP "Local Service Provider."

Grade UNE Loop (with Number Portability) attached, linked, or connected via special access transport and multiplexing. Four of the CLEC Information Packages identified Commingling Architectures that are analogous to STS's *Commingled Network Architecture* for a SL2 in a *Commingled* arrangement.

32) The seven AT&T Southeast Region CLEC Information Packages relating to *Commingling* that are available now and were available during the 2006 and 2007 timeframes are:

- **"UNE Loop Multiple Bandwidth Commingling (new loop orders)."**<sup>35</sup> Includes *Commingling Architectures* that are analogous to STS's *Network Architecture* for a SL2 in a *Commingled* arrangement.
- **"Unbundled Dedicated Transport-Currently Combined UNE Combinations."**<sup>36</sup> Includes *Commingling Architectures* that are analogous to STS's *Network Architecture* for a SL2 in a *Commingled* arrangement.
- **"Unbundled Dedicated Transport-Ordinarily Combined UNE Combinations."**<sup>37</sup> Includes *Commingling Architectures* that are analogous to STS's *Network Architecture* for a SL2 in a *Commingled* arrangement.
- **"Wholesale Transport Service Conversion to Unbundled Network Element-Loop (UNE-L)."**<sup>38</sup> Includes *Commingling Architectures* that are analogous to STS's *Network Architecture* for a SL2 in a *Commingled* arrangement.

<sup>35</sup> See exhibit H Bates CDRC00394 – CDRC00406. See Exhibit JJ, CDRC001014 – CDRC001015.

<sup>36</sup> See exhibit H Bates CDRC00407 – CDRC00425

<sup>37</sup> See exhibit H Bates CDRC00426 – CDRC00442

<sup>38</sup> See exhibit H Bates CDRC00443 – CDRC00459

- “Unbundled Dedicated Transport-Unbundled Dark Fiber (UDF).”<sup>39</sup>
  - “Unbundled Dedicated Transport-UNEs.”<sup>40</sup>
  - “Unbundled Loop Service Rearrangements.”<sup>41</sup>
- 33) The CLEC Information Package available to CLECs in AT&T’s Southeast region entitled “UNE Loop Multiple Bandwidth Commingling (New loop orders)”<sup>42</sup> contains the process that has been referred to by AT&T as the “manual process.” This process was limited to a REQTYP A<sup>43</sup> and an ACT of “N”<sup>44</sup> (“new loop”), and does not allow local number portability or the re-use of an existing loop. Even if one were to disregard the additional cost of a new loop as opposed to the lower cost of reusing an existing loop and the additional service outage in provisioning a new loop as opposed to the hot cut process for the conversion of an existing loop, the absence of local number portability rendered the manual process completely useless. Therefore, STS could not have used this process to convert any customer to its network.<sup>45</sup>
- 34) Outside of the defective Work Around Process (WAP) for STS and the UNE Loop Multiple Bandwidth Commingling (new loop orders) CLEC information package, the only other option STS was informed of for converting its customer base was

<sup>39</sup> See exhibit H Bates CDRC00460 – CDRC00473

<sup>40</sup> See exhibit H Bates CDRC00472 – CDRC00484

<sup>41</sup> See exhibit H Bates CDRC00485 – CDRC00494

<sup>42</sup> See exhibit H Bates CDRC00394 – CDRC00406

<sup>43</sup> See exhibit AA Bates CDRC00805

<sup>44</sup> See exhibit AA Bates CDRC00806

<sup>45</sup> See KK00419, KK00420, Robby Pannell to Curry August 1, 2006 “Remember these are for NEW loops only.” KK00221 e-mail from Dorothy Vallery to Ron Curry, Pannell, Cicero dated March 24, 2006, KK00222 (same document) Currently, a spread sheet or Bulk Migration process to convert UNE-P to UNE-L Commingling does not exist. The transition of a UNE-P line to an applicable Commingled UNE L may be accomplished by a manual request.

presented to STS by Robby Pannell in an e-mail on March 20, 2006.<sup>46</sup> According to Mr. Pannell's e-mail, the only way that STS could convert a UNE-P/ LWC account to a UNE loop is by submitting an order with REQ TYP "A"/ACT "V". The LCSC would disconnect the UNE-P and issue a new connect for the Commingled Loop. The LCSC would try to reuse the Cable and Pair. In many if not most cases, AT&T would not reuse the cable and pair and insist on the ordering of a new loop. Regardless of whether the loop was new or able to be converted, this process would not have worked because the REQ TYP "A"/ACT "V" combination does not allow for loop service with number portability, requires the use of the "DISC NBR" field on the Loops Service (LS) page of the order, and would have resulted in the disconnection of the customer's phone number.<sup>47</sup>

