

Suggested Topics For Telecommunications Competitive Topics Forum (as of 10/19/01)

The following topics are attributed to the party originally submitting them using the following abbreviations. Numerical references are to sequence or paragraph numbers.

AL = Allegiance

AS = ASCENT

AT = AT&T

BE = BellSouth

CO = Covad

ES = e.spire

FI = FISPA

FD = Florida Digital Network

IT = ITC^DeltaCom

KM = KMC Telecom

NS = NewSouth

NT = Network Telephone

SU = Supra

TW = Time Warner Telecom

VE = Verizon

WC = WorldCom

XO = XO Florida

ZT = Z-Tel

10 Digit Translations

1. (AT4d) Facilities - 10 digit translations/triggers: BST either cannot or will not use 10-digit triggers in some of their switches, which means that ported numbers do not automatically disconnect during the porting process. This puts our large direct-inward-dialing (DID) customers at risk of losing dial tone during number porting.

Advanced Services Resale

2. (AS1) Issue: BellSouth compliance with checklist item xiv (resale) with respect to BellSouth's provision of advanced services, pursuant to the Court of Appeals for the District of Columbia Circuit finding that incumbent local exchange carriers and their affiliates must make advanced services available for resale pursuant to section 251(c)(4) of the 1996 Telecommunications Act.

a) The January 2001 decision of the U.S. Court of Appeals for the D.C. Circuit made clear that "Congress did not treat advanced services differently from other telecommunications services" with respect to the resale obligations of Section 251(c)(4) of the Telecommunications Act.

b) The FCC has indicated that it will review compliance with the ASCENT Decision in future 271 applications. In the FCC's January 23, 2001 SBC Kansas 271 Order, the FCC stated that while Southwestern Bell Telephone Company could not be faulted for complying with the Commission rules in effect at the time of the application, "we expect SWBT to act properly to come into compliance with section 251(c)(4) in accordance with the terms of the court's decision."

c) The FCC held Verizon - Connecticut and its advanced services affiliate, Verizon Advanced Data, Inc. ("VADI") to the unconditioned resale of advanced services, concluding, "In light of the ASCENT Decision, we cannot accept Verizon's contention that it is not required to offer

resale of DSL unless Verizon provides voice service on the line involved....”

d) BellSouth has failed to demonstrate that it, or its affiliates, comply, or are capable of complying, with the resale obligations under section 271(c)(2)(B)(xiv) of the 1996 Telecommunications Act, with respect to the provision of advanced services.

e) BellSouth must be required to demonstrate that it complies with the obligation to provide advanced services on a resale basis, both currently and on a going-forward basis.

Billing

3. (XO7a) Process to quickly resolve billing disputes - between LEC & ALEC
4. (XO7b) Process to quickly resolve billing disputes - with customers after conversion
5. (XO7c) Discourage “Self help” by LECs
6. (NT 5a) Inaccurate bills and dispute process is flawed
7. (NT5b) Delays in billing new contract rates
8. (WCpar11) Bell is not updating its billing system properly and rapidly which causes double billing; orders fall into a hold file and remain there for more than 30 days.
9. (WCpar 14) BellSouth’s billing should be accurate and timely.
10. (IT4) Bell is sending some carriers **usage without the ANI**. Whether this traffic is local or not cannot be determined since the “from” number is missing.
11. (TW3) Improvement of carrier-to-carrier billing practices with respect to new charges in order to ensure accuracy in billing and avoid disruption of services.

Time Warner Telecom proposes carrier-to-carrier billing guidelines be revamped. Currently, the interconnection agreements and tariffs state that invoices must be paid within 30 days. If the invoices are not paid, letters are sent out by BST to the ALEC informing them that if they don’t pay by the 61st day, their service will be disconnected. Unfortunately, when the ILECs do not pay the ALEC invoices on time, the only recourse is to file a complaint.

ILECs (particularly BellSouth) encourage facilities-based ALECs to purchase network elements from them instead of building their own facilities. However, invoices received by the ALECs for new services often contain billing errors and discrepancies. In fact, Time Warner Telecom has set up a specific group to review all ILEC invoices and has uncovered millions of dollars in errors on invoices across all markets. This review usually means a delay in payment of invoices with new charges, although these invoices are usually paid within 45 – 60 days. However, since there is a delay, we receive a letter from BST threatening to disconnect services. We in turn expend resources trying to determine if the invoice has been paid in time before services are disconnected rather than concentrating our efforts toward reviewing and paying the new charges.

In order to avoid this fire drill every month, the only alternatives are to either 1) pay the entire bill, review the bill after it is paid and then file disputes in the next month; or 2) send a generic dispute letter each month with a standard amount withheld to cover potential errors and then settle up the next month. Both alternatives create administrative nightmares; add additional costs and require unnecessary expenditure of resources.

Ironically, if billing invoices were more accurate, 30 days would probably be sufficient; however, our records reflect that a detailed review of ILEC invoices has yielded millions of dollars in saved expenses due to inaccurate billing. Currently, residential customers are given the same length of time to process and pay their \$50.00 residential bills as carriers are given to process and pay their invoices amounting to thousands of dollars and multiple line items and charges. Therefore, Time Warner Telecom believes carrier-to-carrier billing should allow for 60 days to pay all invoices, but at a minimum, should allow 60 days to pay invoices with new charges so a proper analysis of the invoices can be conducted.

11.A. (CO1) There is a need to reduce the amount of bills generated by BellSouth by reducing or consolidating BAN #s that are received by CLECs. There should be an effort made to reduce these to no more than 1 per LATA for each billing type unless requested by the CLEC.

11.B. (CO2) There is a need to eliminate Late Payment Charges on disputed amounts when BellSouth fails to respond back within 30 days of the claim. If BellSouth cannot return the processed claim within 30 days, Late Payment Charges should not be allowed to accrue.

11.C. (CO3) Covad needs to have a more thorough explanation of Other Charges and Credit (OC&C) Sections on bills. Currently, definitions do not readily explain what constitutes the charges that appear. Items appear to be "lumped" together so no information can be derived as to what circuit specifically generated this charge. Specifically, there is a lack of information concerning "No Trouble Found" charges. Covad was informed that those charges would appear as "additional labor, engineering, etc" which does not allow a thorough reconciliation of charges.

11.D (CO4) The need to have all major charges thoroughly documented instead of just having to "accept" BellSouth estimates or summary bills of charges as a legitimate explanation of bills. This is especially relevant to collocation non-recurring charge bills and their lack of documentation.

11.E (CO5) There is a need to have more billing expertise within the Acct Team. The Acct Teams constantly refer CLEC personnel to others instead of taking responsibility to solve customer related billing problems.

11.F. (CO6) A more streamline billing dispute resolution procedure needs to be developed. The one that exists now puts a tremendous burden on CLEC resources because it is very labor intensive from the CLECs perspective. A streamlined approach is warranted and not one that tries to place a heavy burden on the CLECs to discourage disputes.