**The development of the Bulk Migration Work Around Process (WAP) for STS by AT&T**

- 35) AT&T has falsely alleged that the Bulk Migration WAP was developed so that STS could submit its orders via LENS to convert its UNE-P customers to a commingled SL2 Loop. Prior to the development of the Bulk Migration WAP, AT&T had an existing process that could and should have been used to convert STS' UNE-P

<sup>46</sup> See Bates KK00223-224

<sup>47</sup> See Exhibit AA Bates CDRC00807 LOH Section 4 - Data Dictionary "DISC NBR Disconnect Telephone Number (LS Page)" Definition "Identifies the telephone number to be disconnected". Also see Section 4- Data Dictionary "DISC NBR" Definition Note No. 1: "This field is used to identify the existing end user number of the associated bundled service which is to be disconnected with the conversion." Also see Section 4- Data Dictionary "DISC NBR" Conditional Usage Note 1: "Required when the REQ TYP is A, and the ACT is V and the LNA is D or V".

customers to its commingled network. There were no technical limitations in LENS that would require a WAP to be developed to submit orders.<sup>48</sup>

- 36) The Bulk Migration WAP for STS required STS to populate certain fields on the order with fictitious information.<sup>49</sup> We will explain these fields and how they were to be populated per the WAP and later explain why the use of this fictitious information was not necessary to get the orders submitted to the LCSC through LENS using an AT&T process that existed at the time. We will also explain what effect the fictitious information had on the order where applicable.
- 37) The particular fields STS was required to populate with fictitious information were the Bulk Order Package Identifier (BOPI), the Project ID (PRJID), the Network Channel Interface (NCI), the Cable ID, and the Channel Pair.
- 38) Per the ordering requirements found in section 6 of the WAP, the requirements for the BOPI read: "This is a 12 character Bulk Order Package Identifier (BOPI). The 12 character BOPI is made up of the following and is required for each BSLA: Positions 1-8 will always be "COMMNGFL" for all BSLA orders. Positions 9-12 will be unique for each BSLA and will be formatted as 0001, 0002, 0003, etc. (a different number is required for each BSLA). The same BOPI is required on each LSR that is part of the same BSLA." These requirements circumvent the bulk scheduling tool.
- 39) Per the WAP, the requirements for the Project ID field (PRJID) read: "12 character BOPI plus the word "BULK" for a total of 16 characters." The WAP required the use of a fictitious BOPI which was not obtained for bulk migration via the bulk

<sup>48</sup> See Exhibit "A" Bates CDRC00001 - CDRC00006 "Bulk Migration Order Entry Comparison Matrix" attached.

<sup>49</sup> See BATES CD000484-485, CD000504-505, CD000514-515 and CD000534-535. "The Bulk Migration work-around process" section 6.5 \*Note: LSR Field Requirements.



scheduling tool in PMAP. The PRJID is comprised of the BOPI. Since the BOPI required by the WAP is fictitious, the PRJID is not valid for bulk migration per the SQM Plan and any orders submitted via the WAP were EXCLUDED from (but not limited) to the following SQM Plan measurements:

1. O-8 [RI]: Reject Interval<sup>50</sup>
  2. O-9 [FOCT]: Firm Order Confirmation Timeliness<sup>51</sup>
  3. O-11 [FOCC]: Firm Order Confirmation and Reject Response Completeness<sup>52</sup>
  4. P-11 [SOA]: Service Order Accuracy<sup>53</sup>
- 40) The required use of the fictitious BOPI also prevented STS' orders from being project managed by an AT&T Customer Care Project Manager (CCPM) as stated in the bulk migration WAP "Section 3 - Service Description."<sup>54</sup> Since the BOPI was not obtained via the bulk scheduling tool, STS' orders did not reach the CCPM team.<sup>55</sup>

<sup>50</sup> See exhibit W Bates CDR00654 "Exclusions"

<sup>51</sup> See exhibit W Bates CDR00656 "Exclusions"

<sup>52</sup> See exhibit W Bates CDR00658 "Exclusions"

<sup>53</sup> See exhibit W Bates CDR00680 and ATT116840 email dated Thursday October 19, 2006 from Nancy Piatowski to Ronald Pate and Karen Fields "They (LSRs) will all have a Project ID and BOPI that begins with COMMNGFL so we can identify them for exclusion from the ordering measures. We discussed excluding them from FOCT and RI as projects, and counting them as planned manual fallout in Flow-Through. They will not impact Service Order Accuracy, and are supposed to be L-Appr coded so they will be excluded from OCL."

<sup>54</sup> See exhibit BB Bates CDR00828

<sup>55</sup> See Bates ATT008132-8133 Email dated June 4, 2007 from Kimberly Purifoy to Karen Fields "There have been some orders that have been recently issued. I cannot see them in PMAP nor do they populate an automatic BOPI notification. Without this notification, I don't have any way to know when the clec has placed a request or been foc'd. Please let me know what the expectation is for project management's involvement if the orders do not come to us for handling." And email dated June 4, 2007 from Kathryn Ray to Anjelyne Roney, Karen Fields, Kimberly Purifoy "Ok, guys, all I understand at this point is that we're not receiving any notification that a project is pending. We have to know that before we can do anything. Who can fix this, and how

- 41) In April 2009, AT&T updated "Section 3 - Service Description" of the Bulk migration WAP to state that STS' orders would be project managed by an AT&T Local Wholesale Support Manager (WSM).<sup>56</sup> All versions of the WAP prior to April 2009 stated that the orders will be project managed by an AT&T Customer Care Project Manager (CCPM).<sup>57</sup>
- 42) Per the WAP, the "Network Channel Interface" (NCI) field was to be populated with "02QC3.OOD".<sup>58</sup> This entry is valid for a two (2) wire network interface and requires the use of the Cable ID and Channel Pair fields.<sup>59</sup> STS has a four (4) wire network interface and requires the use of the CFA fields.<sup>60</sup> The invalid NCI entry found in the recent versions of the *Bulk Migration work-around process* section "6" for a two wire network interface prohibits the use of the CFA field and requires the use of the Cable ID and Channel Pair fields. It is important to note that the NCI codes that are valid for a four wire network interface such as 04QB6.33 and 04QB9.11 were available in LENS until its retirement in May 2010.<sup>61</sup> In fact, these same four wire NCI codes are listed as "valid" NCI codes in the recently published CLEC Information Package "Migrations to Commingled UVL-SL2 Loop with Number Portability April 14, 2010 Version 1 and April 26, 2010 Version 1.1"<sup>62</sup>. These same codes were also required

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fast since the orders are already coming in? Unless corrected, there is no way for us to add any value here."

<sup>56</sup> See Bates CD000647

<sup>57</sup> See Bates CD000481, CD000491, CD000501, CD000511 and CD000521

<sup>58</sup> See BATES CD000515 and CD000525

<sup>59</sup> See Affidavit of Caryn Diaz, Exhibit 102, Bates CD001701 (Video demonstrating the LENS order entry defects with the Bulk Migration Work-Around Process)

<sup>60</sup> A four wire network interface is a DS 1 level, with 24 available channels. See Exhibit I BATES CDRC000495 "Unbundled Loop Matrix"

<sup>61</sup> See exhibit L Bates CDRC00532

<sup>62</sup> See exhibit Y Bates CDRC00776 and CDRC00782

per section 6, (attachment 1) of the first two versions of the WAP that AT&T provided to STS on November 1, 2006 and November 28, 2006. The requirement was subsequently changed to a two wire NCI code after AT&T acknowledged that the entry of the correct four wire NCI code prohibited the use of the Cable ID and Channel Pair fields. The Cable ID and Channel Pair fields were required per the WAP to be populated with fictitious information which would cause the orders to "fall out" for manual handling. Based upon orders that STS placed in 2010 (orders placed not using the WAP), as further explained hereinafter, it is clear that had AT&T permitted STS to populate the NCI code in LENS with a valid NCI code for a four wire network interface such as 04QB6.33 or 04QB9.11, STS would have been able to populate the CFA information in the proper CFA field as well as populate the telephone number to be ported with the corresponding CFA. Additionally, LENS would have accepted the order, loaded it into AT&T's database and dropped it for manual handling by the LCSC representative. Instead, STS was required per the WAP to populate the CFA information in the remarks field of the order while the corresponding numbers to be ported were required to be populated on the Loop Service with Number Portability (LSNP) page along with the fictitious Cable ID of "PXXX1"<sup>63</sup> and the fictitious Channel Pair of "00."<sup>64</sup> Per the WAP, the fictitious Cable ID and Channel Pair are what forced the order to drop for manual handling by the LCSC representative.<sup>65</sup>