Cancellation of ALEC Service

12. (WCpar12) Customers leave MCI but MCI does not receive line loss notification.
13. (BE1) Conversions from ALEC to ILEC or between ALECs: a) Timely access to customer service records of previous local exchange carrier. b) Process for porting numbers from ALECs. c) LSR/FOC response time from other carriers. d) Withholding customer numbers because of accounts past due.
14. (BE3) Process for handling customers when a carrier decides to exit the business (including bankruptcy)

Change Management Process

15. (NT6) (AT1) Lack of prioritization and resolution
16. (WC2,18) Review of process, including the internal BellSouth processes, to determine how they can be revised to ensure that ALEC changes can be implemented in a rapid timeframe.
17. (WCpar22) Extend the length of time for which LENS and TAFI passwords remain valid.
18. (WCpar25) Allow a CLEC to electronically order a migration of a customer's line to the CLEC and have that line added to an existing account the customer has with the CLEC (CR135)
19. (WCpar 25) Enable CLECs to obtain real-time status information electronically (CR0040)
20. (WCpar 25) Enable CLECs to view multiple CSRs simultaneously (CR0020)
21. (WCpar 28) CLEC-initiated changes take twice as long as Bell-initiated changes to implement
22. (IT1) BellSouth refuses to define **release packaging** in a manner which allows CLEC's to prioritize work requests. In Florida discovery, BST admits to only providing the top 30 items to their vendor. Smaller items are never presented for delivery. All items are not targeted for release. While the BellSouth's OSS systems changes are being made are mostly cosmetic with no tangible benefit, resulting only in continuous retraining for CLEC personnel. There should be a more orderly process by which prioritization of CLEC-requested changes are incorporated into each release.
23. (ZT2) Proper use of the change control process to institute operational and/or billing changes.
24. (CO1) When BellSouth develops a new product for CLECs, it only develops procedures for manual orders. It is then incumbent upon CLECs to use the Change Control Process (CCP) and request that electronic ordering capabilities be developed. This is in contrast to BellSouth retail when a new product is developed. Therefore, mechanized ordering through any electronic gateway is not available unless the CLEC makes a formal request to BellSouth. This process

could take from months to a year before a mechanized order is implemented. BellSouth Product Development should include the ability for manual and electronic ordering in the launching of new products and services.

BellSouth should immediately implement system upgrades to permit Covad to order UDC/IDSL, UCL-ND, UNE-T1, ULM (Unbundled Loop Modification).

25. (AS6) Issue: Effectiveness of BellSouth Change Management Practices:

a) ASCENT members report a variety of problems associated with inconsistency between “established” or understood BellSouth ALEC procedures and actual practice, particularly manifested in training (BellSouth and ALECs) and BellSouth handbooks. Constant and uncommunicated changes in practices and policies result in provisioning delays and disgruntled ALEC subscribers.

b) Changes in BellSouth practice are particularly evident in conversion of high capacity special access circuits to UNEs.

Collocation

26. (NS9) In BellSouth’s area, NewSouth is being overcharged for power at its collocation spaces. BellSouth charges for the maximum fused capacity (225 amps) from its BDFB despite the fact that NewSouth has smaller fuses (60 amps) in the BDFB in its collocation and cannot draw more than 60 amps. We have made requests for billing adjustment and have to date received no response.

26A. (FD2) PSC review of collocation pricing and tariffing.

Customer Service Records

27. (XO4a) Permit access to Customer Service Records (CSR) for resale customers based on end user authorization (rather than requiring losing CLEC authorization) to facilitate ALEC to ALEC conversions, rather than return to LEC - important issue to prevent ILEC winback by default

28. (XO4b) Related issue: need to look at call routing of calls to customers with ported CLEC NXX’s, when calls come into ILEC tandem as unprocessed (have had problems with ILECs routing calls based on NPA-NXX, rather than all 10 digits - resulting in “dead-ending”

29. (IT2) When using TAG 7.5.0.12 to pull Customer Service Records (CSR) the data is not retrieved or partially retrieved. Numerous attempts will eventually collect and present the CSR. This causes Order Assistant to be unable to mechanically generate the order. BellSouth acknowledges the defect stating that accounts having more than "8 HSG" records are impacted. It has been assumed these are the larger accounts for which order generation is so critical. Also, BellSouth acknowledges that all current (non-Unix) Versions of TAG, i.e. 7.5.x and 7.6.x are corrupt. Therefore no Version is available to ITC^DeltaCom to avoid this problem. This defect was concealed in testing. All escalation routes have been used to expedite a fix without success. Current BellSouth reply is that Telcordia will ship code next week. This code will then require

testing by BellSouth while our ability to do business remains severely impaired.

30. (IT6) BellSouth does not update CSRs in a timely manner. This results in delays in turning up service, which frustrates the customers, results in the customer losing confidence in ITCD and delays revenue to ITCD.

31. (SU3) Customer Record Information (CRI) – Upon completion of conversion of customer accounts to CLECs, the BellSouth system takes three to four weeks before customer record information becomes available to a CLEC. Supporting or verifying customer requests is impossible without the CRI.

Digital Subscriber Line (DSL)

32. (NT7) Delayed repair and service degrade issues

32A. (FD1) Unavailability of ILEC (either ILEC-branded, UNE, or resold) DSL over CLEC voice

Dispute Resolution Process

33. (XO9) Informal mechanisms to quickly resolve disputes regarding interconnection issues

EELs

34. (XO1a) Reasonable conversion times and processes for conversion of access circuits to EELs

35. (XO1b) Provision of appropriate credits for converted circuits

36. (XO1c) Reasonable provisioning intervals for EELs - parity with same access circuit

37. (XO1d) Provision of a clear ordering system for new EELs

38. (XO1e) Provision of clear maintenance and repair process for EELs and parity with same access circuit.

39. (ES2) EEL conversions

40. (NS5) In Verizon's area, NewSouth would like Verizon to assist in converting Special Access circuits to EELs on a Project Managed basis. To date, the parties have been unable to agree on terms under which this project would be carried out.

Facilities

41. (AT4a) Pending facilities: There are a high number of pending facilities in Florida when

UNE loops and/or T1 facilities are ordered. This delays the orders for an unpredictable amount of time, and BST generally cannot give a firm date when facilities will be available.

42. (AT4b) Repair times: BST's mean time to repair its facilities is unacceptable, particularly in Miami and Orlando. AT&T's internal goal is that repairs be accomplished in less than 4 hours, 85-87% of the time. Because BST is not meeting this goal, AT&T cannot meet its internal goal.

43. (AT4c) Billing inaccuracies: AT&T shares the same issues as mentioned by other ALECs relating to billing and the amount of time to reach resolution of billing disputes.

44. (ES3) Trunk testing

Interconnection Agreements

45. (ZT1) Development of a method for effecting changes in the interconnection agreements, such as the UNE rate reductions, in a timely and efficient manner.

Internet

46. (FI1) Whether and to what extent incumbent LECs have the ability and incentive to disadvantage competing providers of Internet service.

LENS

47. (NT3a) Outages too numerous

48. (NT3b) Delays for updates in LENS. CSI updates sometimes take over 30 days. Process needs improvement.

49. (NT3c) Incorrect information on LENS updates.

50. (CO2a) Covad can not submit mechanized Lineshare orders through LENS due to multiple edit problems for this order type. Covad identified problems with the edit routines upon Covad testing beginning on or before June 4, 2001. BellSouth's last response to Covad on 8/22/01 was to provide new instructions on how to place the lineshare order correctly. The 8/22/01 communications was in regards to Billing Account Number (BAN) problems and acknowledgement that the problem had been referred to the "systems group" at BellSouth to address. It is clear that BellSouth did not complete a single order for linesharing through LENS before it announced that LENS was ready to support linesharing. Covad has spent enormous time and effort in what amounts to a Beta Test for BellSouth systems. ellSouth must immediately resolve the Covad open issues surrounding Lineshare mechanized order placement by providing accurate ordering documentation and resolving back in-system problems with LENS.

51. (CO2b) BellSouth does not have an internal end to end testing process for LENS

enhancements. This causes the CLEC to be BellSouth's quality assurance monitor. The CLEC must submit Change Controls to have system and documentation defeats resolved. Covad can no longer perform the "quality assurance" role with the LENS interface and requests BellSouth to provide a specific testing plan for LENS for all system enhancements.

Clarification of item 51.

Covad expects to place an order for loops and achieve flow-through without spending weeks and months identifying for BellSouth their documentation defeats, system defeats, down-stream provisioning problems, and billing establishment and rate database update failures. This applies to both mechanized and manual ordering processes. However, it has been more apparent with the implementation of LENS by Covad.

Since BellSouth does not have a flow through test process or "end to end" test process, the result is that when Covad or any other CLEC implements a new product or service we find ourselves in the position of working out the ordering problems on a "trial and error" basis. That is, Covad has to submit and resubmit LSRs until we can achieve order flow-through. Covad experiences Billing establishment issues, rate table update issues, etc. which continues all the way to provisioning problems due to incorrect BellSouth product development. BellSouth has a grossly inadequate process for development, testing and implementing new products, system changes upgrades, and lastly failure to provide CLECs documentation that is error free. This issue delays Covad's ability to provide service to our customers and it uses Covad resources in our Process, Training and Operations groups to identify and advise BellSouth of their gateway system, billing systems, and documentation defects. BellSouth also requires the CLEC to submit a change request to document their defect or documentation error so BellSouth can correct their mistake. Since BellSouth is not providing quality products, Covad is not given the OSS systems necessary to compete. Covad has experienced problems with every type of product that has been ordered through the LENS gateway.

1. Covad implemented xDSL ordering on June 4. A BellSouth defect where supplemental orders could not be placed on xDSL ordering originally placed through LENS. This impacted Covad's ability to provide service to customers in which they had already been provided a FOC but the order needed to be changed for some reason. The work around caused delay in processing of LSRs and supplementing orders for new FOCs, changes and cancels of orders or disconnects of orders that had originally been placed via LENS. Software fix installed 8/17/01.
2. Covad reported that LENS would not allow supplemental orders on orders that have been placed in Missed Appointments status. This is a know defect with BellSouth but BellSouth did not advise Covad upon implementation of LENSs, BellSouth did not provide a workaround, and BellSouth did not advise when this defect would be corrected until Covad raised the issue. The defect is targeted for fix in January, 2002.
3. Covad has been trying to order the UCL-ND (Unbundled Copper Loop-Non Design) loop for 7 weeks. BellSouth inability to provide end to end testing for CLECs resulted in Covad ordering being rejected at each breakdown and orders having to be resubmitted, or supplemented. Each step could have been avoided if BellSouth had formal flow through test procedures that were executed for each ILEC prior to implementation of products

and services. The following breakdowns in ordering path have resulted in delayed implementation of UCL-ND loops:

- Ordering Documentation Wrong (2 week delay)
 - BellSouth could not locate Covad PSC Certificates to set up Q Accounts for billing. Covad had to resend certificates for all states except GA, FL, NC. (2.5 weeks delay)
 - BellSouth did not update the BellSouth rate file so all orders were rejected and had to be supplemented for new due dates with expedite requests. (3 days)
 - BellSouth provisioning failures on loop install. As of 9/27, Covad was advised by BellSouth CWINS group that the USOC on the order is not the correct USOC to provision the order. This is an internal product problem with BellSouth. No status has been provided by BellSouth.
4. LENS Lineshare orders were not able to be input via LENS due to the following issues during June, July and August:
- BellSouth Documentation errors on ordering format that were cleared, then
 - Covad Lineshare account numbers being rejected
5. ULM (Unbundled Loop Modification). Began ordering week of 9/17/01. Although, ULM can not be submitted via a mechanized interface this is an example of manually orders that the ordering requirements were not tested. Covad placed our first ULM request to get a clarification back from BellSouth CRSG to make changes to the LSR. These changes were not in the BellSouth documentation instructions. However, we made the changes and the ULM was completed with no problem. Our second ULM request building on the information from the first request was clarified from BellSouth with a list of changes to the ordering process that is not in the documentation. At this time, Covad Training and Process departments are having to review the "clarification" and rework our ordering documentation since the new instructions differ from the web documentation.

52. (CO2c) BellSouth should designate a single point of contact for CLECs using LENS. This person should have sufficient familiarity with the system to enable him/her to address questions immediately and should have sufficient authority to drive resolution of internal BellSouth issues relating to LENS deployment.

Clarification of item 52.

The Interconnection Sales and Services group does not have an adequate support structure to support the needs of CLECs. It takes months to resolve problems. Until BellSouth can provide a better support structure, a subject matter expert should be made available as a point of contact to CLECs for LENS issues. Covad has requested via the BellSouth Change Control team that LENS User Meetings be held by BellSouth like BellSouth holds for EDI. This will provide a common Forum to address LENS issues and improve product/services ordering via LENS. Covad can not continue to be adversely affected by the lack of attention, testing, and support of this gateway. As information, this gateway is used by over 60% of the CLECs. LENS functionality should be flawless and its support superior.

53. (SU11) RNS v. LENS: BellSouth does not provide CLECs with the same operating features. For pre-ordering, ordering and provisioning, BellSouth customer service representatives (CSRs) use RNS. Supra Telecom CSRs use LENS. There are significant differences between the two

operating systems.