**Other Processes that could have worked outside of the WAP for STS**

<sup>63</sup> See Bates CD000525

<sup>64</sup> See Bates CD000525

<sup>65</sup> See Bates CD000525

- 43) On February 12, 2010, STS submitted PON CDZ-10000-1RV electronically via LENS<sup>66</sup> and populated the appropriate fields according to the ordering business rules for the "LNP- Designed Analog Loop" Process.<sup>67</sup> This should not be confused with STS submitting this order via the WAP – instead, this order was placed using the LNP-Designed Analog Loop Process which is a separate and distinct process from the WAP. This is the same process referred to in section (4) of the WAP which states, "For complete requirements and instructions, refer to the Local Ordering Handbook (LOH) Section 3 Ordering: REQTYP B- Bulk Migrations Process section and LNP BSLA – Designed Analog Loop Section."<sup>68</sup> STS populated the NCI field with a valid NCI code for a four wire network interface of 04QB6.33 per the business rules, and populated the CFA(s) in the proper CFA field(s) along with the numbers to be ported on the Loop Service with Number Portability page (LSNP).<sup>69</sup>
- 44) Per the Electronic PON Status Report, PON CDZ-10000-1RV was received, loaded into AT&T's database, and dropped to the LCSC for manual handling.<sup>70</sup> The order was then clarified for the following reason: "cfa and nci code needs to be in rmks, need valid nc/nci combination".<sup>71</sup>
- 45) STS resubmitted the order and it was again clarified by the LCSC representative who advised STS to "refer to the special handling document for this type of request."<sup>72</sup> STS resubmitted the order again and included the following in the remarks of the

<sup>66</sup> See exhibit J Bates CDRC00496-498

<sup>67</sup> See Bates CD000521-525

<sup>68</sup> See Bates CD000482, CD000492, CD000502, CD000512, CD000522 and CD000648

<sup>69</sup> See exhibit J Bates CDRC00496, CDRC00497, CDRC00500 and exhibit DD Bates CDRC00906, CDRC00907 and CDRC00908

<sup>70</sup> See exhibit J Bates CDRC00499

<sup>71</sup> See exhibit J Bates CDRC00501-502

<sup>72</sup> See exhibit J Bates CDRC00507-508

order "RESUBMIT PER SE LOH SECTION 3 ORDERING FOR LSOG 10  
RELEASE 32 LNP DESIGNED ANALOG LOOP PAGES 471-475.<sup>73</sup> PER SE NC-  
NCI CODES APPLICATION TOOL NC NCI SECNCI VALID. THANKS."<sup>74</sup>

- 46) An LCSC representative by the name of Paula contacted Ron Curry via phone to advise him that per her work instructions she could not work the order unless it was resubmitted with the fictitious NCI code of 02QC3.OOD as well as "special handling" populated in the remarks field along with the CFA information. Paula's instructions mirror those found in the WAP for STS. However, STS didn't use the WAP to submit this order. STS submitted this order following the business rules for the "LNP Designed Analog Loop" Process,<sup>75</sup> a process which is still available today. This is the same process that STS believes it could have and should have used in 2007 via LENS.<sup>76</sup>
- 47) This process also could have been used in a Bulk Migration Single LSR Bulk Arrangement, as there are ordering rules for such an arrangement<sup>77</sup>. PON CDZ-10000-1RV demonstrates that the order could have been submitted via LENS and fallen out for manual handling following the "LNP Designed Analog Loop" Process and that the fictitious field information required by the WAP was not necessary for