54. (SU12) CONVERSION 'AS IS: The four-part problem is as follows: A BellSouth customer will call a Supra CSR, requesting that her service be converted to Supra 'as is', meaning that the Supra CSR will not have to make any changes to that customer's service record. Therefore, there is no chance of human error in submitting the order through LENS. Still, a high percentage of these orders are being clarified by BellSouth as a result of a LENS systems error. After receiving the clarification, the Supra CSR, in a process unilaterally set forth by BellSouth, must call BellSouth's LCSC in order to inform BellSouth of the problem with the order. Supra CSRs are often on hold from 45 – 60 minutes. Supra has recently learned that BellSouth's representatives at the LCSC do not even work the order, but instead refer the order to another office, making it difficult, if not impossible for Supra to check up on the order. Finally, Supra is asked to fax the order to BellSouth's LCSC on a form provided by BellSouth. This creates many problems, in that BellSouth will only accept the form that it faxes to Supra to be filled out manually. This prevents Supra from being able to auto-fax wrongfully clarified orders, and it prevents Supra from faxing a simple spread sheet of wrongfully clarified orders. Furthermore, and perhaps most problematic, is that BellSouth will often ignore the faxed orders, which are then purged from the system (without notice to Supra) after 10 days.

55. (SU13) EXTENDED DUE DATES: This problem results from the fact that RNS provides BellSouth CSRs with on-line edit-checking, whereas LENS does not provide such for Supra CSRs. As a result, BellSouth CSRs cannot even send an erroneous order which could be clarified, whereas Supra CSRs can and do send such erroneous orders. The significance of this is that whenever Supra receives a clarified order, whether due to a systems error or a Supra CSR error, BellSouth extends the due date for the completion of the order. This problem does not happen to BellSouth CSRs, and therefore BellSouth customers receive much more rapid provisioning of their orders.

56. (SU14) PENDING ORDERS: Supra orders which have been given due dates will often sit in the system for days with a "Pending" status. This leads Supra to believe that BellSouth manually controls the speed in which it processes Supra's orders (as opposed to the orders simply flowing through an electronic system).

57. (SU15) INABILITY TO TRACK ORDERS: In attempting to find the status of our PONs, we accessed the LENS "View LSR/Order Information PON List" screen on the BellSouth website. A copy of this screen is attached hereto, showing PON STICVR06089 as being "LSR Rejected." When we clicked on that PON number, the "PON Details" screen showed that the processing status of that PON was, again, "LSR Rejected." We have attached a copy of this screen as well. However, when we reviewed the same PON on a different "PON Details" screen, LENS told us that the order had been completed. A copy of this screen is also attached. LENS is giving us two different answers to the same question, making it impossible for us to track our orders, and impossible for us to accurately determine if BellSouth is meeting its performance measurements.

Local Service Ordering Guide (LSOG)

(XO3) BellSouth claims to have implemented LSOG 4, but testing with all ALECs is not complete; ALECs have experienced delays in testing

Marketing

58. (XO6) Elimination of anticompetitive win back campaigns, including the provision of untrue and distorted information to ALEC customers

59. (NS4) In Verizon's area, Verizon's Contractor performing install is engaging in inappropriate contact and discussion with our customers. This is most often associated with the discriminatory install practices mentioned above. NewSouth would obviously prefer that all discussions involving our installs be between Verizon and NewSouth and not directly with end users.

60. (KM27) KMC has been informed that BellSouth is utilizing questionable tactics in its effort to attract former BellSouth customers that have switched to competitive providers - that these marketers are questioning KMC's viability and misrepresenting its status as a facilities-based competitor. One customer relayed that he had been told by a BellSouth representative that KMC did not have a switch in Pensacola and was backhauling traffic to Mobile, Alabama – an obvious falsehood.

61. (KM28) BellSouth technicians are also telling KMC customers (at the time the loops are being installed) that KMC is not a good choice and that they should be concerned about doing business with KMC.

62. (KM29) Additionally, BellSouth has been informing customers that they must switch back to BellSouth to obtain DSL service. In fact, BellSouth has threatened to disconnect a customer's DSL service (which the customer had with BellSouth prior to the switch) if the customer remained with the CLEC.

63. (KM30) KMC has also experienced problems with Sprint technicians making negative comments to customers. Some of these instances are to be investigated by Sprint. However, no resolution has occurred to date.

64. (SU10) Winback campaigns.

64A. (FD7) Bell: Winback pricing, marketing, provisioning.

Number Porting

65. (AT2a) Premature disconnects

66. (AT2b) Failure to disconnect after number port

67. (AT2c) Number reassignments

68. (AT2d) Problems within 48 hours of installation

69. (AT2e) Duplicate billing

Operations Support Systems (OSS) in General

70. (WC1) Walk-through of BellSouth's OSS Systems in Florida: BellSouth should provide their subject matter experts to work with ALECs to explain how ALEC Local Service Requests (LSR) are processed from beginning to end through the complete spectrum of interface and legacy systems, including internal error checking, posting to billing, cancellation, etc.

71. (WCpar3) BellSouth system cannot handle full commercial volumes

72. (WCpar4,8) Fall-out of orders requiring manual rather than electronic processing (one key reason is BellSouth's special pricing plans such as Complete Choice), require longer processing time

73. (WCpar9) Other LECs give 30 days to correct a rejected (queried) LSR while BellSouth only gives 10 days. Clarifications that provide vague or incorrect explanations of the reason for rejection make the 10 days a greater problem.

74. (WCpar10) For a migration order, other LECs only require a customer name and telephone number but BellSouth requires a service address; this results in order rejects.

75. (WCpar13.3) BellSouth must provide a fully fielded and parsed CSR.

76. (WCpar13.4, 26) BellSouth must implement real-time ordering (vs. being transmitted through a value added network that causes delay) using what is known as the interactive agent.

77. (WCpar29) Allow CLECs to take pre-ordering information and use it to populate an order without having to re-type that information.

78. (IT3) BellSouth is sending EMI records on CMDS tapes from CLEC's that are local in nature, but marking these records as if they are access records. This Bell tandem usage must be filtered before processing for billing, comparing data to local calling plans to eliminate local usage.

79. (IT5) Bell retail reps are able to view pending service orders CLEC reps cannot.

80. (IT7) BellSouth has stopped providing data on their E911 tandem to end office homing arrangements. Not having these arrangements causes CLECs additional time in programming switches, performing additional test calls and speaking with the PSAPs to figure out E911 calling from data BellSouth has. BellSouth has supplied this data in the past, but now as stopped providing this information without an explanation.

81. (IT8) BellSouth has a binding forecast in the interconnection agreement, but does not have any process or procedure for submitting the forecast, ordering the trunks or monitoring the utilization of the portions of the network trunks that make up the binding forecast. BellSouth asks for unreasonable data regarding normal forecasting and tries to match trunk group service requests (orders and ASRs) to the forecasts. In some cases, BellSouth either refuses to process the order until forecasts are updated or delays the order process.

82. (IT9) Pending Facility Status: FOC dates for Add Line and Move Orders are received from BellSouth only to go into Pending Facility Status shortly thereafter. Many times customers have been without service until the PF issues are resolved because they can't move back into their old building. As these orders are handed off to BellSouth's engineering group, they become so isolated that even Bell can't find out the status of the order. Even though escalation is not an option on orders in PF status, calling to get a status on these is virtually impossible as the engineer assigned to the order cannot be located and that person is the only one who knows the exact status of the order. Does BellSouth not have the capability to look at the availability of Facilities before the date the order is scheduled to complete on?