<sup>73</sup> See exhibit J Bates CDRC00512-514

<sup>74</sup> See exhibit J Bates CDRC00514

<sup>75</sup> See exhibit J Bates CDRC00521-525

<sup>76</sup> This has been the consistent position of AT&T since STS requested a conversion process using the Bulk Migration Process for commingling of voice grade loops. AT&T seemed with all requests to be confused and misleading. See KK00184, KK00185, KK00186, KK00187, KK00188, KK00189, KK00191, KK192, KK00193, KK00194, KK00195, KK00196, KK00197, KK00198, KK00199, KK00200, KK00201, KK00218, KK00219, KK00220, KK00221, KK00222, KK00223, KK00224, KK00227, KK00228, KK00243, KK00244, KK00280, KK00307-310,

<sup>77</sup> See BATES RC002818-RC002822, RC002744-RC002748, RC002669-RC002673, RC002594-RC002598, RC002380-RC002384, RC002307-RC002311.

manual fallout. It was AT&T's internal decisions that prevented STS from using this process, not technical limitations in LENS.<sup>78</sup>

#### The Bulk Migration Process

- 48) In September 2005, BellSouth added to the product field of the Bulk Migration Scheduling tool Collocation ACTL to accommodate the addition of "2w VG EELs to the product list."<sup>79</sup>
- 49) There have been no major changes, only administrative, to the Bulk Migration Process as far as processes and fields that the CLEC uses. An example of an administrative change in 2007 is.<sup>80</sup>

<sup>78</sup> The following is a continuation of AT&T's insistence that STS not use the established business rules but mislead STS into believing that there was not a process available for the conversion of UNE-P/Wholesale UNE-P/LWC Lines, or Bulk Migration Process: Carrier Notification SN1084241 September 27, 2004 "BellSouth will offer a Web-based Scheduling Toll enhancement to be used in conjunction with UNE-P/DS) Wholesale Platform to UNE-L Bulk Migration process. The Scheduling tool will allow the CLEC to reserve due dates and number of lines to migrate by Central Office (CO) when planning for a Bulk Migration", ATT155377, ATT152827, ATT008396, ATT152510 "Adapt Bulk Migration process to Accommodate migration (must complete prior to June) dated April 4, 2006, ATT008403 April 7, 2006 Ad Avernull to Keith Milner, "The revision replaces the 1,300 line impact with 3500 the \$118K revenue impact with \$317K that I briefly mentioned to you yesterday" attachment has "Adapt Bulk Migration process to accommodate migration, ATT009430, ATT151943-44, ATT008583 "This deadline was established due to the proposed use of the older Bulk Migration process. However, this process is being discontinued the first week in July, 2006. Since it is too late to meet the June 30<sup>th</sup> deadline, a new deadline will be negotiated and STS will use the most recent Bulk Migration process." ATT151628 Brasfield to Davis May 22, 2006 "Mike, I have gone back through all my e-mails. Correspondence went back and forth where BellSouth let them know that they could not do UNE-P to Commingling UNE-L on the Bulk Migration Process. I had Cathy Crosswhite submit an NBR to see if we could come up with a process. I was asked to cancel the NBR when the Account Team got involved to help with the solution." ATT000826, ATT000833, ATT000834, ATT000837, ATT000838, ATT132415-17, ATT132418 Fields to Pannell July 07, 2006 "Robby, STS will not submit a spreadsheet for the bulk migration process. STS will still have to submit orders according to the bulk migration process that is documented along with a few changes to force this workaround that Tina is working on.", ATT132419, ATT132345, ATT132346, ATT132347, ATT132348, ATT116839, ATT116840-42, Pannell0000030-32, ATT132481.

<sup>79</sup> See Exhibit Q BATES RC001457 description is a 2 wire voice grade EEL is now part of the product list that can be used in the bulk migration process.

- Change BOPI from S – Special Handling, B – Bulk to S – Special Handling, A – Z 0-9 Bulk [increments every year], for example, 2007 = C, 2008 = D etc.
  - Rebrand “report” from BellSouth to AT&T
- 50) All Bulk Migration orders including EELs are facilitated by the CLEC utilizing the following functions:
- The first function the CLEC logs into is the Performance Measurement and Analysis Platform (PMAP) GUI tool to schedule a bulk migration.
  - The CLEC then goes to the Bulk Migration Scheduling tool which will display the availability for each central office to do bulk migrations for each day. The CLEC will be able to schedule their migrations up to the availability on each due date selected.
  - When the CLEC completes scheduling the work, the tool will display the Bulk Order Package Identifier (BOPI).<sup>81</sup>
  - The BOPI is entered by the CLEC on the bulk LSR a.k.a. “Order” along with the scheduled due dates. After the LSR is submitted, a Customer Care Project Manager will contact the CLEC to obtain any additional information that may be required for the request.
- 51) This process is followed whether the bulk “LSR” contains multiple “LSRs” for multiple Existing Account Telephone Numbers (EATNs) or for EELs in bulk requests. The minimum requirements are two EATNs which would represent two customers at the same Central Office.

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<sup>80</sup> See Exhibit Q BATES RC001457

<sup>81</sup> See Exhibit Q BATES RC001459

- 52) Whether an order is submitted in a bulk arrangement or as a single LSR, the order process itself can be logically broken into the following three key activities:<sup>82</sup>
- Order Process Submission
  - Order Process Validation/Clarification
  - Order Process Confirmation
- 53) When the LSR is submitted by the CLEC via either an electronic interface or e-mailed "manually" to the LCSC (LSC), the next steps follow:<sup>83</sup>
- The order flow validates the LSR data, checks the data for errors, and either generates a service order or falls out for planned manual handling by a LCSC/LSC Rep.
  - In some instances the LSR may be returned to the CLEC because the information provided by the CLEC is invalid or incomplete. The CLEC may need to provide additional information or clarify some of the information already provided before the LSR is validated.
  - Once the LSR is validated, the Southeast Region issues an AT&T Firm Order Commitment (FOC) to the CLEC. This completes the ordering process and prompts the provisioning of the bulk ordering request.<sup>84</sup>
- 54) The CLEC follows the Business Rules and Ordering Guides found in the Local Ordering Handbook (LOH), CLEC Information Packages, and recently added Local Service Ordering Requirements (LSOR).<sup>85</sup>

<sup>82</sup> See Exhibit M BATES CDRC00533

<sup>83</sup> See Exhibit C BATES CDRC00033 The Florida Public Service Commission Evaluation of the LEX and LENS OSS interface Section 4.3 page 20.

<sup>84</sup> See Exhibit C BATES CDRC00033. The Florida Public Service Commission's Evaluation of the LEX and LENS OSS interface Section 4.3.



- 55) The CLEC can order an EEL for voice grade loop by populating the Service and Product Enhancement Code (SPEC) field.
- 56) The business rules for ordering EELs, designed analog (voice grade) loops, and non-designed analog loops in a bulk arrangement, are found in the LOH, and the LSOR combined with the Required/Conditional/Optional (RCO) tables. The RCO tables indicate the proper fields to be populated on manual orders as well as electronic orders.<sup>86</sup>
- 57) An electronic order is intended to flow-through to AT&T's back-end OSS interfaces for order processing without the need for manual intervention. However, some orders may fall out of the electronic flow-through for a number of reasons as defined in various AT&T business rules.<sup>87</sup> For example, in a bulk migration or single LSR of an EEL or commingled arrangement, the CFA must drop out for "validation" regardless of what type of order entry method is chosen by the CLEC.<sup>88</sup>
- 58) The Provisioning Process includes all of the activities necessary to fulfill a CLEC order for telecommunications service.

#### **Bulk Migration Process Order Entry Comparison**

- 59) AT&T provides designed voice grade loops in EELs and Commingling arrangements with special access multiplexing and transport. These arrangements can be ordered as a "new" loop/service on a single LSR, or as a "conversion" of an existing

<sup>85</sup> See exhibit C BATES CDRC00034-CDRC00038. The Florida Public Service Commission's Evaluation of the LEX and LENS OSS interface Sections 4.3.1, 4.3.2

<sup>86</sup> See Bulk Migration Order Entry Comparison Matrix, Exhibit A to Curry/Diaz Supplemental Declaration, 000001-000006.

<sup>87</sup> See exhibit C BATES CDRC00033-CDRC00038. The Florida Public Service Commission's Evaluation of the LEX and LENS OSS interface Section 4.3.

<sup>88</sup> See exhibit C BATES CDRC00039-CDRC00043. The Florida Public Service Commission's Evaluation of the LEX and LENS OSS interface Section 4.5.

service/loop on a single LSR or in a bulk single LSR arrangement for multiple LSRs and EATNs. STS provides in Exhibit "A" attached hereto The Bulk Migration Order Entry Comparison Matrix for EELs and Designed Analog Loops using either the standard Bulk Migration Process or the WAP.