83. (KM10) BellSouth has a practice of repeatedly "clarifying" the same service order. KMC will resubmit a service order that has been returned by BellSouth with the necessary changes to correct the problem identified. However, KMC may have the same order sent back by BellSouth for additional "clarification." BellSouth says that additional clarification is often necessary because there is a new error in corrected service order. However, KMC experiences multiple clarifications when BellSouth could have identified all the necessary changes at once.

84. (CO3a) BellSouth does not provide the same level of customer service in the handling of its CLEC customers as it does for its retail customer. Instead, Covad agents must call the LCSC center number and let it ring until someone answers. (A) LCSC does not allow LSRs or jeopardy notification to be emailed (B) BellSouth system's data are incorrect, inconsistent, and unreliable. BellSouth should allow CLECs to submit orders via email and should transmit LSRs, clarifications, jeopardy notices, etc. by email rather than requiring CLECs to use facsimile transmission. Even though Covad is implementing electronic ordering, BellSouth does not provide mechanized loop ordering for BellSouth products so manual ordering must always be used by the CLEC. Similarly, this process effects Covad electronic orders that fall out for manual handling. Email communication is much preferred and BellSouth is the only ILEC that does not use this form of communications. This has been requested of BellSouth but denied on repeated occasion.

85. (CO3b) BellSouth should implement a single customer interface to determine the status of CLEC orders. Order status information is housed in a variety of databases. CSOTS, CPSS, COSMOS/SWITCH report, and the PON status report are examples of BellSouth systems/reports that must be accessed for order status information. This impacts Covad's ability to issue and status orders in an efficient and timely manner. In addition, the systems and reports to status orders, PON status report, CSOTs, and CPSS, contain conflicting information. BellSouth must provide a solution to eliminate having to access multiple systems to status orders, and a process to ensure that the data is accurate and complete.

86. (BE5) Ordering – Is training that is available regarding proper ordering procedures being fully utilized?

87. (SU4) Telephone Number Change – It's impossible to do a change in telephone (number?) on accounts with two lines or more. The option available is to use manual LSRs, which often leads to service interruption.

88. (SU5) System Errors - BellSouth's retail system rarely have system errors and whenever they do, the order stays in the system for as long it takes to correct the mistakes. CLEC systems errors and clarifications get purged within 3-10 days after the service request date.

89. (SU6) BellSouth's Local Carrier Service Center representatives are inexperienced and not helpful.

89A. (FD4) Local freeze lifts properly authorized are not executed.

89B. (FD5) Directory listings not timely placed or dropped entirely.

89C. (FD6) Design loop ordering and provisioning process.

89D. (FD12) Verizon: Lack of coordination between LSR process and BFR processes when both are involved regarding the same customer order (i.e. Verizon cancels LSRs when BFR process for order is ongoing).

89E. (FD13) Verizon: Incomplete or improper execution of orders for new (or dry) loops.

89F. (FIB1) BellSouth SOEG (order entry and changes system for NSP's) is often down for prolonged periods of time and NSPs are not told that BellSouth will not take orders/changes until the BellSouth system is back up. NSPs are not told when they can expect the SOEG to be back up.

Order Confirmation

90. (ES1) Firm order confirmations

Performance Reporting & Testing

91. (XO8a) Standardize information so that ALECs can meaningfully track performance

92. (XO8c) Special access metrics needed

93. (NS6) In Sprint's area, NewSouth's Interconnection Agreement with Sprint provided for Sprint to make performance data available. To date, Sprint has provided no reports and in fact has stated that they have no intention of doing so unless required to do so by the Commission.

94. (IT10) Performance Measures: The availability of the PMAP and PARIS data is unreliable. The data is frequently unavailable, revised, etc. Data errors are unexplained, just a notation of when the posting or reposting occurred. The process of downloading this data is cumbersome. PMAP is not managed under the CCP, therefore no formal Change Control process is applied. Payment amounts do not match reports.

95. (AS2) Issue: The metrics to be used in demonstrating BellSouth's compliance with the ASCENT Decision in the absence of specific performance assurance plan measures.

a) It is essential that the performance measures be added to the Florida measurements to determine whether BellSouth is providing Florida ALECs with adequate resold DSL services.

b) Performance measures are essential for testing purposes, as they provide objective performance comparisons (whether retail analogs or benchmarks) to determine whether BellSouth is providing non-discriminatory wholesale services to ALECs.

c) It is also essential that such a measure be provided so that the Commission can view BellSouth's provision of such DSL resale services to ALECs during the course of the test and beyond. This is the only manner for the Commission to view reliable data on BellSouth's provisioning of DSL resale services to ALECs

96. (AS3) Issue: Operations Support System testing of advanced services provisioning capabilities and performance.

a) The purpose of third party testing is to prove that BellSouth is in compliance with its parity and benchmark standards for purposes of making an application to provide interLATA services.

b) Testing of BellSouth's OSS should include its wholesale provision of resold DSL services, since BellSouth can no longer "hide behind" its affiliates and deny the existence of an resale obligation pursuant to Section 251(c) of the Telecommunications Act of 1996 when the affiliates provide advanced services to retail customers.

c) As the Commission is well aware, the demand for advanced services such as DSL is rapidly growing. CLECs are attempting to incorporate this service into their own service offerings throughout the country. The availability of a viable DSL-resale offering would more easily allow CLECs to bundle this offering with their own voice services and even perhaps with their own ISP provider. Quite simply, the availability of such a resale DSL offering would allow CLECs to complete a "bundled" package that customers are demanding: voice, internet access, and DSL. In short, the ASCENT decision opens up a potential market entry mechanism that should be fully tested.

97. (AS4) Issue: OSS testing must be fully completed and sustain performance demonstrated.

a) OSS testing procedures have not been completed and final test and audit results have not been released.

b) Even a successful OSS test, without a subsequent demonstration of actual commercial experience of ALECs in using such systems under each of the three modes of competitive entry contemplated under the Act, is not enough for the Commission to be able to make a finding that BellSouth's OSS systems will function adequately on a day-to-day basis, and that ALECS are treated at parity, under competitive conditions and at commercial volumes over a sustained period of time.

c) The actual provision of OSS, under conditions of competition - present compliance - which

must be demonstrated by BellSouth.

d) Members report recurring internal OSS problems including firm order confirmation date changes and missed LNP milestone problems, among others, which underscore concern over the effectiveness of BellSouth's OSS and need for thorough testing.

98. (TW1) Establishment of Performance Measures for Special Access or, in the alternative, establishment of a special access product in local product line in order to apply performance measures developed for local products to special access.

99. (SU16) BELLSOUTH'S PERFORMANCE MEASUREMENTS ARE INACCURATE: BellSouth measures its performance, not by the date in which an original order is submitted, but rather by the date an order is accepted and a due date is given. Therefore, if a Supra order is clarified, for whatever reason, the clock does not start ticking. As a result, BellSouth's performance measurements are skewed in favor of BellSouth.

100. (SU17) BELLSOUTH DISCRIMINATES AGAINST SUPRA CUSTOMERS: Supra customers, who are faced with delays as a result of the problems detailed above, will often call the BellSouth customer service center in order to see if they cannot get compliance from BellSouth in the processing of their orders. The BellSouth customer service center has no way of determining whether Supra had even submitted an order for conversion of service, and therefore will tell the new Supra customer that they have no record of Supra's order. Furthermore, the BellSouth customer service center will not transfer the Supra customer to anyone who could check up on Supra's order. Often, the BellSouth customer service center will tell the Supra customer that they could begin receiving service that very day if they switch back to BellSouth, which often occurs. Of course, this begs the question as to why BellSouth is able to provision services to its customer on the same day, while claiming it takes days to weeks to provision Supra customers.

Point of Demarcation

101. (NS3) In Verizon's area, Verizon has failed to extend the point of demarcation on many of NewSouth's circuit installs. This despite rules in Florida which require a "maximum point of penetration" policy be followed on circuit installs. This issue is prevalent in Lakeland and Winterhaven.

Provisioning

102. (XO2a) "Pending facilities" used to slow down orders; need to discuss criteria for "pending facilities" - often facilities exist, but are inventoried as something other than available for UNE

103. (XO2b) FOCs issued without determining if facilities are available

104. (XO2c) If facilities are not available, often no notification until day before or day of installation - yet Bell intends to charge ALEC for cancellation of order, even in pending facility situation, with no agreement to waive fees or reimburse ALEC.

105. (NS2) In Verizon's area, Verizon is forcing NewSouth to meet requirements that it does not itself enforce on its retail units (i.e. fire retardant backboards, #6 ground wire, buried cabling). These requirements are inconsistently applied within the Verizon footprint, leaving NewSouth to guess what will or will not be acceptable on a circuit installation. These tactics are also used to intimidate customers and drive them away from NewSouth.

106. (KM3) BellSouth will fail to provision a T-1 line in accordance with a previously issued Firm Order Confirmation (FOC), and will instead hold the order as Pending Facilities (PF). KMC believes BellSouth's records are inadequate to enable a timely determination as to whether there is a facility available for KMC, consistent with the service request. In some instances, it appears that the BellSouth records indicate that a satisfactory circuit exists only to be proven incorrect when the time comes to turn up that circuit.

107. (KM4) Lack of facilities by BellSouth cause substantial delays in customer orders. BellSouth also fails to send timely Pending Facility notices.

108. (KM5) Sprint also cancels many orders on the day of the scheduled cut-over due to PF, causing repeatedly delays of KMC customer orders. There has been little resolution of PF orders by Sprint since May of 2001.

109. (KM6) Sprint fails to meet acceptable intervals for KMC due to "work load" problems. Sprint technicians miss cut-overs due to inadequate coordination with Sprint's Coordination Desk, causing the cut-over to be rescheduled and the customer order to be delayed.

110. (KM7) KMC has also had repeated problems with Sprint failing to have CB cards in place at the time of a cut-over, again resulting in installation delays.

111. (KM11) BellSouth has unnecessarily postponed installation appointments. BellSouth has, for example, requested that orders be postponed, or supp'd, because the street address was abbreviated as "Av." versus an "Ave." In other cases, BellSouth technicians have postponed cut-overs scheduled for late in the day (a typical scheduling time) to avoid working "overtime." Instances such as these waste valuable resources, since the work must be rescheduled and re-worked each time the cut-over is missed.

112. (KM12) Sprint also unnecessarily cancels appointments due to its one-sided scheduling policy for cut-overs, causing KMC to re-start the order process. The Sprint technician chooses a time most convenient for him and gives the KMC technician a 30-minute window to make the appointment. If the KMC technician cannot make the appointment, it is designated as a KMC missed appointment and KMC is charged.

113. (KM13) There is a need to ensure proper communication between Sprint and KMC before network translation work is done on KMC's trunkgroups.

114. (KM14) Sprint also has insufficient network translation escalation procedures.

115. (CO5b) BellSouth must implement an immediate plan to comply with Covad's Interconnection Agreement provisioning interval of 3 business days (for line sharing/splitting).

116. (CO6a) BellSouth should maintain in its facilities database copper facilities when BellSouth changes its physical plant to Fiber for their own provisioning. Currently, BellSouth is deleting the copper facilities from LFACS, once the facilities are replaced by fiber even though BellSouth is leaving the copper in the ground. DSL providers are entitled to lease the copper facilities from BellSouth, but by removing them from LFACs, DSL providers cannot find and therefore cannot order these loops. As a result, Covad cannot locate, qualify, reserve or order those existing facilities and thus loses customers.

117. (CO6b) BellSouth should update BellSouth facilities database to provide information on the F2 segment of residential accounts. Loop Makeup may exist on feeder pairs but not on distribution facilities. This is especially true of the F2 segment of residential accounts. By not having this information, Covad is required to either cancel the order or must use yet another BellSouth system to qualify the loop so that facilities can be reserved.

118. (BE2) Access to carrier's owned or controlled inside wire.

119. (BE4) Forecasting – Enhance process for obtaining six month long-range forecasts from other carriers.

120. (BE6) Network Management – Are carrier requests for reciprocal trunks being managed to maximize network resources and minimize cost to requesting carrier so that the impact on network resources is minimized?

121. (TW2) Clarification and improvement of escalation procedures for meet-point services so that an ILECs, as the seller, is fulfilling its responsibility to initiate and manage to fruition escalations in the event of an installation or maintenance problem.

122. (SU2) ADSL – When a CLEC wins a voice customer from BellSouth, and the customer also is being provided BellSouth ADSL service, BellSouth has stated it will disconnect the ADSL service if the CLEC provisions the service via UNE combos, as opposed to resale.

123. (SU7) BellSouth disconnects CLEC lines and claims it is an abandoned station.

124. (SU8) Delay in service provisioning.

124A. (FD3) Lack of provisioning parity, particularly in cases involving new facilities.

124B. (FD8) Bell: High incidence of bad cuts on SL-1 loops.

124C. (FD9) Bell & Verizon: High number of no dial tone (NTD) incidents, including NTDs caused by ILEC technicians pulling jumpers/field pair.

124D. (FD10) Bell & Verizon: Closing tickets as “no trouble found” when tests prove otherwise.

124E. (FD11) Verizon: General lack of reasonable provisioning intervals and parity.

124F. (FD16) Sprint: Large numbers of customers served through remote switching facilities, but BFR prices for connectivity to remote switches is exorbitant.

124G. (FIC1) NSPs experience errors and delays when requesting BellSouth to check for synch at the NID. For example, an NSP pays \$300 for BellSouth to clear a line of load coils and check for synch at the NID. The NSP technician goes to the location and finds that the circuits have no synch. BellSouth fails to meet its time commitment when the synch problem is reported. BellSouth refuses to refund the \$300 when the work is not performed.

124H. (FIC2) Apparent ILEC errors in reporting whether DSL is available to a requested location.

124I. (FIC3) NSPs experience errors in BellSouth’s provisioning of ADSL circuits approximately 25% of the time. For example, BellSouth either connects the line to the wrong ATM circuit or enters the wrong VPI/VCI. Although it sometimes takes days to get the circuit up (since the BellSouth SOEG system is often down) BellSouth charges the NSP during the time the circuit is down.

124J. (FIF1) When an NSP orders an additional ATM DS-1 from BellSouth, BellSouth refuses to mux (IMUX) the DS-1 with the existing circuits. This forces NSPs to prematurely purchase the DS-3 connection at great cost.

124K. (FIH1) BellSouth disconnects ADSL circuits whenever a NSP customer moves (even when the move is within the same building or the customer keeps its phone number) requiring the NSP to pay a new connection charge of \$110 and a \$50 disconnection charge.

Public Service Commission Enforcement of Anti-competitive Behavior

125. (FI3) Is the PSC's current enforcement authority sufficient to prevent against anticompetitive behavior by incumbent telecom providers? If not, what additional enforcement rules and procedures can or should be promulgated by the PSC, and what additional legislation should be recommended? [examples of additional enforcement tools include increased forfeiture authority, and authority to award compensatory damages and other relief in complaint proceedings before the PSC]

Quality of Service

126. (XO8b) Prohibit continual changes in the website; have ILEC work with ALECs to provide historical data or allow File Transfer Protocol download of web information (BellSouth has refused, despite repeated requests for cooperation).

127. (NS8) In BellSouth's area, NewSouth continues to try to engage BellSouth in a cooperative effort to maintain proper grade of service over its interconnection trunks. We too often find BellSouth to be passive in this role and resistant to requested augments. This despite the fact that we present accurate forecasts to them on a quarterly basis.

128. (KM1) KMC is experiencing significant problems with BellSouth missing installation appointments. For the seven-month period ending July 2001, BellSouth missed 32% of the installation appointments for KMC in Daytona Beach.

129. (KM2) KMC usually does not receive notice from BellSouth that the installation will not be completed until the day before or the same day as the scheduled install. In other instances, when facilities are apparently available, the install will still be delayed due to the poor quality of the circuits.

Repair

130. (XO5a) Correct repeat troubles on same line

131. (XO5b) Require LEC to clearly delineate reason for outage

132. (XO5c) Problems with report of "no trouble found" where there is a problem with provisioned line

133. (XO5d) Establishment of maintenance priority for wholesale comparable to same priority for retail (hospitals, etc.)

134. (NS7) In Sprint's area, Sprint seems unwilling to work troubles after hours and will delay maintenance until working hours on T1 outages. This results in excessive delays in bringing service back up for customers and leaves them without access to 911. Many of these customers are open after working hours or on weekends.

135. (KM15) The lack of Sprint trouble ticket codes result in the repair technicians not having the most accurate trouble description, which could result in the trouble not being identified. KMC technicians are also not notified by Sprint at the time a trouble report is to be closed.

136. (KM16) Sprint sends notice by facsimile after the trouble ticket is closed. KMC requests implementation of a real-time ticket closure notice procedure.

137. (KM17) A major problem with T-1 lines is outages. The T-1 loops that KMC buys from BellSouth are repeatedly out of service. Many KMC customers experience outage after outage on the same circuit – even after BellSouth "repaired" the loop. KMC customers experience many times the number of problems that BellSouth's customers do.

138. (KM18) KMC will quite frequently report a T-1 outage and BellSouth will report back no trouble found, identifying the trouble as either an end user or KMC problem. After further

investigation, these often turn out to be a BellSouth circuit or equipment problem. BellSouth's incorrect trouble identification and the associated back-and-forth obviously waste many valuable hours while customers are awaiting repairs.

139. (KM19) KMC subscribed hotels in Daytona Beach have suffered outages due to circuit failures, with a lack of urgency on BellSouth's part to repair the problems.

140. (KM20) Four particularly large KMC customers in Pensacola, which represent significant revenue in KMC's operation, lose their T-1 service virtually every time it rains. Over a three-week period spanning late June and early July, 2001, the Pensacola-Bayview location of a large hotel chain experienced eight outages, representing a total of 93 hours that the T-1 line was either down or experiencing trouble. Similarly, a Tractor and Equipment retailer experienced seven outages, representing a total of 46 hours that their T-1 was either down or experiencing trouble. A Credit Union experienced five outages totaling 36 hours that their T-1 was down or experiencing troubles. Finally, a door company experienced four outages that represented a total of 230 hours that their T-1 was either down or experiencing problems. Unfortunately, there are numerous other examples.

141. (KM21) BellSouth's performance has remained consistently poor, even after KMC has communicated the chronic problems to BellSouth. It is our understanding that BellSouth has created a chronic trouble team to address KMC and CLEC-wide outages. This effort has proven ineffective to date.

142. (KM22) KMC has experienced repeated service problems with Sprint as well. Recent data shows a large number of No Dialtone and static trouble tickets.

143. (KM23) KMC believes Sprint should implement a written circuit acceptance policy.

144. (KM24) KMC signed up a large hotel in Daytona Beach as a customer. The cut-over took place on a Friday afternoon, and by Saturday morning the newly installed T-1 was out of service. BellSouth refused to fix the circuit until Monday, leaving the hotel completely without service for the entire weekend. The hotel owner was, understandably, quite angry at the party he perceived as responsible -- KMC.

145. (KM25) CLECs should have available an escalation procedure for when a customer has a service problem after regular business hours and on weekends. It is critical that this procedure be available and functional so the customer will not go completely without service over the weekend or even into the next business day.

146. (KM26) KMC is also experiencing problems reconciling Sprint's repair commitment levels and escalation timelines. It is critical that there be clear repair standards and escalation procedures in place.

147. (CO4b) BellSouth should implement an immediate trouble resolution process for loop problems that result from BellSouth's actions. For example, when BellSouth outside plant

construction destroys a Covad customer connection or when BellSouth changes the loop effective Covad's service, Covad needs an immediate escalation path to insure the loop is returned to original condition in an expedited fashion (no more than 2 days).

148. (CO4c) During cooperative testing of xDSL loops, when Covad diagnoses a problem with BellSouth central office wiring, BellSouth often refuses to take responsibility for notifying vendors to resolve problems. Instead, Covad is asked to open a trouble ticket that winds through the BellSouth system to the central office where the problem must again be diagnosed and then the BellSouth vendor is called. BellSouth should develop and implement a plan for expediting resolution of these problems once identified by Covad.

149. (CO4d) BellSouth field technicians take facilities assigned to Covad customers and use them for BellSouth customers, an action known as "switching-pairs." Since DSL loops do not have a dial tone, BellSouth technicians often test the loop for dial tone and determine it is spare if no tone is found. As a result, Covad customer's transmission is destroyed. BellSouth must immediately retrain BellSouth technicians not to "swap" pairs. Furthermore, resolution of these problems should be expedited in no more than 2 days.

150. (CO5a) BellSouth uses the Sunset ADSL test set for its retail ADSL loop testing (line sharing/splitting). This test set is compatible with Covad line sharing and BellSouth ADSL as both use the standard DMT-4 line cards. Covad requests that BellSouth provide the Sunset xDSL test set for maintenance testing purposes. This process will check not only the high frequency portion of the cross-connects and jumpers, but will also allow Covad to perform cooperative testing remotely with BellSouth. This tester would help eliminate repeat trouble reports and issues of no trouble found.

150A. (FD14) Verizon: Failure to call ALEC prior to closing trouble tickets, refusal to reopen tickets when problem persists.

150B. (FD15) Verizon: Lack of coordination and communication between and among repair technicians and wholesale repair center representatives.

150C. (FID1) NSPs would like online updates as to the status or resolution of any open action items such as trouble tickets, engineering escalations and false positive escalation.

UDC Ordering

151. (NT4) No means, or plans for, mechanized ordering

152. (CO4a) Because of the high amount of fiber deployed in this state, one third of Covad's stand alone loop orders are for UDC/IDSL loops. BellSouth continues to have problems provisioning these loops, which Covad has determined is due to (1) incomplete line card information on the work order; (2) lack of training of BellSouth technicians regarding testing, changing and setting line cards. BellSouth must develop an immediate plan to improve the provisioning of this loop, including a mechanism for improving intervals and decreasing repeat

troubles on these loops.

UNE-P & UNE Combinations

153. (NT1a) (ATpar6,13) Disconnections (working D order before N order) - BST proposed "1st quarter 2002 resolution" not timely enough. Should move to a single C order.

154. (NS10) BellSouth continues to employ procedures in its handling of UNEp orders which create service affecting issues for NewSouth customers. BellSouth's systems require that a UNEp order be worked as a new "N" and disconnect "D" order separately. While BellSouth has made some improvements in its process which diminish the probability of complete outage, other service affecting issues like loss of features, incorrect translations for customers with hunting and incorrect billing.

155. (SU1) Conversions to UNE combos: -- BellSouth issues both a disconnect and a reconnect order. This should not be done, as it needlessly creates instances in which customers may be without service.

156. (NT1b) Hunting and Cross Connect problems)

157. (AT3a) System functionality: AT&T requests that BST implement an internal "C" order process to avoid the problems and inefficiencies inherent in the "D" and "N" process. Additionally, "move" orders for UNE-P customers must be sent manually, and AT&T requests an electronic process via LENS and EDI.

158. (AT3b) Provisioning intervals: Since the preparation of the original topics list, the provisioning intervals have improved. BST was providing longer than standard intervals in June & July on UNE P orders. Instead of same or next day intervals, AT&T was receiving 3 to 5 days out due to a TAG software defect. Due date calculation errors appear to have started again the week of Oct 1st, and the origin still under investigation. AT&T agrees to remove this from the list but reserves the right to ask that it be included at a late date if the intervals are not corrected in a timely manner or if this become an issue in the future.

159. (AT3c) Provisioning support: The BST LCSC and CWINS centers refer to UNE-P as "resale" and require the ALECs to do the same, which causes confusion both within BST and AT&T. If AT&T calls into a center in asks about UNE-P, BST transfers AT&T to the incorrect group and which leads to multiple transfers within BST's centers. This issue should remain open until substantial improvement is seen.

160. (AT3d) Provisioning errors: When provisioning errors occur, features may not be turned on as ordered, features that were not ordered may be turned on, or features may not function satisfactorily (for example, the end-user customer experiences static or noisy lines). Additionally, even with the "RRSO FID" process, customers are still losing dial tone.

161. (AT3e) Order process: AT&T continues to receive fax clarifications, firm order confirmations, and missed appointments on orders that were sent via LENSs.

162. (AT3f) Combinations

163. (AT3g) Maintenance support: AT&T experiences problems when reporting troubles that happen immediately post-provisioning. The CWINS maintenance center claims the problem is with provisioning, and the provisioning center won't help because they claim the problem is a maintenance issue.

164. (NS1) Needs access to new combinations of UNEs

165. (KM8) When an order must be postponed, or "supp'd," BellSouth often fails to postpone the physical disconnect portion of the order. The BellSouth technicians will therefore disconnect the customer's line and put the customer out of service since the reconnect portion of the order has been postponed.

166. (KM9) (see KM8) KMC is experiencing similar premature disconnect problems with Sprint.

Miscellaneous

167. (AS5) Issue: The public interest considerations surrounding BellSouth's entry into the interLATA market in Florida.

a) The FCC has ruled that regulators cannot "conclude that compliance with the checklist alone is sufficient to open a BOC's local telecommunications markets to competition," because "[s]uch an approach would effectively read the public interest requirement out of the statute, contrary to the plain language of Section 271, basic principles of statutory construction, and sound public policy."

b) Alleged benefits to the long distance market are insufficient to prove that long distance entry by the BOC is in the public interest.

c) The myriad of benefits BellSouth may stress with respect to its entry into the interLATA market, should already exist – but do not – for competitors in the local market, if one follows Qwest's logic.

168. (FI2) Bundled Pricing - Should incumbent LECs be permitted to offer combined packages of local exchange telephone service and other services (including Internet access) at prices below which competing Internet providers may acquire the individual components of those services from the incumbents?

169. (FI4) Whether structural separation of incumbent LECs' retail and wholesale operations is a necessary and appropriate remedial action? If so, how should such a separation be structured and enforced? (separate ownership, separate management, separation of employees, limitations on shared facilities and personnel, limitations on information flow,

separate books of account, others?)

170. (VE1) Based on Chairman Jacobs' August 13 Letter and his remarks at the first meeting of the Forum, there is no intended difference in the topics to be addressed in this Forum and in the aforementioned dockets examining "anticompetitive behavior" of the incumbent local exchange companies. Both proceedings have the same goal of resolving "competitive issues" in the service of "effective competition and choice for consumers." (Aug. 13 Letter, at 2.)

As such, Verizon recommends that the competitive topics to be raised in the docketed proceedings be folded into this Forum. (As noted, Verizon is unable to specifically designate those topics, because it doesn't yet know what they may be.) Those dockets should be closed. This is the only approach that is consistent with the benefits the Chairman hopes to achieve in this Forum.

171. (AL)BellSouth requires two orders for each requested DS3 as a UNE (one from the Allegiance switch to BellSouth's serving wire center and one from the BellSouth serving wire center to the targeted collocation at another BellSouth CO). Other ILECs generally only require one order. By requiring two orders for one DS3, BellSouth is essentially able to double the price per UNE DS3. Allegiance would like BellSouth to require only one complete order from the switch to the targeted collocation.