- 60) This matrix clearly explains and compares each process and the required fields that have to be populated. Whereas for EELs and Designed Analog Loops the business rules are standard and published for all CLECs, the WAP was for one CLEC in one State and available to STS.
- 61) The Bulk Migration Order Entry Comparison Matrix shows that the following fields differed from each other:
- BOPI field: although required for all of the order types, it was only in the WAP that AT&T required the use of an invalid "common" BOPI.
  - DDD field: only in the WAP did AT&T assign the due dates on a spreadsheet.
  - NCI field: only in the WAP did AT&T require STS to use a NCI code that was not compatible with "Commingling."
  - Project field: only in the WAP was STS required to use an invalid Project ID consisting of the "common" invalid BOPI information plus the word "BULK."
  - The CFA (connected facility assignment): only in the WAP was STS required to populate CABLE ID & CHANNEL/PAIR fields with fictitious information. All other order types in this comparison require the CLEC to populate CFA or Cable ID/Channel Pair.

- The SPEC field: only in the EEL process was it required that the field be populated; initially AT&T required STS to populate the SPEC field but later removed the requirement from the WAP since subsequent changes to the WAP field requirements (i.e. the required NCI code) disabled the SPEC field in LENS... The Designed Analog Loop does not require a SPEC code.

**Processes made available in April, 2010**

- 62) Prior to April 2010, AT&T had no process for STS to utilize for a REQTYP "B" migration to a commingled UVL-SL2 Loop with Number Portability other than the defective Bulk Migration WAP. In April 2010, AT&T published a CLEC information Package entitled "Migrations to Commingling UVL-SL2 Loop with Number Portability."<sup>89</sup> This process is a REQTYP "B" and does not specify any restriction from the use of the standard REQTYP B – Bulk Migration Process.<sup>90</sup> With the exception of the BOPI and Project ID fields, this process published in April 2010 had the same LSR field requirements as the WAP for STS.
- 63) In April 2010, STS used the standard REQTYP B Bulk Migration Process business rules to order the conversion of LWC lines to a commingled arrangement with special access. The valid BOPI was obtained via the bulk scheduling tool in PMAP and used to populate a valid Project ID on the orders. The fields on the LSRs were populated following the business rules in the April 2010 published CLEC information Package "Migrations to Commingled UVL-SL2 Loop with Number Portability." The orders were received and

<sup>89</sup> See exhibit Y Bates CDRC00772 – CD00777

<sup>90</sup> See exhibit BB Bates CDRC00827 "Unless otherwise specified, Bulk Single LSR Arrangement (BSLA) will be based upon existing REQTYP B rules found in the 9-state LSOR.

loaded in AT&T's database, dropped for manual handling by the LSC, a FOC was issued, and the provisioning and conversion process was completed.

- 64) By comparison, just two months earlier, in February 2010, STS used the business rules for the conversion of LWC lines to a Designed Analog Loop to populate the appropriate fields. LENS accepted the Order and it flowed through to the LSC (LCSC). However, instead of issuing a FOC, the LSC clarified the Order, and required STS to use the defective WAP, in lieu of the business rules.

Exhibit "B," marked "CONFIDENTIAL," shows the Purchase Order Numbers, Date of Entry, Telephone Numbers, Due Date, and whether the Order was a "Bulk Migration" or "Single LSR" for a single customer for commingling with special access.<sup>91</sup> All of the Orders were completed using the standard Business Rules using a REQ TYP B with number portability for a designed loop.<sup>92</sup>

<sup>91</sup> See exhibit B Bates CDRC00007

<sup>92</sup> See exhibit F which includes detailed tracking information for the bulk orders submitted by STS since April 2010 following the published Bulk Migration process and REQ TYP B business rules. This exhibit also includes screenshots of the bulk service order details.

Caryn Diaz  
CARYN DIAZ

Ronald E. Curry  
RONALD E. CURRY

BEFORE ME, the undersigned authority, on this 14 day of July 2010 personally appeared CARYN DIAZ and RONALD E. CURRY, who ARE personally known to me or produced \_\_\_\_\_ as identification, and who after being first duly sworn depose and say that they have read the foregoing Affidavit, that the information contained therein is true and correct and based upon their personal knowledge.

James L. Parado  
NOTARY PUBLIC  
Print Name:  
Commission No.:

