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February 20, 2001

Mr. Tom Dorman
Executive Director
Kentucky Public Service Commission
730 Schenkel Lane
Frankfort, Kentucky 40602

Re: Petition by AT&T Communications of the South Central States, Inc. and TCG Ohio for Arbitration of Certain Terms and conditions of a proposed Agreement with BellSouth Telecommunications, Inc. Pursuant to 47 U.S.C. Section 252
Docket No. 2000-465

Dear Mr. Dorman:

Pursuant to the Commission's Order on November 17, 2000, enclosed please find the electronic copies of the Rebuttal Testimony of Jay Bradbury, Greg Follensbee, and Ron Mills on behalf of AT&T in the above-referenced proceeding.

This electronic filing is a true representation of the original documents prepared in this case. Also attached is a document entitled "index.pdf," which lists all documents attached to this electronic filing. The original and three copies are being overnighted to the Commission.

If you have questions, please call me. Thank you for your attention to this matter.

Respectfully Submitted,

Jim Lamoureux
Senior Attorney

cc: All parties of record

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February 20, 2001

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ATT_RT_JMB_EX1-10_022001.pdf	Bradbury Exhibits 1-10
ATT_RT_JMB_EX11-26_022001.pdf	Bradbury Exhibits 11-26
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BEFORE THE KENTUCKY PUBLIC SERVICE COMMISSION

REBUTTAL TESTIMONY OF JAY M. BRADBURY

ON BEHALF OF

AT&T COMMUNICATIONS OF THE SOUTHERN STATES, INC.

AND TCG MIDSOUTH, INC.

DOCKET NO. 2000-465

FEBRUARY 20, 2001

Q. PLEASE STATE YOUR NAME AND ADDRESS.

A. My name is Jay M. Bradbury. My business address is 1200 Peachtree Street, Suite 8100, Atlanta, Georgia 30309.

Q. PLEASE DESCRIBE YOUR CURRENT POSITION AND RESPONSIBILITIES.

A. I am a District Manager in the AT&T Law and Government Affairs organization, and I provide consulting support to AT&T's business units and other internal organizations. In particular, I am involved in the negotiation and implementation of interfaces for operational support systems ("OSS") necessary to support AT&T's entry into the local telecommunications market.

Q. ARE YOU THE SAME JAY M. BRADBURY THAT FILED DIRECT TESTIMONY IN THIS CASE ON DECEMBER 20, 2000?

A. Yes, I am.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. The purpose of my testimony is to respond to the testimony of Ronald M. Pate and W. Keith Milner filed on February 6, 2001. I will address the following issues: 18, 19, 22, 23, and 24. I will correct inaccurate and misleading statements made by these witnesses in their direct testimony. I also will provide additional information in response to BellSouth's position on each of these issues. I will first address two of Mr. Pate's claims that apply to multiple issues and then respond to various claims regarding to the individual issues.

Q. ON PAGE 4 OF HIS TESTIMONY MR. PATE STATES THAT BELLSOUTH PROVIDES CLECS WITH NONDISCRIMINATORY ACCESS TO BELLSOUTH'S OSS. IS THERE ANY EVIDENTIARY SHOWING OF FACT OR ANY REGULATORY FINDING THAT PROVIDES A BASIS FOR HIS STATEMENT?

A. No. Mr. Pate is making an unsubstantiated claim. The FCC rejected BellSouth's last attempt to demonstrate that it was providing nondiscriminatory OSS access in its Second Louisiana Order on October 13,

1998.[1] BellSouth has not demonstrated in any jurisdiction since that time that it has corrected the OSS deficiencies noted by the FCC. Additionally, as this Commission knows, BellSouth withdrew from its attempt to demonstrate that it was providing nondiscriminatory access in Tennessee[2] and attempted to withdraw from this Commission's 271 investigative docket (Docket No. 96-608) as well. Mr. Pate's claim is unfounded and should be given no weight in the Commission's deliberation of this arbitration.

Q. IN MR. PATE'S TESTIMONY HE REPEATEDLY ASSERTS THAT CERTAIN ISSUES AND SUB-ISSUES "ARE NOT APPROPRIATE FOR ARBITRATION," IS HE CORRECT?

A. No. Mr. Pate incorrectly asserts that Issues 22 and 23[3] and their various sub-issues "are not appropriate for arbitration" and that "AT&T is attempting to circumvent the CCP [Change Control Process]….This would allow AT&T to gain an unfair advantage over the other CLECs…." Not only is this incorrect, as I will discuss, but this position is inconsistent with testimony given by Mr. Pate in an arbitration proceeding between BellSouth and AT&T in August 2000.

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[1] Memorandum Opinion and Order, Application of BellSouth Corp., et al. Pursuant to Section 271 to Provide In-Region, InterLATA Services in South Carolina, 13 FCC Rcd. 539 (1997), hereinafter "FCC South Carolina Order" and Memorandum Opinion and Order, Application of BellSouth Corporation, et al. for Provision of In-Region, InterLATA Services in Louisiana, 13 FCC Rcd. 20599 (1998), hereinafter "FCC Louisiana II Order".

[2] Initial Order Accepting BellSouth Telecommunications, Inc.'s Notice of Voluntary Dismissal and Withdrawal. In Re: BellSouth Telecommunications, Inc.'s Entry Into Long Distance (InterLATA) Service In Tennessee Pursuant to Section 271 of the Telecommunication Act of 1996. Docket No. 97-00309, June 1, 1999.

[3] In prior arbitrations, Mr. Pate has also held that Issue 24 is also inappropriate for arbitration although he does not repeat that claim in his direct testimony in this docket.

On page 45 of testimony which Mr. Pate filed in the AT&T-BellSouth Arbitration in North Carolina, Docket No. P-140, Sub 73 & P-646, Sub 7 (Rebuttal Exhibit JMB-R1), Mr. Pate stated that BellSouth was negotiating with CLECs, including AT&T, to include compliance with the CCP in interconnection agreements. Any issue that is appropriate for negotiation and inclusion in interconnection agreements is also appropriate for arbitration. BellSouth has shown no reason to treat these issues differently from all of the other issues that are included in this arbitration and which were subject to negotiation with the intent of inclusion in the interconnection agreement.

Mr. Pate has cited no authority for his position, but one need only look to the Telecommunications Act of 1996 to determine that it is incorrect. Telecommunications companies are to negotiate "the particular terms and conditions of agreements to fulfill the duties" imposed by Section 251 of the Telecommunications Act, including "nondiscriminatory access to network elements on an unbundled basis at any technically feasible point on rates, terms and conditions that are just, reasonable and nondiscriminatory …." Section 251(a)(1) and (c). BellSouth's obligation to provide nondiscriminatory unbundled access to its OSS necessarily includes the terms and conditions under which BellSouth may change its OSS. Establishment of an adequate change management process for OSS systems and processes is absolutely critical to CLEC success in the marketplace and is a critical

component of BellSouth's provision of non-discriminatory treatment as required by the Act.

Not only does the Telecommunications Act clearly require parties to negotiate in good faith all terms and conditions of their business relationship, but it just as clearly requires state regulatory authorities to arbitrate, without exception, all "open" or "unresolved" issues remaining after negotiation. Section 252(b)(1), 252(c). The Act therefore contemplates that issues such as change control and equivalent functionality will be negotiated between the parties and arbitrated by state regulatory authorities should those negotiations fail.

It is curious that BellSouth did not raise its concerns about appropriateness of this issue during the negotiation process, where change control and equivalent functionality for ordering and maintenance were frequently discussed. Importantly, it was during the negotiations that BellSouth asked AT&T to provide information on its desired change control process.

At least one federal court has upheld the duty of a state regulatory authority to arbitrate all issues presented in an arbitration proceeding. The U.S. District Court for the Northern District of Florida recently reviewed a decision issued by the Florida Public Service Commission in an arbitration between BellSouth and MCI. Order on Merits issued June 6, 2000 in Case

No. 4:97cv141-RH, *MCI Telecommunications Corporation, et al. vs. BellSouth Telecommunications, Inc., et al*. ("MCI Order"). The Florida PSC had refused to address an issue presented by MCI, in part, on the grounds that "the Telecommunications Act authorized arbitration only on 'the items enumerated to be arbitrated in Sections 251 and 252 of the Act, and matters necessary to implement those items.'" The Florida PSC determined that the matter presented by MCI "was not such an item." (*MCI Order* at 32.)

The federal judge rejected the FPSC's "narrow reading" of the Act's arbitration provisions, explaining that:

> the right to arbitrate is as broad as the freedom to agree; any issue on which a party unsuccessfully seeks agreement [though negotiation] may be submitted to arbitration….
> *(Id.* at 33.)

Citing Section 252(b)(4)(C) of the Act, the judge further held that when the state PSC undertook the arbitration, it was obligated to decide all issues:

> When the Florida Commission chose to act as the arbitrator in this matter, its obligation was 'to resolve each item set forth in the petition and the response, if any'.
> *(Id.* at 33-34.)

BellSouth asks this Commission not to resolve the open issue of OSS functionality. For the reasons explained above, the Commission should reject BellSouth's unlawful request.

As will be discussed further below, BellSouth, not AT&T, is attempting to circumvent the purpose of the Change Control Process and its requirements. BellSouth attempts to utilize the Change Control Process as a shield to protect it from its failures to meet its obligations under the Act and consistently makes unilateral decisions regarding the process, over the protests of the CLEC community.

Additionally, BellSouth's argument is inconsistent with its own desire to arbitrate issues that are also covered by region-wide plans. For example, BellSouth has developed its VSEEM performance measures plan which it proposes for region-wide application, yet in various jurisdictions it has also argued that this plan is ripe and appropriate for arbitration because any CLEC in any state could "pick and choose" to buy into the plan. If BellSouth's regional performance measures plan is appropriate for arbitration, it is hard to understand BellSouth's position that the Change Control Process and equivalent functionality for ordering and maintenance are not similarly ripe and appropriate for arbitration.

Issue 18: Has BellSouth provided sufficient customized routing in accordance with State and Federal law to allow it to avoid providing Operator Services/Directory Assistance ("OS/DS") as a UNE?

Issue 19: Should BellSouth provide customized OS/DA routing to AT&T for its UNE platform customers through a process that establishes common (infrastructure) elements in advance of customer orders and customer specific elements using flow-through ordering?

Q. MR. PATE AND MR. MILNER TESTIFY ABOUT BELLSOUTH'S UNDERSTANDING OF ISSUES 18 AND 19. IS BELLSOUTH'S UNDERSTANDING ACCURATE?

A. No. Mr. Pate's testimony on Issue 19 is both confusing and inaccurate, as is Mr. Milner's testimony on Issue 18. It is difficult to understand why Mr. Pate and Mr. Milner continue to misrepresent AT&T's request and position, since AT&T fully presented its position in my direct and rebuttal testimony and briefs in arbitration proceedings in North Carolina, Georgia, Florida and Tennessee. AT&T also has presented BellSouth with specific contract language detailing its requested procedures, yet Mr. Pate and Mr. Milner continue to insinuate that a single "default" routing to "unbranded" OS/DA will meet AT&T's needs. In addition, both Mr. Pate and Mr. Milner claim that electronic ordering for customer specific OS/DA routing is presently available from BellSouth. It is not.

As I discussed in my direct testimony on pages 23 through 27, the FCC clearly contemplated use of multiple customized OS/DA routings by CLECs and in its order, instructed BellSouth to accommodate the electronic ordering

of such arrangements through the uniform application of region wide "identifiers." Nevertheless, BellSouth has failed to provide electronic ordering for customer specific OS/DA routing, as discussed on pages 32 through 37 of my direct testimony.

BellSouth planned to make electronic OS/DA ordering available on an industry-wide basis in Release 8.0 of its ordering software, but in October, BellSouth made the unilateral decision to remove the capability from Release 8.0. The extremely limited OS/DA ordering capability that BellSouth belatedly attempted to provide was intended to support a very limited AT&T test, and had no commercial applicability.[4]

In their testimony in this docket, however, Mr. Milner and Mr. Pate attempt to convince this Commission that BellSouth reinstated electronic OS/DA ordering as originally planned. As stated above, this is not true. BellSouth has made no attempt to reintroduce the originally-planned capability, and in fact has been unable to provide even the limited "substitute" test support capability it attempted to introduce. In its hasty attempt to rescue Mr. Milner's inaccurate Georgia testimony by substituting a form of electronic OS/DA ordering, however limited, BellSouth provided line class codes for one office (the 5ESS in which AT&T is conducting its test) but developed the

[4] As discussed in my direct testimony, the "substitute" OS/DA ordering capability planned by BellSouth would have been limited to AT&T's UNE-P trial, in one office, using only one interface (EDI), to provide only "unbranded" BellSouth OS/DA, could not be used with live customers (even by AT&T), and would not support all possible order types.

new software, screening, and lookup tables for another office (a DMS in the same wire center available to but not being used by AT&T).

Exhibit JMB-10 of my direct testimony shows that although BellSouth corrected the errors in its programming, it will not allow AT&T to test the new software until changes in the testing agreement are negotiated. This requirement did not exist in November when BellSouth "implemented" the software and was ready to accept AT&T's test orders. BellSouth has not responded to AT&T's February 9, 2001, e-mail asking for a clarification of this new requirement. Exhibit JMB-R2. Not a single order has been processed using this supposedly available software. Thus, in Release 8.0 it is still impossible to electronically order any form of customized OS/DA routing -- just as it always has been.[5]

Q. ON PAGES 16 THROUGH 18 OF HIS TESTIMONY, MR. PATE PRESENTS AND DISCUSSES HIS EXHIBITS RMP-2, RMP-3, AND RMP-4 IN AN ATTEMPT TO DEMONSTRATE THAT BELLSOUTH HAS PROVIDED THE INFORMATION THAT AT&T IS REQUESTING AND THAT BELLSOUTH HAS MADE THAT INFORMATION AVAILABLE TO THE CLEC COMMUNITY. PLEASE COMMENT.

[5] Even had BellSouth successfully implemented this limited test ordering capability, such success would not have provided commercial production capability to any CLEC. Additionally, the test capability only would result in routing to "unbranded" BellSouth OS/DA, but BellSouth must provide

A. Mr. Pate's exhibits demonstrate clearly that BellSouth has not provided AT&T or any other CLEC with the information required to place any type of footprint request, or to submit electronically any customer-specific local service request for OS/DA routing. Further, when compared to the description of BellSouth's use of USOCs for other types of services and features, Mr. Pate's exhibits demonstrate that BellSouth is implementing software developments for electronic ordering of customer-specific OS/DA routing that are needlessly complex and fail to utilize available software and processes.

In his exhibit RMP-2, Mr. Pate provides three versions of BellSouth's proposed contract language. Only the last version (shown in the last three pages of his exhibit) is relevant because each version replaces the previous version.[6] The last section clearly reveals that BellSouth's proposal is incomplete: "3.20.10 Electronic ordering of Line Class Codes will be negotiated between the parties once Line Class Codes are established." Further reading of the proposal establishes that it provides only a process overview description, with no details as to the information required for AT&T to place a footprint request. A number of forms are referenced but neither they nor their contents are provided or offered. My Exhibit JMB-R3 shows AT&T's proposed contract language for this section, which requires

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customized routing to an alternative provider's platform if it wishes to engage in market-based pricing of its own OS/DA.

[6] These last three pages are identical to my Direct Exhibit JMB-3.

BellSouth to provide the information and processes being requested in this arbitration.

Further, BellSouth has revised its offered contract language twice since October, once on January 15, 2001, well before Mr. Pate's testimony, and again on February 12, 2001, a fact Mr. Pate was unaware of when he appeared before the Florida PSC on February 15. BellSouth's most recently offered contract language is even less specific than prior versions and has eliminated any commitments by BellSouth to implementation intervals. Exhibit JMB-R4.

Mr. Pate's exhibit RMP-3 is similar to the specification BellSouth provided to AT&T by e-mail on November 10, 2000, in its attempt to rescue Mr. Milner's inaccurate Georgia testimony, as noted on pages 35-36 of my direct testimony and page 10 above. Mr. Pate's document is dated November 16, 2000, and the Change History Log on page 4 reflects changes to the document on November 14th and 16th that were not discussed with AT&T. In any event, as discussed above, this specification clearly does not provide electronic ordering for the full range of OS/DA options available to CLECs entering BellSouth's market. Further, it needs to be pointed out that this type of specification is internal to BellSouth[7], and is not the vehicle by which BellSouth communicates business rules and interface requirements to the

[7] Note the proprietary markings "PRIVATE/PROPRIETARY: No disclosure outside BellSouth except by written agreement."

CLEC community. Information for the CLEC community is published in documents such as the BellSouth Business Rules for Local Ordering and the BellSouth EDI Specifications on BellSouth's Interconnection Services Web Site.

As I explained in my direct testimony, the FCC instructed BellSouth to accept region-wide indicators for CLECs' customized OS/DA routing. Mr. Milner's Georgia Affidavit (my Direct Exhibit 4) confirms that BellSouth easily could use Uniform Service Order Codes ("USOCs") as indicators to identify a CLEC's selection of customized OS/DA routing. As Mr. Milner explains in paragraph 17 of his affidavit, BellSouth uses USOCs, Field Identifier Codes ("FIDs"), the Line Class Code Assignment Module ("LCCAM"), and a system called MARCH, to assign Line Class Codes ("LCC") to customer specific service requests. This same process could be used to assign LCCs to CLECs' customized OS/DA routing requests. The "indicator" the FCC contemplated in its order, and which AT&T is requesting in this docket, is analogous to a USOC. BellSouth provides USOCs for all other services and elements it makes available to CLECs, and those USOCs are processed by LCCAM whether they are being used by BellSouth or a CLEC.

Rather than use USOCs for AT&T's customized OS/DA routing, however, BellSouth proposes a system unique to AT&T's Operating Company Number

and MAN code, a specific switch, and specific NPA-NXXs within that switch. The methodology proposed by BellSouth clearly does not take advantage of the much simpler USOC-based process used for all other BellSouth and CLEC service requests. Additionally, BellSouth has proposed a system unique to AT&T, to be used for specific NPA/NXXs within that switch, as though AT&T had submitted a bona fide request for an individual process rather than a Change Request for a nondiscriminatory process available to all CLECs. BellSouth was unable to implement this "solution" for one switch; attempting to implement such a process for each requesting CLEC for each switch in which the CLEC plans to do business is unwieldy and unnecessary.

Once again, it is important to remember that this software has not been demonstrated to function as designed, as AT&T has not been allowed to test it.

Mr. Pate presents a Carrier Notification letter as his exhibit RMP-4 and attempts to claim that this means that BellSouth has made OS/DA available to any CLEC. In fact, the letter grossly overstates what might have been available to AT&T if BellSouth had been successful (which it were not) in its attempt to provide limited test OS/DA ordering capability, and directs CLECs to their account team representative: "The ability to control branding on Operator Assistance and Directory Assistance using specific Line Class

Codes (LCC) was implemented for AT&T in Georgia. Other CLECs interested in this capability should contact their account team representative." On page 18 of his testimony, Mr. Pate makes the further claim that his exhibit RMP-3 without the AT&T-specific information is applicable to any CLEC. However, if you remove the AT&T-specific information from RMP-3, there is nothing left of value to any CLEC.

Q. ON PAGES 16 AND 17 OF MR. PATE'S TESTIMONY, HE IMPLIES THAT THERE IS NO INDUSTRY STANDARD FOR ORDERING OS/DA ROUTING BUT STATES THAT BELLSOUTH HAS PROVIDED AN ELECTRONIC CAPABILITY TO AT&T. PLEASE COMMENT.

A. As discussed above, Mr. Pate is absolutely wrong concerning the availability of electronic OS/DA ordering. Further, his comment regarding industry standards is irrelevant. Although the use of industry standards can meet the needs of a competitive local exchange market[8], lack of industry standards does not excuse an incumbent LEC from meeting its obligation to provide nondiscriminatory access to OSS functions.[9] Similarly, deploying an interface that merely adheres to industry standards is not sufficient to demonstrate nondiscriminatory access. A BOC must provide

[8] FCC Ameritech Order ¶ 217; FCC BA-NY Order ¶ 88
[9] FCC South Carolina Order ¶ 121, n. 362.

nondiscriminatory access to its OSS functions irrespective of the existence of, or whether it complies with, industry standards.[10]

Q. MR. MILNER'S TESTIMONY CLAIMS THAT BELLSOUTH IS NOT OBLIGATED TO PROVIDE ACCESS TO OPERATOR SERVICES AND DIRECTORY ASSISTANCE AT UNE RATES BECAUSE BELLSOUTH PROVIDES CUSTOMIZED ROUTING. IS HE CORRECT?

A. No. As I discussed in my direct testimony on pages 38-45, BellSouth does not provide commercially viable customized OS/DA routing of CLEC calls to non-BellSouth platforms. And as I discussed above, there is no documented, repeatable, reliable process for placing footprint requests or submitting customer-specific orders. In addition, there are no working OS/DA routing arrangements in place anywhere within BellSouth's nine states.

Q. PLEASE SUMMARIZE YOUR RESPONSE TO MR. PATE'S AND MR. MILNER'S TESTIMONY REGARDING ISSUES 14 AND 15.

A. BellSouth has mischaracterized AT&T's position and the FCC's orders regarding customized OS/DA routing. AT&T is entitled to customized routing, and the methods it has requested are reasonable, technically feasible, and anticipated by the FCC. BellSouth has not provided the industry with technology to route OS/DA calls to third party platforms and to take

[10] FCC Louisiana II Order ¶ 137.

advantage of different (more efficient, less costly) trunking options that might be available to it in different local exchange areas, LATAs and states through a commercially viable, timely and repeatable process. BellSouth therefore must provide CLECs with its own OS/DA as a UNE, at UNE rates.

Q. WHAT DOES AT&T REQUEST THE COMMISSION TO ORDER REGARDING THIS ISSUE?

A. AT&T asks the Commission to order BellSouth to provide AT&T with specific documented methods and procedures for each of the customized routing methods it purports to offer: unbranded at BellSouth's platform, AT&T branded at BellSouth's platform, and routed to a non-BellSouth platform using the two-part procedure requested by AT&T. The Commission also should require BellSouth to provide AT&T with ordering capability that will allow AT&T to place individual customer orders electronically, utilizing a single region-wide indicator for each routing option. The orders should flow through, and AT&T should not be required to place line class codes on any order, nor should AT&T be required to place any indicator on orders when only one arrangement exists in a given footprint area. BellSouth should be ordered to provide these capabilities within 6 months of the Commission's order.

Further, until such time as BellSouth can demonstrate that it is offering, as a practical matter, customized OS/DA routing to alternative providers, it should

be required to continue to provide its own OS/DA services to CLECs as a UNE at UNE prices.

Issue 22: Should the Change Control Process be sufficiently comprehensive to ensure that there are processes to handle at a minimum the following situations:

Issue Matrix

a) introduction of new interfaces;

b) retirement of existing interfaces;

c) exceptions to the process;

d) documentation, including training;

e) defect correction;

f) emergency changes;

g) an eight step cycle, repeated monthly;

h) a firm schedule for notifications associated with changes initiated by BellSouth;

i) a process for dispute resolution including referral to state utility commissions or courts;

j) a process for escalation of changes in process.

Other Concerns

k) Testing Support and Testing

l) Provision of a Trouble Number for Type 1 Events

m) The Ability of BellSouth to Unilaterally Cancel or Reject a CLEC Request

n) Change Review – Prioritization – Release Package Development and Approval

o) The Process of Changing the Process.

Q. ON PAGE 24, MR. PATE SUGGESTS THAT THE COMMISSION SHOULD ONLY GIVE GUIDANCE ON THESE ISSUES, RATHER THAN ORDER SPECIFIC CHANGES, IN ORDER TO AVOID STATE-TO-STATE CONFLICTS. DO YOU AGREE?

A. No. In order for the change control process to become legally binding upon BellSouth and subject to effective regulatory oversight, this Commission must specifically order BellSouth to adopt the changes requested herein, direct BellSouth to comply with the process, and should specifically place the Change Control Document under its supervision. It should be no more difficult to avoid state-to-state conflicts regarding this process than any other process incorporated into an Interconnection Agreement or into BellSouth's Statement of Generally Available Terms and Conditions ("SGAT"). If this Commission adopts BellSouth's preferred approach, however, the Change Control Process will continue to be subject to BellSouth's sole control.

Q. IN ARGUMENTS AGAINST ARBITRATING THIS ISSUE, MR. PATE MAKES NUMEROUS ASSERTIONS THAT AT&T IS

ATTEMPTING TO "CIRCUMVENT THE COLLABORATIVE PROCESS." IS THIS TRUE?

A. No. AT&T is entitled to arbitrate this issue, as I have demonstrated above. Mr. Pate mischaracterizes AT&T's actions and paints a misleading picture of the level of collaboration that exists today regarding the CCP. As BellSouth is well aware, AT&T and other CLECs continue to work with BellSouth to improve the CCP. Notably, Mr. Pate never states that AT&T is the sole CLEC requesting changes such as those sought in this arbitration.

BellSouth, not AT&T, has circumvented the process by consistently making unilateral decisions regarding the process, over the protests of the CLEC community. In fact, other CLECs have expressed dissatisfaction with BellSouth's Change Control Process, which is not as collaborative as BellSouth attempts to portray. See, for example, Rebuttal Exhibit JMB-R5, which includes MCI and Sprint e-mails indicating disagreement with BellSouth's establishment of a three month trial period for the I-CCP, the definition of defects and several other processes BellSouth had proposed. The e-mails also indicate MCI and Sprint's concurrence with AT&T's objection to BellSouth's reclassification of "defects" as "features". I have also attached minutes of the March 23, 2000 Steering Committee meeting, which lists eight items regarding which CLECs had expressed concerns (retirements, testing, documentation, notification methods, the expedited process, intervals for process steps, the definition of a defect, notification

contents). As shown in the minutes, these items were not addressed during the meeting, but were instead deferred until future meetings. Many of these issues are still under discussion today. Rebuttal Exhibit JMB-R6.

Q. CAN YOU PROVIDE EXAMPLES OF INSTANCES IN WHICH BELLSOUTH FAILED TO FOLLOW ITS OWN CHANGE CONTROL PROCESS?

A. Yes. I will provide four examples of instances in which BellSouth failed to follow the Change Control Process, although there are many more.

1. Issue 9G Business Rules: On August 30, 2000, BellSouth released Issue 9G of BellSouth's Business Rules for Local Ordering ("BBR-LO"), which it admits includes significant changes that BellSouth did not submit to the CCP. (Direct Exhibit JMB-15.) Because BellSouth circumvented the CCP, CLECs were unable to make the required coding and process changes by the proposed October 2, 2000, implementation date. BellSouth nevertheless refused to withdraw these unapproved changes and implemented the software changes on October 2, 2000. In addition to rejecting the previously valid CLEC orders impacted by these unilaterally imposed changes, BellSouth's software release also contained coding errors that caused the rejection of other types of CLEC orders. BellSouth ultimately corrected these additional errors and CLECs and BellSouth utilized manual workarounds until that CLEC coding could be accomplished.

2. Unilateral Changes to Ordering Software: In my direct testimony, I provided an example of how BellSouth unilaterally decided to remove electronic OS/DA ordering functionality from Release 8 of its ordering software, in flagrant violation of the Change Control Process. Since that time, BellSouth has unilaterally decided to make other changes to Release 9 and Release 10. At the November 13, 2000, Release 9 User Requirements Meeting, BellSouth announced that three features based on CLEC change requests and previously scheduled for Release 9 would not be included in the scope of the release, that it was probable that not all of them would even be in Release 10, and that Release 11 was yet to be scheduled. Further, BellSouth revealed that its implementation of UNE to UNE migrations (per its self-initiated CR-0030) would include only the capability to migrate from UNE-P to a UNE loop without number portability, the least likely scenario, and that if any other capability was desired, a new change request would have to be submitted. Exhibit JMB-R7 provides the minutes of the meeting, the associated change requests, and correspondence between AT&T and BellSouth related to the UNE to UNE migration feature. BellSouth later responded to AT&T's December 15, 2000, change request to obtain the UNE-P to loop with number portability migration capability that meets CLEC business needs by indicating that its previous answer was wrong and that the capability actually exists in Release 9. BellSouth however has not provided any updated documentation describing how to use that capability.

Release 9 still contains no CLEC initiated change request implementations, and CLECs attempting to use the stealth the UNE to UNE capability are forced to use trial and error to discover the proper ordering method.

3. Preferential Treatment of BellSouth-Initiated Change Requests: BellSouth recently implemented several software changes on a preferential basis, without following the Change Request Process. As shown in Exhibit JMB-R8, (a November 13, 2000, e-mail from Change Control to the CLECs forwarding BellSouth- initiated change requests 216, 217, 218 and 219), BellSouth submitted four "Type 4" (BellSouth initiated) change requests on November 13th. BellSouth targeted these changes for implementation in November 2000, in violation of the Change Control Process. None of the requests were scheduled for or subject to a prioritization review, as is required for all non-defect change requests. Various CCP log entries reflect that change requests 216, 218, and 219 were implemented as of December 20, 2000.[11] Only fixes for defects are entitled to this "fast track" treatment, yet BellSouth treated its own change requests in this preferential fashion.

4. AT&T's Requested CCP Changes: BellSouth's handling of requests to change the process following the August publication of Version 2.0 also reflects its ability to ignore the Change Control Process. I provided a full discussion of this issue on pages 59-63 of my direct testimony.

These examples explain why AT&T has asked the Commission to arbitrate this issue. CLECs have no recourse if BellSouth fails to follow the Change Control Process, and BellSouth has no incentive to follow it.

Q. WHY DOES AT&T OBJECT TO BELLSOUTH'S REFUSAL TO FOLLOW THE CHANGE CONTROL PROCESS?

A. BellSouth's unique ability to ignore the process delays work on CLEC needs and limits the overall usefulness of the Change Control Process. Every single one of these "out of process" actions are costly to CLECs, who must repeatedly beg BellSouth to provide them with competitive functionalities, must program their systems for capabilities that may or may not be provided as promised, and must constantly revise business plans in response to BellSouth's unilateral decisions. Additionally, BellSouth has ignored the process when it wants to "cut in line" ahead of CLECs to implement changes that benefit BellSouth alone, which clearly is anticompetitive.

Q. ON PAGE 36, MR. PATE BEGINS A DISCUSSION OF THE OUTCOME OF THE JANUARY 10, 2001 PROCESS IMPROVEMENT REVIEW MEETING AND SUBSEQUENT EVENTS THAT CONTINUES THROUGH PAGE 45. CAN YOU SUMMARIZE THE SIGNIFICANT OUTCOMES UPON WHICH THIS COMMISSION SHOULD FOCUS?

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[11] I was unable to find any record of 217 on the CCP Web Site.

A. Yes. This Commission should direct its attention to the new "baseline" version of the Change Control Process Document, Version 2.1.A published on February 16, 2001 and attached as Exhibit JMB-R9 as well as the new "working document" also published on February 16th, which is attached as Exhibit JMB-R10. These two documents taken together should reflect the BellSouth and AT&T/CLEC positions on the CCP Document and eliminate the need to consult several of the previous versions provided as exhibits in my and Mr. Pate's direct testimony. I say "should" because my initial scan of the new "working document" indicates that it is incomplete and in at least two cases does not reflect the CLEC's position. I have brought this issue to the attention of the BellSouth Change Control Team (Exhibit JMB-R-15) and will be discussing all of the CLEC's positions in the next Process Improvement Review Meeting on February 21, 2001.

Q. DOES THE NEW VERSION 2.1.A CCP DOCUMENT RESOLVE ANY OF THE SUB-ISSUES IN THIS ARBITRATION?

A. Yes. Of the 15 sub-issues, Version 2.1.A resolves 5 and partially resolves 2. Here is the status of the sub-issues in this arbitration following the publication of Version 2.1.A.

a) introduction of new interfaces; - OPEN

b) retirement of existing interfaces; - RESOLVED

c) exceptions to the process; - RESOLVED

d) documentation, including training; - RESOLVED

e) defect correction; - Definition – RESOLVED, Cycle Time - OPEN

f) emergency changes; - RESOLVED

g) an eight step cycle, repeated monthly; - Number of Steps – RESOLVED, Cycle Time - OPEN

h) a firm schedule for notifications associated with changes initiated by BellSouth; - OPEN

i) a process for dispute resolution including referral to state utility commissions or courts; - OPEN

j) a process for escalation of changes in process. – Cycle Time - OPEN

k) Testing Support and Testing - OPEN

l) Provision of a Trouble Number for Type 1 Events - RESOLVED

m) The Ability of BellSouth to Unilaterally Cancel or Reject a CLEC Request - OPEN

n) Change Review – Prioritization – Release Package Development and Approval - OPEN

o) The Process of Changing the Process. - OPEN

Q. MR. PATE MAKES FREQUENT REFERENCE TO THE MINUTES OF THE JANUARY 10, 2001, MEETING TO SUPPORT HIS CLAIMS. SHOULD THIS COMMISSION RELY SOLEY UPON THE CONTENTS OF THESE OR ANY OTHER CCP MEETING MINUTES IN REACHING ITS DECISIONS?

A. No. As a matter of convenience, BellSouth's CCP team prepares all CCP meeting minutes. Producing minutes for lengthy and free flowing dialogue is a difficult undertaking. I am certain that BellSouth's team does its best to produce complete, accurate and unbiased minutes, however occasionally error and bias may appear. There is no standing process for the review or approval of CCP meeting minutes. Exhibit JMB-R11 is an e-mail I sent to BellSouth asking for clarification and amendment of the January 10, 2001, minutes. Mr. Pate, who does not attend CCP meetings, and this Commission should use caution when presented with the minutes of such meetings.

Q. ON PAGE 39, MR. PATE'S TESTIMONY IMPLIES THAT ITEM 35 WAS REMOVED FROM THE BALLOT TO PLACATE AT&T. IS THIS TRUE?

A. No. I had worked hand-in-hand with the BellSouth CCP Team in the preparation of the ballot as the CLEC's representative. BellSouth's CCP Team and I had determined that the issue in item 35 – Changing the Process – was not ready to ballot, as both BellSouth's and the CLEC's positions were new or recently revised. It appears to me that in the few hours between my last conversation with the CCP Team and the initial publication of the ballot others in BellSouth vetoed the CCP Team's commitment to me. Subsequent to the publication of the ballot, I believe these other players came to understand that they had made an error in judgement.

Q. ON PAGE 40, MR. PATE STATES THAT "THE SEVEN REMAINING 'CONTESTED CONSENSUS' ITEMS, PLUS THE ITEM THAT HAD BEEN REMOVED FROM THE ORIGINAL BALLOT, WERE SCHEDULED FOR FURTHER DISCUSSION A THE NEXT MEETING TO BE HELD ON OR ABOUT FEBRUARY 21, 2001." PLEASE COMMENT.

A. This is misleading. The consensus reached as a result of the returned ballots was that all 34 items were approved and should therefore be adopted into the CCP document. However, BellSouth vetoed the CLECs' votes on seven issues and implemented its own recommendation rather than the consensus. Further as I note in my e-mail at Exhibit JMB-R15, BellSouth has failed to include all seven issues and the full CLEC recommendation regarding changing the process in the new "working document", thus attempting a preemptive veto over future discussion.

Q. ON PAGES 57-59 OF HIS TESTIMONY, MR. PATE DISCUSSES THE PRIORITIZATION MEETING, THE RELEASE PACKAGE MEETING, THE ACTIVITIES IN THE INTERVAL BETWEEN THE TWO, AND SUBSEQUENT ACTIVITIES LEADING TO IMPLEMENTATION OF A CHANGE REQUEST. IS HIS DESCRIPTION ACCURATE?

A. No. On page 57, Mr. Pate indicates that in the interval between the Prioritization Meeting and the Release Package Meeting, BellSouth "provides

requirements and the technical references to the CLECs" and conducts face-to-face meetings or conference calls "to discuss the programming and coding details for the changes." Mr. Pate is wrong. BellSouth has never conducted these activities during this interval despite CLECs' repeated requests that they do so. The e-mail at Exhibit JMB-R7 above discusses BellSouth's failure to do so prior to its recent publication of the Release 9 specifications on November 13, 2000. The CCP doesn't require the actions Mr. Pate discusses, and BellSouth doesn't perform them.

Similarly, Mr. Pate implies that BellSouth and the CLECs "jointly create the Approved Release Package." While this is indeed the desired outcome, in practice, BellSouth simply dictates the contents of the release.

On pages 58 and 59, Mr. Pate describes a notification letter process and states that: "These letters are not intended to be technical references for use by CLEC software developers. As discussed previously, BellSouth provides CLECs with this information through other sources well in advance of the formal notification." This simply isn't the experience of CLECs since the creation of the first process document in 1998. KPMG recently posted Observation 21 to the Florida PSC Web Site dealing with this very subject; KPMG observed that "The distribution of Carrier Notification information associated with the BellSouth Change Control Process is not adequate. Furthermore, in BellSouth's implementation of the process, significant

information is not included in the Carrier Notifications." There is no consistent process that provides CLECs with this type of information in a timely manner; and thus AT&T seeks the notification processes described in the "working document" Exhibit JMB-R10.

Q. IN HIS DISCUSSION OF NEW INTERFACES MR. PATE MAKES A DISTINCTION BETWEEN "INTRODUCTION" AND "DEVELOPMENT"" OF NEW INTERFACES. DOES THE CCP INCLUDE ANY SUCH DISTINCTION?

A. Mr. Pate states that the "introduction" of new interfaces is subject to the CCP but "development" of those interfaces is not. This distinction is not supported by the CCP itself, which refers only to "introduction" of interfaces.

BellSouth makes this distinction because it wants to exclude development of new interfaces and processes from the CCP (as did the old EICCP). BellSouth's continued exclusion of the development of new interfaces and processes from the CCP guarantees repeated deployment of interfaces and processes that do not meet the needs of the CLECs and are wasteful of the industry's limited resources.

On pages 60-62 of his testimony, Mr. Pate attempts to justify BellSouth's actions using excuses that are both flimsy and downright paranoid:

"BellSouth must have flexibility to develop interfaces to meet industry standards and regulatory requirements."

"new development is too critical to risk being stymied in the process by CLEC disagreement."

"the nature of the CCP is such that if developing interfaces were included in the CCP, CLECs with no intention of using such interfaces could game the process by voting for additional features and functionality that would increase the time and cost to BellSouth and rival CLECs to implement them."

This Commission should turn a deaf ear to such excuses, for which BellSouth has provided no basis in fact. CLECs – the customers of BellSouth and the ultimate beneficiaries of the Change Control Process – must be accorded an opportunity to participate in the development of interfaces and processes that will serve them.

Q. YOU HAVE STATED THAT BELLSOUTH'S EXCLUSION OF NEW INTERFACES GUARANTEES REPEATED DEPLOYMENT OF INTERFACES AND PROCESSES THAT DO NOT MEET THE NEEDS OF THE CLECS AND ARE WASTEFUL OF THE INDUSTRIES LIMITED RESOURCES. CAN YOU PROVIDE EXAMPLES?

A. Yes. AT&T's customers have been victimized by BellSouth's secretive development of new OSS interfaces, specifically, BellSouth's Local Number Portability Gateway ("LNP-GTWY") and the processes supporting local number portability ("LNP"). I discussed two examples in my direct testimony on pages 68-70.

Q. ARE THERE OTHER PROBLEMS WITH LOCAL NUMBER PORTABILITY PROCESSES AND THE LNP GATEWAY THAT RESULT FROM BELLSOUTH'S DEVELOPMENT PROCESS?

A. Yes. The local number portability processes and the LNP Gateway itself were developed by BellSouth outside the Change Control Process. In addition to the customer-impacting process problems discussed above, I will describe how the LNP Gateway also denies CLECs and regulators of BellSouth in all nine states the processes and data needed to meet business and regulatory requirements.

The LNP Gateway itself was placed into service in August/September 1998, without the first scrap of technical documentation about its operation or location in the flow of processing CLECs' LNP-related orders. Historically, BellSouth has placed systems that must communicate with other systems external to BellSouth on the "downstream" side of its Service Order Control System ("SOCS"). Examples include communication with BAPCO for directory listings, communication with its 911database vendor, and

communication with the Service Management Systems of the network signaling system and other databases such as the Line Information Database ("LIDB").

Given that the Local Exchange Ordering ("LEO") and Local Exchange Service Order Generator ("LESOG") were already in place and operational for CLEC-originated local service requests, and in the absence of any specifications about the LNP-GTWY, CLECs made the logical assumption that LNP-GTWY had also been designed and placed "downstream" from SOCS.

Many months later, however, through continued questioning associated with various anomalies in processing LNP orders, the industry discovered that the LNP-GTWY was "upstream" from SOCS. The LNP-GTWY had in fact been developed and placed in the CLEC service request process flow to replace LEO-LESOG when a CLEC service request contained a request for LNP. Without any notice to CLECs, BellSouth had placed a "router" between the CLEC interfaces (EDI, TAG and LENS) and the two possible paths a CLEC LSR could now take, the LEO-LESOG path or the LNP-GTWY path. It is impossible to measure the wasted CLEC resources and CLEC customer ill will that resulted from BellSouth's decision to develop the LNP process and LNP Gateway without CLEC input.

The LNP-GTWY path processes only LSR's that include requests to port a number away from BellSouth to a CLEC. This includes two types of LSRs: those that request migration of a loop and porting of the associated telephone number (Reqtype B) and those that request the porting of a telephone number without its associated loop. (Reqtype C)

BellSouth's development of the LNP-GTWY Reqtype B (loop + number) process does not use the same business rules that are in place in the LEO-LESOG path for migration of the loop. Further, the LNP-GTWY does not collect or report the same process data as does the LEO-LESOG path despite the fact that regulatory data requirements do not differentiate between LNP orders and "regular" orders, and the fact that CLECs' business needs for data are identical. Thus, the LNP interface and process fails to collect data that would allow CLECs and state regulatory authorities to determine whether the system provides nondiscriminatory access to CLECs, and to target improvements where necessary. Open development would have provided the opportunity to ensure that such data is collected.

Q. ARE YOU AWARE OF OTHER NEW INTERFACE DEVELOPMENT THAT BELLSOUTH IS CONDUCTING OUTSIDE OF THE CHANGE CONTROL PROCESS?

A. Yes. As discussed in my direct testimony, BellSouth is developing three maintenance interfaces: DLEC TAFI, CPSS-TA and E-Repair. While

BellSouth has "introduced" these developments to the CLEC industry through a presentation to the October 25, 2000, Monthly Status meeting, even that introduction was not in accord with the requirements of the CCP.

Additionally, BellSouth is engaged in the development of new interfaces and capabilities to support xDSL services and line sharing outside the CCP. Mr. Pate recently filed testimony in Tennessee and Georgia that addresses the extensive nature of these developments. I have attached his Georgia testimony as Exhibit JMB-R12. Once again, BellSouth has elected to allow CLECs only limited participation and input, even though these interfaces are being developed specifically for CLEC use. Exclusion of CLECs from the process typically results in an architecture that further complicates the processing of CLEC LSRs. Exhibit JMB-R13.

From the explanations and claims made in Mr. Pate's Georgia testimony, (which sounds largely like its vendor's sales pitch), it seems possible BellSouth's development of xDSL and line sharing support services could have a broader scope of applicability, perhaps to all types of CLEC orders, but Mr. Pate does not discuss the reasons BellSouth has elected not to use the existing systems for xDSL and line sharing. Those reasons include design deficiencies, unsatisfactory performance, capacity concerns, future plans to migrate all CLEC transactions to the Telcordia vendor solution, future plans to migrate BellSouth's retail transactions to the new architecture, among

others. However, since development is occurring largely out of sight of the CLEC industry without the ability for an open dialogue under the CCP, CLECs are being denied any possibility of timely evaluation and input.

Q. ON PAGE 76, MR. PATE BEGINS A DISCUSSION OF THE DEVELOPMENT OF THE CLEC TEST ENVIRONMENT, AND STATES THAT YOU ARE THE CREATOR OF MINOR ACTION ITEMS, IMPLYING THAT IN SOME WAY THIS HAS BEEN HARMFUL TO THE DEVELOPMENT EFFORT. PLEASE COMMENT.

A. Exhibit JMB-R14 shows the BellSouth-produced CLEC Test Environment User Requirements and Issue Log that BellSouth provided to CLECs in advance of the January 17th and 18th meetings. These are BellSouth's documents and they contain conflicting information that I questioned during the January 18th meeting. BellSouth's representatives to the meeting were unable to explain the various discrepancies and created action items for themselves to provide responses to the industry. The implementation date for this test environment has now slipped from the March 31, 2001, date discussed in the meetings and to which Mr. Pate refers at line 20 of page 76, until some unspecified date in the second quarter. (See Exhibit JMB-R10, page 63) Due to this slippage, BellSouth would like to defer the resolution of open items in the section of the CCP document dealing with the CLEC Test

Environment, even though many of the issues could and should be resolved in advance of its implementation.

Q. ON PAGE 78, MR. PATE DENIES THAT BELLSOUTH HAS OR WOULD EVER USE A "VETO" POWER OVER CLEC CHANGE REQUESTS. PLEASE COMMENT.

A. As discussed above, BellSouth has expressly reserved to itself a veto and has not hesitated to use it in relationship to change requests associated with changing the process (Exhibit RMP-15, page 2). Further, BellSouth even engages in "proactive" vetoing of CLEC proposals. In publishing the "working document" version of the CCP, BellSouth knowingly failed to included CLEC Recommendations. Two examples are highlighted in the e-mail attached as Exhibit JMB-R15. Additionally, BellSouth continues to reserve this same right for itself in the processing of standard change requests as in reflected in Exhibit JMB-R10 on pages 24-25.

Q. ON PAGE 79, LINES 13-16, MR. PATE NOTES THAT THERE IS A PROCESS FOR "A GROUP OF CLEC'S (BUT NOT JUST A SINGLE CLEC)" TO ESCALATE THE RESOLUTION OF DISPUTES. DOES THE CCP LIMIT CLEC'S ABILITY TO ESCALATE INDIVIDUALLY?

A. No. There is no such language, limitation or concept anywhere within the CCP Document. The first time I heard a BellSouth employee state this concept was during BellSouth's opening statement at the Florida AT&T Arbitration Hearing on February 14, 2001. This is another example of creative unilateral process revision by BellSouth.

Q. HAS THERE BEEN AN INCREASE IN CHANGE CONTROL ACTIVITY DURING 2000?

A. Yes. The emphasis placed on Change Control by the FCC in its New York and Texas 271 decisions, and by KPMG in the Georgia and Florida Third Party Tests served as an impetus to BellSouth to take change control off the back burner and turn up the heat – things have been boiling ever since. Activity, however, should not be confused with success or real improvement in meeting the CLECs' business needs. The various Change Control Logs included in Exhibit JMB-R16 provide a source of considerable information.

First, I will contrast change control in 1999 with change control in 2000 at a very high and simplistic level. In 1999, there were 14 officially recognized change requests; in 2000, there have been 257 (as of December 20, 2000).

In 1999, BellSouth submitted no change control requests, and many areas, including defects were outside the scope of the process. Here is the disposition of the 14 CLEC requests submitted in 1999.

1999 CLEC Change Request Disposition at Year End 2000

Submitted	Implemented	Cancelled	Pending	Scheduled
14	5	2	2	5 (Release 10, June 30, 2001)

The two pending change requests[12] were both submitted well over a year ago, on September 12, 1999. Despite having been accepted and prioritized, they still do not have an implementation commitment from BellSouth.

In 2000, BellSouth submitted its first ever change request, and the scope of requests BellSouth would accept expanded, including defect correction requests.

Year 2000 Change Request Disposition

	Submitted	Implemented	Cancelled	Pending	Scheduled	"New"	Defect
Total	257 **(241)**	**84**	**69**	**32**	**16**	**23**	**17**
BellSouth	**96**	**41**	**20**	**15**	**7**	**4**	**9**
CLECs	162 **(145)**	43	49	17	9	19	8

BellSouth's various Change Control logs do not reconcile to each other. Sixteen submitted change requests appear not to have been captured in any category. In constructing this matrix, I used the December 20, 2000 active log and archived log, to count the total entries in each category, count the entries identified as BellSouth initiated and then subtract to get the CLEC total – this of course assigns all missing CRs as belonging to the CLECs.

Using the 241 submissions that can be tracked using the logs we can make a number of observations.

- after two years of submitting no change requests, BellSouth is now clearly the largest single user of the process.
- BellSouth initiated CRs account for 49% of all implementations.
- a significantly higher percentage of BellSouth initiated CRs are in implemented, pending or scheduled status than are CLEC initiated requests:
    - BellSouth:65% (63 of 96)
    - CLECs 43 - 48% (69 of 145 or 69 of 162, depending on which data is used)

A further analysis of implemented BellSouth CRs reveals that 29 of the 41 or 71% were "defects", not including cases, as described above, where BellSouth implemented Type 4 changes as if they were defects, thus disguising their true nature. In contrast, only 17 (40%) of the implemented CLEC CRs originated as defects. Many of BellSouth's CRs appear to be related to KPMG findings in the two ongoing Third Party Tests. BellSouth's use of the process in this manner may not be in the best interests of the CLECs.

[12] Parsed CSRs and an electronic process for correcting dropped 411 listings.

Q. PLEASE SUMMARIZE YOUR RESPONSE TO MR. PATE'S TESTIMONY REGARDING THE CHANGE CONTROL PROCESS.

A. While Mr. Pate attempts to portray AT&T as a renegade trying to circumvent an otherwise cooperative and collaborative process, the truth is that BellSouth simply has been unable to obtain CLEC agreement for the process it proposes. As the multiple examples in my testimony illustrate, several CLECs have been asking for changes, but BellSouth continues to exercise exclusive control over the process, thus preventing true collaboration from taking place.

Mr. Pate's testimony also glosses over the deficiencies in the process by providing high-level overviews and citing obscure examples that are not indicative of the process. But as my direct and rebuttal testimony clearly illustrate, the current process is fraught with deficiencies that allow critical problems to languish, CLEC requests to be denied unilaterally, and even agreed-upon changes to move unnecessarily at a snail's pace such that months, and even more than a year, can pass before change requests are implemented.

Q. WHAT DOES AT&T REQUEST THAT THE COMMISSION DO REGARDING THIS ISSUE?

A. AT&T requests that the Commission correct these deficiencies by adopting the CLEC recommendations in the "working document" version of the CCP

attached as Exhibit JMB-R10 in the context of whatever is the then-most-current version of the Change Control document (Version 2.1.A at this writing), and by ordering BellSouth to comply with these documents.

Issue 23: What should be the resolution of the following OSS issues currently pending in the change control process but not yet provided? (The Equivalent OSS Issue)

a) parsed customer service records for pre-ordering?

b) ability to submit orders electronically for all services and elements?

c) electronic processing after electronic ordering, without subsequent manual processing by BellSouth personnel?

Q. ON PAGE 84 OF HIS TESTIMONY MR. PATE OFFERS A DEFINITION OF "PARSE." SHOULD THIS COMMISSION ADOPT MR. PATE'S DEFINITION?

A. No. Mr. Pate' definition is clearly self-serving. As I describe in my direct testimony on pages 84 and 85, industry standards call for the transmittal of parsed CSR information in response to CLEC queries, and BellSouth requires CLECs to transmit parsed information to them in compliance with those same industry standards when placing orders. Because BellSouth fails to meet industry parsing standards, Mr. Pate has attempted to define the problem away.

The Commission should reject BellSouth's attempt to provide less than parity. BellSouth exchanges (transmits and receives) parsed CSR data internally in its daily operations. BellSouth's systems thus are able automatically to populate its own retail orders, saving time and expense, and providing a greater level of accuracy. Because BellSouth provides parsed CSR data to its customer service representatives, it also is required to provide the same functionality to AT&T.

Mr. Pate argues that BellSouth has met its obligation to provide nondiscriminatory access because "BellSouth provides CLECs the CSR data in the same manner that it provides the data to itself for use by the BellSouth retail units." Pate testimony at pages 85 and 87. Mr. Pate thus attempts to introduce an artificial wholesale/retail distinction, and hopes the Commission will overlook the functionalities that BellSouth provides within its retail operations, such as parsed CSRs.

Mr. Pate also argues that AT&T can use its own systems to parse the unparsed CSR data provided by BellSouth. This argument is not only irrelevant (because it ignores BellSouth's obligation to provide parsed data on a non-discriminatory basis), but often incorrect. Only if BellSouth provides AT&T with data that contains delimiters, and also provides the rules by which the fields represented by the delimiters can be determined, can

AT&T separate BellSouth's unparsed data and place it in the appropriate fields. For example, Mr. Pate discusses the "customer's listed name" field on page 85 of his testimony. BellSouth provides this information to AT&T in one field, without delimiters, so AT&T's systems cannot parse this data. Yet BellSouth requires AT&T to submit an ordering form in which the customer name must be shown in a minimum of two fields, forcing AT&T to separate this information manually.[13] Rebuttal Exhibit JMB-R17.

Thus AT&T is unable to reliably automatically populate its service orders with the CSR information BellSouth currently provides to CLECs, but BellSouth is able to automatically populate its own service orders. Mr. Pate's new definition should be rejected.

Q. ON PAGES 88 THROUGH 90 OF HIS TESTIMONY, MR. PATE DESCRIBES HIS VIEW OF THE STATUS OF AT&T'S CHANGE REQUEST FOR PARSED CSRS. DO YOU HAVE ANY COMMENTS?

A. Yes. Mr. Pate accurately states that AT&T presented its change request for parsed CSRs via the change control process in September, 1999. However, AT&T and other CLECs first made this request to BellSouth in September, 1998, a full year earlier, as part of its requirements for the OSS99 upgrade.

[13] Mr. Pate appears to indicate in his testimony that AT&T's request is inappropriate and unnecessary because BellSouth "retains the customer's listed name as a complete field", e.g. "Pate, Ronald M." BellSouth's decision to "retain" information as one field is irrelevant. It provides its customer service

BellSouth refused to include parsed CSRs in the upgrade, and thus AT&T had to resubmit its request through change control. As Mr. Pate indicates, this was one of eleven pending change requests prioritized by the CLECs, and it received the number one ranking by the group for the TAG interface. Despite CLEC agreement on the high priority of this request, it has been languishing ever since. A review of the September 28, 1999 meeting minutes, provided in Mr. Pate's Exhibit RMP-27, shows that this change request was targeted for implementation in April, 2000. Others were requested in similar time frames, and still others were to be completed as soon as possible ("ASAP"). However, to date, BellSouth has only implemented four of the eleven change requests prioritized in September 1999, although it has implemented a total of 76 other change requests of varying types since that meeting.

Mr. Pate implies that CLEC reprioritization is the cause of this lengthy delay, rather than BellSouth's actions. Mr. Pate is wrong. BellSouth made the unilateral decision to downgrade this important request, and announced its decision to the CLECs. Thus, the March 29, 2000 change control meeting minutes (Pate Exhibit RMP-28) show that the status of AT&T's request was downgraded from "Targeted for release 4/20/2000" to "Subteam being formed to perform planning and analysis during 2000." As noted above, CLECs voted parsed CSRs as their number one priority for TAG interface

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representatives with parsed CSRs, so BellSouth's systems may automatically populate retail orders. BellSouth thus is obligated to provide AT&T with this same functionality.

changes during the September 18, 1999 meeting, and they have never re-prioritized this issue. During the September 18, 2000, Release Package Meeting, BellSouth again downgraded and delayed the implementation of this change, and now states that "Parsed CSR could possibly be implemented with Release 10.0 in May 2001." On December 5, 2000, BellSouth published its proposed schedule to the sub-team mentioned above, showing a planned implementation date of December 31, 2001, for parsed CSRs! Exhibit JMB-R18. Mr. Pate notes correctly on page 90 of his testimony that BellSouth has now informed the CLECs that this implementation date has been improved to the indefinite "summer 2001 timeframe." Therefore, due to BellSouth's unilateral control of this process, a request that has been pending for two years now has an indefinite implementation date over three years from the CLEC's original request.

(b) ability to submit orders electronically for all services and elements?

Q. MR. PATE STATES IN HIS TESTIMONY THAT NON-DISCRIMINATORY ACCESS DOES NOT REQUIRE THAT ALL LSRS BE SUBMITTED ELECTRONICALLY. HE FURTHER STATES THAT BELLSOUTH'S OWN RETAIL PROCESSES OFTEN INVOLVE MANUAL PROCESSES, AND THEREFORE THERE IS NO REQUIREMENT THAT EVERY LSR HAS TO BE SUBMITTED ELECTRONICALLY. PLEASE COMMENT.

A. Mr. Pate uses an apples-to-oranges comparison in an attempt to convince the Commission that BellSouth is treating AT&T the same as it treats itself. However, a careful reading of his testimony reveals the lack of candor in BellSouth's position. When Mr. Pate addresses AT&T's requirements, he correctly notes that AT&T wants to be able to submit all orders electronically. However, when he discusses BellSouth's own ordering capability, he broadens his terminology from actual order submission and instead uses the terms "manual processing" and "manual handling" of BellSouth orders, which are not the same thing as order submission. Additionally, although he admits that the manual processing and handling of which he speaks occur as part of the order preparation process, not as part of the order submission process, he goes on to imply that because the manual pre-ordering processes are substantially the same for both retail and CLEC orders, that BellSouth is providing an equivalent ordering process. Mr. Pate's admission is simply irrelevant to the ordering process.

AT&T does not dispute that both its requests for service and BellSouth's requests for service involve some level of manual collection of information and order preparation before input into each company's respective ordering systems. But after an order is prepared, BellSouth has the ability – which AT&T does not -- to input that order into its ordering system. What AT&T is asking for itself is to be able to submit its orders electronically, once

prepared, just as BellSouth does for its customers. BellSouth continues to refuse to provide that non-discriminatory capability.

Q. WHY IS ELECTRONIC ORDER SUBMISSION IMPORTANT TO AT&T?

A. As I stated in my direct testimony, lack of electronic ordering increases the possibility of errors, extends intervals, and increases costs. Electronic ordering allows a CLEC to populate its own databases simultaneously with providing an order to BellSouth. A manual process, however, requires two steps: an order must be provided to BellSouth, and the appropriate ordering information be separately input into AT&T's internal OSS.

Q. MR. PATE USES EXHIBITS RMP-34 AND RMP-35 TO ATTEMPT ILLUSTRATE THAT "BELLSOUTH PROVIDES CLECS THE ABILITY TO ORDER COMPLEX SERVICES IN SUBSTANTIALLY THE SAME TIME AND MANNER AS IT PROVIDES TO ITS RETAIL CUSTOMERS." PLEASE COMMENT.

A. Mr. Pate's exhibits do not achieve that goal. As the unshaded (electronic) blocks in each exhibit demonstrate, the CLEC simply does not place its orders as BellSouth does. Rather, as the two exhibits clearly indicate, BellSouth submits both its own electronic order and the CLEC's order, thereby denying CLECs the advantages of electronic order submission as described above. For Mr. Pate's diagrams actually to depict a

nondiscriminatory process, the block on Exhibit 34, presently labeled "CSA – ORDER ENTRY INTO DOE" would have to show and accurately represent input of the order by the CLEC employee into the CLEC sales and marketing interface.

Mr. Pate's exhibits reveal an additional area of discrimination. The BellSouth retail order is processed using BellSouth's new Regional Ordering System (ROS), while the CLEC order is processed using the former system, Direct Order Entry (DOE). In his description of ROS, Mr. Pate indicates ROS "utilizes software to compare <u>each</u> FID contained within the service order to corresponding SOER edits." It is highly unlikely that BellSouth would have gone to the expense of deploying a new ordering system such as ROS if it were not superior to the old one. Yet BellSouth is not using that superior capability for CLEC orders. Thus, in actuality, Mr. Pate's exhibits depict that a CLEC orders complex services in a <u>very different</u> (and discriminatory) "manner" when compared to BellSouth.

(c): Electronic processing after electronic ordering, without subsequent manual processing by BellSouth personnel.

Q. MR. PATE STATES IN HIS TESTIMONY ON PAGE 98 LINES 23-25 THAT NON-DISCRIMINATORY ACCESS DOES NOT REQUIRE THAT ALL LSRS BE SUBMITTED ELECTRONICALLY FLOW

THROUGH BELLSOUTH'S SYSTEMS WITHOUT MANUAL INTERVENTION. DO YOU AGREE?

A. Absolutely not. The Act and the FCC require that BellSouth provide non-discriminatory access to its OSS. Because all of BellSouth's orders are capable of flow through, the CLECs' orders must be provided with the same capability. Further Mr. Pate is hoping that he can sufficiently misdirect this Commission from the findings of the FCC and other state regulators in BellSouth's territory regarding BellSouth's OSS.

In 1997, the Florida Public Service Commission ("FPSC") made its own independent investigation into the OSS BellSouth was offering to the CLEC community and found them lacking. In its order that Commission established the criteria BellSouth would have to meet in order to demonstrate that its offered OSS were providing nondiscriminatory access, and determined that BellSouth must provide electronic interfaces that require no more human or manual intervention for CLECs than for BellSouth:

> Upon consideration, we believe that BellSouth is required to demonstrate to this Commission and to the FCC, that its interfaces provide nondiscriminatory access to OSS functions. Although AT&T witness Bradbury stated that there are five characteristics of a non-discriminatory interface, we find it appropriate to recognize four of those characteristics. We find that each interface must exhibit the following characteristics to be in compliance with the nondiscriminatory standards of the Act. They are: **1) the interface must be electronic. The interface must require no more human or manual intervention than is necessarily involved for BellSouth to perform a similar transaction itself;** 2) the interface

must provide the capabilities necessary to perform functions with the same level of quality, efficiency, and effectiveness as BellSouth provides to itself; 3) the interface must have adequate documentation to allow an ALEC to develop and deploy systems and processes, and to provide adequate training to its employees; and, 4) the interface must be able to meet the ordering demand of all CLECs, with response times equal to that which BellSouth provides itself. (DOCKET NO. 960786-TL; ORDER NO. PSC-97-1459-FOF-TL; ISSUED: November 19, 1997, pages 101 and 177-178, emphasis added.)

Mr. Pate, however, attempts to confuse this issue by introducing BellSouth's own definition of CLEC flow-through.

Q. HOW DOES BELLSOUTH DEFINE CLEC FLOW-THROUGH?

A. On page 99 of his testimony, Mr. Pate indicates that CLEC flow-through occurs when a "**complete and correct electronically submitted LSR is sent via one of the** CLEC **ordering interfaces** (EDI, TAG, or LENS), **flows through the mechanical edit checking** and LESOG system, is mechanically transformed into a service order by LESOG, **and is accepted by the SOCS** without any human intervention." The portions shown in bold are BellSouth's modifications to the FCC's definition of flow-through, which is discussed below.

Q. DOES MR. PATE DEFINE OR DESCRIBE BELLSOUTH'S RETAIL FLOW-THROUGH?

A. No. However, the flow-through process for BellSouth shares many commonalties with the CLEC flow-through process. The following is a description of BellSouth flow-through, using the common areas depicted in bold from the CLEC flow-through description above. Information specific to BellSouth's retail flow-through is shown in *italics*:

> *Retail* flow-through occurs when a complete and correct electronically submitted LSR is sent via one of the *retail* ordering *systems (RNS, ROS, or DOE*), flows through the mechanical edit checking, and is accepted by the Service Order Control System (SOCS).

As will be described below, <u>all</u> BellSouth orders are capable of flow through between its ordering systems and SOCS, while only some CLEC orders are allowed to do so.

Q. IS BELLSOUTH'S DEFINITION OF FLOW-THROUGH CONSISTENT WITH THE FCC'S DEFINITION?

A. No. BellSouth has significantly both embellished and restricted the FCC's definition for its own purposes. The FCC's definition is found in paragraph 107 of the LAII Order:

> A competing carrier's orders "flow through" if they are transmitted electronically through the gateway and accepted into BellSouth's back office ordering systems without manual intervention.

While BellSouth maintains that all it has done with its revision of the FCC's simple definition is to make it specific to BellSouth's systems, it has in fact introduced significant requirements beyond the FCC's.

The central concept of FCC's definition (which it should be noted addressed only flow-through for CLEC service requests) can be restated to encompass both CLEC and BellSouth retail processes without introducing any spurious restrictions:

> A service request that is input to a sales and marketing interface by the manual actions of a CLEC or BellSouth employee and subsequently sent to and accepted by BellSouth's Service Order Control System ("SOCS") without any further human intervention has flowed-through.

Using this description, it is easy to see that all BellSouth retail service requests input to BellSouth's RNS or ROS sales and marketing interfaces are capable of flow-thorough to SOCS, while only a portion of CLEC service requests sent electronically to BellSouth are allowed to do so. In exactly the same way, all BellSouth retail service requests input to the systems that preceded ROS, DOE and SONGS, were capable of flow-through.

Q. IN APRIL OF 1999, AFTER 2O MONTHS OF REPORTING FLOW THROUGH FOR ITS BUSINESS ORDERS, BELLSOUTH STOPPED REPORTING THAT DATA AND DECLARED THAT IT HAD

DISCOVERED THAT ITS RETAIL BUSINESS ORDERS DID NOT HAVE FLOW THROUGH. IS THIS A VALID ARGUMENT?

A. No. It is plain to see that all of BellSouth's retail business orders are submitted electronically and capable of flow through. The Georgia Commission in its recent order in its Performance Measures Docket, No. 7892-U, rejected the argument that BellSouth makes in this arbitration that its business retail orders are not electronic and do not flow through. The Georgia Commission has ordered BellSouth to resume reporting of this data going back to May 2000. Exhibit JMB-R19. Additionally the Georgia Order creates an Improvement Task Force to expand the scope of ALEC electronic ordering and to eliminate BellSouth system errors and designed manual fallout.

Q. MUST EVERY STEP OF THE PREORDERING AND ORDERING PROCESS BE AUTOMATED BEFORE AN ORDER CAN FLOW THROUGH?

A. No. As noted above, flow-through occurs when an order is entered into a sales and marketing order system and it flows through to SOCs. As shown in Mr. Pate's Exhibit RPM-35, there also may be a number of manual pre-ordering steps necessary to gather information for the order.

Q. MR. PATE CLAIMS ON PAGE 99 OF HIS TESTIMONY THAT TO HIS KNOWLEDGE NO FLOW-THROUGH CHANGE REQUESTS HAVE BEEN SUBMITTED TO THE CCP. IS THIS CORRECT?

A. No. It is both incorrect and irrelevant. AT&T has submitted CRs 0137 and 0160 and other CLECs have also submitted flow-through related change requests. However, this is irrelevant to BellSouth's obligation to provide nondiscriminatory OSS functionality, including flow-through ordering. This requirement was established by the Act and the implementing rules and orders of the FCC and by the orders of various state authorities, including the FPSC's 1997 Order. Further, as Mr. Pate knows AT&T and BellSouth have been engaged in on-going discussions of flow-through and order mechanization since early 1997. The most recent dialogue began August-September 1999 and continues to the present. Exhibit JMB-R20 provides copies of inter-company correspondence and meeting minutes from this on-going effort. Additionally the Georgia Order cited above (Exhibit JMB-R19) creates an Improvement Task Force to expand the scope of ALEC electronic ordering and to eliminate BellSouth system errors and designed manual fallout.

Q. MR. PATE STATES ON LINES 12-14, PAGE 100 OF HIS TESTIMONY THAT BELLSOUTH HAS CONCLUDED THAT MECHANIZING MANY LOWER-VOLUME COMPLEX RETAIL

SERVICES WOULD BE IMPRUDENT FOR ITS OWN RETAIL OPERATIONS. IS THIS RELEVANT TO FLOW-THROUGH?

A. No. Complex services are rarely totally mechanized, but this is irrelevant to the issue of flow-through. An order for a complex service may require many manual pre-ordering activities yet still flow through, as shown in Mr. Pate's Exhibit RPM-35.

As is indicated above, retail flow-through is achieved when a service request is successfully transmitted from the ordering system (RNS, ROS, DOE), and is accepted by SOCS. A review of Mr. Pate's exhibit reveals that a BellSouth employee enters an order into ROS, which transmits it to SOCS – thus flowing through. In his testimony on page 86, Mr. Pate refers to the manual pre-ordering processes that also are used to prepare these complex orders for entry into BellSouth's front-end system. His exhibit uses shaded areas to indicate steps involving manual processing. The Commission should concentrate its attention, however, on the two BellSouth activities (order entry into ROS and receipt by SOCS) that are <u>not</u> found in the shaded areas indicative of manual processing. BellSouth's own exhibit shows that these steps are electronic, and that BellSouth's own retail complex orders do flow through from its ordering systems to SOCs. CLEC orders are thus entitled to the same flow through process.

There is no retail service that BellSouth cannot order electronically. If, as Mr. Pate testifies, BellSouth had elected not to mechanize a particular retail service, then it would be impossible to order that service via the retail RNS, DOE or ROS interfaces. Yet BellSouth has never identified a single retail service that its retail service representative cannot order via input to one of these systems, although AT&T has repeatedly inquired into this issue.

In the spring of 1999, for example, BellSouth was asked to respond to a matrix identifying the interface it used to place requests for each of its retail services. In its response, BellSouth did not identify a single service that was not was not ordered via RNS, DOE, or SONGS. Rebuttal Exhibit JMB-R21 provides a copy of BellSouth's response. More recently, during the North Carolina arbitration between AT&T and BellSouth, Mr. Pate was asked whether there was any service that a BellSouth representative could not order via ROS, to which he responded that he was not aware of any such service. (Rebuttal Exhibit JMB-R22 – NC Testimony Transcript reference page 227-228). Mr. Pate confirmed his North Carolina response in the Georgia arbitration hearing Exhibit JMB-R23, Georgia Transcript at page 1107.

Q. HAVE OTHER KNOWLEDGEABLE BELLSOUTH EMPLOYEES PROVIDED TESTIMONY INDICATING THE EXISTANCE OF FLOW THROUGH FOR ORDERS PLACED USING THE DOE INTERFACE?

A. Yes. In a deposition taken on July 28, 2000, Mr. Douglas W. McDougal, discussing the importance of flow-through to the operation of the LCSC, referred directly to the importance of flow-through of the orders his employees placed using the DOE, SONGS, and LNP interfaces. This discussion may be found on pages 16-20 of his deposition, which I have attached as Rebuttal Exhibit JMB-R24. On page 17, line 16, Mr. McDougal states:

> "However, we also have flowthrough on orders that come in by fax and paper because we get tremendous of fax and paper orders, particularly from smaller CLECs. So we attribute flowthrough to once the service rep builds the order and releases the order to the downstream systems, it flows without erroring out."

It is entirely logical to believe that if orders submitted by LCSC employees using DOE are capable of flow-through, orders submitted by BellSouth retail employees using DOE or its replacement, ROS, are also flow-thorough capable.

Q. DOES BELLSOUTH DESCRIBE REASONS OTHER THAN COMPLEXITY THAT CLEC ORDERS FALL OUT FOR MANUAL PROCESSING?

A. Yes. BellSouth has created "designed fallout", which means that CLEC order fall out for manual handling for reasons other than complexity. In previous arbitrations Mr. Pate has indicated that these other reasons are described in its Service Quality Reports Performance Reports document. A

review of page 19 of that document (Rebuttal Exhibit JMB-R25) reveals at least twelve scenarios in which BellSouth has decided that orders should not flow through. The discriminatory nature of this decision is apparent in the last line of this information, which states "all but one [of the twelve non flow-through scenarios] are unique to the CLEC environment."

Q. DO YOU AGREE WITH THE STATEMENT THAT THESE SCENARIOS ARE UNIQUE TO THE CLEC ENVIRONMENT?

A. No. Although the non-flow through or manual fall-out is unique to the CLEC environment, the scenarios are not. For example, the exhibit lists several types of CLEC orders that do not flow through: CLEC orders with more than 25 business lines, expedited orders, end-user outside moves, pending order activity on account, and transfer of calls option. But these situations are not unique to CLECs. Certainly BellSouth has these types of scenarios as well, but BellSouth's resulting retail orders do not fall out for manual processing as do CLEC orders. In a deposition taken on July 20, 2000, Mr. Pate was uncertain about the "uniqueness" of these situations to the CLEC environment. On page 42 beginning at line 25 Mr. Pate states:

> "Well, I need to talk to the author on that as well. They were trying to categorize these as unique; and, frankly, they're not all unique, but most are unique. I think that's an area where we can go back and look, but the majority of these are unique to CLEC environment."

In subsequent discussion Mr. Pate agreed that many of the same situations existed for BellSouth. I have attached Mr. Pate's deposition as Rebuttal Exhibit JMB-R26.

Q. ON PAGE 100 OF HIS TESTIMONY MR. PATE DISCUSSES WHAT HE CALLS THE TWO MAIN REASONS THAT ELECTRONICALLY SUBMITTED ORDERS FALL OUT FOR MANUAL HANDLING. FIRST, THAT LESOG HAS NOT BEEN PROGRAMMED TO HANDLE REQUESTS FOR CERTAIN TYPES OF PRODUCTS AND SERVICES AND SECOND, UNIQUE CIRCUMSTANCES RELATED TO THE LSR. PLEASE COMMENT.

A. It is important to understand that the programming of LESOG is totally at BellSouth's discretion and is not limited by any industry standards or other external guidelines – it is simply BellSouth's, and BellSouth's alone, decision as to what programming to install in LESOG.[14] Ms. Terri Hudson speaking at the November 1, 2000, meeting made this point clear when she stated that there were many things BellSouth could do to improve "flow-through" for CLECs without the CLECs needing to perform any coding or take any other action. Ms. Hudson's words were paraphrased in the minutes of the meeting as part of an action item appearing on page 8 (see Exhibit RMP-13):

> BellSouth will provide a report of internal changes that have a positive impact and improve performance for CLECs, but do not

[14] This is true of all the software and system components BellSouth has introduced between the CLEC interface (EDI, TAG, LENS) the BellSouth's legacy Service Order Control System (SOCS). This includes, the LSR Router, LEO, LESOG, LNP Gateway, LAUTO, and the new "Corporate Gateway".

require coding. These changes improve "flow-through" in BellSouth and would require no vote by the CLECs.

Mr. Pate claims once again that "complexity" and "low ordering volume" don't justify programming in LEO that would provide CLECs with parity to BellSouth retail operation. In October 2000, there were 31,883 LEO LSRs subjected to designed manual fallout (10% of the total submitted), and 27,406 LEO LSRs that BellSouth's LEO system failed to process as it should have (8% of the total submitted). For the LNP-GTWY there were 5,911 LSRs subjected to designed manual fallout (28% of the total submitted), and 7,450 LSRs that the LNP-GTWY system failed to process as it should have (36% of the total submitted). Thus, in October alone 72,650 (21% or 1 out of 5) electronically submitted LSRs were subjected to manual handling by BellSouth's unilateral programming decisions. Low volume is clearly not an issue that justifies BellSouth's continuing failure to program LESOG/LNP-GTWY or fix its currently defective programming.

As discussed above, complexity is not an issue, as BellSouth provides flow-through for its own service requests.

As discussed above, the claim of uniqueness is also highly suspect, and the resulting impact on customer service of designed manual fallout is often negative rather than positive. Consider the absurdity of have LSRs that request expedited due dates fallout for manual processing, when the average

interval from when the LSR falls out to when it is claimed by a service representative ranges from 34 to 130 hours as documented in my direct testimony at page 101.

Q. THE LOCAL CARRIER SERVICE CENTER ("LCSC") HANDLES ALL MANUALLY SUBMITTED ORDERS AND ALL ELECTRONICALLY SUBMITTED ORDERS THAT FALL OUT FOR MANUAL PROCESSING. MR. PATE HAS REPORTED THAT THE PERCENTAGE OF ELECTRONICALLY SUBMITTED ORDERS HAS RISEN SIGNIFICANTLY OVER THE PAST YEAR. DOES THIS NECESSARILY MEAN THAT BELLSOUTH IS PROCESSING PROPORTIONALLY MORE CLEC ORDERS WITHOUT HUMAN INTERVENTION?

A. No. Because real flow-through for electronically submitted orders is generally low, human intervention on CLEC orders is still unreasonably high and BellSouth still relies excessively on manual processing of CLEC orders.

Let me illustrate this point with some data. In the recent Georgia Arbitration (October 31, 2000), Mr. Pate stated that a year ago, (October 1999) 49% of CLEC orders were submitted electronically and that today (October 2000) that percentage had risen to 82%. (Exhibit JMB-R23, TR page 1108. Additionally, BellSouth has provided volume and staffing data in its responses to AT&T's Interrogatories and Document Requests in both North

Carolina and Florida.[15] Combining this with information from the Monthly Flow-Through Reports, we can summarize some significant data points for each of the two months one year apart and make a number of observations.

Comparative Data October 1999 / October 2000

	OCTOBER 1999	Counts	% of Total LSRs	% of Electronic LSRs
1	Electronically submitted LSRs	110,814	52%	
2	Manually submitted LSRs	103,123	48%	
3	Total LSRs	213,937		
4	Manual Fallout LSRs	8,180		
5	Total System Error Fallout LSRs	9,590		
6	Manually handled electronic LSRs (4+5)	17,770		16%
7	Total LCSC LSRs (2+4+5)	120,893	57%	
8	LCSC Headcount	639		

	OCTOBER 2000	Counts	% of Total LSRs	% of Electronic LSRs
1	Electronically submitted LSRs	345,834	88%	
2	Manually submitted LSRs	47,961	12%	

[15] In North Carolina BellSouth's responses were to IRs 29 and 32, in Florida they are to IRs 34 and 36.

3	Total LSRs	393,795		
4	Manual Fallout LSRs	37,794		
5	Total System Error Fallout LSRs	43,446		
6	Manually handled electronic LSRs (4+5)	81,240		23%
7	Total LCSC LSRs (2+4+5)	129,201	33%	
8	LCSC Headcount	740		

While the percentage of LSRs submitted electronically did rise from 52% to 88%, the percentage of LSRs still subject to manual processing only fell from 57% to 33% and the percentage of electronically submitted LSRs subjected to manual handling actually rose from 16% to 23%. Interestingly, while the number of LSRs handled by the LCSC grew 7% (from 120,893 to 129,201), the head count required to handle those LSRs grew 16% -- even though in 1999, 85% of such orders were fully manual while in 2000, only 37% were fully manual. BellSouth still relies excessively on manual processing of CLEC LSRs and as shown above is unable to provide such manual processing in a timely manner.

Q. IN PRIOR ARBITRATIONS MR. PATE HAS CRITICIZED YOUR FLOW THROUGH ANALYSIS AS INCOMPLETE AND INACCURATE BECAUSE YOU DID NOT HAVE ACCESS TO THE UNDERLYING DATA. WHAT IS YOUR RESPONSE?

A. I disagree. The rationale Mr. Pate has used in the past for recasting my calculations is completely inappropriate.

Q. WHAT RATIONALE DID MR. PATE USE?

A. In essence, Mr. Pate's position has been that access to the underlying data is necessary to conduct flow-though analysis. To support his contention, he selected one category of the flow-through report (business resale) for one month to examine the data for factors influencing the level of orders falling out for manual handling. He concluded that orders were not falling out in this case because BellSouth had designed them to, but because two primary CLEC users of the EDI and TAG interfaces had not upgraded their interfaces to take advantage of an upgrade BellSouth had made which allowed one of the services they order to now flow through.

Q. PLEASE COMMENT ON MR. PATE'S POSITION.

A. Mr. Pate's position is inaccurate. Flow-through does not occur at the interface level (EDI, TAG, LENS). Rather, service requests are submitted at the interface level. Flow through, by Mr. Pate's definition on page 99 of his testimony occurs in BellSouth's OSS:

> "Flow through for a CLEC LSR occurs when the complete and correct electronically submitted LSR is sent via one of the CLEC ordering interfaces (EDI, TAG, or LENS), flows through the mechanical edit checking and LESOG system, is mechanically transformed into a service order by LESOG, and is accepted by SOCS without any human intervention. (emphasis added)

As is clearly indicated by Mr. Pate's own definition, flow-through occurs in BellSouth's OSS (LEO/LESOG or LNP/LAUTO), not at the interface level. Unfortunately, the CLEC has no control over what BellSouth designs to flow through its OSS. If BellSouth has designed CLEC orders to flow through in some circumstances, but not others, the responsibility and the ability to correct that problem lies with BellSouth, not with the CLECs. Therefore, BellSouth is responsible for the orders it has designed to fall out for manual handling, and the analysis submitted in my direct testimony is correct.

The specific business service mentioned by Mr. Pate in his previous testimony that BellSouth has elected to allow to flow through for EDI releases greater than 6.0 and TAG releases greater than 3.0 is series hunting. Series hunting has been electronically orderable for three years. At any time during those three years BellSouth could have provided flow through for every CLEC submitting such orders. Thus for three years BellSouth denied this capability for up to 147 CLECs when it could have provided it to all with only a change in its programming of LEO/LESOG. Instead, BellSouth has elected to provide this capability only to those CLECs that elect to perform an expensive upgrade. The orders the two CLECs Mr. Pate discusses are still accurate, complete and capable of being provided with flow through -- as they have been for three years.

Q. HAS MR. PATE'S PRIOR ANALYSIS REFUTED YOUR POSITION THAT BELLSOUTH PROVIDED UNACCEPTABLE LEVELS OF FLOW-THROUGH BUSINESS RESALE?

A. No. Even if all of Mr. Pate's assumptions had been correct, which they were not, his exercise only increased the maximum possible flow-through for TAG from 37% to a still-unacceptable rate of 56%, and EDI from 28% to a similarly unacceptable flow-through rate of 56%. These inflated numbers, which indicate that orders fall out almost half the time, still stand in stark contrast to the 100% flow through potential for BellSouth's own orders.

Q. IN THE PAST MR. PATE HAS ASSERTED THAT OVERALL FLOW THROUGH RATES ARE SKEWED BECAUSE A SMALL NUMBER OF CLECS ARE DOMINANT VOLUME USERS OF THE ELECTRONIC INTERFACES. IS HIS ARGUMENT ACCURATE OR RELEVANT?

A. No. It makes no difference if BellSouth is discriminating against one user who provides 100% of the volume, or 100 users who each contribute 1% of the volume. If the overall rate of manual fallout and BellSouth-caused system failures is unacceptable, there is no doubt that BellSouth has treated the CLEC industry in a discriminatory manner.

The data Mr. Pate uses to identify the "dominant volume users" are public. I should point out, however, that in the past Mr. Pate has been less than

thorough in his explanation of this data and the application of available knowledge about individual CLECs.

For example, totaling the number of individual horizontal lines, as Mr. Pate has suggested, will overstate the number of users of a given interface for a given product. For example, AT&T, as a user of EDI, may appear in the Business Report two times, in the UNE Report three times, in the LNP Report two times, and in the Residence Report two times in any given month. I am certain the same is true for other CLECs.

Thus, in addition to being irrelevant, Mr. Pate's conclusions, which are based on incomplete data, are wrong and misleading.

Q. PLEASE SUMMARIZE YOUR RESPONSE TO MR. PATE'S TESTIMONY REGARDING THE EQUIVALENT FUNCTIONALITY ISSUE (ISSUE 23).

A. Mr. Pate offers contradictory views on this issue. He first states that these long-outstanding issues should go through change control, then says that non-discriminatory access does not require that BellSouth provide them, and then finally tries to persuade this Commission with easily refuted evidence that BellSouth is already providing similar treatment to CLECs as it provides itself. However, as is illustrated in my responses above, this is not accurate, and BellSouth is continuing its long-standing discrimination against CLECs

in the areas of CSR parsing, electronic order submission, and order flow-through.

Q. WHAT DOES AT&T REQUEST THAT THE COMMISSION ORDER REGARDING THIS ISSUE?

A. AT&T is asking that the Commission order BellSouth to provide equivalent functional capability by providing parsed CSRS, the ability for all orders to be submitted electronically, and flow-through equal to that which BellSouth provides itself. BellSouth should be ordered to provide these capabilities within 12 months of the Commission's order.

Issue 24: Should BellSouth provide AT&T with the ability to access, via EBI/ECTA, the full functionality available to BellSouth from TAFI and WFA?

Q. AT&T HAS REQUESTED THAT BELLSOUTH PROVIDE FULL TAFI AND WFA FUNCTIONALITY VIA EBI/ECTA. HAS BELLSOUTH AGREED TO DO SO?

A. No. BellSouth argues that it already provides CLECS with non-discriminatory access to maintenance and repair OSS functions through TAFI and the ECTA Gateway, so it should not be required to meet AT&T's request.

Q. DO YOU AGREE WITH BELLSOUTH'S ASSERTION?

A. No, and neither has the FCC. As I describe in my direct testimony, the FCC concluded that none of BellSouth's repair and maintenance interfaces provide competitors with OSS functionalities equivalent to BellSouth's own capabilities. FCC Second Louisiana Order para 148.

Mr. Pate makes an unsubstantiated claim on page 105 of his testimony that BellSouth "provides CLECs with electronic access to its maintenance and repair OSS in a manner that far exceeds what is provided by the Web-based graphical user interface ("GUI") that Bell Atlantic had in place when is was approved by the FCC." This is irrelevant, given the FCC's specific finding regarding the insufficiency of the maintenance and repair OSS BellSouth makes available to CLECs.

Q. PLEASE DISCUSS THE INSUFFICIENCIES OF THE ACCESS PROVIDED BY BELLSOUTH TO ITS MAINTENANCE REPAIR OSS.

A. BellSouth provides two options for electronic trouble reporting: Trouble Analysis Facilitation Interface ("TAFI") and the Electronic Communication Trouble Administration ("ECTA"). As I describe in detail in my direct testimony, TAFI provides the broader array of functionality, but is a human-to-machine interface. ECTA, on the other hand, can be integrated into CLEC systems, but provides only a limited set of functionalities for any type of

service. CLECs are denied the ability to access the functionality of TAFI and integrate it into other systems, as BellSouth can. Therefore, BellSouth is not providing non-discriminatory access.

Q. YOU HAVE STATED THAT BELLSOUTH HAS INTEGRATED TAFI INTO ITS OTHER SYSTEMS, BUT MR. PATE IMPLIES THAT TAFI IS NOT INTEGRATABLE. HOW CAN THIS COMMISSION DETERMINE WHO IS CORRECT?

A. Mr. Pate appears to indicate that the TAFI interface can be integrated by neither BellSouth nor CLECs, thus leading a casual reader to conclude that BellSouth and CLECs share equivalent and nondiscriminatory access to TAFI. A careful reading of Mr. Pate's testimony, however, reveals that this simply is not the case. BellSouth can indeed integrate the TAFI interface with its systems, with the exception of its "sales and marketing systems."

This Commission also should note that Mr. Pate's testimony herein appears to contradict BellSouth's position in its second Louisiana 271 application before the FCC. There, BellSouth "conceded" that it failed to offer nondiscriminatory access to TAFI functionalities:

> "We also note that BellSouth concedes that it derives superior integration capabilities from TAFI than the capabilities offered to competitors. BellSouth states that TAFI is a 'human to machine interface' meaning that new entrants using TAFI cannot integrate it with the new entrant's own back office systems….BellSouth, on the other hand, is able to take advantage of its own TAFI system's capability of

'automatically interacting with other systems as appropriate' and its customer service representatives need not duplicate their efforts in the same way. In other words, TAFI is integrated with BellSouth's other back office systems."

FCC Second Louisiana Order, para. 151, emphasis added.

Q. ON PAGE 109 OF HIS TESTIMONY, MR. PATE CLAIMS "IF TAFI FUNCTIONALITY WAS BUILT INTO ECTA, THEN ECTA WOULD NO(T) LONGER BE (A) STANDARDS BASED INTERFACE." IS THIS CORRECT?

A. No. This is a tired and irrelevant red herring that BellSouth has raised now for over four years. Industry standards are guidelines - providing functionality over and above the guideline does not violate it, in fact doing so is one of the key methods by which the guidelines are expanded and improved. A number of parties using an interface based on industry standards modify the interface to have more functionality or operate more efficiently and then submit their work and the evidence of its value to the industry for consideration as an improvement to the standard. In fact, AT&T and BellSouth have presented such joint modifications of industry standards to the industry in the past.

Further it is important to remember, just as I discussed above in Issue 19, that although the use of industry standards can meet the needs of a competitive

local exchange market[16], lack of industry standards does not excuse an incumbent LEC from meeting its obligation to provide nondiscriminatory access to OSS functions.[17] Similarly, deploying an interface that merely adheres to industry standards is not sufficient to demonstrate nondiscriminatory access. A BOC must provide nondiscriminatory access to its OSS functions irrespective of the existence of, or whether it complies with, industry standards.[18]

Q. PLEASE SUMMARIZE YOUR RESPONSE TO MR. PATE'S TESTIMONY ON THIS ISSUE.

A. BellSouth asserted that it provides non-discriminatory access to maintenance and repair functionalities, in spite of the obviously discriminatory lack of integratable access to TAFI for CLECs as it provides for itself. Surprisingly, it asserted that TAFI was not integratable for BellSouth, in apparent direct contradiction to affidavits filed by BellSouth at the FCC and upon which the FCC based its findings in determining that BellSouth does not provide non-discriminatory access to maintenance and repair.

AT&T is in agreement with the conclusions and decisions of the orders of the FCC and the Georgia Commission. The FCC determined that BellSouth provides discriminatory access, and the Georgia Commission required

[16] FCC Ameritech Order ¶ 217; FCC BA-NY Order ¶ 88
[17] FCC South Carolina Order ¶ 121, n. 362.
[18] FCC Louisiana II Order ¶ 137.

BellSouth to provide TAFI functionality over a machine-to-machine interface, in accordance with BellSouth's report to the Commission.

Q. WHAT DOES AT&T REQUEST THAT THE COMMISSION ORDER REGARDING THIS ISSUE?

A. AT&T asks the Commission to order BellSouth to provide full TAFI functionality via the ECTA interface on an expedited schedule

Q. DOES THIS CONCLUDE YOUR TESTIMONY AT THIS TIME?

A. Yes.

BELLSOUTH TELECOMMUNICATIONS, INC.

DIRECT TESTIMONY OF RONALD M. PATE

BEFORE THE NORTH CAROLINA PUBLIC UTILITIES COMMISSION

DOCKET NO. P-140, SUB 73 & P-646, SUB 7

MAY 26, 2000

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

A. My name is Ronald M. Pate. I am employed by BellSouth Telecommunications, Inc. ("BellSouth") as a Director, Interconnection Services. In this position, I handle certain issues related to local interconnection matters, primarily operations support systems ("OSS"). My business address is 675 West Peachtree Street, Atlanta, Georgia 30375.

Q. PLEASE SUMMARIZE YOUR BACKGROUND AND EXPERIENCE.

A. I graduated from Georgia Institute of Technology in Atlanta, Georgia, in 1973, with a Bachelor of Science Degree. In 1984, I received a Masters of Business Administration from Georgia State University. My professional career spans over twenty-five years of general management experience in operations, logistics management, human resources, sales and marketing.

PROMULGATED BY THE FCC FOR CHANGE MANAGEMENT. WHAT IS YOUR RESPONSE?

A. I have listed these "guidelines" in a table format that follows and stated whether BellSouth's change control process meets those guidelines. I have also provided comments on each of Mr. Bradbury's and BellSouth's compliance with them as appropriate.

Bradbury Guideline	BellSouth's Change Management	Comments
CLP participation	Yes	
Procedures documentation	Yes	
Prioritization and stratification of changes	Yes	
Schedules for notifications	Yes	
A testing environment and minimum 30 day test window new releases	Yes/No	BellSouth offers a test environment for Beta and New Carrier Testing; BellSouth does not currently offer a minimum 30 day test window for new releases. This issue will be discussed below.
A go/no go decision	Yes	
Versioning of releases (maintaining the old version of an interface along with the new)	Yes	
Memorialization of the process, including a means by which the process can be modified	Yes	
Dispute resolution process for CLPs, specific to change management disputes	Yes	
Followed consistently over time	Yes	
Subject to regulatory oversight (which includes enforcement)	Yes/No	BellSouth is negotiating with CLPs, including AT&T, to include compliance with the CCP in interconnection agreements. This will make it binding on the CLP and BellSouth. The dispute resolution process included in the CCP includes referral to state regulatory commissions

> -----Original Message-----
> From: Gibbs, Edward L, NCAM
> Sent: Friday, February 09, 2001 11:57 AM
> To: 'ranae.stewart1@bridge.bellsouth.com'
> Subject: Metrics, OSDA
>
> Hi Ranae,
>
> Thanks for the good conversation last week. Glad to hear the things have dramatically improved for your family.
>
> Quick couple of things. Next week is not a good week for some of the folks who plan to join our Metrics Discussion. Can we move the meeting to the following week? Preferably Thursday or Friday morning? Please advise.
>
> I also need to make sure I understand one part of our conversation. I am still confused a little about OS/DA. You indicated that you fixed the 5E switch and it is now available. While I am fuzzy on the dates, I thought that we were supposed to have tested OS/DA in October then due to delay, December. I thought that we asked for an extension to the end of December primarily to test OS/DA. I keep thinking that as such that should have been a part of Phase III. What changed and why do we need a contract to test?
>
> Lastly, what will you turn on in your switch after we sign the contact to give us our own branding? Is this a feature you will be able to turn on or off based on future contracts in the commercial environment?
>
> Would apprecite your thoughts,
>
> Edward

AT&T's
Proposed Contract Language addition for AT&T/BellSouth Interconnection Agreement:
November 21, 2000

Procedures for Selective Carrier Routing Footprint Implementation.

General

3.20.1 In order for BellSouth to provide branded or unbranded Operator Services and/or Directory Assistance ("OS/DA"), any of three technologies may be elected by AT&T; (1) Selective Carrier Routing using the BellSouth Advanced Intelligence Network (AIN) platform; (2) Selective Carrier Routing using a Line Class Code (LCC) platform; or (3) Originating Line Number Screening (OLNS). Custom Branding for Directory Assistance is not available for certain classes of service, such as: Hotel/Motel, WATS, cellular type 1, and certain PBX services. AT&T may also elect to have BellSouth provision Alternative Operator Services Routing (AOSR) to AT&T using AIN or LCC technologies. The parties anticipate that Line Class Codes unique to AT&T will be required when AT&T purchases local switching using UNE ports for all three technologies (AIN, LCC, and OLNS), and may be requested when AT&T purchases local switching as a reseller.

3.20.2 LCCs and the trunking arrangements required to implement AT&T's chosen technology and OS/DA routing options shall be ordered through the BellSouth Account Team dedicated to AT&T ("Account Team"). BellSouth shall provide AT&T with all of the appropriate ordering forms and written methods and procedures required to identify to BellSouth, in a single submission, the entirety of AT&T's request for its choices of technology and routing options. Such forms and written methods and procedures include, but are not limited to, the Selective Routing Ordering Document, the Selective Routing End Office Detail Form, the CLEC Branding Questionnaire, the Network Design Request, Trunk Order Forms, etc., and are attached as Exhibit [X] to this Attachment.

3.20.3 For each request for a selective carrier routing footprint, AT&T shall provide a single submission, using the forms identified in Section 3.20.2. AT&T shall identify the BellSouth end offices where it would like to offer end user service; describe each set of end user call blocking restrictions, each set of call routing instructions, and each class of service to be offered by AT&T; and provide a forecast of call volumes for each end office. BellSouth shall verify the Line Class Code capacity for the end offices identified by the AT&T. Within two weeks of receiving the request from AT&T, the BellSouth Account Team shall notify AT&T in writing whether the Line Class Code and Selective Carrier Routing request can be satisfied and shall commit to a due date for completion of the project.

3.20.4 In the event that BellSouth finds that Line Class Code capacity does not exist for a given end office, BellSouth shall provide without charge one of the following options in that end office according to the following preferred order:

OLNS - AT&T Branded;
OLNS – Unbranded;
AIN – AT&T Branded;
AIN – Unbranded; or
BellSouth Branded.

Docket No. 2000-465
JMB-R3
Page 1 of 5

This "fallback" option shall be provided without charge until the end office LCC capacity problem is relieved.

3.20.5 BellSouth shall program the LCCs to meet AT&T's request in the end offices identified by AT&T. At the same time, BellSouth shall update all databases, including any look-up tables, necessary to accept and process AT&T-submitted LSRs as described in Section 3.30 of this Attachment.

3.20.6 The rates for Line Class Codes are set forth in Exhibit C of this Attachment. These charges include non-recurring charges to build and program the Line Class Codes in each end office for each serving TOPS Tandem.

AT&T-branded BellSouth OS/DA

3.20.7 Where BellSouth is providing local switching to AT&T, and where BellSouth is providing AT&T-branded OS/DA through selective carrier routing using Line Class Code technology, AT&T's end user traffic is routed to a dedicated trunk group uniquely identified by LCC instructions.

3.20.8 If Line Class Code capacity exists within the end offices identified by the AT&T, and AT&T has requested AT&T-branded OS/DA, AT&T will order the required dedicated trunks from the desired BellSouth end office to the BellSouth TOPS Tandem. Separate trunk groups are required for Operator Services and for Directory Assistance. AT&T shall prepare and submit the Selective Routing Ordering Document, Selective Routing Detail forms, CLEC Branding Questionnaire, Network Design Request and Trunk Order forms to the BellSouth Account Team, which shall review such documents and request any further information that may be necessary within 3 business days of receipt. AT&T shall verify and provide any information requested by BellSouth. No later than one day after the determination made in 3.20.3 above, the BellSouth Account Team will submit the Selective Routing Ordering Document and the Selective Routing End Office Detail forms to the Line Class Code Administrator; the CLEC Branding Questionnaire to BellSouth Operator Services Organization; and the Network Design Request and Trunk Order forms to the Interconnection Trunking Center.

3.20.9 The intervals from the determination made in 3.20.3 above to provide up to 20 LCCs per end office using this process are as follows: 30 days for up to 100 end offices, 60 days for 101-200 end offices, and 90 days for over 200 end offices. If AT&T requests more than 20 LCCs for each end office, the parties shall negotiate the appropriate intervals. The interval to provide dedicated trunking is 30 calendar days for all trunks per end office. BellSouth shall simultaneously build LCCs and install trunks for a given end office and BellSouth translations shall point the codes to the appropriate trunk groups for testing at the end of the applicable LCC build interval. If LCCs have been requested for more than one end office in a single order, AT&T may specify the order in which BellSouth shall implement the end offices. BellSouth may assign a Project Manager to ensure timely and accurate implementation.

Unbranded OS/DA

3.20.10 Where BellSouth is providing local switching to AT&T, and where BellSouth is providing unbranded OS/DA through selective carrier routing using LCC technology, AT&T's end user traffic is routed to a trunk group(s) installed by BellSouth.

3.20.11 If LCC capacity exists within the end offices identified by AT&T, BellSouth shall order the trunk groups necessary to carry the unbranded Operator Services traffic to each TOPs tandem. The interval for the installation of the trunk groups and associated LCCs shall be 30 calendar days from the determination made in 3.20.3 above, for each TOPS tandem. The number of trunk groups required shall be based upon the forecast of traffic volume received from AT&T and may affect the provisioning interval. If so, BellSouth shall promptly notify AT&T. A separate trunk group is required for Operator Assistance and for Directory Assistance. AT&T shall prepare and submit the Selective Routing Ordering Document, Selective Routing Detail forms, CLEC Branding Questionnaire, and Network Design Request forms to the BellSouth Account Team, which shall review such documents and request any further information that may be necessary within 3 business days of receipt. AT&T shall provide and verify any information requested by BellSouth. No later than one day after the determination made in 3.20.3 above, the BellSouth Account Team will submit the Selective Routing Ordering Document and the Selective Routing End Office Detail forms to the Line Class Code Administrator; the CLEC Branding Questionnaire to BellSouth Operator Services Organization; and the Network Design Request and Trunk Order forms to the Interconnection Trunking Center.

3.20.12 The intervals from the determination made in 3.20.3 above to provide up to 20 LCCs per end office using this process are as follows: 30 days for up to 100 end offices, 60 days for 101-200 end offices, and 90 days for over 200 end offices. If AT&T requests more than 20 LCCs for each end office, the parties shall negotiate the appropriate intervals. The interval to provide BellSouth trunking is 30 calendar days for all trunks per end office. BellSouth shall simultaneously build LCCs and install trunks for a given end office and BellSouth translations shall point the codes to the appropriate trunk groups for testing at the end of the applicable LCC build interval. If LCCs have been requested for more than one end office in a single order, AT&T may specify the order in which BellSouth shall implement the end offices. BellSouth may assign a Project Manager to ensure timely and accurate implementation.

Alternative Operator Services Routing

3.20.13 Where BellSouth is providing the local switching to AT&T, and where AT&T is utilizing an Alternative Operator Services Provider through selective carrier routing using LCC technology, AT&T's end user traffic will be routed to a dedicated trunk group, which shall be provisioned in accordance with BellSouth's and the Alternate Operator Service Provider's requirements, from the desired BellSouth End Offices to the Alternative Operator Services Point of Interface. Such dedicated trunking may also utilize BellSouth tandem switching as a means of aggregating end office traffic to an efficient tandem trunk group. Should BellSouth implement tandem trunking in its own OS/DA network, and it is technically feasible to do so, AT&T may elect to have its tandem routed OS/DA traffic carried over these same BellSouth trunks from the end office to the tandem.

3.20.14 If Line Class Code capacity exists within the end offices identified by AT&T, and AT&T has requested an Alternate Operator Services Routing, AT&T shall order the required dedicated Trunks from the desired BellSouth end offices to the Alternative Operator Services Provider Point of Interface. AT&T shall prepare and submit the Selective Routing Ordering Document, Selective Routing Detail forms, Network Design Request and Trunk Order forms to the BellSouth Account Team, which shall review such documents and request any further information that may be necessary within 3 business days of receipt. AT&T shall verify and provide any information requested by BellSouth. No later than one day after the determination made in 3.20.3 above, the BellSouth Account Team will submit the Selective Routing Ordering Document and the Selective

Routing End Office Detail forms to the Line Class Code Administrator; and the Network Design Request and Trunk Order forms to the Interconnection Trunking Center.

3.10.15 The intervals from the determination made in 3.20.3 above to provide up to 20 LCCs per end office using this process are as follows: 30 days for up to 100 end offices, 60 days for 101-200 end offices, and 90 days for over 200 end offices. If AT&T requests more than 20 LCCs for each end office, the parties shall negotiate the appropriate intervals. The interval to provide dedicated trunking is 30 calendar days for all trunks per end office. BellSouth shall simultaneously build LCCs and install trunks for a given end office and BellSouth translations shall point the codes to the appropriate trunk groups for testing at the end of the applicable LCC build interval. If LCCs have been requested for more than one end office in a single order, AT&T may specify the order in which BellSouth shall implement the end offices. BellSouth may assign a Project Manager to ensure timely and accurate implementation.

3.20.16 Where AT&T is using an Alternative Operator Services Provider, AT&T, may at its option, order dedicated trunks between its Alternative Operator Services Provider's Point of Interface and the BellSouth Operator Services Platform. If AT&T elects to install said dedicated trunks, AT&T's Operators may provide verify busy line or line interruption services on numbers located in the BellSouth Switch at the rates set forth in Exhibit C.

Procedures for Selective Carrier Routing Customer-Specific Electronic LSR Ordering

3.30.1 All AT&T OS/DA calls originated from a customer in an end office where BellSouth is providing the local switching to AT&T and where AT&T has requested only a single customized OS/DA routing option, shall be routed to that option by BellSouth following the submission of AT&T's LSR without the need for AT&T to provide any indication of the routing on the LSR. BellSouth shall accept LSRs electronically and shall not subject them to any human intervention associated with implementation of customized OS/DA routing, regardless of which routing option is in use from that end office. Until such time as BellSouth is able to accept and process an electronic LSR as described in this section, AT&T may submit such orders manually, without additional charge, and BellSouth shall expedite such orders, without additional charge, to meet the due date offered for BellSouth branded OS/DA. Likewise should BellSouth implement a process that will accept an electronic LSR, but then subject that LSR to designed manual fallout, BellSouth shall expedite such orders, without additional charge, to meet the due date offered for BellSouth branded OS/DA.

3.30.2 Where BellSouth is providing local switching to AT&T, and where AT&T has requested more than one customized OS/DA routing in the end office serving AT&T's customer, AT&T's customer-specific LSR will provide an indicator identifying to BellSouth which routing to assign to the customer's port. This indicator will appear in the "Feature" field of the LSR and shall be the same for the selected option across all end offices in BellSouth's nine-state region. (For example, the single indicator "UB/BLS" could identify the Unbranded at BellSouth option, the single indicator "CB/BLS" could identify the CLEC Branded at BellSouth option, and the single indicator "C/AOSR" could identify the Alternative Operator Services Routing option.)

3.30.3 Where BellSouth is providing local switching to AT&T, and where AT&T has requested more than one customized OS/DA routing option in the end office serving AT&T's customer, BellSouth shall accept AT&T's LSRs providing the indication of which option to apply to a specific customer electronically and shall not subject the LSR to any human intervention

associated with the implementation of customized OS/DA routing. This shall be true regardless of the option indicated. Until such time as BellSouth is able to accept and process an electronic LSR as described is this section, AT&T may submit such orders manually, without additional charge, and BellSouth shall expedite such orders, without additional charge, to meet the due date offered for BellSouth branded OS/DA. Likewise should BellSouth implement a process that will accept an electronic LSR, but then subject that LSR to designed manual fallout, BellSouth shall expedite such orders, without additional charge, to meet the due date offered for BellSouth branded OS/DA.

-----Original Message-----
From: Michael.Willis1@bridge.bellsouth.com
[mailto:Michael.Willis1@bridge.bellsouth.com]
Sent: Monday, February 12, 2001 3:28 PM
To: Peacock, Billy C (Bill), NCAM
Subject: OS/DA/OLNS
Importance: High

Attached is the latest draft of the SCC via Line class codes language. I have added the OLNS language as 3.40 for your review.

Please send available dates for your smes to discuss this issue along with local interconnection issues.

AT&T's
Proposed Contract Language addition for AT&T/BellSouth Interconnection Agreement:
~~November 21, 2000~~February 12, 2001

Procedures for Selective Carrier Routing Footprint Implementation.

General

3.20.1 In order for BellSouth to provide ~~CUSTOM BRANDING~~Custom Branding ~~branded~~ or ~~UNBRANDING~~Unbrandingunbranded for~~FOR~~ Operator Services and/or Directory Assistance ("OS/DA"), any of three technologies may be elected by AT&T; (1) Selective Carrier Routing using the BellSouth Advanced Intelligence Network (AIN) platform; (2) Selective Carrier Routing using a Line Class Code (LCC) platform; or (3) Via~~VIA~~ Originating Line Number Screening (OLNS) ~~SOFTWARE~~Software. Custom Branding for Directory Assistance is not available for certain classes of service, such as: Hotel/Motel, WATS, cellular type 1, and certain PBX services. AT&T may also elect to have BellSouth provision Alternative Operator Services Routing (AOSR) to AT&T using AIN or LCC technologies. Currently OLNS ~~SOFTWARE~~Software is only and option for unbranded and custom branding in~~IN~~ Georgia. BellSouth will make ~~CUSTOM BRANDING~~Custom Branding and~~AND~~ ~~UNBRANDING~~Unbranding via~~VIA~~ OLNS ~~SOFTWARE~~Software available to AT&T as it is rolled out in the remaining BellSouth region. ~~The parties anticipate that Line Class Codes unique to AT&T will be required when AT&T purchases local switching using UNE ports for all three technologies (AIN, LCC, and OLNS), and may be requested when AT&T purchases local switching as a reseller.~~

3.20.2 LCCs and the trunking arrangements required to implement AT&T's chosen technology and OS/DA routing options shall be ordered through the BellSouth Account Team ~~dedicated to AT&T ("Account Team")~~. BellSouth shall provide AT&T with all of the appropriate ordering forms and written methods and procedures required to identify to BellSouth~~, in a single submission,~~ the entirety of AT&T's request~~, for its choices of technology and routing options. Such forms and written methods and procedures include, but are not limited to, the Selective Routing Ordering Document, the Selective Routing End Office Detail Form, the CLEC Branding Questionnaire, the Network Design Request, Trunk Order Forms, etc., and are attached as Exhibit [X] to this Attachment.~~

3.20.3 For each request for a selective carrier routing ~~footprint~~, AT&T shall provide the following information ~~a single submission~~, using the forms identified by BellSouth~~in Section 3.20.2~~. AT&T shall identify the BellSouth end offices where it would like to offer end user service; describe each set of end user call blocking restrictions, each set of call routing instructions, and each class of service to be offered by AT&T; and provide a forecast of call volumes per NPA for each end office. BellSouth shall verify the Line Class Code capacity for the end offices identified by the AT&T. Within two weeks of receiving the request from AT&T, the BellSouth ~~Account Team~~ shall notify AT&T in writing whether the Line Class Code and Selective Carrier Routing request can be satisfied~~, and shall commit to a due date for completion of the project~~.

3.20.4 ~~In the event that BellSouth finds that Line Class Code capacity does not exist for a given end office, BellSouth shall provide without charge one of the following options in that end office according to the following preferred order:~~

~~OLNS – AT&T Branded;~~
~~OLNS – Unbranded;~~

~~AIN – AT&T Branded;~~
~~AIN – Unbranded; or~~
~~BellSouth Branded.~~

~~This "fallback" option shall be provided without charge until the end office LCC capacity problem is relieved.~~

3.20.5 BellSouth shall program the LCCs to meet AT&T's request in the end offices identified by AT&T. At the same time, BellSouth shall update all databases, including any look-up tables, necessary to accept and process AT&T-submitted LSRs as described in Section 3.30 of this Attachment.

3.20.6 The rates for Line Class Codes are set forth in Exhibit C of this Attachment. These charges include non-recurring charges to build and program each~~the~~ Line Class Codes in each end office. ~~for each serving TOPS Tandem.~~

AT&T-branded BellSouth OS/DA

3.20.7 Where BellSouth is providing local switching to AT&T, and where BellSouth is providing AT&T-branded OS/DA through selective carrier routing using Line Class Code technology, AT&T's end user traffic is routed to a dedicated trunk group uniquely identified by LCC instructions.

3.20.8 If Line Class Code capacity exists within the end offices identified by the AT&T, and AT&T has requested AT&T-branded OS/DA, AT&T will order the required dedicated trunks from the desired BellSouth end office to the BellSouth TOPS Tandem. Separate trunk groups are required for Operator Services and for Directory Assistance. AT&T shall prepare and submit the appropriate ~~Selective Routing Ordering Document, Selective Routing Detail~~ forms, ~~CLEC Branding Questionnaire, Network Design Request and Trunk Order forms~~ to ~~the~~ BellSouth ~~Account Team~~, which shall review such documents and request any further information that may be necessary ~~within 3 business days of receipt~~. AT&T shall verify and provide any information requested by BellSouth. ~~No later than one day~~ Aafter the determination made in 3.20.3 above, ~~the~~ BellSouth ~~Account Team~~ will submit the appropriate documents to its internal organizations. ~~Selective Routing Ordering Document and the Selective Routing End Office Detail forms to the Line Class Code Administrator; the CLEC Branding Questionnaire to BellSouth Operator Services Organization; and the Network Design Request and Trunk Order forms to the Interconnection Trunking Center~~.

3.20.9 The intervals from the determination made in 3.20.3 above ~~to provide up to 20 LCCs per end office using this process are as follows:~~ the intervals will be negotiated between the BellSouth Account Team and AT&T to establish the appropriate intervals based on the number of line class codes and end offices requested. ~~30 days for up to 100 end offices, 60 days for 101-200 end offices, and 90 days for over 200 end offices. If AT&T requests more than 20 LCCs for each end office, the parties shall negotiate the appropriate intervals~~. The interval to provide dedicated trunking is approximately 45 ~~30~~ calendar days for all trunks per end office where facilities are available. ~~BellSouth shall simultaneously build LCCs and install trunks for a given end office and BellSouth translations shall point the codes to the appropriate trunk groups for testing at the end of the applicable LCC build interval~~. If LCCs have been requested for more than one end office in a single order, AT&T may request ~~specify~~ the order in which BellSouth shall implement the end offices. BellSouth may assign a Project Manager to ensure timely and accurate implementation.

Unbranded OS/DA

3.20.10 Where BellSouth is providing local switching to AT&T, and where BellSouth is providing unbranded OS/DA through selective carrier routing using LCC technology, AT&T's end user traffic is routed to a trunk group(s) installed by BellSouth.

3.20.11 If LCC capacity exists within the end offices identified by AT&T, BellSouth shall order the trunk groups necessary to carry the unbranded Operator Services traffic to each TOPs tandem. The interval for the installation of the trunk groups and associated LCCs shall be approximately 4530 calendar days from the determination made in 3.20.3 above, for each TOPS tandem. The number of trunk ~~groups~~ required shall be based upon the forecast of traffic volume received from AT&T and may affect the provisioning interval. ~~If so, BellSouth shall promptly notify AT&T.~~ A separate trunk group is required for Operator Assistance and for Directory Assistance. AT&T shall prepare and submit the appropriate forms ~~Selective Routing Ordering Document, Selective Routing Detail forms, CLEC Branding Questionnaire, and Network Design Request forms~~ to ~~the~~ BellSouth ~~Account Team~~, which shall review such documents and request any further information that may be necessary ~~within 3 business days of receipt~~. AT&T shall provide and verify any information requested by BellSouth. ~~No later than one day a~~After the determination made in 3.20.3 above, ~~the~~ BellSouth ~~Account Team~~ will submit the forms to its internal organizations~~Selective Routing Ordering Document and the Selective Routing End Office Detail forms to the Line Class Code Administrator; the CLEC Branding Questionnaire to BellSouth Operator Services Organization; and the Network Design Request and Trunk Order forms to the Interconnection Trunking Center~~.

3.20.12 The intervals from the determination made in 3.20.3 above shall be negotiated between the BellSouth Account Team and AT&T based on the number of line class codes and end offices requested.~~above to provide up to 20 LCCs per end office using this process are as follows: 30 days for up to 100 end offices, 60 days for 101-200 end offices, and 90 days for over 200 end offices. If AT&T requests more than 20 LCCs for each end office, the parties shall negotiate the appropriate intervals~~. The interval for the installation of the trunks will be approximately 45 days for all trunks per end office where facilities are available~~to provide BellSouth trunking is 30 calendar days for all trunks per end office. BellSouth shall simultaneously build LCCs and install trunks for a given end office and BellSouth translations shall point the codes to the appropriate trunk groups for testing at the end of the applicable LCC build interval~~ If LCCs have been requested for more than one end office in a single order, AT&T may requests~~specify~~ the order in which BellSouth shall implement the end offices. BellSouth may assign a Project Manager to ensure timely and accurate implementation.

Routing to an Alternative Operator Services Provider~~Routing~~

3.20.13 Where BellSouth is providing the local switching to AT&T, and where AT&T is utilizing an Alternative Operator Services Provider through selective carrier routing using LCC technology, AT&T's end user traffic will be routed to a dedicated trunk group, which shall be provisioned in accordance with BellSouth's and the Alternate Operator Service Provider's requirements, from the desired BellSouth End Offices to the Alternative Operator Services Point of Interface. ~~Such dedicated trunking may also utilize BellSouth tandem switching as a means of aggregating end office traffic to an efficient tandem trunk group. Should BellSouth implement tandem trunking in its own OS/DA network, and it is technically feasible to do so, AT&T may elect to have its~~

~~tandem routed OS/DA traffic carried over these same BellSouth trunks from the end office to the tandem.~~

3.20.14 If Line Class Code capacity exists within the end offices identified by AT&T, and AT&T has requested an Alternate Operator Services Provider~~Routing~~, AT&T end user traffic will be routed to a dedicated trunk group, which shall be provisioned in accordance with BellSouth's and the Alternative Operator Services Provider's requirements, ~~shall order the required dedicated Trunks~~ from the desired BellSouth end offices to the Alternative Operator Services Provider Point of Interface. AT&T shall prepare and submit the appropriate forms ~~Selective Routing Ordering Document, Selective Routing Detail forms, Network Design Request and Trunk Order forms~~to ~~the~~ BellSouth ~~Account Team~~, which shall review such documents and request any further information that may be necessary. ~~within 3 business days of receipt~~. AT&T shall verify and provide any information requested by BellSouth. ~~No later than one day~~ After the determination made in 3.20.3 above, ~~the~~ BellSouth ~~Account Team~~ will submit the appropriate forms to its internal organizations.~~Selective Routing Ordering Document and the Selective Routing End Office Detail forms to the Line Class Code Administrator; and the Network Design Request and Trunk Order forms to the Interconnection Trunking Center~~.

3.10.15 The intervals from the determination made in 3.20.3 shall be negotiated between the BellSouth Account Team and AT&T based on the number of line class codes and end offices requested ~~made in 3.20.3 above to provide up to 20 LCCs per end office using this process are as follows: 30 days for up to 100 end offices, 60 days for 101-200 end offices, and 90 days for over 200 end offices. If AT&T requests more than 20 LCCs for each end office, the parties shall negotiate the appropriate intervals. The interval to provide dedicated trunking is 30 calendar days for all trunks per end office. BellSouth shall simultaneously build LCCs and install trunks for a given end office and BellSouth translations shall point the codes to the appropriate trunk groups for testing at the end of the applicable LCC build interval~~. If LCCs have been requested for more than one end office in a single order, AT&T may requests~~specify~~ the order in which BellSouth shall implement the end offices. BellSouth may assign a Project Manager to ensure timely and accurate implementation.

3.20.16 Where AT&T is using an Alternative Operator Services Provider, AT&T, may at its option, order dedicated trunks between its Alternative Operator Services Provider's Point of Interface and the BellSouth Operator Services Platform. If AT&T elects to install said dedicated trunks, AT&T's Operators may provide verify busy line or line interruption services on numbers located in the BellSouth Switch at the rates set forth in Exhibit C.

Procedures for Selective Carrier Routing Customer-Specific Electronic LSR Ordering

3.30.1 All AT&T OS/DA calls originated from a customer in an end office where BellSouth is providing the local switching to AT&T and where AT&T has requested only a single customized OS/DA routing option, shall be routed to that option by BellSouth following the submission of AT&T's LSR without the need for AT&T to provide any indication of the routing on the LSR. BellSouth shall accept LSRs electronically. ~~and shall not subject them to any human intervention associated with implementation of customized OS/DA routing, regardless of which routing option is in use from that end office. Until such time as BellSouth is able to accept and process an electronic LSR as described in this section, AT&T may submit such orders manually, without additional charge, and BellSouth shall expedite such orders, without additional charge, to meet the due date offered for BellSouth branded OS/DA. Likewise should BellSouth implement a process that will~~

~~accept an electronic LSR, but then subject that LSR to designed manual fallout, BellSouth shall expedite such orders, without additional charge, to meet the due date offered for BellSouth branded OS/DA.~~

3.40 **Custom Branding AND Unbranding via Orginating Line Number Screening (OLNS) Software in Georgia**

3.40.1 Custom Branding and Unbranding via OLNS Software -will be made available to AT&T as it becomes available in the other BellSouth states.

3.40.2 Unbranding and Custom Branding are available for Directory Assistance and Operator Call Processing via OLNS Software. Rates for Custom Branding will be as set forth in Exhibit A of this Attachment.

3.40.3 - For Custom Branding, using OLNS Software , allows BellSouth to brand in the name of AT&T by use of announcement trunk groups.

3.40.4 Unbranding, using OLNS Software ~~the~~, allows BellSouth to route to "No Announcement" trunk groups which are common trunk groups provisioned by BellSouth.

3.40.5 Any Branding Request and subsequent changes will cause AT&T to incur a Loading charge ~~and the~~ (rate element entitled "DRAM or front end loading, per TOPS switch") and the applicable Announcement Charge will also apply as set forth in Exhibit A of this Attachment.

3.40.6 ~~3.40.6~~ Custom Branding and Unbranding via the OLNS software currently is ordered via a manual process through the BellSouth Account Team. AT&T will be required to complete the appropriate forms and submit to the BellSouth Account Team. BellSouth will, in turn , submit the forms to the appropriate BellSouth internal organizations. This process will take sixty (60) calendar days.

~~Where BellSouth is providing local switching to AT&T, and where AT&T has requested more than one customized OS/DA routing in the end office serving AT&T's customer, AT&T's customer-specific LSR will provide an indicator identifying to BellSouth which routing to assign to the customer's port. This indicator will appear in the "Feature" field of the LSR and shall be the same for the selected option across all end offices in BellSouth's nine-state region. (For example, the single indicator "UB/BLS" could identify the Unbranded at BellSouth option, the single indicator "CB/BLS" could identify the CLEC Branded at BellSouth option, and the single indicator "C/AOSR" could identify the Alternative Operator Services Routing option.)~~

3.30.3 ~~Where BellSouth is providing local switching to AT&T, and where AT&T has requested more than one customized OS/DA routing option in the end office serving AT&T's customer, BellSouth shall accept AT&T's LSRs providing the indication of which option to apply to a specific customer electronically and shall not subject the LSR to any human intervention associated with the implementation of customized OS/DA routing. This shall be true regardless of the option indicated. Until such time as BellSouth is able to accept and process an electronic LSR as described is this section, AT&T may submit such orders manually, without additional charge, and BellSouth shall expedite such orders, without additional charge, to meet the due date offered for BellSouth branded OS/DA. Likewise should BellSouth implement a process that will accept an electronic LSR, but then subject that LSR to designed manual fallout, BellSouth shall expedite such orders, without additional charge, to meet the due date offered for BellSouth branded OS/DA.~~

From: jrwilliamson@att.com
Sent: Monday, June 05, 2000 1:50 PM
To: sr271lib@lga.att.com
Subject: FW: Interim Change Control Process

Importance: High

-----Original Message-----
From: sandra k evans [mailto:sandra.k.evans@mail.sprint.com]
Sent: Tuesday, April 18, 2000 5:06 PM
To: sharon.arnett@openmail.mail.sprint.com; BellSouth@quintessent.net; brian.powers@onepointcom.com; brutter@kpmg.com; bszafran@covad.com; c_and_m@bellsouth.net; cecilia.ortiz@adelphiacom.com; Change.Control@bridge.bellsouth.com; cheryl@eatel.com; CPolizzotti@northpoint.net; Craig.B.Douglas@MCI.com; Craig@exceleron.com; dana.braun@adelphiacom.com; Debra.Pasquale@btitele.com; dfoust@deltacom.com; dlasher@eftia.com; DoBeck@Mediaone.com; donnas@intetech.com; dpetry@ix.netcom.com; drodrigu@accessone.cc; Dwight.Scrivener@wcom.com; epadfield@nextlink.com; sandra.k.evans@openmail.mail.sprint.com; evdoty@nextlink.com; Gary@CSII.net; generalg@cris.com; george@accesscomm.com; jason.estep@adelphiacom.com; Jdavid4715@aol.com; JDoherty@accessone.cc; jeffrey@cellularsouth.com; jhoze@kmctelecom.com; JMMaxwell@intermedia.com; Williamson, Jill R, NCAM; Wilson Jr, Jack T (Tom), BGM; kelley.dunne@onepointcom.com; khudson@nextlink.com; Kimberly.O.Williams@MCI.com; kmiller@northpointcom.com; kschwart@covad.com; lhall@floridadigital.net; Lminasola@Mediaone.com; Lorraine.Watson@wcom.com; Mark.E.Turner@MCI.com; mconquest@itcdeltacom.com; microsun@bellsouth.net; mubeen@nightfire.com; Nicole.Moorman@adelphiacom.com; PBarker@aol.com; PBohn@Mediaone.com; pkinghorn@eztalktelephone.com; rbuffa@interloop.net; rthompson@nextlink.com; RSchell@rhythms.net; Sandrajf@intetech.com; sbowling@caprock.com; shane@eatel.com; sharon.russo@btitele.com; sjenning@nowcommunications.com; smason@interloop.net; srober@kmctelecom.com; steve.taff@allegiancetelecom.com; TAYLORJG@LCI.COM; tbrooks@mantiss.com; TLA@magicnet.net; tmontemayer@mantiss.com; Todd@CSII.net; tvercellotti@mantiss.com; Tyra.Colbert@wcom.com; wmknapek@intermedia.com; wmontano@uslec.com; wolfsbrg@cris.com; WWalker@mantiss.com
Cc: jim.a.lenihan@openmail.mail.sprint.com
Subject: Interim Change Control Process
Importance: High

Change Control,

Due to past experience with BellSouth's Change Management Process, Sprint does not agree with the New/Interim Change Control Process becoming a baseline at the end of 3 months without a review. The original Change Management Process formed a Steering Committee for the purpose of reviewing the process and suggest changes. Few of the requested changes were implemented. Currently there is no way to introduce changes to the process. The new process eliminates the Steering Committee without creating a User's Forum or some other means for CLECs to request changes to the CCP.

Sprint does not agree with the following processes included in the New/Interim Change Control Process:

- Definition of a defect versus feature changes.
- Lack of testing support and environment.
- Lack of a solid question resolution process.
- The dispute Resolution Process needs re-defined.

- Carrier Notifications process. An email should also be included in these type of notifications.
- Retirement of systems.
- Interval of Type 2-5 notifications are too long.

Again Sprint cannot agree to this New/Interim Change Control process as long as the above issues remain open and no resolution process in place to work through these and future issues.

Sandy Evans
Product Manager
Sprint National Integrated Services
913-433-8499

From: jrwilliamson@att.com
Sent: Monday, June 05, 2000 1:52 PM
To: sr271lib@lga.att.com
Subject: FW: Update on Pending Change Requests

-----Original Message-----
From: sandra k evans [mailto:sandra.k.evans@mail.sprint.com]
Sent: Thursday, March 23, 2000 3:20 PM
To: sharon.arnett@openmail.mail.sprint.com;
brian.powers@onepointcom.com; brutter@kpmg.com; bszafran@covad.com;
c_and_m@bellsouth.net; Change.Control@bridge.bellsouth.com;
cheryl@eatel.com; CPolizzotti@northpoint.net; Craig.B.Douglas@MCI.com;
Craig@exceleron.com; dbraun@adelphia.com; Debra.Pasquale@btitele.com;
dfoust@deltacom.com; dlasher@eftia.com; DoBeck@Mediaone.com;
donnas@intetech.com; dpetry@ix.netcom.com; drodrigu@accessone.cc;
sandra.k.evans@openmail.mail.sprint.com; Gary@CSII.net;
generalg@cris.com; george@accesscomm.com; jason.estep@adelphiacom.com;
Jdavid4715@aol.com; JDoherty@accessone.cc; jeffrey@cellularsouth.com;
jhoze@kmctelecom.com; JMMaxwell@intermedia.com;
JOSEPH.ONEAL@adelphiacom.com; Williamson, Jill R, NCAM; Wilson Jr, Jack
T (Tom), BGM; kelley.dunne@onepointcom.com; Kimberly.O.Williams@MCI.com;
kmiller@northpointcom.com; lhall@floridadigital.net;
Lminasola@Mediaone.com; Mark.E.Turner@MCI.com;
mconquest@itcdeltacom.com; microsun@bellsouth.net;
Nicole.Moorman@adelphiacom.com; PBarker@aol.com; PBohn@Mediaone.com;
Pkingborn@eztalktelephone.com; Sandrajf@intetech.com;
sbowling@caprock.com; shane@eatel.com; sharon.russo@btitele.com;
sjenning@nowcommunications.com; srober@kmctelecom.com;
steve.taff@allegiancetelecom.com; TAYLORJG@LCI.COM; tbrooks@mantiss.com;
TLA@MAGICNET.NET; tmontemayer@mantiss.com; Todd@CSII.net;
tvercellotti@mantiss.com; Tyra.Colbert@wcom.com;
wmknapek@intermedia.com; wmontano@uslec.com; wolfsbrg@cris.com;
WWalker@mantiss.com
Cc: jim.a.lenihan@openmail.mail.sprint.com
Subject: RE: Update on Pending Change Requests

Change Control Team,

Sprint concurs with AT&T that the below examples should be treated as a Defect. The possibly of delaying or completly shutting down the electronic process of the order flow is detrimental to the CLEC. If a maunal work around is suggested or used until the electronic process is corrected, the impact to both the CLEC and BST is great. The manual processes require more time, headcount, and allows for more errors. This is not acceptable to Sprint. Thus the below examples should be treated as a Defect and requiring the same resolution timeframe as a Defect.

Sandy Evans
Product Manager II
Sprint National Integrated Services
913-433-8499

-----Original Message-----
From: jrwilliamson [SMTP:jrwilliamson@att.com]
Sent: Thursday, March 23, 2000 12:14 PM
To: Change.Control; Arnett, Sharon A.; TLA; PBarker; PBohn;

sbowling; dbraun; tbrooks; bszafran; Tyra.Colbert; mconquest; CPolizzotti; Jdavid4715; DoBeck; JDoherty; Craig.B.Douglas; kelley.dunne; jason.estep; Evans, Sandra K.; george; dfoust; generalg; lhall; jhoze; Craig; sjenning; Sandrajf; Pkingborn; wmknapek; dlasher; JMMaxwell; c.and.m; Gary; Todd; kmiller; Lminasola; wmontano; tmontemayer; Nicole.Moorman; JOSEPH.ONEAL; Debra.Pasquale; dpetry; brian.powers; microsun; cheryl; jeffrey; srober; drodrigu; sharon.russo; brutter; shane; donnas; steve.taff; TAYLORJG; Mark.E.Turner; tvercellotti; WWalker; Kimberly.O.Williams; jtwilson2; wolfsbrg
Cc: jrwilliamson
Subject: RE: Update on Pending Change Requests
Importance: High

Valerie,

In response to your update, I disagree on BellSouth's assessment of my
requests for the following reasons.

DEF030100_002 (Pre-Order and Order Business Rule Discrepancies)
While BellSouth may not consider this a systems defect based on the fact
that the systems was designed as such, I consider it a defect in the design
of the system. For example, BellSouth may allow for 15 characters to be
sent to me out of RSAG for a certain field, but only allows for 9 characters
on the order. If RSAG gives me back a value greater than 9 (its designed to
accommodate more), I cannot place a firm order because of the way the
ordering system is designed. Regardless, I cannot send the order and my
production is impacted.

DEF030200_001 (RPON Business Rules and Error Messages)
You hit on my point exactly when you stated that there is no business rule
defined for rejecting RPON'd orders. BellSouth does not have any documented
rules around RPON'ing of orders not does it have a reject code specifically
for RPON'd orders. We've been told that we can relate the orders
sequentially or relate all orders to the first order, but neither seems to
generate a consistent result from BellSouth. We've been told that when
BellSouth rejects one order in a group of RPON'd orders, it will reject all
of the related orders. However, this does not always occur. Sometimes all
of our orders are rejected and sometimes only one is rejected and the
related PONs are FOC'd. In order for us to solidify our M&Ps and build
consistency in our process, BellSouth must document its rules around
RPON'ing of orders.

Sincerely,

Jill Williamson
AT&T Local Services and Access Management

-----Original Message-----
From: Change.Control@bridge.bellsouth.com
[mailto:Change.Control@bridge.bellsouth.com]
Sent: Wednesday, March 22, 2000 5:20 PM
To: sharon.arnett@mail.sprint.com; TLA@MAGICNET.NET; PBarker@aol.com;
PBohn@Mediaone.com; sbowling@caprock.com; dbraun@adelphia.com;
tbrooks@mantiss.com; bszafran@covad.com; Tyra.Colbert@wcom.com;
mconquest@itcdeltacom.com; CPolizzotti@northpoint.net;
Jdavid4715@aol.com; DoBeck@Mediaone.com; JDoherty@accessone.cc;
Craig.B.Douglas@MCI.com; kelley.dunne@onepointcom.com;
jason.estep@adelphiacom.com; sandra.k.evans@mail.sprint.com;
george@accesscomm.com; dfoust@deltacom.com; generalg@cris.com;
thall@floridadigital.net; jhoze@kmctelecom.com; Craig@exceleron.com;
sjenning@nowcommunications.com; Sandrajf@intetech.com;
Pkingborn@eztalktelephone.com; wmknapek@Intermedia.com;
dlasher@eftia.com; JMMaxwell@Intermedia.com; c_and_m@bellsouth.net;
Gary@CSII.net; Todd@CSII.net; kmiller@northpointcom.com;
Lminasola@Mediaone.com; wmontano@uslec.com; tmontemayer@mantiss.com;
Nicole.Moorman@adelphiacom.com; JOSEPH.ONEAL@adelphiacom.com;
Debra.Pasquale@btitele.com; dpetry@ix.netcom.com;
brian.powers@onepointcom.com; microsun@bellsouth.net;
cheryl@eatel.com;
jeffrey@cellularsouth.com; srober@kmctelecom.com;
drodrigu@accessone.cc;
sharon.russo@btitele.com; brutter@kpmg.com; shane@eatel.com;
donnas@intetech.com; steve.taff@allegiancetelecom.com;
TAYLORJG@LCI.COM;
Mark.E.Turner@MCI.com; tvercellotti@mantiss.com; WWalker@mantiss.com;
Kimberly.O.Williams@MCI.com; Williamson, Jill R, NCAM; Wilson Jr,
Jack T
(Tom), BGM; wolfsbrg@cris.com
Subject: Update on Pending Change Requests

Attention CLECs:

Attached are updates on two pending change requests:

DEF030100_002 (Pre-Order and Order Business Rule Discrepancies)
This issue has been reclassified as a feature. The field
discrepancies
identified by this request were designed and implemented according to
the
original user requirements. BellSouth is investigating this change
for
implementation in a future release.

DEF030200_001 (RPON Business Rules and Error Messages)
This issue has been reclassified as a feature. There is not a
business
defined
where a related PON is rejected because one other or several others
that are
related are rejected. This issue has been referred to our
documentation
staff
for review.

We will keep you posted with the status. Please let us know if you
have any
questions.

Thanks,

Change Control Team

From: jrwilliamson@att.com
Sent: Monday, June 05, 2000 1:52 PM
To: sr271lib@lga.att.com
Subject: FW: Update on Pending Change Requests

-----Original Message-----
From: Tyra Colbert [mailto:tyra.colbert@wcom.com]
Sent: Thursday, March 23, 2000 3:16 PM
To: Williamson, Jill R, NCAM; Change.Control@bridge.bellsouth.com; sharon.arnett@mail.sprint.com; TLA@MAGICNET.NET; PBarker@aol.com; PBohn@Mediaone.com; sbowling@caprock.com; dbraun@adelphia.com; tbrooks@mantiss.com; bszafran@covad.com; mconquest@itcdeltacom.com; CPolizzotti@northpoint.net; Jdavid4715@aol.com; DoBeck@Mediaone.com; JDoherty@accessone.cc; Craig.B.Douglas@wcom.com; kelley.dunne@onepointcom.com; jason.estep@adelphiacom.com; sandra.k.evans@mail.sprint.com; george@accesscomm.com; dfoust@deltacom.com; generalg@cris.com; lhall@floridadigital.net; jhoze@kmctelecom.com; Craig@exceleron.com; sjenning@nowcommunications.com; Sandrajf@intetech.com; Pkingborn@eztalktelephone.com; wmknapek@Intermedia.com; dlasher@eftia.com; JMMaxwell@Intermedia.com; c_and_m@bellsouth.net; Gary@CSII.net; Todd@CSII.net; kmiller@northpointcom.com; Lminasola@Mediaone.com; wmontano@uslec.com; tmontemayer@mantiss.com; Nicole.Moorman@adelphiacom.com; JOSEPH.ONEAL@adelphiacom.com; Debra.Pasquale@btitele.com; dpetry@ix.netcom.com; brian.powers@onepointcom.com; microsun@bellsouth.net; cheryl@eatel.com; jeffrey@cellularsouth.com; srober@kmctelecom.com; drodrigu@accessone.cc; haron.russo@btitele.com; brutter@kpmg.com; shane@eatel.com; jonnas@intetech.com; steve.taff@allegiancetelecom.com; TAYLORJG@LCI.COM; Mark.E.Turner@wcom.com; tvercellotti@mantiss.com; WWalker@mantiss.com; Kimberly.O.Williams@wcom.com; Wilson Jr, Jack T (Tom), BGM; wolfsbrg@cris.com
Subject: RE: Update on Pending Change Requests

Bell South Change Control,

I'm in agreement with AT&T (Jill Williamson) regarding this issue in that it needs to be handled as a priority. If the defect takes us out of business, it needs to handled in a expeditious manner. If Bell South identifies a work around we should expect some reasonable timeframe to resolve the issue, not just "investigating for a future release".

Sincerely,

Tyra Colbert
MCI WorldCom

> -----Original Message-----
> From: Williamson, Jill R, NCAM [mailto:jrwilliamson@att.com]
> Sent: Thursday, March 23, 2000 1:14 PM
> To: Change.Control@bridge.bellsouth.com; sharon.arnett@mail.sprint.com;
> TLA@MAGICNET.NET; PBarker@aol.com; PBohn@Mediaone.com;
> sbowling@caprock.com; dbraun@adelphia.com; tbrooks@mantiss.com;
bszafran@covad.com; Tyra.Colbert@wcom.com; mconquest@itcdeltacom.com;
CPolizzotti@northpoint.net; Jdavid4715@aol.com; DoBeck@Mediaone.com;
> JDoherty@accessone.cc; Craig.B.Douglas@wcom.com;

> kelley.dunne@onepointcom.com; jason.estep@adelphiacom.com;
> sandra.k.evans@mail.sprint.com; george@accesscomm.com;
> dfoust@deltacom.com; generalg@cris.com; lhall@floridadigital.net;
> jhoze@kmctelecom.com; Craig@excelcron.com;
> sjenning@nowcommunications.com; Sandrajf@intetech.com;
> Pkingborn@eztalktelephone.com; wmknapek@intermedia.com;
> dlasher@eftia.com; JMMaxwell@intermedia.com; c_and_m@bellsouth.net;
> Gary@CSII.net; Todd@CSII.net; kmiller@northpointcom.com;
> Lminasola@Mediaone.com; wmontano@uslec.com; tmontemayer@mantiss.com;
> Nicole.Moorman@adelphiacom.com; JOSEPH.ONEAL@adelphiacom.com;
> Debra.Pasquale@btitele.com; dpetry@ix.netcom.com;
> brian.powers@onepointcom.com; microsun@bellsouth.net; cheryl@eatel.com;
> jeffrey@cellularsouth.com; srober@kmctelecom.com; drodrigu@accessone.cc;
> sharon.russo@btitele.com; brutter@kpmg.com; shane@eatel.com;
> donnas@intetech.com; steve.taff@allegiancetelecom.com; TAYLORJG@LCI.COM;
> Mark.E.Turner@wcom.com; tvercellotti@mantiss.com; WWalker@mantiss.com;
> Kimberly.O.Williams@wcom.com; Wilson Jr, Jack T (Tom), BGM;
> wolfsbrg@cris.com
> Subject: RE: Update on Pending Change Requests
> Importance: High
>
>
> Valerie,
>
> In response to your update, I disagree on BellSouth's assessment of my
> requests for the following reasons.
>
> DEF030100_002 (Pre-Order and Order Business Rule Discrepancies)
> While BellSouth may not consider this a systems defect based on the fact
> that the systems was designed as such, I consider it a defect in
> the design
> of the system. For example, BellSouth may allow for 15 characters to be
> sent to me out of RSAG for a certain field, but only allows for 9
> characters
> on the order. If RSAG gives me back a value greater than 9 (its
> designed to
> accommodate more), I cannot place a firm order because of the way the
> ordering system is designed. Regardless, I cannot send the order and my
> production is impacted.
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> You hit on my point exactly when you stated that there is no business rule
> defined for rejecting RPON'd orders. BellSouth does not have any
> documented
> rules around RPON'ing of orders not does it have a reject code
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> for RPON'd orders. We've been told that we can relate the orders
> sequentially or relate all orders to the first order, but neither seems to
> generate a consistent result from BellSouth. We've been told that when
> BellSouth rejects one order in a group of RPON'd orders, it will
> reject all
> of the related orders. However, this does not always occur.
> Sometimes all
> of our orders are rejected and sometimes only one is rejected and the
> related PONs are FOC'd. In order for us to solidify our M&Ps and build
> consistency in our process, BellSouth must document its rules around
> RPON'ing of orders.
>
> Sincerely,
>
> Jill Williamson
AT&T Local Services and Access Management
>
>

> -----Original Message-----
> From: Change.Control@bridge.bellsouth.com
> [mailto:Change.Control@bridge.bellsouth.com]
> Sent: Wednesday, March 22, 2000 5:20 PM
> To: sharon.arnett@mail.sprint.com; TLA@MAGICNET.NET; PBarker@aol.com;
> PBohn@Mediaone.com; sbowling@caprock.com; dbraun@adelphia.com;
> tbrooks@mantiss.com; bszafran@covad.com; Tyra.Colbert@wcom.com;
> mconquest@itcdeltacom.com; CPolizzotti@northpoint.net;
> Jdavid4715@aol.com; DoBeck@Mediaone.com; JDoherty@accessone.cc;
> Craig.B.Douglas@MCI.com; kelley.dunne@onepointcom.com;
> jason.estep@adelphiacom.com; sandra.k.evans@mail.sprint.com;
> george@accesscomm.com; dfoust@deltacom.com; generalg@cris.com;
> lhall@floridadigital.net; jhoze@kmctelecom.com; Craig@exceleron.com;
> sjenning@nowcommunications.com; Sandrajf@intetech.com;
> Pkingborn@eztalktelephone.com; wmknapek@Intermedia.com;
> dlasher@eftia.com; JMMaxwell@Intermedia.com; c_and_m@bellsouth.net;
> Gary@CSII.net; Todd@CSII.net; kmiller@northpointcom.com;
> Lminasola@Mediaone.com; wmontano@uslec.com; tmontemayer@mantiss.com;
> Nicole.Moorman@adelphiacom.com; JOSEPH.ONEAL@adelphiacom.com;
> Debra.Pasquale@btitele.com; dpetry@ix.netcom.com;
> brian.powers@onepointcom.com; microsun@bellsouth.net; cheryl@eatel.com;
> jeffrey@cellularsouth.com; srober@kmctelecom.com; drodrigu@accessone.cc;
> sharon.russo@btitele.com; brutter@kpmg.com; shane@eatel.com;
> donnas@intetech.com; steve.taff@allegiancetelecom.com; TAYLORJG@LCI.COM;
> Mark.E.Turner@MCI.com; tvercellotti@mantiss.com; WWalker@mantiss.com;
> Kimberly.O.Williams@MCI.com; Williamson, Jill R, NCAM; Wilson Jr, Jack T
> (Tom), BGM; wolfsbrg@cris.com
> Subject: Update on Pending Change Requests
>
>
> Attention CLECs:
>
> Attached are updates on two pending change requests:
>
> DEF030100_002 (Pre-Order and Order Business Rule Discrepancies)
> This issue has been reclassified as a feature. The field discrepancies
> identified by this request were designed and implemented according to the
> original user requirements. BellSouth is investigating this change for
> implementation in a future release.
>
> DEF030200_001 (RPON Business Rules and Error Messages)
> This issue has been reclassified as a feature. There is not a business
> defined
> where a related PON is rejected because one other or several
> others that are
> related are rejected. This issue has been referred to our documentation
> staff
> for review.
>
> We will keep you posted with the status. Please let us know if
> you have any
> questions.
>
> Thanks,
>
> Change Control Team
>
>
>

From: jrwilliamson@att.com
Sent: Monday, June 05, 2000 1:52 PM
To: sr271lib@lga.att.com
Subject: FW: change control

-----Original Message-----
From: Tyra Colbert [mailto:tyra.colbert@wcom.com]
Sent: Monday, April 10, 2000 7:39 AM
To: sandra k evans; sharon.arnett@openmail.mail.sprint.com; Williamson, Jill R, NCAM; mark.e.turner@wcom.com
Subject: RE: change control

All,

MCI WorldCom also agrees that a consensus has not been met between the CLEC community and Bell South, and that a 3 month trial period is a must. Without a trial period this would allow BST to close the door on a process that we have noted clear disagreement and have highlighted several gaps within the process. MCI WorldCom is in support of requesting that a trial period be established before the process is considered final.

Tyra

> -----Original Message-----
> From: sandra k evans [mailto:sandra.k.evans@mail.sprint.com]
> Sent: Friday, April 07, 2000 4:34 PM
> To: sharon.arnett@openmail.mail.sprint.com; jrwilliamson@att.com; mark.e.turner@wcom.com; Tyra.Colbert@wcom.com
> Subject: RE: change control
>
>
> Jill,
>
> Sprint agrees BellSouth did not receive consensus. I think a 3 month
> trial should show a good indication if the CMP is going to work for the
> CLEC community. Sprint is already experiencing issues with system outage
> notifications and getting questions resolved between the Change
> Management Team and the Account Team.
>
> Sandy
> 913-433-8499
>
> -----Original Message-----
> From: jrwilliamson [SMTP:jrwilliamson@att.com]
> Sent: Thursday, April 06, 2000 4:23 PM
> To: mark.e.turner; Arnett, Sharon A.; Evans, Sandra K.; Tyra.Colbert
> Cc: jrwilliamson
> Subject: change control
>
> As FYI, attached is KPMG's interim report on the Georgia Third Party
> Testing. Take a look at the Change Control Section highlighted. As far as
> I'm concerned, we don't have a consensus. Also, I firmly believe, based on
> my past and current experience with the process, that we need to have
> a

> trial period for the process. Any thoughts???
>
> Jill
>
> > <<KPMG 4-6-00_.doc>>
> >
> >
> << File: KPMG 4-6-00_.doc >>
>

BELLSOUTH

EICCP Steering Committee
Meeting Minutes

DATE: March 23, 2000

MEETING: EICCP Steering Committee

PURPOSE: Review Interim Change Control Process

ATTENDEES

Tyra Colbert, MCI	Brian Rutter, KPMG	Valerie Cottingham, BST
Sandy Evans, Sprint	Jill Williamson, AT&T	Edwardine Marrone - BST
Melvin Porter, BST	Tom Montemayer, Mantiss/Access One	Shamne Stapler, ITC-DeltaComm
Bill Shoemaker, BST	Cornelius White, BST	Cheryl Storey, BST
Renard Robinson, BST	Steve Hancock, BST	

AGENDA

Agenda — This was a follow-up conference call to review BST's input regarding the recommended changes made to the Change Control Process during the CLEC/BST February 29, 2000 conference call.

SUMMARY OF MEETING

TOPIC	*DISCUSSION*
Opening	The BCCM opened the meeting and covered the items we were to accomplish on this conference call. • Review the Interim Change Control Process document. • Review outstanding action items from 2/29/00 conference call. • Review new action items.

Docket No. 2000-465
JMB-R6
Page 1 of 6

Review of Changes to the CCP	The CCP documentation (Ver 1.3, March 14, 2000) was updated to incorporate the following changes: • Addition of Type 6 Change Request, CLEC Impacting Defect • Increased number of participants at Change Review meetings • Changed cycle time for Types 2-5 Step 3 from 20 days to 15 days • Defined Step 4 of the Defect Notification process to include communicating the workaround to the CLEC community • Added web site address for the Change Control Process • Added notification regarding the Retirement and Introduction of new interfaces • Added new status codes for Defect Change Requests: "V" for Validated Defect, "W" for Workaround Developed, "DC" for Defect Cancelled", "S" for Defect Scheduled for Release and "I" Defect Implemented • Added new status codes for Types 2-5 Change Requests: "S" for Scheduled for a Release and "I" for Implemented Change Request • Removed reference to EDI Helpdesk. Electronic Communications Support (ECS) will be the first point of contact for Type 1 System Outages. • Word changes to provide clarification throughout the document.
Process Change/Review	Each section of the Interim Change Control Process document (Version 1.3, March 14, 2000) was reviewed. Changes agreed upon are reflected in the Action Items.

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CLEC Concerns	The following are concerns expressed by the CLECs regarding the Interim Change Control Process: • Introduction of new interfaces and retirement of existing interfaces. All new interfaces must be introduced through the CCP (not just announced) and that the retirement of an existing interface should be facilitated through the CCP. • Issues around or changes to testing of the interfaces and processes should be managed through the CCP. • Any issues or questions surrounding the interfaces, documentation of business processes should also be managed through the CCP. • Notifications and correspondence from BellSouth should be distributed to the industry via BellSouth's web site and email. • Need a process for reporting requests for expedited features. • The intervals for resolution of a defect are too long. • Need to further define defect (system vs. design, lack of business rules) • Software release and documentation notifications of 30 days are not sufficient time for CLECs to build their interfaces.
CLEC Training of new CCP	CLEC training will be developed to educate CLECs of the improvements to the process. Training documentation will be posted to the web. BST asked for volunteers from the CLEC community to assist with the development of training. No volunteers were provided.
Review of Outstanding Action Items	1. Backup support for CSMs. Status: For after hours support the appropriate Customer Service Center should be contacted and escalation procedures utilized if necessary. 2. Regulatory statements/changes – will BST notify CLEC community if they are not going to comply or if they plan to apply for extension, etc. Status: BellSouth will comply with Regulatory statements/changes. If dates of responding are different a CLEC Notification Letter will be posted to the BellSouth web site. 3. Test environment for CLECs. Status: There is a pending change request under review for an EDI Test Environment. 4. Web posting of release status and release notification information. Status: Release status and release notification information will be posted to the web site when the new CCP is fully implemented. 5. Retirement of existing interfaces. Status: Note was added to Version 1.3, March 14, 2000 CCP document indicating as new interfaces are introduced or retired, BellSouth will post a CLEC Notification Letter to the web 60-90 days prior to the introduction or retirement of the interface. Refer to "CLEC Concerns" – this is an outstanding issue. 6. Status of pending change requests. Status: Our monthly status meeting on March 29, 2000 will provide status of all pending requests. 7. Copy of notification template. Status: The Type 1 System Outage notification template was reviewed during this meeting. 8. BST is currently looking at incorporating the initial notification for Type 1 System Outages via email to all impacted CLECs. Status: No status change.

Review of New Action Items	1. BellSouth will consider improvement ideas listed in the "CLEC Concerns" section of these minutes. 2. BST Electronic Communications Support (ECS) will entertain the suggestion of providing resolution information to the Type 1 System Outage Notification. 3. The Change Control Team will make the following changes to the Interim Change Control Process document (Version 1.3, March 14, 2000): • Add "billing" to Process and Documentation bullets under types of changes that will be managed by this process (Introduction Section) • Further define "Testing Support" and "Issue Resolution/Questions" under types of changes that Change Control Process does not include (Introduction Section) • Define a process for handling defects that are re-classified as features (design defects and documentation issues). • Change Step 3 cycle time (Types 2-5) from 15 to 20 Bus Days. • Add to Step 10 (Types 2-5) verbiage regarding BellSouth Business Requirements will be presented to CLECs. If needed, BellSouth will incorporate changes and re-baseline. • Add verbiage to reflect that notification will be posted to the web if it is determined that a defect affects more than one CLEC (Section 5.0 – Defect Notification Process opening paragraph). • Reword "NOTE" in Section 6.0 – Change Review to reflect that status meetings will occur monthly. Prioritization meetings will include monthly status agenda. • Terms & Definitions – include verbiage to the definition for Type 1 System Outage to match Type 1 Definition in Section 3.0.
Closure	The goals of implementing the new Change Control Process are: • "Work" process as defined • Review performance of defined process • Take "improvement ideas" into consideration • Move forward with implementing new Change Control Process 4/17/00 A follow up call will be scheduled to review status of outstanding issues. Meeting details to follow.

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BELLSOUTH

Change Control Process
Meeting Minutes

DATE: April 17, 2000

MEETING: CCP Interim Document Review Meeting

PURPOSE: Review Status of CCP Interim Document changes

ATTENDEES

Tyra Colbert, MCI	Mary Conquest, ITC-Deltacom	Valerie Cottingham, BST
Sandy Evans, Sprint	Jill Williamson, AT&T	Edwardine Marrone - BST
Steve Hancock, BST	Cheryl Storey, BST	
Bill Shoemaker, BST		

AGENDA

Agenda Review changes to the Interim CCP Document since last meeting.

SUMMARY OF MEETING

TOPIC	*DISCUSSION*
Opening	The BCCM opened the meeting and covered the items we were to accomplish on this conference call. • Review changes to the Interim CCP Document, including the Testing portion.
	Cheryl Storey – BST discussed the recent changes that have been made to the Interim Change Control Document (Ver. 1.4, April 14, 2000). These included the addition of the Testing Environment portion and clarification of the Dispute Process. 1. Discussed the verbiage surrounding the addition of "billing" issues to the document in the introduction section. Clarification was offered and discussion was held that Change Control would not handle billing changes as they affect the electronic interfaces. BST will go back internally and clarify the scope of what "billing" will include. 2. Change control will not be including testing support. 3. Clarified that the issue resolution/questions are not included in Change Control. 4. Discussed about Type 1 system outages and that Email notification will now be sent with the web posting. Also clarified the email notification reference throughout the document. 5. Discussed about Type 6 defect notification and that Email notification will now be sent with the web posting. Also clarified the email notification reference throughout the document as it relates to Type 6.

	6. Discussed the Introduction and Retirement of Interfaces section and the posting guidelines. 7. Discussed about the addition of the Dispute Resolution Process to the document. 8. Discussed the addition of the Informational page regarding the Testing Environment and explained that testing would not be included in change control but should be coordinated through the Account Teams using the current process. 9. BST recommends to the CLEC community that if a trial is agreed upon for 3 months using this process and CLEC issues are addressed, a "final" baselined document would be implemented at the end of the 3 month period. MCI and ITC/Deltacom verbally agreed to this.
Issues raised by the CLECs	1. Tyra Colbert (MCI) asked if Email notification on System 1 outages would include the resolution. BST explained that currently the date, type of outage, brief description of outage and resolution date will be included. ACTION ITEM: BST – Susan Hart will provide the suggested format that the ECS group will publish. 2. Jill Williamson (AT&T) is concerned that workarounds are not always working and there needs to be a process or mechanism in place to identify these situations and allow for more expedient resolution. 3. Jill Williamson (AT&T) wants clarification on when a defect becomes a "feature" change and gets re-classified as a pending request. 4. AT&T, Sprint, and MCI agreed that depending on the situation, the CLECs may not be willing to participate in another "dispute team" before filing a formal complaint with the commisions on items that have been escalated to Level 3. 5. CLECs would prefer that the testing environment go through Change Control. 6. Tyra Colbert (MCI) recommends that additional terms be added to the term definitions. (e.g., Account Manager, ECS, etc.) 7. CLECs recommend to BST that a 3 month trial be implemented using the Interim Change Control process to determine if process is working as outlined before committing the document as "Final".

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BELLSOUTH

November 13, 2000
Release 9.0 User Requirements
MEETING MINUTES

MEETING NAME	MINUTES PREPARED BY:	DATE PREPARED
Release 9.0 User Requirements	Cheryl Storey – Change Control Team	11-14-00

Participants/Attendees

PARTICIPANT	COMPANY
Sheriann Lively	Trivergent
Valerie Cottingham	BST - CCP
Cheryl Storey	BST - CCP
Jill Williamson	AT&T
Donna Cain	AT&T
Anthony Zerillo	Birch Telcom
Woody Roe	Albion Connect
Tami Swanson	Anderson Consulting
Kim Gillette	Quintessent
Gloria Melvin	Trivergent

PARTICIPANT	COMPANY
Kevin McCall	BST
Stephanie Smith	Dset
Brenda Jones	BST
Barry Burnett	Trivergent
Michelle Gemey	Trivergent
Brian Rutter	KPMG
Jane Scott	BST
Lorraine Watson	WorldCom
Jean John	Quintessent

Meeting Information History

DATE	START TIME	END TIME
11/13/00	2:00 PM EST	3:00 PM EST

MEETING PURPOSE

- Review User Requirements for Release 9.0.
- Discuss reason for removing three (3) targeted features from Release 9.0 scope.

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MEETING MINUTES

Agenda Items	Discussion
1. Removal of Targeted Features from Release 9.0 Scope	The following features that were targeted for Release 9.0 will not be included in the scope: CR0003 – RPON Electronic Reject & Flow-Through EDI1215990001/CR0133 – TN vs RSAG Validation/Migration of UNE-P Notifications EDI0812990003 – 411 Drops – Electronic Solution Due to the system capacity of Release 9.0, with Number Pooling being a sizable effort, the above 3 (three) targeted features have been removed from the Release 9.0 scope and are being considered for Release 10.0. BellSouth is in the process of finalizing Release 10.0 scope. The prioritization ranking from both the 6/28/00 and 9/27/00 meetings are being considered for Release 10.0. It's probable that all items previously targeted will not be included in Release 10.0. Release 11.0 has not been scheduled yet.
2. Review of UNE to UNE Migrations User Requirements (CR0030)	Jane Scott led the review of the UNE to UNE Migrations User Requirements (CR0030). The scope of this feature is to provide the functionality to electronically support UNE-to-UNE migration service requests for REQTYP M: ACT of V for Port/Loop Combo to REQTYP A (Loop). Jill (AT&T) questioned if this feature supported REQTYP M to B. The response provided was that REQTYP M to B was not included in these User Requirements. If this functionality is needed, a Change Request would need to be submitted. Jill (AT&T) questioned if orders could be related. The response provided is that there is no change in submitting RPONs to relate LSRs. Jill (AT&T) questioned if there were any restrictions with this feature. Jane advised there are no restrictions. If you can perform a function today, you will be able to perform the same function when this feature is implemented. This feature accommodates conversion from CLEC to same CLEC (must own the account).
3. Wrap up/Adjourn	Release 9.0 scope includes: CR0169 – Number Pooling Mandate CR0030 – UNE to UNE Migrations The scheduled implementation date is 01/06/01.

November 13, 2000
Release 9.0 User Requirements
MEETING MINUTES

-----Original Message-----
From: Change.Control@bridge.bellsouth.com
[mailto:Change.Control@bridge.bellsouth.com]
Sent: Wednesday, November 08, 2000 5:19 PM
To:
Subject: ID: Update to Rel 9.0 Targeted CRs

---------- Distributed Message ----------

Message sent by: Change Control /m6,mail6a

To unsubscribe from CCP, send a message to
List Manager /m1,mail1a with the Subject line: UNSUBSCRIBE CCP

For online help, send a message with the subject HELP.

Internal Reference # _____(1) Date Change Request Submitted 3/2/00 (2)

☐ TYPE 5 (CLEC) ☐ TYPE 4 (BST) ☐ TYPE 3 (INDUSTRY) ☐ TYPE 2 (REGULATORY) (3)

☒ DEFECT (3A)

Company Name AT&T (4)

CCM Jill Williamson (5) Phone 404-810-8562 (6)

CCM Email Address jrwilliamson@att.com (7) Fax 404-810-8562 (8)

Alternate CCM _____(9) Alt Phone # _____(10)

Originator's Name Jill Williamson (11) Phone 404-810-8562 (12)

Title of Change RPON Business Rules and Error Messages (13)

Category ☐ Add New Functionality ☒ Change Existing (14) Desired Due Date 3/10/00 (15)

Originating CCM assessment of impact ☒ Major ☐ Minor ☐ None expected (16)

Originating CCM assessment of priority ☒ Urgent ☐ High ☐ Medium ☐ Low (17)

Interfaces Impacted (18)			
☐ Pre-Ordering ☐ LENS ☐ TAG ☐ CSOTS	☒ Ordering ☒ EDI ☐ LENS ☐ TAG	☐ Maintenance ☐ TAFI ☐ EC-TA Local	☐ Manual

Type Of Change - Check one or more, as applicable (19)		
☐ Software	☐ Hardware	☐ Industry Standards
☐ Product & Services	☒ New or Revised Edits	☐ Process
☒ Documentation	☐ Regulatory	☐ Other

Description of requested change including purpose and benefit received from this change. (Use additional sheets, if necessary.) (20)

There are currently no documented business rules for placing orders that are related. AT&T has been sending the orders such that the second PON is related to the first PON, the third PON is related to the second PON and so forth. At one time, BellSouth told us that we should relate all of the orders to the first order. Also, our understanding is that if BellSouth rejects one of the related orders, all of the related orders should be rejected. This does not happen. In most cases when one of the related orders is rejected, the others get FOC'd. BellSouth needs to clearly define its expectations for related orders and fix its systems such that they match the business rules. Also, BellSouth does not have an electronic reject that states the order was rejected because the RPON'd order was rejected. (We've only seen this in the manual environment) BellSouth needs to add a reject code/reason for RPON'd orders.

Known dependencies (21)

Additional Information ☐ Yes ☐ No (22)

Attachment A-4A

List all business specifications and/or requirements documents included (or Internet / Standards location, if applicable)

_____

_____

_____

_____

This Section to be completed by BCCM only.

Change Request Log #___CR0003 23) Clarification ☐ Yes ☒ No (24)

Clarification Request Sent ___/___/___ (25) Clarification Response Due ___/___/___ (26)

Status _____ RC____(27)

Change Request Review Date 06/28/00_(28) Target Implementation Date _____ (29)

Last Modified By _____BCCM_____ (30) Date Modified _11/6/00__ (31)

Review Results (32) ___3-17-00 There is not a business defined where a related PON is rejected because one other or several others that are related are rejected. This issue has been referred to our documentation staff to incorporate the handling of RPONs in the business rules.

6-29-00 Business rules for RPONs are targeted to be included in the next update of the BellSouth Business Rules for Local Ordering (BBR-LO) mid-July, 2000.

7-25-00 Target date for posting RPON business rules in the BellSouth Business Rules for Local Ordering (BBR-LO) guide has changed to August 25, 2000. The request for the electronic reject is currently being sized for a future release.

8/16/00 – Advance copy of RPON business rules provided to CLEC community.

8/31/00 – RPON business rules posted on Web site.

9/14/00 See Related CR0137 and CR0160.

AT&T is requesting that BellSouth modify its systems so that additional order types will flow through its systems without manual intervention. AT&T would like BellSouth to fully mechanized the following order types: All RPON'd orders.

9/22/00 – Targeted for Release 9.0 scheduled for 01/06/01.

11/6/00 – RPON flow-through and electronic reject will not be included with Release 9.0 scope. This issue to be addressed during the 11/13/00 Release 9.0 User Requirements meeting.

Canceled Change Request ☐ Duplicate ☐ Training ☐ Clarification Not Received (33)

Cancellation Acknowledgment CLEC _____ BST _____ Date ___/___/___ (34)

Request Appeal ☐ Yes ☐ No (35)

Appeal Considerations (36)

_____

_____

_____

Agreed Release Date ___/___/___ (37) CMVC #_____(38)

Attachment A-4A

DDTS#_____(39)

Attachment A-4A

Jointly Developed by the EI Change Control Sub-team comprised
of BellSouth and CLEC Representatives.

BELLSOUTH

Change Request Form

Internal Reference # (1) Date Change Request Submitted 12/15/99 (2)
[X] CLEC [ ] BST (3) Company Name AT&T (4)
CCM Jill Williamson (5) Phone 404-810-8562 (6)
CCM Email Address jrwilliamson@att.com (7) Fax 404-810-8605 (8)
Alternate CCM (9) Alternate Phone (10)
Originator's Name Jill Williamson (11) Phone 404-810-8562 (12)
Title of Change Validation on TN vs. Address (13)

Category: [ ] Add New Functionality [X] Change Existing (14) Desired Due Date 2/1/00 (15)

Originating CCM assessment of impact [X] Major [ ] Minor [ ] None expected (16)

Originating CCM assessment of priority [X] Urgent [ ] High [ ] Medium [ ] Low (17)

Interfaces Impacted (18)

[ ] Pre-Ordering	[X] Ordering	[ ] Maintenance
[ ] LENS	[X*] EDI	[ ] TAFI
[ ] LPOG	[ ] LENS	[ ] EC-TA Local
	[ ] EDI-PC	

*** OSS'99 and TCIF7**

Type Of Change - Check one or more, as applicable (19)

[ ] Software	[ ] Hardware	[ ] Industry Standards
[ ] Product & Services	[X] New or Revised Edits	[ ] Process
[ ] Documentation	[ ] Regulatory	[ ] Other

Description of requested change including purpose and benefit received from this change. (Use additional sheets, if necessary.) (20)
It appears that BellSouth currently conducts full edits on both the telephone number and service address on all orders, regardless of the activity type. Because the edit requires that every aspect of the address be exactly correct (St. vs Street), a high number of "RSAG invalid" rejects are unncessarily generated. AT&T concedes that this level of validation is probably necessary on an order for new service, however, should not be required when a migration of or change to existing service is being ordered. In the past, BellSouth did a "partial validatio on these order types, validating the TN and street number against its database and the number of RSAG errors dropped significantly. AT&T requests that BellSouth relax its edits on migrations, changes, suspends,etc. and use TN and street number information only for validation purposes. While this request is more critical for non-LNP orders, it also applies to LNP orders.

Known dependencies (21)

Additional Information [ ] Yes [ ] No (22)

List all business specifications and/or requirements documents included (or Internet / Standards location, if applicable)

RF-1870
(5/98)

BELLSOUTH Change Request Form

This Section to be completed by BCCM only.

Change Request Log # EDI121599001 (23) Clarification [X] Yes [ ] No (24)

Clarification Request Sent 12/16/99 (25) Clarification Response Due 12/23/99 (26)

Status RC (27)

Enhancement Review Date 06/28/00 (28) Target Implementation Date _____ (29)

Last Modified By BCCM (30) Date Modified 11/6/00 (31)

Review Results (32)
9-18-00 For LNP orders, the end user information is needed to ensure the end user is within the Toll Message Rate Center (TMRC).

9-22-00 Edits have been relaxed for changes, disconnects, suspends, restores, seasonal suspends and denies. BST is currently reviewing the business rules to determine electronic programming changes that may need to be made to support conversions and migrations (ACTs V, W, P and Q). For LNP, the edits cannot be relaxed because the end user information is used to ensure that the end user address is in the same TMRC with the serving wire center for that telephone number. Targeted for Release 9.0 scheduled for 01/06/01.

9-27-00 CR0133 - Migration of UNE-P Notifications (WorldCom) combined with EDI1215990001.

11-6-00 TN vs RSAG Validation changes will not be included in Release 9.0 scope. This issue will be addressed at the 11-13-00 Release 9.0 User Requirements meeting.

Canceled Change Request [ ] Duplicate [ ] Training [ ] Clarification Not Received (33)

Cancellation Acknowledgment CLEC _____ BST _____ Date _____ (34)

Request Appeal [ ] Yes [ ] No (35)

Appeal Consideration (36)

Agreed Release Date _____ (37)

Jointly Developed by the EI Change Control Sub-team comprised of BellSouth and CLEC Representatives.

RF-1870
(5/98)

BELLSOUTH Change Request Form

Internal Reference # _____ (1) Date Change Request Submitte 8/12/99 (2)

[X] CLEC [ ] BST (3) Company Name _____ (4)

CCM Jill Williamson (5) Phone 404-810-8562 (6)

CCM Email Address jrwilliamson@att.com (7) Fax 404-810-8605 (8)

Alternate CCM _____ (9) Alternate Phone _____ (10)

Originator's Name Jill Williamson (11) Phone 404-810-8562 (12)

Title of Change 411 Drop-out (13)

Category: [X] Add New Functionality [ ] Desired Due 10/1/99 (15)

Originating CCM assessment of impact [ ] [X] Minor [ ] None expecte (16)

Originating CCM assessment of priority [X] [ ] High [ ] Medium [ ] Low (17)

Interfaces Impacted (18)

[ ] Pre-Ordering	[X] Ordering	[ ] Maintenance
[ ] LENS	[X] EDI	[ ] TAFI
[ ] LPOG	[ ] LENS	[ ] EC-TA Local
	[ ] EDI-PC	

Type Of Change - Check one or more, as applicable (19)

[ ] Software	[ ] Hardware	[ ] Industry Standards
[ ] Product & Services	[ ] New or Revised Edi	[X] Process
[ ] Documentation	[ ] Regulatory	[ ] Other

Description of requested change including purpose and benefit received from this change. (Use additional sheets, if necessary.) (20)

In the current environment, when a customer's listing "drops out" of 411/DA, BellSouth requires that CLEC's fax a new LSR to BellSouth to correct the drop out regardless of whether the fall-out is caused by BellSouth or the CLEC. AT&T agrees that when the drop out is caused by the CLEC, a new LSR should be sent. However, when the fall out is caused by BellSouth, a CLEC should not have to send a LSR. AT&T requests that BellSouth adopt its 411 drop out form as an interim solution when the drop out is caused by BellSouth and work jointly to develop an acceptable process for future use and propose our jointly developed form/process to OBF. Because AT&T has nothing to "correct" on that customer's service, it's systems cannot (and should not) generate a new LSR with no changes.

Known dependencies (21)

Additional Information [X] Yes [ ] No

List all business specifications and/or requirements documents included (or Internet / Standards location, if applicable)

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AT&T's proposed form is attached.

RF-1870
(5/98)

BELLSOUTH **Change Request Form**

This Section to be completed by BCCM only.

Change Request Log # EDI0812990003 (23) Clarification [ ] Yes [X] No (24)

Clarification Request Sent _____ Clarification Response Due _____ (26)

Status RC (27)

Enhancement Review Date 9/28/99 (1st) 6/28/00 (2nd) (2Target Implementation Date _____ (29)

Last Modified By BCCM (30) Date Modified 11/6/00 (31)

Review Results (32)
Note: BST agrees that when a listing falls out of 411/DA due to BST error that an LSR should not have to be submitted by the CLEC. BST will be glad to review the form that ATT proposes to be used as an interim solution to the problem and advise if we agree to use it.

09/18/00 - The process for handling 411 drops will be documented and provided to the CLEC community. If a listing drops out of 411/DA, the CLEC should call the LCSC to report the drop. The LCSC retrieves the LSR to investigate cause of error. If determined to be a BST error, it is corrected immediately, no additional paperwork is required. If CLEC error, CLEC will need to resubmit LSR. Change Control is in the process of investigating a standard process for CLECs to use to report 411 drops in batch, if they do not wish to call the LCSC.

09/22/00 - A form for CLECs to use to report 411 drops in batch will be presented at the 10/25/00 Monthly Status meeting. BST is pursuing the possibility of implementing an electronic solution in Release 9.0.

10/25/00 - Documented process for reporting 411 drops and a standard form for submitting drops in batch was presented and discussed at the 10/25/00 Monthly Status Meeting. Updates to the form will be discussed at the 11/15/00 Monthly Status Meeting in addition to when the form can be implemented.

11/6/00 - The electronic solution for reporting 411 drops will not be included in the Release 9.0 scope. This issue to be addressed at the 11/15/00 Monthly Status Meeting.

Canceled Change Request [ ] Duplicate Training [ ] Clarification Not Recei (33)

Cancellation Acknowledgment CLEC ____ BST ____ Date ____ (34)

Request Appeal [ ] Yes [ ] No (35)

Jointly Developed by the EI Change Control Sub-team comprised of BellSouth and CLEC Representatives.

Appeal Consideration (36)

Agreed Release Date _____ (37)

Bradbury,J M (Jay) - LGA

From: jrwilliamson@att.com
Sent: Tuesday, November 28, 2000 10:05 AM
To: bradbury@att.com; sharonnorris@att.com; eppsteiner@att.com; mrule@att.com; gpterry@att.com; dreinig@att.com; bkgrant@att.com; bobik@att.com
Subject: FW: 11/13/00 Rel 9.0 User Requirements Meeting Minutes

Importance: High

-----Original Message-----
From: Williamson, Jill R, NCAM
Sent: Tuesday, November 28, 2000 10:04 AM
To: 'Change.Control@bridge.bellsouth.com'; Annette.Cook@espire.net; apatel3@telcordia.com; BellSouth@quintessent.net; best2@surfsouth.com; brutter@kpmg.com; bszafran@covad.com; c_and_m@bellsouth.net; cassandrap@networktelephone.net; Catherine.Gray@alltel.com; cecilia.ortiz@adelphiacom.com; cflanigan@uslec.com; Chapmanwe@cepb.com; charrison@mpowercom.com; cheryl@eatel.com; chrisg@pvtel.net; christine.shelton@cc.gte.com; colleen.e.sponseller@wcom.com; Craig@exceleron.com; Craig.B.Douglas@MCI.com; CSteele@nuitele.com; daddymax@netbci.com; dana.braun@adelphiacom.com; Debra.Pasquale@btitele.com; DElliott@connectsouth.com; desiree@communitytelephone.com; dfoust@deltacom.com; dkane@aspiretelecom.com; dlasher@eftia.com; DoBeck@MediaOne.com; donnam@networktelephone.net; donnas@intetech.com; dpetry@ix.netcom.com; drodrigu@accessone.cc; Dwight.Scrivener@wcom.com; ed.ramsden@cc.gte.com; epadfield@nextlink.com; ESingleton@eztalktelephone.com; evdoty@nextlink.com; frankb@cellone-ms.com; Gary@CSII.net; generalg@cris.com; george@accesscomm.com; jason.estep@adelphiacom.com; jbritton@phonesforall.com; Jdavid4715@aol.com; JDoherty@accessone.cc; JDuffey@PSC.STATE.FL.US; jeffrey@cellularsouth.com; JG6837@ctmail.snet.com; jhoze@kmctelecom.com; jmclau@kmctelecom.com; JMMaxwell@Intermedia.com; jnovo@mpowercom.com; Wilson Jr, Jack T (Tom), BGM; julie.jacobs@adelphiacom.com; Katherine.Hudler@espire.net; kcooper@eftia.com; kelley.dunne@onepointcom.com; khudson@nextlink.com; Kimberly.O.Williams@MCI.com; kmarshall@telstar.org; kmiller@northpointcom.com; kschwart@covad.com; lhall@floridadigital.net; lisa@annox.com; Lminasola@MediaOne.com; Lorraine.Watson@wcom.com; mark@annox.com; marybethkeane@kpmg.com; matt@albionconnect.com; mconquest@itcdeltacom.com; mer@networkwcs.com; microsun@bellsouth.net; mmclaughlin@dset.com; mt7210@momail.sbc.com; ngiugno@kpmg.com; Nicole.Moorman@adelphiacom.com; PBarker@aol.com; PBohn@MediaOne.com; Pkinghorn@eztalktelephone.com; prehm@nightfire.com; prichardson@Trivergent.com; rbennett@floridadigital.net; rbuffa@interloop.net; rhonda.calvert@adelphiacom.com; robert@alternativephone.com; rszczepanski@kpmg.com; sandra.k.evans@mail.sprint.com; Sandrajf@intetech.com; sbowling@caprock.com; shane@eatel.com; sharon.arnett@mail.sprint.com; sharon.russo@btitele.com; sjenning@nowcommunications.com; smason@interloop.net; smoore@Trivergent.com; smurray@rhythms.net; snole@kpmg.com; srober@kmctelecom.com; SStapler@itcdeltacom.com; steve.taff@allegiancetelecom.com; stuartw@networkonecom.com; talleylinda@mindspring.com; Tanya.Finney@espire.net; TAYLORJG@LCI.COM; timk@networktelephone.net; TLA@MAGICNET.NET; tmontemayer@MANTISS.com; Todd@CSII.net; usfloridaoss@kpmg.com; Williamsal@cepb.com; wmknapek@Intermedia.com; wolfsbrg@cris.com; woody@albionconnect.com; Yvette.Brown@espire.net; Tyra.Hush@wcom.com; trsmith@Trivergent.com; haynes@Trivergent.com; ssmith@dset.com; sangelo@bellsouth.net; brown@covad.com; gulfcoast@dotstar.net; Mark.Mecca@dsl.net; Connie@albionconnect.com; ASamson@birch.com; heidi.a.crow@mail.sprint.com; rbreckin@telcordia.com; msykes@telcordia.com; billg@telcordia.com; svc-gate@telcordia.com;

karen.grim@mail.sprint.com; mike.norris@mindspring.com;
csti@bellsouth.net; mdominick@Trivergent.com; dgraham@MANTISS.com;
KKester@STIS.com; Jim.Meyers@wcom.com; Hwhittington@mpowercom.com;
Taldinger@mpowercom.com; Rdupraw@mpowercom.com; Jim.Meyers@wcom.com;
JOliver@birch.com; reym@networktelephone.net; LHinton@PrismCSI.net;
dmcmanus@Trivergent.com; bmurdo@kmctelecom.com; david.burley@wcom.com;
SLively@Trivergent.com; TThompson2@broadband.att.com;
blsinterfacecontrol@kpmg.com; Kathryn.Phipps@btitele.com;
ronald.l.thompson@xo.com; MPatyk@connectsouth.com; schula.hobbs@dsl.net;
mark@albionconnect.com; AZerillo@birch.com; EGunn@birch.com;
clhawk@kmctelecom.com; tami.m.swenson@ac.com; jim.lee@dsl.net;
TJStokes@Trivergent.com; Faye.Restaino@dsl.net; Elliot.Wrann@dsl.net;
changecontrol.bellsouth@onepointcom.com; carl.taylor@lecstar.com;
Glenn.Sonnier@usunwired.com; arobison@kpmg.com;
default.user@bellsouth.com; KUchida@northpoint.net;
ESaeed@northpoint.net; PPinick@birch.com; lynn@mfn.net; ruth@mfn.net;
mcbrunnhilde@juno.com; lavernek@arrowcom.com; Micki.Jones@wcom.com;
jfuller@fairpoint.com; EFarnell@broadband.att.com;
Ellen.Neis@mail.sprint.com; Ronald.Klamer@wcom.com;
conniec@arrowcom.com; CoDavis@covad.com; timw@networkonecom.com;
sheryl_scobel@stratosoilandgas.com; Nancy.Watt@RHTelCo.com;
wendy.hernandez@RHTelCo.com; swargo@rhythms.net;
Alan.Flanigan@twtelecom.com
Subject: RE: 11/13/00 Rel 9.0 User Requirements Meeting Minutes
Importance: High

Change Control Team,

This message is to follow-up on the concerns I expressed in our November 13 call to review UNE to UNE Migration requirements. As I stated on the call, the requirements developed by BellSouth do not meet the needs of AT&T. BellSouth's requirements only allow a CLEC to migrate from a port/loop combination (REQTYP M) to a stand alone loop (REQTYP A). This scenario will be a very rare occurrence when converting a customer from UNE-P to UNE-L. In most, if not all, instances, the customer will want to keep his existing telephone number. Because BellSouth failed to include requirements for converting from a port/loop combination (REQTYP M) to a loop with number portability (REQTYP B), CLECs will be forced to send multiple orders to accomplish a migration that could be done with one order. Today's environment allows us to migrate a customer from BellSouth retail to a loop with number portability, therefore, the same process should be available to migrate from UNE-P to loop with number portability.

When BellSouth presented its requirements for UNE to UNE Migrations, it presented the requirements as final with no opportunity for change by the CLECs. This is another instance of BellSouth not providing CLECs the opportunity to provide input during the development phase. The result is that BellSouth will be delivering a product that does not meet the needs of the CLECs, adds expense to CLECs cost of doing business (charges per order), and will cause re-work in the future to change what was implemented.

As part of our CCP Improvement initiative, we MUST create a process with intervals that allow for better communication between CLECs and BellSouth SMEs. Otherwise, both BellSouth and the CLECs will continue to expend resources unnecessarily with little results to show for it.

Sincerely,

Jill Williamson
AT&T Local Services and Access Management

-----Original Message-----
From: Change.Control@bridge.bellsouth.com
[mailto:Change.Control@bridge.bellsouth.com]
Sent: Friday, November 17, 2000 8:51 AM
To: Annette.Cook@espire.net; apatel3@telcordia.com;

BellSouth@quintessent.net; best2@surfsouth.com; brutter@kpmg.com;
bszafran@covad.com; c_and_m@bellsouth.net;
cassandrap@networktelephone.net; Catherine.Gray@alltel.com;
cecilia.ortiz@adelphiacom.com; cflanigan@uslec.com; Chapmanwe@cepb.com;
charrison@mpowercom.com; cheryl@eatel.com; chrisg@pvtel.net;
christine.shelton@cc.gte.com; colleen.e.sponseller@wcom.com;
Craig@exceleron.com; Craig.B.Douglas@MCI.com; CSteele@nuitele.com;
daddymax@netbci.com; dana.braun@adelphiacom.com;
Debra.Pasquale@btitele.com; DElliott@connectsouth.com;
desiree@communitytelephone.com; dfoust@deltacom.com;
dkane@aspiretelecom.com; dlasher@eftia.com; DoBeck@MediaOne.com;
donnam@networktelephone.net; donnas@intetech.com; dpetry@ix.netcom.com;
drodrigu@accessone.cc; Dwight.Scrivener@wcom.com; ed.ramsden@cc.gte.com;
epadfield@nextlink.com; ESingleton@eztalktelephone.com;
evdoty@nextlink.com; frankb@cellone-ms.com; Gary@CSII.net;
generalg@cris.com; george@accesscomm.com; jason.estep@adelphiacom.com;
jbritton@phonesforall.com; Jdavid4715@aol.com; JDoherty@accessone.cc;
JDuffey@PSC.STATE.FL.US; jeffrey@cellularsouth.com;
JG6837@ctmail.snet.com; jhoze@kmctelecom.com; jmclau@kmctelecom.com;
JMMaxwell@Intermedia.com; jnovo@mpowercom.com; Williamson, Jill R, NCAM;
Wilson Jr, Jack T (Tom), BGM; julie.jacobs@adelphiacom.com;
Katherine.Hudler@espire.net; kcooper@eftia.com;
kelley.dunne@onepointcom.com; khudson@nextlink.com;
Kimberly.O.Williams@MCI.com; kmarshall@telstar.org;
kmiller@northpointcom.com; kschwart@covad.com; lhall@floridadigital.net;
lisa@annox.com; Lminasola@MediaOne.com; Lorraine.Watson@wcom.com;
mark@annox.com; marybethkeane@kpmg.com; matt@albionconnect.com;
mconquest@itcdeltacom.com; mer@networkwcs.com; microsun@bellsouth.net;
mmclaughlin@dset.com; mt7210@momail.sbc.com; ngiugno@kpmg.com;
Nicole.Moorman@adelphiacom.com; PBarker@aol.com; PBohn@MediaOne.com;
Pkinghorn@eztalktelephone.com; prehm@nightfire.com;
prichardson@Trivergent.com; rbennett@floridadigital.net;
rbuffa@interloop.net; rhonda.calvert@adelphiacom.com;
robert@alternativephone.com; rszczepanski@kpmg.com;
sandra.k.evans@mail.sprint.com; Sandrajf@intetech.com;
sbowling@caprock.com; shane@eatel.com; sharon.arnett@mail.sprint.com;
sharon.russo@btitele.com; sjenning@nowcommunications.com;
smason@interloop.net; smoore@Trivergent.com; smurray@rhythms.net;
snole@kpmg.com; srober@kmctelecom.com; SStapler@itcdeltacom.com;
steve.taff@allegiancetelecom.com; stuartw@networkonecom.com;
talleylinda@mindspring.com; Tanya.Finney@espire.net; TAYLORJG@LCI.COM;
timk@networktelephone.net; TLA@MAGICNET.NET; tmontemayer@MANTISS.com;
Todd@CSII.net; usfloridaoss@kpmg.com; Williamsal@cepb.com;
wmknapek@Intermedia.com; wolfsbrg@cris.com; woody@albionconnect.com;
Yvette.Brown@espire.net; Tyra.Hush@wcom.com; trsmith@Trivergent.com;
chaynes@Trivergent.com; ssmith@dset.com; sangelo@bellsouth.net;
sbrown@covad.com; gulfcoast@dotstar.net; Mark.Mecca@dsl.net;
Connie@albionconnect.com; ASamson@birch.com;
heidi.a.crow@mail.sprint.com; rbreckin@telcordia.com;
msykes@telcordia.com; billg@telcordia.com; svc-gate@telcordia.com;
karen.grim@mail.sprint.com; mike.norris@mindspring.com;
csti@bellsouth.net; mdominick@Trivergent.com; dgraham@MANTISS.com;
KKester@STIS.com; Jim.Meyers@wcom.com; Hwhittington@mpowercom.com;
Taldinger@mpowercom.com; Rdupraw@mpowercom.com; Jim.Meyers@wcom.com;
JOliver@birch.com; reym@networktelephone.net; LHinton@PrismCSI.net;
dmcmanus@Trivergent.com; bmurdo@kmctelecom.com; david.burley@wcom.com;
SLively@Trivergent.com; TThompson2@broadband.att.com;
blsinterfacecontrol@kpmg.com; Kathryn.Phipps@btitele.com;
ronald.l.thompson@xo.com; MPatyk@connectsouth.com; schula.hobbs@dsl.net;
mark@albionconnect.com; AZerillo@birch.com; EGunn@birch.com;
clhawk@kmctelecom.com; tami.m.swenson@ac.com; jim.lee@dsl.net;
TJStokes@Trivergent.com; Faye.Restaino@dsl.net; Elliot.Wrann@dsl.net;
:hangecontrol.bellsouth@onepointcom.com; carl.taylor@lecstar.com;
Glenn.Sonnier@usunwired.com; arobison@kpmg.com;
default.user@bellsouth.com; KUchida@northpoint.net;
ESaeed@northpoint.net; PPinick@birch.com; lynn@mfn.net; ruth@mfn.net;
mcbrunnhilde@juno.com; lavernek@arrowcom.com; Micki.Jones@wcom.com;

jfuller@fairpoint.com; EFarnell@broadband.att.com;
Ellen.Neis@mail.sprint.com; Ronald.Klamer@wcom.com;
conniec@arrowcom.com; CoDavis@covad.com; timw@networkonecom.com;
sheryl_scobel@stratosoilandgas.com; Nancy.Watt@RHTelCo.com;
wendy.hernandez@RHTelCo.com; swargo@rhythms.net;
Alan.Flanigan@twtelecom.com
Subject: ID: 11/13/00 Rel 9.0 User Requirements Meeting Minutes

---------- Distributed Message ----------

Message sent by: Change Control /m6,mail6a

To unsubscribe from CCP, send a message to
List Manager /m1,mail1a with the Subject line: UNSUBSCRIBE CCP

For online help, send a message with the subject HELP.

December 15, 2000

Jill,

This message is to acknowledge receipt of your 11-28-00 e-mail expressing concerns with the UNE to UNE Migration user requirements. As part of our CCP Process Improvement meetings we have committed to provide the user requirements earlier in the process, which will allow for better communication between CLECs and BellSouth. As we discussed at our 12-7-00 meeting, BellSouth proposed that draft user requirements will be provided 90 calendar days in advance of the release implementation date and that final user requirements will be provided 45 calendar days in advance of the release implementation date. The CLECs requested that these intervals be changed to state "in advance of the CLEC testing with BST date" in lieu of release implementation date. We are currently addressing this request and will provide an update at our January 10, 2001 CCP Process Improvements Meeting.

BellSouth is committed to ensuring that we have adequate communication with the CLECs to support their needs.

Please let us know if you have questions.

Thanks,

Change Control Team

-----Original Message-----
From: Change.Control@bridge.bellsouth.com
[mailto:Change.Control@bridge.bellsouth.com]
Sent: Monday, November 13, 2000 2:48 PM
To:
Subject: ID: New Change Requests

_____ Distributed Message _____

Message sent by: Change Control /m6,mail6a

To unsubscribe from CCP, send a message to
List Manager /ml,mailla with the Subject line: UNSUBSCRIBE CCP

For online help, send a message with the subject HELP.

BELLSOUTH

Change Request Form

Internal Reference # _____(1) Date Change Request Submitted _1113/00__(2)

☐ **TYPE 5 (CLEC)** ☒ **TYPE 4 (BST)** ☐ **TYPE 3 (INDUSTRY)** ☐ **TYPE 2 (REGULATORY) (3)**

☐ **TYPE 6 (DEFECT)** OCN _____(3A)

Company Name___BellSouth_____(4)

CCM___Brenda Files_____(5) Phone____205-321-2105_____(6)

CCM Email Address Change.Control@bridge.bellsouth.com_(7) Fax__205-321-5160_____(8)

Alternate CCM_ _____(9) Alt Phone # _____(10)

Originator's Name _____(11) Phone_____(12)

Title of Change NPORD Data for FOC (Issue 7) (13)

Category ☐ Add New Functionality ☒ Change Existing (14) Desired Due Date 11/30/00_(15)

Originating CCM assessment of impact ☐ Major ☒ Minor ☐ None expected (16)

Originating CCM assessment of priority ☐ Urgent ☒ High ☐ Medium ☐ Low (17)

Interfaces Impacted (18)			
☐ Pre-Ordering ☐ LENS ☐ TAG ☐ CSOTS	☐ Ordering ☐ EDI ☒ LNP ☐ LENS ☐ TAG	☐ Maintenance ☐ TAFI ☐ EC-TA Local	☐ Manual

Type Of Change - Check one or more, as applicable (19)			
☐ Software	☐ Hardware	☐ Industry Standards	☐ Defect
☐ Product & Services	☐ New or Revised Edits	☐ Process	
☐ Documentation	☐ Regulatory	☒ Other	

Description of requested change including purpose and benefit received from this change. (Use additional sheets, if necessary.) (20) _

The Port out Order number to will now go back on the FOC instead of the C Trigger order. This will only change the **DATA** content that the CLEC will receive in the NPORD field.

Known dependencies (21)

_____

_____

Additional Information ☐ Yes ☐ No (22)
List all business specifications and/or requirements documents included (or Internet / Standards location, if applicable) _____

BELLSOUTH

Change Request Form

This Section to be completed by BCCM only.

Change Request Log #___CR0216_____(23) Clarification ☐ Yes ☒ No (24)

Clarification Request Sent ___/___/___ (25) Clarification Response Due ___/___/___ (26)

Status __N__(27)

Change Request Review Date __/__/__(28) Target Implementation Date 11/00 (29)

Last Modified By _____ (30) Date Modified ___/___/___ (31)

Change Review Meeting Results (32)

_____

_____

_____

Canceled Change Request ☐ Duplicate ☐ Training ☐ Clarification Not Received (33)

_____

_____

_____

Cancellation Acknowledgment CLEC _____ BST _____ Date ___/___/___ (34)

Request Appeal ☐ Yes ☐ No (35)

Appeal Considerations (36)

_____

_____

_____

Agreed Release Date ___/___/___ (37)

CMVC #_____(38)
DDTS#_____(39)

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

BELLSOUTH

Change Request Form

This section to be completed by BellSouth – Internal Validation of Defect Change Request

Defect Validation Results: (40)

Clarification Needed ☐ Yes ☒ No

☐ Defect ☐ Feature ☐ Duplicate ☐ Training Issue ☐ Cancel

Defect/Feature Impacts Other CLECs? ☐ Yes ☐ No

Interfaces Impacted by defect/feature: ☐ EDI ☐ TAG ☐ LNP ☐ LENS
☐ TCIF 7 ☐ TCIF 9

Target Implementation Date: _____

BELLSOUTH

Change Request Form

Internal Reference # _____(1) Date Change Request Submitted _11/13/00__(2)

☐ **TYPE 5 (CLEC)** ☒ **TYPE 4 (BST)** ☐ **TYPE 3 (INDUSTRY)** ☐ **TYPE 2 (REGULATORY) (3)**

☐ **TYPE 6 (DEFECT)** OCN _____(3A)

Company
Name___BellSouth_____(4)

CCM___Brenda Files_____(5) Phone____205-321-2105_____(6)

CCM Email Address Change.Control@bridge.bellsouth.com_(7) Fax__205-321-5160_____(8)

Alternate CCM_ _____(9) Alt Phone # _____(10)

Originator's Name _____(11) Phone_____(12)

Title of Change CSR with 888 USOC (13)

Category ☐ Add New Functionality ☒ Change Existing (14) Desired Due Date 11/30/00_(15)

Originating CCM assessment of impact ☐ Major ☒ Minor ☐ None expected (16)

Originating CCM assessment of priority ☐ Urgent ☒ High ☐ Medium ☐ Low (17)

Interfaces Impacted (18)			
☐ Pre-Ordering ☐ LENS ☐ TAG ☐ CSOTS	☐ Ordering ☐ EDI ☒ LNP ☐ LENS ☐ TAG	☐ Maintenance ☐ TAFI ☐ EC-TA Local	☐ Manual

Type Of Change - Check one or more, as applicable (19)			
☐ Software	☐ Hardware	☐ Industry Standards	☐ Defect
☐ Product & Services	☐ New or Revised Edits	☐ Process	
☐ Documentation	☐ Regulatory	☒ Other	

Description of requested change including purpose and benefit received from this change. (Use additional sheets, if necessary.) (20) _

Change to the LNP Gateway to ignore telephone number(s) associated with 888 USOC. The CLEC will no longer be clarified back due to the 888 USOC. This change requires no coding changes for the CLEC community.
Known dependencies (21)

Additional Information ☐ Yes ☐ No (22)
List all business specifications and/or requirements documents included (or Internet / Standards location, if applicable) _____

BELLSOUTH

Change Request Form

This Section to be completed by BCCM only.

Change Request Log #___CR0217_____(23) Clarification ☐ Yes ☒ No (24)

Clarification Request Sent ___/___/___ (25) Clarification Response Due ___/___/___ (26)

Status __N__(27)

Change Request Review Date __/__/__(28) Target Implementation Date 11/00 (29)

Last Modified By _____ (30) Date Modified ___/___/___ (31)

Change Review Meeting Results (32)

_____

_____

_____

Canceled Change Request ☐ Duplicate ☐ Training ☐ Clarification Not Received (33)

_____

_____

_____

Cancellation Acknowledgment CLEC _____ BST _____ Date ___/___/___ (34)

Request Appeal ☐ Yes ☐ No (35)

Appeal Considerations (36)

_____

_____

_____

Agreed Release Date ___/___/___ (37)

CMVC #_____(38)
DDTS#_____(39)

BELLSOUTH

Change Request Form

This section to be completed by BellSouth – Internal Validation of Defect Change Request

Defect Validation Results: (40)

Clarification Needed ☐ Yes ☒ No

☐ Defect ☐ Feature ☐ Duplicate ☐ Training Issue ☐ Cancel

Defect/Feature Impacts Other CLECs? ☐ Yes ☐ No

Interfaces Impacted by defect/feature: ☐ EDI ☐ TAG ☐ LNP ☐ LENS
☐ TCIF 7 ☐ TCIF 9

Target Implementation Date: _____

BELLSOUTH

Change Request Form

Internal Reference # _____(1) Date Change Request Submitted _1113/00__(2)

☐ **TYPE 5 (CLEC)** ☒ **TYPE 4 (BST)** ☐ **TYPE 3 (INDUSTRY)** ☐ **TYPE 2 (REGULATORY) (3)**

☐ **TYPE 6 (DEFECT)** OCN _____(3A)

Company Name___BellSouth_____(4)

CCM___Brenda Files_____(5) Phone____205-321-2105_____(6)

CCM Email Address Change.Control@bridge.bellsouth.com_(7) Fax__205-321-5160_____(8)

Alternate CCM_ _____(9) Alt Phone # _____(10)

Originator's Name _____(11) Phone_____(12)

Title of Change EDI Map Change for Error text (13)

Category ☐ Add New Functionality ☒ Change Existing (14) Desired Due Date 11/30/00_(15)

Originating CCM assessment of impact ☒ Major ☐ Minor ☐ None expected (16)

Originating CCM assessment of priority ☐ Urgent ☒ High ☐ Medium ☐ Low (17)

Interfaces Impacted (18)			
☐ Pre-Ordering ☐ LENS ☐ TAG ☐ CSOTS	☐ Ordering ☐ EDI ☒ LNP ☐ LENS ☐ TAG	☐ Maintenance ☐ TAFI ☐ EC-TA Local	☐ Manual

Type Of Change - Check one or more, as applicable (19)			
☐ Software	☐ Hardware	☐ Industry Standards	☐ Defect
☐ Product & Services	☐ New or Revised Edits	☐ Process	
☐ Documentation	☐ Regulatory	☒ Other	

Description of requested change including purpose and benefit received from this change. (Use additional sheets, if necessary.) (20) _

LNP is changing to allow 264 characters to be returned on the FOC for error messages that are returned to the CLEC. The CLEC will not see any change in this particular LNP feature until the ENCORE systems are able to work their feature to actually change the EDI map to accommodate the 264 characters.

Known dependencies (21)

_____

_____

Additional Information ☐ Yes ☐ No (22)
List all business specifications and/or requirements documents included (or Internet / Standards location, if applicable) _____

BELLSOUTH

Change Request Form

This Section to be completed by BCCM only.

Change Request Log #___CR0218_____(23) Clarification ☐ Yes ☒ No (24)

Clarification Request Sent ___/___/___ (25) Clarification Response Due ___/___/___ (26)

Status __N__(27)

Change Request Review Date __/__/__(28) Target Implementation Date 11/00 (29)

Last Modified By _____ (30) Date Modified ___/___/___ (31)

Change Review Meeting Results (32)

_____

_____

_____

Canceled Change Request ☐ Duplicate ☐ Training ☐ Clarification Not Received (33)

_____

_____

_____

Cancellation Acknowledgment CLEC _____ BST _____ Date ___/___/___ (34)

Request Appeal ☐ Yes ☐ No (35)

Appeal Considerations (36)

_____

_____

_____

Agreed Release Date ___/___/___ (37)

CMVC #_____(38)
DDTS#_____(39)

BELLSOUTH

Change Request Form

This section to be completed by BellSouth – Internal Validation of Defect Change Request

Defect Validation Results: (40)

Clarification Needed ☐ Yes ☒ No

☐ Defect ☐ Feature ☐ Duplicate ☐ Training Issue ☐ Cancel

Defect/Feature Impacts Other CLECs? ☐ Yes ☐ No

Interfaces Impacted by defect/feature: ☐ EDI ☐ TAG ☐ LNP ☐ LENS
☐ TCIF 7 ☐ TCIF 9

Target Implementation Date: ____

BELLSOUTH

Change Request Form

Internal Reference # _____(1) Date Change Request Submitted _11/13/00__(2)

☐ **TYPE 5 (CLEC)** ☒ **TYPE 4 (BST)** ☐ **TYPE 3 (INDUSTRY)** ☐ **TYPE 2 (REGULATORY) (3)**

☐ **TYPE 6 (DEFECT)** OCN _____(3A)

Company Name___BellSouth_____(4)

CCM___Brenda Files_____(5) Phone____205-321-2105_____(6)

CCM Email Address Change.Control@bridge.bellsouth.com_(7) Fax__205-321-5160_____(8)

Alternate CCM_ _____(9) Alt Phone # _____(10)

Originator's Name _____(11) Phone_____(12)

Title of Change Standard Interval Changes for Loop (13)

Category ☐ Add New Functionality ☒ Change Existing (14) Desired Due Date 11/30/00_(15)

Originating CCM assessment of impact ☒ Major ☐ Minor ☐ None expected (16)

Originating CCM assessment of priority ☐ Urgent ☒ High ☐ Medium ☐ Low (17)

Interfaces Impacted (18)			
☐ Pre-Ordering ☐ LENS ☐ TAG ☐ CSOTS	☐ Ordering ☐ EDI ☒ LNP ☐ LENS ☐ TAG	☐ Maintenance ☐ TAFI ☐ EC-TA Local	☐ Manual

Type Of Change - Check one or more, as applicable (19)			
☐ Software	☐ Hardware	☐ Industry Standards	☐ Defect
☐ Product & Services	☐ New or Revised Edits	☐ Process	
☐ Documentation	☐ Regulatory	☒ Other	

Description of requested change including purpose and benefit received from this change. (Use additional sheets, if necessary.) (20) _

Changing internal tables to assign the correct standard interval for Loops as published in the Interval Guide. Currently the system is adding the 2 day FOC interval into the interval that is applied to the service order..

Known dependencies (21)

Additional Information ☐ Yes ☐ No (22)
List all business specifications and/or requirements documents included (or Internet / Standards location, if applicable) _____

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Change Request Form

This Section to be completed by BCCM only.

Change Request Log #___CR0219_____(23) Clarification ☐ Yes ☒ No (24)

Clarification Request Sent ___/___/___ (25) Clarification Response Due ___/___/___ (26)

Status __N__(27)

Change Request Review Date __/__/__(28) Target Implementation Date 11/00 (29)

Last Modified By _____ (30) Date Modified ___/___/___ (31)

Change Review Meeting Results (32)

Canceled Change Request ☐ Duplicate ☐ Training ☐ Clarification Not Received (33)

Cancellation Acknowledgment CLEC _____ BST _____ Date ___/___/___ (34)

Request Appeal ☐ Yes ☐ No (35)

Appeal Considerations (36)

Agreed Release Date ___/___/___ (37)

CMVC #_____(38)
DDTS#_____(39)

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Change Request Form

This section to be completed by BellSouth – Internal Validation of Defect Change Request

Defect Validation Results: (40)

Clarification Needed ☐ Yes ☒ No

☐ Defect ☐ Feature ☐ Duplicate ☐ Training Issue ☐ Cancel

Defect/Feature Impacts Other CLECs? ☐ Yes ☐ No

Interfaces Impacted by defect/feature: ☐ EDI ☐ TAG ☐ LNP ☐ LENS
☐ TCIF 7 ☐ TCIF 9

Target Implementation Date: ____

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CHANGE CONTROL PROCESS

CCP2_16.DOC

VERSION 2.1A

FEBRUARY 16, 2001

Issued: 2/16/01

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

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VERSION CHANGE HISTORY

This section list changes made to the baseline Electronic Interface Change Control Process document since the last issue. New versions of this document may be obtained via BellSouth's Web site.

Version	Issue Date	Section Revised	Reason for Revision
1.0	04/14/98		Initial issue.
1.2	2/28/00	All	The EICCP Documentation has been modified to incorporate: - Multiple Change Request Types (CLEC Initiated, BST Initiated, Industry Standards, Regulatory and System Outages) - Incorporated manual process - Defined cycle times for process intervals and notifications - Defect Notification process - Escalation Process - Modified Change Control forms to support process changes - Changed EICCP to CCP
1.3	3/14/00	All	The CCP Documentation has been modified to incorporate: - Type 6 Change Request, CLEC Impacting Defect - Increased number of participants at Change Review meetings - Changed cycle time for Types 2-5 Step 3 from 20 days to 15 days - Defined Step 4 of the Defect Notification process to include communicating the workaround to the CLEC community - Web Site address for Change Control Process - Notification regarding the Retirement and

			Introduction of new interfaces - New status codes for Defect Change Requests - New status codes: 'S' for Scheduled Change Requests and 'I' for Implemented Change Requests (types 2-5 Change Requests) - Removed reference to EDI Helpdesk. Electronic Communications Support (ECS) will be the first point of contact for Type 1 System Outages. - Word changes to provide clarification throughout the document.
1.4	4/12/00	All	The CCP Documentation has been modified to incorporate: - Type 1 and 6 Notifications will be communicated to CLECs via e-mail and web posting - Step 3 Cycle Time (Types 2-5) changed from 15 business days to 20 business days - Verbiage to Step 10 (Types 2-5) regarding BellSouth presenting baseline requirements - Introduction and Retirement of New Interfaces Section - Dispute Resolution Process - Testing Environment Section - Word changes to provide clarification throughout the document - Monthly Status Meeting Agenda Template - RF1870 Change Request Form changes
1.5	4/26/00	Section 1 Section 8 Section 11	- Updated CCP web site address - Updated Escalation Contacts for Types 2-6 - Added definitions for Account Team and Electronic Communications Support (ECS)
1.6	7/20/00	Section 1 Section 2	- Added "testing" under process changes - Clarification provided in "Change Review Participants" description

			Participants" description.
		Section 4	- Added statement regarding submittal of Change Requests
		Part 2	- Clarification provided for documentation changes for business rules
			- Step 2-Added email notification
			- Step 3-Removed "Cancellation by BellSouth"
			- Step 3-Clarification on reject reasons
		Section 5	- Step 3-Clarification on internal validation activities
			- Step 4-Changed cycle time from 5 to 4 bus days for develop workaround
			- Added defect implementation range
		Section 6	- Changed prioritization from "by interface" to "by category"
			- Changed timeframe for receiving a Change Request prior to a Change Review Meeting from 33 to 30 business days
			- Modified the prioritization voting rules
		Section 7	- Updates to the Introduction and Retirement of Interfaces
		Section 8	- Added Type 6 escalation turnaround time
			- Changed 3rd Level Escalation contacts for Types 2-6
		Section 11	- Removed "Cancellation by BellSouth" and "Defect Cancelled" definitions
		Appendix A	- Removed "Cancellation by BellSouth" from Change Request Form and Checklist
			- Added Letter of Intent Form
		Appendix C	- Changes to the following forms: Preliminary Priority List, CCP User Registration Form. Added the following forms: Defect Notification Sample, CR Log Legend.
		Appendix D	- Added BellSouth Versioning Policy

		All	Word changes to provide clarification throughout the document.
2.0	08/23/00	Cover	- Removed "Interim" from cover.
		Section 3	- Updated Type 6 definition to incorporate new defect and expedited feature definitions.
		Section 5	- Replaced Section 5, Defect Notification Process with a "Draft" Defect/Expedite Notification Process. - Reduced the implementation interval for validated defects (High Impact) from 4 - 30 business days to 4 - 25 business days, best effort.
		Section 10	- Added Internet Web sites for EDI and TAG Testing Guidelines
		Section 11-Terms & Definitions	- Updated definition for Defect. Added definitions for Expedited Feature, High, Medium and Low Impacts.
		Appendix A	- Modified Change Request Forms (RF1870 and RF1872) to include email address for Change Control. Also added High, Medium and Low Assessment of Impact Levels.
		All	- Referenced the handling of expedites and expedite notification where appropriate.
2.1	02/09/01	Section 1 – Introduction	- Added new language to the 8th bulleted item – "including User Guides that support OSS sytems currently within the scope of CCP" - Added two new bulleted items dealing with the coordination of test agreements, and questions regarding existing documentation.
		Section 3 – Introduction	- Added "language" for Types 2, 3, 4 & 5 – "Type xx changes may be managed using the Expedited Feature Process as discussed in Section 4, Part 3." - Type 6 – CLEC Impacting Defects – Added new defect definition.
		Section 4 – Part 1 Type 1 Detail Process Flow	- Added #4 to the Activities – Step 1

			- Added additional sentence to Activity #1 – Step 2
		Section 4 – Part 2 – Types 2-5 Process Flow	- Added Activity #5 – Step 4
		Section 4 – Part 3 – Expedited Feature Process	- Added new Expedited Feature Process definition and flow
		Section 5 – Part 3 – Defect Process	- New Defect title page and definition. - Table 5-1 – Step 1 – Activity - #4 – Attach related requirements and specifications documents. These attachments **must** include the following, **if appropriate.** - Table 5-1 – Step 2 – Cycle Time – Replaced old cycle times with: 4 hrs for High Impact, 1 Bus Day for Medium and Low Impact. - Table 5-1 – Step 3 – Cycle Time – Replaced old cycle times with: 2 Bus Day for High Impact, and 3 Bus Days for Medium and Low Impact - Table 5-1 – Step 3 – Outputs – Added new bullet – "Status provided for High Impact Defects to originator via email with 24 hours" - Table 5-1 – Step 4 – Activity – Added language to Activity #3 - …and to the CLEC community via email and web posting. - Table 5-1 – Step 4 – Cycle Time – Replaced old cycle times with: 2 Bus Days for High Impact and 4 Bus Days for Medium and Low Impact. - Table 5-1 – Step 5 – Activity – Added language to #1 - …to the CLECs and BellSouth. Added language to Activity #2 - …defect is implemented. - Table 5-1 – Step 5 – Cycle Time – Replaced old cycle times to reflect: Validated High Impact Defects will be implemented within a 4-25 business day range, best effort. Medium

			4-25 business day range, best effort. Medium Impact will he implemented within 90 bus day, best effort. Low Impact will be implemented best effort.
		Part 1 – Change Review-Prioritization – Release Package Development and Approval	- Part 1 – Change Review Meeting – 4th paragraph NOTE: Added language to address meetings would occur in March, June, September and December - Part 2 – Change Review Meeting – 4th bullet – Added new bullet - …BellSouth's estimate of the size and scope of each Change Request. - Part 4 – Developing and Approving Release Packages – 1st bulleted item: New language
		Section 7 – Introduction and Retirement of Interfaces	- Retirement of Interfaces – 1st paragraph sentence: New language - Retirement of Versions – New Language - Retirement of Versions – Appeal Language - New Language for Type 6 High Impact Issues and Medium and Low Impact issues. - Types 2-6 Changes – 1st paragraph – new language.
		Section 8 – Escalation Process	- Types 2-6 Changes – Contact List for High, Medium and Low Impact escalations.
		Section 8 – Dispute Resolution Process	- New definition language
		Appendix A	- Updated CR form & checklist
		Appendix C	- Updated RF1874 User Registration Form
2.1A	02/15/01	All	- Updated various sections of the document to change "language" from defect/expedite to defect and/or expedited features. - Changed reference from Section 9.0 to Section 11.0 – Terms and Definitions where

		Section 8	appropriate. - Minor "cosmetic" changes throughout document. - New 2nd Level Escalation Contacts for Types 2-6

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1.0 INTRODUCTION

This document establishes the process by which BellSouth Telecommunications (BST) and Competitive Local Exchange Carriers (CLECs) will manage requested changes to the BellSouth Local Interfaces, the introduction of new interfaces, and provide for the identification and resolution of issues related to Change Requests. This process will cover Change Requests that affect external users of BellSouth's Electronic Interface Applications, associated manual process improvements, performance or ability to provide service including defect/expedite notification. This process shall be referred to as the Change Control Process.

All parties should recognize that deviations from this process might be warranted where unanticipated circumstances arise such that strict application of these guidelines may not result in their intended purpose. Furthermore, deviations may be required due to specific regulatory and business requirements. Parties shall provide appropriate web notification to the CLEC/BST Change Control Team participants prior to deviating from the processes established within this document. All parties will comply with all legal and regulatory requirements.

The Change Control Process will cover change requests for the following interfaces and associated manual processes that have the potential to impact the interfaces connected to BellSouth:

- Local Exchange Navigation System (LENS)
- Electronic Data Interchange (EDI)
- Telecommunications Access Gateway (TAG)
- Trouble Administration Facilitation Interface (TAFI)
- Electronic Communications Trouble Administration (EC-TA) Local
- CLEC Service Order Tracking System (CSOTS)

The types of changes that will be handled by this process are as follows:

- Software
- Hardware
- Industry Standards
- Product and Services (i.e., new services available via the in-scope interfaces)
- New or Revised Edits
- Process (i.e., electronic interfaces and manual processes relative to order, pre-order, maintenance and testing)
- Regulatory
- Documentation (i.e., business rules for electronic and manual processes relative to order, pre-order, maintenance, including User Guides that support OSS systems currently within the scope of CCP)
- Defects

The scope of the Change Control Process **does not** include the following which are handled through existing BellSouth processes:

- BonaFide Requests (BFR)
- Production Support (i.e. adding new users to existing interfaces, existing users requesting first time use of existing BST functionality)
- Contractual Agreements
- Collocation
- Coordination of test agreements will continue to be supported by the Account Team
- Questions regarding existing documentation should be handled by the Account Team. However, if documentation needs to be changed for clarification purposes, a defect change request should be submitted through Change Control

OBJECTIVES OF THE CHANGE CONTROL PROCESS:

- Support the Industry guidelines that impact Electronic Interfaces and manual processes relative to order, pre-order, maintenance, and billing as appropriate
- Ensure continuity of business processes and systems operations
- Establish process for communicating and managing changes
- Allow for mutual impact assessment and resource planning to manage and schedule changes
- Capability to prioritize requested changes

The minimum requirements for participation in the Change Control Process electronically are:

- Word 6.0 or greater
- Excel 5.0 or greater
- Internet E-mail address
- Web access

The web site address for the Change Control Process is as follows:

http://www.interconnection.bellsouth.com/
Select "Local Exchange Carriers"
Select "Change Control Process"

2.0 CHANGE CONTROL ORGANIZATION

The Change Control organizational structure supports the Change Control Process. Each position within the organization has defined roles and responsibilities as outlined in the Change Control Process Flow - Section 4 of this document. Identified positions, along with associated roles and responsibilities are as follows:

Change Review Participants. Representatives from Competitive Local Exchange Carriers (CLECs) and BellSouth. This team meets to review, prioritize, and make recommendations for Candidate Change Requests. The Candidate Change Requests are used as input to the Internal Change Management Processes (refer to process step 7 for Types 2-5 changes).

CLECs and BellSouth will define points of contact in each of their companies for communicating and coordinating change notification. All change requests are made in writing (e-mail is preferred). Notifications will be provided via e-mail and posted to the BellSouth web site.

Each company may bring the number of participants necessary to represent their position. If the number of participants grows to be unmanageable, CLECs and BellSouth will revisit the issue of representation to apply some restrictions.

BellSouth Change Control Manager (BCCM). The BCCM is responsible for managing the Change Control Process and is the main point of contact for Types 2 – 6 changes. This individual maintains the integrity of the Change Requests, prepares for and facilitates the Change Review Meetings, presents the Pending Change Requests to the BST Internal Change Management Process, and ensures that all Notifications are communicated to the appropriate parties.

CLEC Change Control Manager (CCCM). The CCCM is the CLEC point of contact for Change Requests. This individual is responsible for presenting and prioritizing Change Requests at the Change Review Meetings.

Release Management Project Team. A team of CLEC and BellSouth Project Managers who manage the implementation of scheduled changes and releases.

3.0 CHANGE CONTROL DECISION PROCESS

Change requests will be classified by Type. There are six Types:

Type 1 – System Outage

A Type 1 change is a BellSouth System Outage. A System Outage is where the system is totally unusable or there is degradation in an existing feature or functionality within the interface. If the System Outage is not resolved within 20 minutes, a notification will be provided via e-mail and posted to the web within one hour. Either BellSouth or a CLEC may initiate the change request. Type 1 system outages will be processed on an expedited basis. All Type 1 System Outages will be reported to the Electronic Communications Support (ECS) Help Desk. A Type 1 System Outage is a condition where the CLEC Pre-Orders/Orders/Queries/Maintenance Requests cannot be submitted or will not be accepted by BellSouth.

Type 2 – Regulatory Change.

Any non-Type 1 change to the interfaces between the CLEC's and BellSouth's operational support systems mandated by regulatory or legal entities, such as the Federal Communications Commission (FCC), a state commission/authority, or state and federal courts are Type 2 changes. Regulatory changes are not voluntary but are requisite to comply with newly passed legislation, regulatory requirements, or court rulings. While timely compliance is required, the systems requirements and methodology to achieve compliance are usually discretionary and within the scope of change management. Either BellSouth or a CLEC may initiate the change request. Type 2 changes may be managed using the Expedited Feature Process, as discussed in Section 4, Part 3.

Type 3 – Industry Standard Change.

Any non-Type 1 change to the interfaces between the CLEC's and BellSouth's operational support systems required to bring these interfaces in line with newly agreed upon telecommunications industry guidelines are Type 3 changes. Either BellSouth or a CLEC may initiate the change request. Type 3 changes may be managed using the Expedited Feature Process, as discussed in Section 4, Part 3.

Type 4 – BellSouth Initiated Change.

Any non-Type 1 change affecting the interfaces between the CLEC's and BellSouth's operational support systems which BellSouth desires to implement on its own accord. These changes might involve system enhancements, manual and/or business processes. These type changes might also include issues for Pre-Orders, Orders, Queries, and Maintenance Requests that can be submitted and accepted, but may require clarification. This classification does not include changes imposed upon these interfaces by third parties such as regulatory bodies (which are Type 2 Changes) or

standards organizations (which are Type 3 Changes). Type 4 changes may be managed using the Expedited Feature Process, as discussed in Section 4, Part 3.

Type 5 – CLEC Initiated Change.

Any non-Type 1 change affecting interfaces between the CLEC's and BellSouth's operational support systems which the CLEC requests BellSouth to implement is a Type 5 change. These changes might involve system enhancements, manual and/or business processes. These type changes might also include issues for Pre-Orders, Orders, Queries, and Maintenance Requests that can be submitted and accepted, but may require clarification. This classification does not include changes imposed upon these interfaces by third parties such as regulatory bodies (which are Type 2 Changes) or standards organizations (which are Type 3 Changes). Type 5 changes may be managed using the Expedited Feature Process, as discussed in Section 4, Part 3.

Type 6- CLEC Impacting Defects

A Type 6 defect request is any non-type 1 change that corrects problems discovered in production versions of an application interface. These problems are where the interface is not working in accordance to the BellSouth baseline business requirements or the business rules that BellSouth has published or otherwise provided to the CLECs. In addition, if functional requirements agreed upon by BellSouth and the CLECs, results in inoperable functionality, even though software business requirements and business rules match; this will be addressed as a defect.

These problems typically affect the CLEC's ability to exchange transactions with BellSouth and may include documentation that is in error, has missing information or is unclear in nature.

Type 6 validated defects may not be managed using the Expedited Feature Process as discussed in Section 4, Part 3.

Defect Change Requests will have three (3) Impact Levels:

- High Impact – The failure causes impairment of critical system functions and no electronic workaround solution exists.
- Medium Impact – The failure causes impairment of critical system functions, though a workaround solution does exist.
- Low Impact – The failure causes inconvenience or annoyance.

The CLEC and/or BellSouth may initiate these types of changes affecting interfaces between the CLEC's and BellSouth's operational support systems. These type changes might also include issues for Pre-Orders, Orders, Queries, and Maintenance Requests that can be submitted and accepted, but may require workarounds or clarification.

Figure 3-1 shows the top-level process that will be used to evaluate Change Requests. The BellSouth Account Team(s) will handle BFR requests and production support issues. Enhancements and defects/expedites will be handled through the Change Control Process.

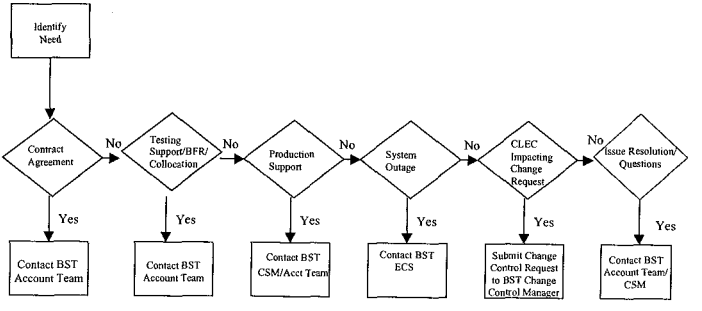


Figure 3-1. Change Control Decision Process

4.0 CHANGE CONTROL PROCESS FLOW

The following three sub-sections describe the process flows for typical Type 1 through Type 5 changes, including expedited features. Each sub-section will describe the cycle times for an activity and document accountability, sub-process activities, inputs and outputs for each step in the process. Section 5 of this document describes the process flow for Type 6 changes. Based on the categorization of the request, the following diagram will help guide a CLEC or BellSouth representative to the appropriate process flow based on Change Control Request Type:

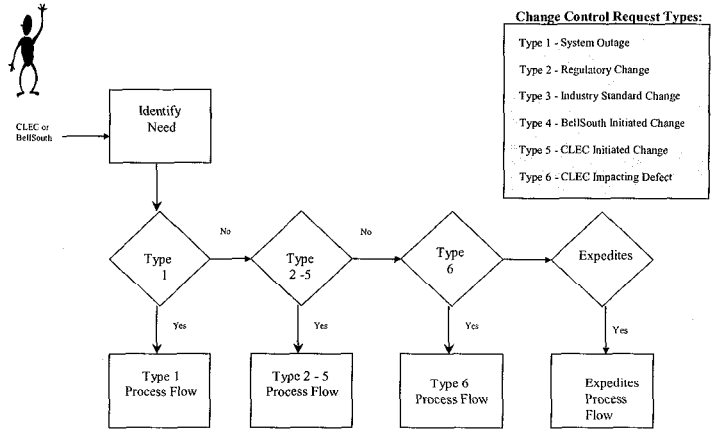


Figure 4-1. Change Control Process Flow

Part 1 - Type 1 Process Flow

Figure 4-2 provides the process flow for resolving a typical Type 1 - System Outage. The Electronic Communications Support (ECS) Group will work with the CLEC community to resolve and communicate information about system outages in a timely manner - actual cycle times are documented in table 4-1 and the sub-process steps. The ECS Helpdesk number is 888-462-8030.

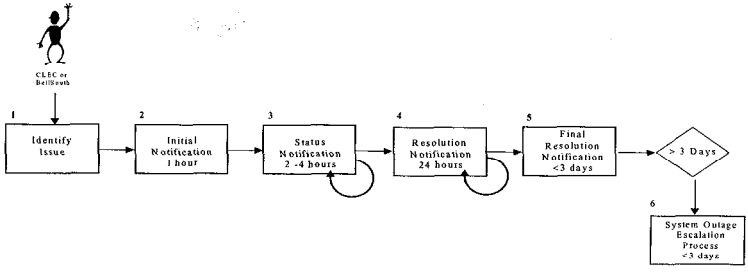


Figure: 4-2. Type 1 Process Flow

Table 4-1 describes the cycle times for each process step that is outlined in the Type 1 - System Outage Process Flow. These cycle times represent typical timeframes for completing the documented step and producing the desired output for the step. In sub-process step 2 "Initial Notification" timeframe for completing this step does not begin until after the outage has been reported. The sub-process steps 3 "Status Notification" and 4 "Resolution Notification" are iterative steps. Iterative steps will be performed one or more times until the exit criteria for that process are met. If resolution is not reached within 20 minutes, BellSouth will provide the initial notification to the CLEC community via e-mail and post outage information on the web.

Table 4-1. Type 1 Cycle Times

Process Description	1 Identify Issue	2 Initial Notification	3 Status Notification	4 Resolution Notification	5 Final Resolution Notification	6 Escalation
Cycle Time	N/A	1 hour E-mail & BST Website will be posted if outage exceeds 20 minutes	2 - 4 hours (Iterative)	24 hours (Iterative)	< 3 days	> 3 days System Outage Escalation Process

Note: The Escalation Process may be used at any time within Steps 3-6 if cycle times are not met and/or responses are not acceptable.

The table below details the steps, accountable individuals, tasks, the inputs/outputs and the cycle time of each sub-process in the Type 1 Process Flow. This process will be used to capture and communicate system outage information, status notification(s), resolution and notification(s), and final resolution to the CLEC community. Steps shown in the table are sequential unless otherwise indicated.

Table 4-2. Type 1 Detail Process Flow

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
1	CCCM ECS	**IDENTIFY ISSUE:** 1. Internally determine if outage exists with BellSouth Electronic Interface. (The CLEC should perform internal outage resolution activities to determine if the potential problem involves the BellSouth Electronic Interface). 2. Call the BST Electronic Communications Support (ECS) help desk at 888-462-8030. 3. ECS and individual CLEC will determine if the problem is likely to have no impact on the industry. If there is no impact, the outage will be worked on a bilateral basis. 4. ECS will provide the CLEC with a trouble ticket number, if requested, to record and track the outage.	**INPUTS:** • Issue Characteristics • Call to ECS Helpdesk **OUTPUTS:** • Recorded Outage	N/A
2	ECS	**INITIAL NOTIFICATION:** 1. ECS will post to the Web an Initial Industry Notification that a BellSouth Electronic Interface outage has been identified. An e-mail to the CLECs participating in Change Control will also be distributed. The system ticket number of the outage will be included in the web posting and the email notification. 2. The CLEC initiating the Type 1 System Outage will need to be available for communications on an as needed basis.	**INPUTS:** • Recorded Outage **OUTPUTS:** • Industry Notification posted on Web • E-mail to CLECs participating in Change Control	1 Hour If System Outage is not resolved within 20 minutes, a notification will be sent to CLECs via e-mail and posted to the

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		3. ECS will continue to work towards the resolution of the problem 4. If outage is resolved, this notice is the first and final notification. The process for the item has ended. Outage Information will be reported in the monthly status meeting by the BCCM.		web.
3	ECS	**STATUS NOTIFICATION:** **(ITERATIVE)** 1. If the outage is not resolved, ECS will continue to work towards the resolution on the problem. 2. ECS may communicate with the industry / affected parties. The following information may be discussed: • Clarification of outage • Current status of resolution • Agreement of resolution 3. If a resolution has not been identified continue giving status notifications to the industry and continue repeating Step 3 "Status Notification" via the web. 4. Proceed to Step 4 "Resolution Notification" when a resolution has been identified.	**INPUTS:** • Industry Notification posted on Web **OUTPUTS:** • Status Notification posted on Web • Resolution information	2-4 hour intervals
4	ECS CCCM	**RESOLUTION NOTIFICATION:** **(ITERATIVE)** 1. The resolution notification is posted to the Web. 2. If the item is determined to be a defect, the CLEC that initiated the call will submit a "Change Request Form" checking the Type 6 box. 3. If the resolution is not the final resolution the process will loop back to Step 3 "Status Notification". BellSouth will continue to work towards the final resolution. 4. When the final resolution has been created, proceed to Step 5 "Final Resolution Notification".	**INPUTS:** • Status Notification posted on Web • Resolution information **OUTPUTS:** • Resolution Information posted on Web • Final Resolution Information	24 hours after reporting outage

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
5	ECS	**FINAL RESOLUTION NOTIFICATION:** 1. The final resolution notification is posted on the Web.	**INPUTS:** • Final Resolution Information **OUTPUTS:** • Final Resolution Notification	< 3 days
6	CCCM ECS	**ESCALATION** 1. Escalation is appropriate anytime the interval exceeds the recommended guidelines for notification. 2. Refer to the Type 1 - Escalation Process documented in Section 8.	**INPUTS:** • Information or concern relating to a Type 1 - Systems Outage **OUTPUTS:** • Documented Escalation • Escalation Response	➢ 3 days (The Escalation Process may be used at any time within Steps 3-6 if cycle times are not met and/or responses are not acceptable.)

Part 2 – Types 2-5 Process Flow

Figure 4-3 provides the process flow for reviewing, scheduling and implementing a typical Type 2-5 Change Request. The process diagram applies to Change Requests submitted via the Change Control Process. Change Requests should be submitted to the BellSouth Change Control Manager using the standard Change Request form template. This template can be acquired on the Change Control web page. Change Requests may be submitted for interfaces that are currently being utilized, in the testing phase, or if a Letter of Intent is on file with the BCCM.

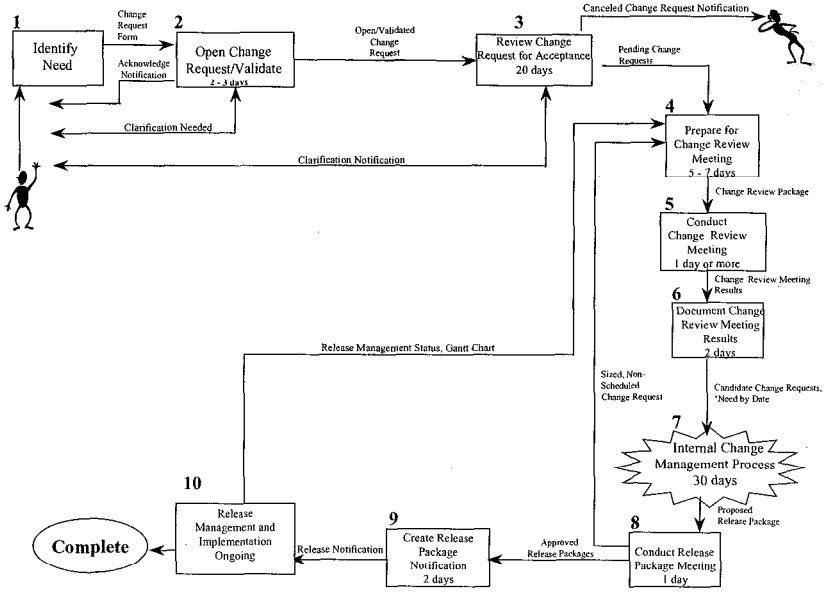


Figure 4-3. Change Control Process Flow

Based on the process flow outlined above:

- Software Release Notifications will be provided 30 days or more in advance of the implementation date.
- Documentation changes for business rules will be provided 30 days or more in advance of implementation date.
- CLEC notification of documentation updates (non-system changes) will be posted 5 (five) business days in advance of documentation posting date.

The table below details the steps, accountable individuals, tasks, inputs/outputs and cycle times of each sub-process in the Change Control process. This process will be used to develop Candidate Change Requests that will be used as input to the Internal Change Management Process. Steps shown in the table are sequential unless otherwise indicated.

Table 4-3. Types 2-5 Detail Process Flow

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
1	CCCM BCCM	**IDENTIFY NEED** 1. Internally determine need for change request. These change requests might involve system enhancements, manual and/or business process changes. 2. Originator and CCCM or BCCM should complete the standardized Change Request Form according to Checklist. 3. Attach related requirements and specification documents. (See Attachment A-1A, Item 22) 4. Appropriate CCCM/BCCM submits Change Request Form and related information via e-mail to BellSouth.	**INPUTS:** • Change Request Form (Attachment A-1) • Change Request Form Checklist (Attachment A-1A) **OUTPUTS:** • Completed Change Request Form with related documentation	N/A
2	BCCM	**OPEN CHANGE REQUEST/VALIDATE CHANGE REQUEST FOR COMPLETENESS** 1. Log Request in Change Request Log. 2. Send Acknowledgement Notification (Attachment A-3) via e-mail to originator. 3. Establish request status ('N' for New Request)	**INPUTS:** • Completed Change Request Form with related documentation • Change Request Form Checklist • Change Request Clarification Response	2-3 Bus Days Clarification times would be in addition to cycle time.

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		4. Review change request for mandatory fields using the Change Request Form Checklist. 5. Verify Change Request specifications and related information exists. 6. Send Clarification Notification via email to the originator (Attachment A-4) if needed. 7. Update Change Request Status to "PC" for Pending Clarification if clarification is needed. **CLEC or BellSouth Originator** If clarification is needed, make necessary corrections per Clarification Notification and submit Change Request Clarification Response (Attachment A-2).	**OUTPUTS:** • New Change Request • Acknowledgment Notification • Validated Change Request • Clarification Notification • Industry Notification via e-mail and web posting	
3	BCCM	**REVIEW CHANGE REQUEST FOR ACCEPTANCE** 1. Review Change Request and related information for content. 2. Change Request reviewed for impacted areas (i.e., system, manual process, documentation) and adverse impacts. 3. Determine status of request: • If change already exists or training issue forward Cancellation Notification (Attachment A-3) to CCCM or BCCM and update status to 'C' for Request Canceled or 'CT' for Training. If Training issue, refer to CSM or Account Team. • If Change Request Clarification Notification not received, validate with CLEC that change request is no longer needed. • If request is accepted, update Change Request status to "P" for Pending in Change Request Log. **NOTE**: See Section 11.0 Terms and Definitions – Change Request Status for valid status codes and descriptions. BST may reject the change request based on	**INPUTS:** • New Change Request • Validated Change Request • Clarification Notification (if required) **OUTPUTS:** • Pending Change Request • Clarification Notification (if required) • Cancellation Notification (if required) • CR status updated on web	20 Bus Days

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		the following reasons: cost, industry direction or technically not feasible to implement and will provide notification to the originating party. Prior to rejecting a request, all options for accommodating the request will be exhausted. The rejection reason will be shared with the CLECs for input. **NOTE:** If requested, appropriate SME will participate in the Monthly Status Meeting to address the reason for rejection and discuss alternatives with CLEC community. SME must be provided a minimum of two-week advance notice to participate in upcoming Monthly Status Meeting.		
4	BCCM CCCM	**PREPARE FOR CHANGE REVIEW MEETING** NOTE: These activities take place to prepare for Change review meetings when prioritizations take place. **BCCM** 1. Prepare an agenda. 2. Make meeting preparations. 3. Update Change Request Log with current status for new and existing Change Requests. 4. Prepare and post Change Request Log to web. 5. Provide size and scope information on each pending change request to CLECs. **CCCM** 1. Analyze Pending Change Requests. 2. Determine priorities for change requests and establish "Desired/Want" dates. 3. Create draft Priority List to prepare for Change Review meeting.	**INPUTS:** • Pending Change Request Notifications • Project Release Status (Step 10) • Change Request Log **OUTPUTS:** • Change Request Log • CLEC Draft Priority List • Size and scope on each Pending change request	5-7 Bus Days
5	BCCM	**CONDUCT CHANGE REVIEW MEETING**	**INPUTS:** • Change Request Log	1 Bus Day

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
	CCCM	**Monthly Status Meetings** 1. Communicate regulatory mandates. 2. Review status of pending/approved Change Requests (including defects/expedites) at monthly status meeting. 3. Review current Release Management statuses. **Prioritization Meetings (held quarterly in March, June, September and December)** 1. Follow Steps 1-3 from Monthly Status Meetings. 2. Initiators present Change Requests. 3. Discuss Impacts. 4. Prioritize Change Requests. 5. Develop final Candidate Requests list of Pending Change Requests by category, 'Need by Dates' and prioritized Change Requests. 6. Update Change Request Log to 'CRC' for Change Review Complete, 'RC' for Candidate Request List, as appropriate. 7. Review issues and action items and assign owners.	• CLEC Draft Priority List • Desired/Want Dates • Impact analysis **OUTPUTS:** • Meeting minutes • Updated Change Request Log • Candidate Change Request List • Issues and Actions Items (if required)	(or as needed based on volume) Meeting Day
6	BCCM	**DOCUMENT CHANGE REVIEW MEETING RESULTS** 1. Prepare and distribute outputs from Step 5.	**INPUTS:** • Change Request Log • Final Candidate Request List **OUTPUTS:** • Updated Change Request Log • Web posting of meeting output	2 Bus Days
7	BCCM CCCM	**INTERNAL CHANGE MANAGEMENT PROCESS** 1. Both BellSouth and CLECs will perform analysis, impact, sizing and estimating activities only to the Candidate Change Requests that meet	**INPUTS:** • Candidate Change Request List with agreed upon 'Need by Dates' • Change Request Log	30 Bus Days

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		the criteria established by the Internal Change Management Process. This ensures that participating parties are reviewing capacity and impacts to schedules before assigning resources to activities.	**OUTPUTS:** • BellSouth's Proposed Release Package	
8	BCCM CCCM	**CONDUCT RELEASE PACKAGE MEETING** 1. Prepare agenda. 2. Make meeting preparations. 3. Evaluate proposed release schedule. 4. Non-scheduled Change Requests returned to Step 4 as Input for the "Prepare for Change Review Meeting" process. 5. Based on BST/CLEC consensus create Approved Release Package. 6. Identify Release Management Project Manager, if possible. 7. Establish date for initial Release Management Project Meeting. 8. All Change Requests that are in the approved scheduled release will be changed to "S" status for "Scheduled".	**INPUTS:** • BellSouth's Proposed Release Package • BellSouth's Release Schedule • Change Request Log **OUTPUTS:** • Approved Release Package • Updated Change Request Log • Meeting Minutes • Scheduled Change Requests • Non-Scheduled Change Requests (Return to Step 4) • Date for initial Release Management Project Meeting	1 Bus Day
9	BCCM	**CREATE RELEASE PACKAGE NOTIFICATION** 1. Develop and distribute Release Notification Package via web.	**INPUTS:** • Approved Release Package **OUTPUTS:** • Release Package Notification	2 Bus Days after Release Package Mtg.
10	BCCM (Project Managers from each participating company)	**RELEASE MANAGEMENT AND IMPLEMENTATION** 1. Provide Project Management and Implementation of Release (See Release Management @ Appendix B). 2. Lead Project Manager communicates Release Management Project status to BCCM for inclusion in Monthly Status Meetings. 3. BellSouth User Requirements will be presented to CLECs. If needed, changes will be incorporated and requirements re-baselined. 4. Once a Change Request is implemented in a release, the status	**INPUTS:** • Approved Release Package Notification **OUTPUTS:** • Project Release Status • Implementation Date • Project Plan, Work Breakdown Schedule, Risk Assessment, Executive Summary, etc • Implemented Change Request	Ongoing

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		will be changed to "I" for Change Implemented.		

Part 3 – Expedited Feature Process

An Expedited Feature is the inability for a CLEC to process certain types of LSR's based on the existing functionality to BellSouth's Operational Support Systems (OSS's) that are in the scope of CCP. The change request for an expedite must provide details of the business impact and will fall into one of two categories:

- A defect that has been re-classified as a feature where the CLEC/BellSouth has determined should be expedited due to impact
- An enhancement to an existing product or service where the CLEC/BellSouth has determined should be expedited due to impact

Re-classified Defects

When a defect is re-classifed as a feature, the CLEC/BellSouth will be notified by Change Control in the defect validation. The CLEC will have the ability to ask BellSouth to expedite the reclassified feature by updating the Change request, marking it as an expedite and sending back to Change Control. The change request will then follow through the Types 2-5 Expedited Feature process using agreed upon intervals.

Enhancement to an existing product or service

A CLEC/BellSouth will also have the ability to submit a Type 2-5 change request as an expedited feature request for an enhancement to an existing product or service where the functionality does not currently exist in BellSouth's offered products and services.

For both re-classified defects and enhancements to an existing product or service, the rules surrounding the expedited feature request will be:

- Must be an enhancement to an existing product or service
- Will follow the Expedited Feature Process flow described below which is based on the current Types 2-5 process flow using agreed upon intervals with the exception of Steps 4-6 which are eliminated.
- The CLEC/BellSouth will be required to give impacts and the consequences for not implementing the feature in the current, next, or point release, best effort.

Figure 4.4 provides the process flow for the expedited feature process.

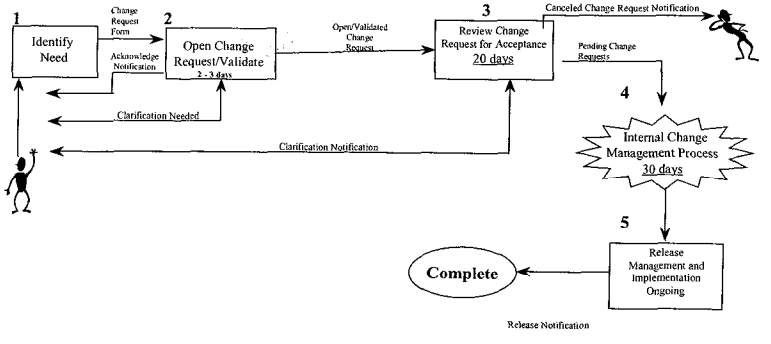


Figure 4.4 – Process Flow for Types 2-5 Expedited Feature Process

The table below details the steps, accountable individuals, tasks, inputs/outputs and cycle times of each sub-process in the Expedited Feature process. Steps shown in the table are sequential unless otherwise indicated.

Table 4-3. Types 2-5 Expedited Feature Detail Process Flow

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
1	CCCM BCCM	**IDENTIFY NEED** 1. Internally determine need for change request. These change requests might involve system enhancements, manual and/or business process changes. 2. Originator and CCCM or BCCM should complete the standardized Change Request Form according to Checklist. 3. Attach related requirements and Attachment A-1A, Item 22. 4. Appropriate CCCM/BCCM submits Change Request Form and related information via e-mail to BellSouth.	**INPUTS:** • Change Request Form (Attachment A-1) • Change Request Form Checklist (Attachment A-1A) **OUTPUTS:** • Completed Change Request Form with related documentation	N/A
2	BCCM	**OPEN CHANGE REQUEST/VALIDATE CHANGE REQUEST FOR COMPLETENESS** 1. Log Request in Change Request Log. 2. Send Acknowledgement Notification (Attachment A-3) via e-mail to originator. 3. Establish request status ('N' for New Request) 4. Review change request for mandatory fields using the Change Request Form Checklist. 5. Verify Change Request specifications and related information exists. 6. Send Clarification Notification via email to the originator (Attachment A-4) if needed. 7. Update Change Request Status to "PC" for Pending Clarification if clarification is needed. **CLEC or BellSouth Originator** If clarification is needed, make necessary corrections per Clarification Notification and submit Change Request Clarification Response (Attachment A-2).	**INPUTS:** • Completed Change Request Form with related documentation • Change Request Form Checklist • Change Request Clarification Response **OUTPUTS:** • New Change Request • Acknowledgment Notification • Validated Change Request • Clarification Notification • Industry Notification via e-mail and web posting	1 Bus Day Clarification times would be in addition to cycle time.

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
3	BCCM	**REVIEW CHANGE REQUEST FOR ACCEPTANCE** 1. Review Change Request and related information for content. 2. Change Request reviewed for impacted area (i.e., system, manual process, documentation) and adverse impacts. 3. Determine status of request: • If change already exists or CLEC training issue, forward Cancellation Notification (Attachment A-3) to CCCM or BCCM and update status to 'C" for Request Canceled or 'CT' for Training. If Training issue, refer to CSM or Account Team. • If Change Request Clarification Notification not received, validate with CLEC that change request is no longer needed. • If request is accepted, update Change Request status to "P" for Pending in Change Request Log. • If request does not meet the expedited feature criteria, it will exit this process and enter the standard Types 2-5 flow, Step 4. **NOTE**: See Section 11.0 Terms and Definitions – Change Request Status for valid status codes and descriptions. If BellSouth determines that a CLEC initiated expedited change request should not be accepted because of cost, industry direction or because it is considered not technically feasible to implement, BellSouth will open an agenda item on the next monthly status meeting/call, and will provide a SME on that call to present its case. BellSouth shall consider all possible options for accommodating the request. **NOTE**: If requested, appropriate SME will participate in the Monthly Status Meeting to address the reason for rejection and discuss alternatives with CLEC community. SME	**INPUTS:** • New Change Request • Validated Change Request • Clarification Notification (if required) **OUTPUTS:** • Validated Expedited Change Request • Clarification Notification (if required) • Cancellation Notification (if required) • CR status updated on web	20 Bus Days

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		must be provided a minimum of two-week advance notice to participate in upcoming Monthly Status Meeting.		
4	**BCCM** **CCCM**	**INTERNAL CHANGE MANAGEMENT PROCESS** 1. Both BellSouth and CLECs will perform analysis, impact, sizing and estimating activities to the Expedited Feature Change Request. This ensures that participating parties are reviewing capacity and impacts to schedules before assigning resources to activities.	**INPUTS:** • Change Request Log **OUTPUTS:** • Release Date for Expedited Feature	30 days
5	**BCCM** **(Project Managers from each participating company)**	**RELEASE MANAGEMENT AND IMPLEMENTATION** 1. Provide Project Management and Implementation of Release (See Release Management @ Appendix B). 2. Lead Project Manager communicates Release Management Project status to BCCM for inclusion in Monthly Status Meetings. 3. BellSouth User Requirements for software changes will be presented to CLECs, if applicable. If needed, changes will be incorporated and requirements re-baselined. 4. BellSouth Documentation changes, including business rules changes will be provided. 5. Once a Change Request is implemented in a release, the status will be changed to "I" for Change Implemented.	**INPUTS:** • Approved Release Package Notification **OUTPUTS:** • Project Release Status • Implementation Date • Documentation Changes	Ongoing

5.0 DEFECT PROCESS

A CLEC/BST identified defect will enter this process through the Change Management Team as a Type 6 Change Request. If the defect is validated internally, it will route through this process, and notification provided to the CLEC community via e-mail and web posting.

A Type 6 defect request is any non-type 1 change that corrects problems discovered in production versions of an application interface. These problems are where the interface is not working in accordance to the BellSouth baseline business requirements or the business rules that BellSouth has published or otherwise provided to the CLECs.

In addition, if functional requirements agreed upon by BellSouth and the CLECs, results in inoperable functionality, even though software business requirements and business rules match; this will be addressed as a defect.

These problems typically affect the CLEC's ability to exchange transactions with BellSouth and may include documentation that is in error, has missing information or is unclear in nature. Type 6 validated defects may not be managed using the Expedited Feature Process discussed in Section 4, Part 3.

Defect Change Requests will have three (3) Impact Levels:

- **High Impact**

  The failure causes impairment of critical system functions and no electronic workaround solution exists.

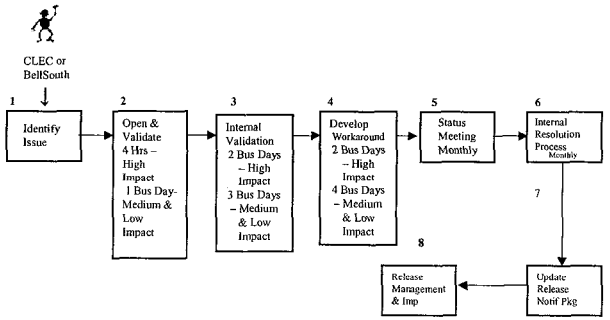
- **Medium Impact**

  The failure causes impairment of critical system functions, though a workaround solution does exist.

- **Low Impact**

  The failure causes inconvenience or annoyance.

Figure 5-1 provides the process flow for the validation and resolution of a Type 6 Change – CLEC Impacting Defect.



NOTE: The intervals in the boxes above match the intervals in the tables below for High, Medium, and Low Impact defect change requests.

Figure 5-1. Type 6 Process Flow

The table below details the steps, accountable individuals, tasks, inputs/outputs and cycle times of each sub-process in the Type 6 Process Flow. This process will be used to validate defects, provide status notification(s), workarounds and final resolution to the CLEC community. Steps shown in the table are sequential unless otherwise indicated.

Table 5-1. Type 6 Detail Process Flow

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
1	CCCM BCCM	**IDENTIFY NEED** 1. Identify Defect. 2. Originator and CCCM or BCCM should complete the standardized Change Request Form indicating that it is a Type 6. 3. Include description of business need and details of business impact. 4. Attach related requirements and specification documents. These attachments must include the following, if appropriate: • PON • OCN • Specific Scenario • Interface(s) affected • Error message (if applicable) • Release or API version (if applicable) 5. Appropriate CCCM/BCCM submits Change Request Form and related information via e-mail to BellSouth Change Management Team.	**INPUTS:** • Type 6 Change Request **OUTPUTS:** • Completed Change Request Form (with related documentation if necessary)	N/A
2	BCCM	**OPEN & VALIDATE DEFECT FORM FOR COMPLETENESS** 1. Log Defect in Change Request Log. 2. Send Acknowledgment Notification via email to initiating CLEC. 3. Establish CR status ('N' for New Defect). 4. BCCM reviews change request for mandatory fields using the Change Request Form Checklist	**INPUTS:** • Completed Change Request Form (with related documentation if necessary) **OUTPUTS:** • New Defect • Acknowledgment Notification • Clarification Notification (if	4 Hours – High Impact 1 Bus Day – Medium & Low Impact (Time to be calculated from time of

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		Request Form Checklist. 5. Verify specifications and related information exists. 6. Send Clarification Notification via email to the originator if needed. 7. Update CR Status to' PC' for Pending Clarification if clarification is needed. If clarification is needed, CLEC or BST originator makes necessary corrections per Clarification Notification and submits via email Change Request Clarification Response.	required)	receipt with a cutoff time of 4:00 PM Eastern Time)

3	BCCM	**INTERNAL VALIDATION**
		1. Validate that it is a defect.
		2. Perform internal defect analysis.
		3. Determine status of request:
		• If change already exists or CLEC training issue forward Cancellation Notification to CCCM or BCCM and update status to 'C' for Request Cancelled or 'CT' for Training. If Training issue, refer to CSM or Account Team.
		  • Send Clarification Notification via email if needed and update status to 'PC' for Pending Clarification.
		  • If Change Request Clarification Notification not received, validate with CLEC that change request is no longer needed.
		  • If request is valid, update Change Request status to 'V' for Validated Defect and indicate appropriate Impact Level.
		  • If the process is operating as specified in the baselined requirements and published business rules, the BCCM will communicate the results via e-mail to the originator to discuss/determine the next step(s).
		• If issue is re-classified as a feature change, provide supporting information via email to the originator for review
			INPUTS:
			• New Defect
			
			OUTPUTS:
			• Validated Defect
			• Defect notification to CLEC community via e-mail and web posting
			• Clarification Notification (if required)
			• Cancellation Notification (if required)
			• Status provided for High Impact Defects to originator via email within 24 hours.
				2 Bus Days – High Impact
				
				3 Bus Days – Medium & Low Impact

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		and feedback. The Change Request will exit the defect process flow and enter Types 2-5 process flow (enter at Step 3). **NOTE**: See Section 11.0 Terms and Definitions – Defect Status for valid status codes and descriptions. Defect notification will be provided to CLEC community via e-mail and web posting.		
4	**BCCM**	**DEVELOP AND VALIDATE WORKAROUND (IF APPLICABLE)** 1. Defect workaround identified. 2. Change Request status changed to "W" for workaround identified. 3. Workaround is communicated via e-mail to originating CLEC and to the CLEC community via email and web posting. 4. If appropriate, communication to the CLEC community regarding workaround will be discussed via conference call. If it is determined that additional time is needed to develop workaround due to the complexity of the defect, notification will be provided to CLEC community via e-mail and web posting.	**INPUTS:** • Validated Defect • Clarification Notification (if required) **OUTPUTS:** • Workaround (if applicable) • Clarification Notification (if required) • Cancellation Notification (if required) • E-mail and web posting of workaround	2 Bus Days – High Impact 4 Bus Days – Medium & Low Impact
5	**BCCM**	**INTERNAL RESOLUTION PROCESS** 1. Schedule and evaluate Defects based on capacity and business impacts to the CLECs and BellSouth. 2. Provide status updates to the CLEC community via email as the status changes until the defect is implemented.	**INPUTS:** • CLEC/ BST input **OUTPUTS:** • Defect Release Schedule	Validated High Impact Defects will be implemented within a 4-25 business day range, best effort. Medium Impact Defects will be implemented

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
				within 90 bus days, best effort. Low Impact Defects will be implemented best effort.
6	BCCM	**UPDATE RELEASE PACKAGE NOTIFICATION** 1. Update and distribute release notification package via web. 2. All Change Requests that are in the approved scheduled release will be changed to "S" status for "Scheduled". **Note:** The release notification will be published in a timely manner, based on the release constraints associated with the defect.	**INPUTS:** • Defect Information **OUTPUTS:** • Updated Release Package Notification • Scheduled Change Request	Based on release constraints for defects (may be less than 30 days).
7	BCCM	**MONTHLY STATUS MEETING** 1. Provide status of Defect. 2. Solicit CLEC/ BST input. 3. Update Defect information as needed.	**INPUTS:** • Defects Received • Change Request Log • Defect Analysis • Workaround (if applicable) **OUTPUTS:** • Updated status • Updated Change Request Log • Meeting minutes	Monthly or when status changes, whichever occurs first.
8	BCCM	**RELEASE MANAGEMENT AND IMPLEMENTATION** The following release management activities will pertain to Type 6 changes: 1. Lead project manager communicates release management project status to	**INPUTS:** • Approved Release Package Notification **OUTPUTS:** • Project Release Status • Implementation Date	Ongoing

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		BCCM for inclusion in Monthly status meetings. 2. Once a defect is implemented in a release, the status will be changed to "I" for Change Implemented.	• Implemented Change Request	

6.0 CHANGE REVIEW

Part 1 – Change Review Meeting

The Change Review meeting provides the forum for reviewing and prioritizing Pending Change Requests, generating Candidate Change Requests, submitting Candidate Change Requests for sizing, and reviewing the status of all release projects underway. Status update meetings will be held monthly and are open to all CLEC's. Meetings will be structured according to category (pre-order, order, and maintenance, etc.). Prioritization meetings will be held quarterly. For non-system impacting changes, there will be a 5 (five)-business day notice for documentation updates. The prioritization meeting dates will be communicated when the release schedule is published.

During the Change Review Meeting each originator of a Change Request will be allowed 5 (five) minutes to present their Change Request. A question and answer session not to exceed 15 minutes will follow this presentation. After all presentations for a particular category are complete, the prioritization process will begin.

The Change Request Log will be distributed 5 - 7 (five to seven) business days prior to the Change Review meeting. A valid and complete Change Request must be received 30 business days prior to the Change Review Meeting. Change Requests must be accepted and in "Pending" status to be placed on the agenda for the next scheduled meeting.

Note: Status Meetings will occur monthly. Prioritization meetings will be scheduled to occur in March, June, September and December and will include the monthly status meeting agenda items.

Part 2 – Change Review Package

The Change Review Package will be distributed to all participants 5 – 7 (five to seven) business days prior to the Change Review meeting. The package will include the following:

- Meeting Notice
- Agenda
- Change Request Log (List of Change Requests to be reviewed)
- BellSouth's estimate of the size and scope of each Change Request
- Reference to Change Control Process on the BST website (for CLECs not familiar with the process, new CLECs or CLECs that choose to participate after the initial rollout)
- Status Reports from each of the active Release Management Project Teams

Part 3 – Prioritizing Change Requests

Prior to the Change Review Meeting, each participating CLEC should determine priorities for change requests and establish "desired/want" dates. The CLEC should use the Preliminary Priority List form as provided via the web.

Final prioritization will be determined at the Change Review meeting after presentation of the Change Requests for each category.

Prioritization Voting Rules

- CLEC must either be using an interface within a category (i.e. ordering), in the testing phase or have a letter of intent on file with the BellSouth Change Control Management Team to participate in the voting process
- One vote per CLEC, per category
- No proxy voting
- Each company may bring the number of participants necessary to represent their position. If the number of participants grow to be unmanageable, CLECs and BellSouth will revisit the issue of representation to apply some restrictions.
- Forced Ranking (1 to N, with N being the highest) will be used
- Votes will be tallied to determine order of ranking
- Changes will be ranked by category
- Manual processes and documentation will be prioritized separately; however they will need to be synchronized with the electronic interface changes
- In case of a tie, the affected Changes will be re-ranked and prioritized based on the re-ranking

Example: The top 2 Changes from high to low are E5 and E2, with E1 and E4 tied for 3rd. E1 and E4 would be re-ranked and prioritized according to the re-ranking.

Pre-Order LENS	CLEC 1	CLEC 2	CLEC 3	Total
E1	3	6	1	10
E2	4	2	6	12
E3	6	1	2	9
E4	2	4	4	10
E5	5	5	3	13
E6	1	3	5	9

7.0 INTRODUCTION AND RETIREMENT OF INTERFACES

Introduction of New Interfaces

BellSouth will introduce new interfaces to the CLEC Community as part of the Change Control Process. A description of the proposed interface will be submitted to the BCCM. The BCCM will add an agenda item to discuss the new interface at the monthly status meeting. BellSouth will be given 30 – 45 minutes to present information on the proposed interface. If BellSouth requests additional time for the presentation, a separate meeting will be scheduled to review the proposed interface, so that, the information can be presented in its entirety. The objective will be to identify interest in the new interface and obtain input from the CLEC community. BellSouth will provide specifications on the interface being developed to the CLEC Community. As new interfaces are deployed, they will be added to the scope of this document as appropriate, based on the use by the CLEC community and requested changes will be managed by this process.

Retirement of Interfaces

As active interfaces are retired, BellSouth will notify the CLECs through the Change Control Process and post a CLEC Notification Letter to the web six (6) months prior to the retirement of the interface. BellSouth will have the discretion to provide shorter notifications (30-60 days) on interfaces that are not actively used and/or have low volumes. BellSouth will consider a CLEC's ability to transition from an interface before it is scheduled for retirement. BellSouth will ensure that its transition to another interface does not negatively impact a CLEC's business.

BellSouth will only retire interfaces if an interface is not being used, or if BellSouth has a replacement for an interface that provides equal or better functionality for the CLEC than the existing interface.

Retirement of Versions

When software versions are retired, BellSouth will give the CLECs a 120 day notification.

A CLEC may respond to Change Control with its desire to extend a retirement date. The CLEC must explain why the scheduled retirement date is not acceptable by providing the impact to it business.

8.0 ESCALATION PROCESS

Guidelines

- The ability to escalate is left to the discretion of the CLEC based on the severity of the missed or unaccepted response/resolution.
- Escalations can involve issues related to the Change Control process itself.
- For change requests, the expectation is that escalation should occur only after normal Change Control procedures (e.g. communication timelines) have occurred per the Change Control agreement.
- Three levels of escalation will be used.
- For Type 1 issues, the escalation process is agreed to allow BellSouth a one-day turnaround for each cycle of escalation.(Excludes Expedites)
- For Types 2-5 issues, the escalation process is agreed to allow BellSouth a five-day turnaround for each cycle of escalation.
- For Type 6 High Impact Issues, the escalation process is agreed to allow BellSouth a two (2) day turnaround to provide a status for each cycle of escalation.
- For Type 6 Medium and Low Impact issues, the escalation process is agreed to allow BellSouth a five (5) day turnaround to provide a status for each cycle of escalation. For Types 2-5 Expedite Process issues, the escalation process is agreed to allow BellSouth a three (3) day turnaround to provide a status for each cycle of escalation.
- Each level will go through the same Cycle, which is described below.
- All escalation communications may be optionally distributed by the CLEC to the industry and BellSouth Change Control e-mail unless there is a proprietary issue.

Cycle for Type 1 System Outages

Contact List for Escalation - ECS Group - Type I Changes

If the originator does not receive a call back from the EC Support Group according to the times specified in this document, they may escalate according to the following list:

Escalation Level	Name and Title	Office Number	Pager Number	Email Address
1st Level	Don Tighe Manager - EC Support Group Interconnection Operations	404-532-2233	1-800-946-4646 PIN 1436470	Don.Tighe@bridge.bellsouth.com
2nd Level	Bruce Smith Operations Director - EC Support Group Interconnection Operations	205-988-7211	1-800-542-3260	Bruce.Smith@bridge.bellsouth.com
3rd Level	Bill Reid Operations Assistant Vice President Interconnection Operations	205-988-1447	1-800-946-4646 PIN 1179523	Bill.C.Reid@bridge.bellsouth.com

NOTE: If a call is escalated without first attempting to contact the ECS Helpdesk, the caller will be referred back to the ECS Helpdesk.

Escalation Cycle for Types 2-6 Change Requests

- Item must be formally escalated as an e-mail sent to the appropriate escalation level within BellSouth with a copy to the industry and BellSouth Change Control e-mail.
- Subject of e-mail must be CLEC (CLEC Name) ESCALATION-CR#, if applicable, Level of Escalation, unless it is proprietary.
- Content of e-mail must include:
  - Definition and escalation of item.
  - History of item.
  - Reason for escalation.
  - Desired outcome of CLEC.
- Impact to CLEC of not meeting the desired outcome or item remaining on current course of action as previously discussed at the Change Control Meeting for enhancements.
- Contact information for appropriate Level including Name, Title, Phone Number, and E-mail ID.
- For escalation Level 2, forward original e-mail and include any additional information including the reason that the matter could not be resolved at Level 1.
- For escalation Level 3, forward original e-mail and include any additional information including the reason that the matter could not be resolved at Levels 1 and 2.
- BellSouth will reply to escalation request with acknowledgement of receipt within 4 hrs and begin the escalation process through Level of escalation.
- The escalating CLEC should respond to BellSouth within 5 days as to whether escalation will continue or the BellSouth response has been accepted as closure to the item.
- If the BellSouth position suggests a change in the current disposition of the item (i.e., what has already been communicated to the industry), a conference call will be held within 1 business day of the BellSouth decision in order to provide industry notification with the appropriate executives.

- BellSouth will publish the outcome of the conference call to the industry via web.
- If unsatisfied with an outcome, either party can seek appropriate relief.

Contact List for Escalation - Type 2 - 6 Changes

Types 2-5 Changes: Within 5 business days of receipt (4 from acknowledgement), BellSouth Change Control appropriate executives will reply through BellSouth Change Control with BellSouth's position and explanation for that position.
Type 6, High Impact Changes: Within two (2) business days of receipt, BellSouth Change Control appropriate executives will reply through BellSouth Change Control with BellSouth's position and explanation for that position.
Type 6 Medium and Low Impact Changes: Within five (5) business days of receipt, BellSouth Change Control appropriate executives will reply through BellSouth Change Control with BellSouth's position and explanation for that position.

Escalations should be made according to the following list.

Escalation Level	Name and Title	Office Number	Email Address
1st Level	Valerie Cottingham Director Change Control Process	205-321-2168	Valerie.cottingham@bridge.bellsouth.com
2nd Level	Terrie Hudson Director (Test Bed, User Requirements, CCP)	404-927-4535	Terrie.Hudson@bridge.bellsouth.com
	Joy Lofton Director (for Business Rules/Operations Issues)	404-927-7828	Joy.A.Lofton@bridge.bellsouth.com
	Suzie Lavett Director (TAG/LENS)	205-977-2876	Suzie.H.Lavett@bridge.bellsouth.com
	Audrey Thomas Director (EDI)	404-927-7886	Audrey.Thomas@bridge.bellsouth.com

3rd Level	**Doug McDougal** **Senior Director** **(for Systems Issues)**	**404-927-7505**	Doug.Mcdougal@bridge.bellsouth.com
	Dee Freeman-Butler **Senior Director** **(for Business Rules/Operations Issues)**	**404-927-3545**	Dee.Freeman2@bridge.bellsouth.com

Dispute Resolution Process

In the event that an issue is not resolved through the Escalation Process as described herein, including (1) escalation within each company to the person with ultimate authority for Change Control operations, and (2) the services of a joint investigative team, when appropriate, comprised of representatives from BellSouth and the affected CLECs. Resolution of the dispute shall be accomplished as set forth below:

- Either BellSouth or any CLEC affected by the dispute may request mediation through the State Public Service Commission, if available. If mediation is requested, parties shall participate in good faith. If the mediation results in the resolution of the dispute, that resolution shall apply to all CLECs affected by the dispute.
- Without necessity for prior mediation, either BellSouth or any CLEC affected by the dispute may file a formal complaint with the appropriate state regulatory agency, requesting resolution of the issue.

9.0 CHANGES TO THIS PROCESS

The current, approved version of this process document will be stored under the component name "Ccp.doc" (the date of the latest CCP document will be included in the file name). The BellSouth Change Control Manager BCCM (and alternate) will be the only persons authorized to update the document version.

Requests for changes to the Change Control Process may be submitted to the BellSouth Change Control Manager (BCCM) using the Change Request form located in the Appendix A. Cosmetic changes may be made and published by the BCCM (or alternate) without further review. Other changes will be reviewed at the monthly Change Review status meetings. All changes will be submitted as a change request and reviewed.

10.0 TESTING ENVIRONMENT

BellSouth offers Carrier Testing to CLECs in an open proven test environment for Telecommunications Access Gateway (TAG) and Electronic Data Interchange (EDI) interfaces. The testing opportunities offered are BETA and New Carrier Testing.

BETA testing is offered to those CLECs that express an interest in assisting BellSouth validate a Telecommunications Industry Forum (TCIF) change for the affected interfaces. The opportunity for testing is submitted via the BellSouth Account Team and is negotiated with the Carrier Testing group. BellSouth opens the test environment for BETA testing after "major releases". CLECs are selected on a "first come, first served basis".

New Carrier Testing is offered to those CLECs who are transitioning from a manual to an electronic environment or from one TCIF issue to another. New Carrier Testing is available to all CLECs and is scheduled with the BellSouth Account Team and Carrier Testing group.

For additional details on the testing environment, regulations and guidelines, refer to the following BellSouth public Internet sites:

EDI

www.interconnection.bellsouth.com/markets/lec.html
Select "Customer Guides"
Select "Local Exchange Ordering Guides"
Select "BellSouth EDI Specifications – TCIF 9"
Select "Section 7 – EDI Testing Guidelines for CLECS"

TAG

www.interconnection.bellsouth.com/markets/lec.html
Select "OSS Information Center"
Select "TAG Documentation"

This site is password protected. You should obtain the password from your Account Team representative.

11.0 TERMS AND DEFINITIONS

A

Account Team. The Account Teams represent the CLECs and all CLEC interests within BellSouth, that is, the Account Team is the CLECs' advocate within BellSouth. Some of the Account Team functions are listed below:

- Contract Negotiations
- Enhanced Billing Options Negotiations
- Customer Education
- Technical Assistance
- General Problem Resolution
- Tariff Interpretation
- BonaFide Requests (BFR)
- Production Support
- Collocation
- Testing Support
- Project/Order Coordination
- Rate Quotations

Accountability. Individual(s) having responsibility for completing and producing the outputs of each sub-process as defined in the Detailed Process Flow.

Acknowledgement Notification. Notification returned to originator by BCCM indicating receipt of Change Request.

Approved Release Package. Calendar of Candidate Change Requests with consensus target implementation dates as determined at the Release Package Meeting.

B

BellSouth Change Control Manager (BCCM). BellSouth Point of Contact for processing all Change Requests.

BFR (Bonafide Request). Process used for providing custom products and/or services. Bonafide Requests are outside the scope of the Change Control Process and should be referred to the appropriate BellSouth Account Team.

Business Day. A business day is considered any Monday-Friday workday that does not fall on an official BellSouth holiday.

Business Rules. The logical business requirements associated with the Interfaces referenced in this document. Business rules determine the when and the how to populate data for an Interface. Examples of data defined by Business Rules are:

- The five primary transactions sets: 850, 855, 860, 865, and 997
- Data Element Abbreviation and Definition
- Activity Types at the appropriate level (account, line, feature) and the associated Usage Type (optional, conditional, required, not applicable, prohibited)
- Conditions/rules associated with each Activity and Usage Type
  - ◊ Dependencies relative to other data elements
  - ◊ Conditions which will be edited within BellSouth's OSSs
- Valid Value Set
- Data Characteristics

C

Cancellation Notification. Notification returned to originator by the BCCM indicating a Change Request has been canceled for one of the following reasons: Originator cancellation, duplicate request, training issue, or failure to respond to clarification.

Candidate Request List. List of prioritized Change Requests with associated "Need by Dates" as determined at an Change Review Meeting. These requests will be submitted for sizing and sequencing.

Candidate Change Request. Change Requests that have been prioritized at an Change Review Meeting and are eligible for independent sizing and sequencing by BellSouth and each CLEC.

Change Request. A formal request submitted on a Change Request Form, to add new functions, defects or expedited features or Enhancements to existing Interfaces (as identified in the scope) in a production environment.

- Type 1 – BellSouth System Outage. A System Outage is where the system is totally unusable or there is degradation in an existing feature or functionality within the interface.
- Type 2 – Regulatory Change. Any non-Type 1 changes to the interfaces between the CLEC's and BellSouth's operational support systems mandated by regulatory or legal entities, such as the Federal Communications Commission (FCC), a state commission/authority or state and federal courts.

- Type 2-5 – Expedited Feature Change. The inability for a CLEC to process certain types of LSR's based on the existing functionality to BellSouth's Operational Support Systems (OSS's) that are in the scope of CCP. The change request for an expedite must provide details of the business impact and will fall into one of two categories: 1) A defect that has been re-classified as a feature where the CLEC/BellSouth has determined should be expedited due to impact and 2) an enhancement to an existing product or service where the CLEC/BellSouth has determined should be expedited due to impact.
- Type 3 – Industry Standard Change. Any non-Type 1 changes to the interfaces between the CLEC's and BellSouth's operational support systems required to bring these interfaces in line with newly agreed upon telecommunications industry guidelines.
- Type 4 – BellSouth Initiated Change. Any non-Type 1 changes affecting the interfaces between the CLEC's and BellSouth's operational support systems which BellSouth desires to implement on its own accord.
- Type 5 – CLEC Initiated Change. Any non-Type 1 changes affecting the interfaces between the CLEC's and BellSouth's operational support systems, which the CLEC requests BellSouth to implement.

Type 6 – CLEC Impacting Defect. Any non-type 1 change that corrects problems discovered in production versions of an application interface. These problems are where the interface is not working in accordance to the BellSouth baseline business requirements or the business rules that BellSouth has published or otherwise provided to the CLECs. In addition, if functional requirements agreed upon by BellSouth and the CLECs, results in inoperable functionality, even thought software business requirements and business rules match; this will be addressed as a defect. These problems typically affect the CLEC's ability to exchange transactions with BellSouth and may include documentation that is in error, has missing information or is unclear in nature. Type 6 validated defects may not be managed using the Expedited Feature Process as discussed in Section 4, Part 3. The CLEC and/or BellSouth may initiate these types of changes affecting interfaces between the CLEC's and BellSouth's operational support systems. These type changes might also include issues for Pre-Orders, Orders, Queries, and Maintenance Requests that can be submitted and accepted, but may require workarounds or clarification.

Change Request Status. The status of a Change Request as it flows through the Change Control process as described in the Detailed Process Flow.

- **A = Appeal.** Indicates a cancelled Change Request is being appealed by the originator (Step 3).
- **C = Request Cancelled.** Indicates a Change Request has been canceled due to one of the following reasons (Step 3):
  - **CC = Clarification.** Requested clarification not received in allotted time (7 days).
  - **CD = Duplicate Request.** A request for this change already exists.

- **CT = Training.** Requested change already exists, additional training may be required.

- **CRC** = Change Review Complete. Indicates a Change Request has been reviewed at a Change Review Meeting, but did not reach the Candidate Request List (Step 5).
- **D** = Request Purge. Indicates the cancellation of a Change Request that has been pending for 12 months and has failed to reach the Candidate Request List (Step 3).
- **I = Change Implemented.** Indicates a Change Request has been implemented in a release (Step 10).
- **N = New Change Request.** Indicates a Change Request has been received by the BCCM, but has not been validated (Step 2).
- **P = Pending.** Indicates a Change Request has been accepted by the BCCM and scheduled for Change Review (Step 3 moving to Step 4).
- **PC = Pending Clarification.** Indicates a Clarification Notification has been sent to the originator, BCCM awaiting response (Step 2 or 3).
- **PN = Pending N times.** Indicates a Change Request reached the Candidate Request List, was sized but not scheduled for a release and has cycled through the process N number of times. Example: P1 = 2nd time through process, P2 = 3rd time through process, etc (Step 8).
- **RC = Candidate Request.** Indicates a Change Request has completed the Change Review process and been assigned to the Candidate Request List for sizing and sequencing (Step 5).
- **S – Request Scheduled**. Indicates a Change Request has been scheduled for a release (Step 8).

Change Review Meeting. Meeting held by the Change Review participants to review and prioritize pending Change Requests, generate Candidate Change Requests, and submit Candidate Change Requests for sizing and sequencing.

Change Review Package. Package distributed by the BCCM 5 – 7 business days prior to the Change Review Meeting. The package includes the Meeting Notice, Agenda, Release Management Status Report, Change Request Log, etc.

Clarification Notification. Notification returned to the originator by the BCCM indicating required information has been omitted from the Change Request and must be provided prior to acceptance of the Change Request. The Change Request will be cancelled if clarification is not received by the date indicated on the Clarification Notification.

CLEC Affecting Change. Any change that requires the CLEC to modify the way they operate or to rewrite system code.

CLEC Change Control Manager (CCCM). CLEC Point of Contact for processing Change Requests.

CSM. Customer Support Manager which supports resale and facility based CLECs.

Cycle Time. The time allotted to complete each step in the Change Control Process prior to moving to the next step in the process.

D

Defect. Any non-type 1 change that corrects problems discovered in production versions of an application interface. These problems are where the interface is not working in accordance to the BellSouth baseline business requirements or the business rules that BellSouth has published or otherwise provided to the CLECs. In addition, if functional requirements agreed upon by BellSouth and the CLECs, results in inoperable functionality, even thought software business requirements and business rules match; this will be addressed as a defect.

These problems typically affect the CLEC's ability to exchange transactions with BellSouth and may include documentation that is in error, has missing information or is unclear in nature.

Type 6 validated defects may not be managed using the Expedited Feature Process as discussed in Section 4, Part 3.

The CLEC and/or BellSouth may initiate these types of changes affecting interfaces between the CLEC's and BellSouth's operational support systems. These type changes might also include issues for Pre-Orders, Orders, Queries, and Maintenance Requests that can be submitted and accepted, but may require workarounds or clarification.

Defect Status. The status of a CLEC Impacting Defect Change Request as it flows through the Change Control process as described in the Detailed Process Flow.

- **A = Appeal.** Indicates a cancelled Change Request is being appealed by the originator (Step 3).
- **C = Cancelled.** Indicates a Change Request has been canceled due to one of the following reasons (Step 3):

- **CC = Clarification.** Requested clarification not received in allotted time (2 days).
- **CD = Duplicate Request.** A request for this change already exists.
- **CT = Training.** Requested change already exists, or CLEC training issue.

- **I = Implemented.** Indicates a Defect Change Request has been implemented in a release (Step 6).
- **N = New Defect Change Request.** Indicates a Defect Change Request has been received by the BCCM and the change request form validated for completeness (Step 2).
- **PC = Pending Clarification.** Indicates a Clarification Notification has been sent to the originator, BCCM awaiting response (Step 2 or 3).
- **S = Scheduled for Release.** Indicates a Defect Change Request has been scheduled for a release (Step 6).
- **V = Validated Defect.** Indicates internal analysis has been conducted and it is determined that it is a validated defect/expedite (Step 3).
- **W = Workaround Identified.** Indicates a workaround has been developed and communicated to impacted CLEC community (Step 4).

E

Electronic Communications Systems (ECS). ECS is the help desk for reporting system outages or degradation in an existing feature/functionality within an interface. The ECS group works with the CLEC community to resolve system outages/degradation in a timely manner. The telephone number for the ECS group is 1-888-462-8030.

Enhancement. Functions which have never been introduced into the system; improving or expanding existing functions; required functional changes to system interfaces (user and other systems), data, or business rules (processing algorithms – how a process must be performed); any change in the User Requirements in a production system.

Expedited Feature. An expedited feature is the inability for a CLEC to process certain types of LSR's based on the existing functionality to BellSouth's operations support systems (OSS's) that are in the scope of Change Control. The change request for an expedite must provide details of the business impact and will fall into one of two categories: 1) a defect that has been re-classified as a feature where the CLEC/BellSouth has determined should be expedited due to impact and 2) an enhancement to an existing product or service where the CLEC/BellSouth has determined

should be expedited due to impact. For both re-classified defects and enhancements to an existing product or service, the rules surrounding the expedited feature request will be:

- Must be an enhancement to an existing product or service
- Will follow the Expedited Feature process flow described below which is based on the current Types 2-5 process flow using agreed upon intervals with the exception of Steps 4-6 that are eliminated.
- The CLEC/BellSouth will be required to give impacts and the consequences for not implementing the feature in the current, next, or point release, best effort.

H

High Impact. The failure causes impairment of critical system functions and no electronic workaround solution exists.

I

Internal Change Management Process. Internal process unique to BellSouth and each participating CLEC for managing and controlling Change Requests.

L

Low Impact. The failure causes inconvenience or annoyance.

M

Medium Impact. The failure causes impairment of critical system functions, though a workaround solution does exist.

N

Need-by-Date. Date used to determine implementation of a Change Request. This date is derived at the Change Review Meeting through team consensus. Example: 1Q99 or Release XX.

P

Points of Contact (POC). An individual that functions as the unique entry point for change requests on this process.

Priority. The level of urgency assigned for resource allocation to implement a change. Priority may be initially entered by the originator of the Change Request, but may be changed by the BCCM with concurrence from the originator or the Review Meeting participants. In addition, level of priority is not an indication of the timeframe in which the Change Request will be worked. It is the originator's label to determine the priority of the request submitted.

One of four priorities may be assigned:

1-Urgent. Should be implemented as soon as possible. Resources may be pulled from scheduled release efforts to expedite this item. A need-by date will be established during the Change Review Meeting. A special release may be required if the next scheduled release does not meet the agreed upon need-by date.

2-High. Implement in the next possible scheduled major release, as determined during the Release Package Meeting.

3-Medium. Implement in a future scheduled major release. A scheduled release will be established during the Release Package Meeting.

4-Low. Implement in a future scheduled major release only after all other priorities. A scheduled release will be established during the Release Package Meeting.

Project Plan. Document which defines the strategy for Release Management and Implementation, including Scope Statement, Communication Plan, Work Breakdown Structure, etc. See Release Management Project Plan template, Attachment B-1.

Proposed Release Package: Proposed set of change requests slated for a release that the BCCM presents to the CLEC community during the Release Package Meeting

R

Release – Major. Implementation of scheduled Change(s) which may or may not impact all CLECs; may or may not require CLECs to make changes to their interface and may or may not prohibit the use of an interface upon implementation of the Change(s). Application-to-Application and Machine-to-Human.

Release – Minor. Implementation of scheduled Change(s) which do not require coordination with the entire CLEC industry, do not require CLECs to make changes to their interface or do not prohibit the use of an interface upon implementation of the Change(s). Machine-to-Human.

Release Package. Package distributed by the BCCM listing the Candidate Change Requests that have been targeted for a scheduled release.

Release Package Notification. Package distributed by the BCCM and used to conduct an initial Release Management and Implementation meeting. The package includes the list of participants, meeting date, time, Approved Release Package, Defect and/or Expedite Notification, etc.

Release Schedule: Schedule that contains the intended dates for implementation of software enhancements. This release schedule is created annually.

S

Specifications. Detailed, exact document(s) describing enhancement and/or defects, business processes and documentation changes requested and included with the Change Request as additional information.

System Outage. A System Outage is where the system is totally unusable or there is degradation in an existing feature or functionality within the interface.

V

Version (Document). Indicates variation of an earlier Change Control process document. Users can identify the latest version by the version control number.

APPENDIX A – CHANGE CONTROL FORMS

See Attached Forms

This section identifies the forms to be used during the initial phases of the Change Control process accompanied by a brief explanation of their use. Attachments A1 – A-4A contains sample Change Control forms and line by line Checklists.

Change Request Form. Used when submitting a request for a change (Attachment A-1).

Change Request Form Checklist. Provides line-by-line instructions for completing the Change Request form (Attachment A-1A).

Change Request Clarification Response. Used when responding to request for clarification or Clarification Notification (Attachment A-2).

Change Request Clarification Checklist. Provides line-by-line instructions for completing the Change Request Clarification Response (Attachment A-2A).

Acknowledgement Notification. Advises originator of receipt of Change Request by BCCM (Attachment A-3).

Acknowledgement Notification Checklist. Provides line-by-lines instructions for completing the Acknowledgement Notification. (Attachment A-3A).

Cancellation Notification. Advises the originator of cancellation of a Change Request (Attachment A-3).

Cancellation Notification Checklist. Provides line-by-line instructions for completing the Cancellation Notification. (Attachment A-3B).

Clarification Notification. Advises originator that a Change Request is being held pending receipt of additional information (Attachment A-4).

Clarification Notification Checklist. Provides line-by-line instructions for completing the Clarification Notification. (Attachment A-4A).

Letter of Intent. CLEC provides notice of intent to implement a TCIF compliant interface within a specified timeframe. (Attachment A-5).

APPENDIX B – RELEASE MANAGEMENT

See Attached Forms

Release Management and Project Implementation is described in Step 10 of the Change Control Process. Project Managers are responsible for confirming the release date, developing project plans and requirements, providing the WBS, Gantt chart and Executive Summary to the BCCM for input to the Change Review Package and ensuring the successful implementation of the release.

The BST Change Control Manager (BCCM) will distribute the Release Notification Information via web. The Notification should contain the following information:

- List of participants (Project Managers from each stakeholder)
- Date(s) for the next Project Manage Release meeting(s)
- Times
- Logistics
- Meeting facilitator and minutes originator (rotated between stakeholders)
- Current Approved Release Package (email attachment)
- Current Maintenance/Defect Notification Information (web posting)
- Draft Release Project Plan - WBS (email attachment created by the Lead Project Manager (s) assigned in step 8 of the Change Control Process)
- Lead Project Manager (s) assigned to the Release with reach numbers (s)

Attachments B1 – B12 contain templates designed to assist the Project Manager(s) in conducting project management responsibilities as needed for Release Management and Implementation.

APPENDIX C –ADDITIONAL DOCUMENTS

See Attached Documents

APPENDIX D –BST VERSIONING POLICY FOR INDUSTRY STANDARD ORDERING INTERFACES

Since August 1998, BellSouth's policy, which is stated in its Statement of Generally Accepted Terms (SGAT) and standard interconnection agreement, has been to support two industry standard versions of the applicable electronic interfaces at all times. Currently, the EDI and TAG electronic interfaces are maintained this way, because they are the interfaces that require the CLEC to "build" its side of the interface to use the new standard. The two industry standard versions of an interface are maintained when BellSouth is implementing an entirely new version of an interface based on new industry standards, not when BellSouth is simply enhancing an existing interface. Periodically, the standards organizations for an interface will issue a new set of standards. After submitting the new standards to the CCP to determine how and when they will be implemented, BellSouth will introduce a new version of that interface based on the new standards. BellSouth will keep the "old" version of the interface based on the old industry standards "up" for those CLECs that have not had enough time to build their side of the interface to the new industry standards. BellSouth gives CLECs six (6) months advance notice of the implementation of electronic interfaces based on new industry standards.

When a new industry standard for the interface is issued, the most recent prior industry standard version of the interface will be frozen - no changes will be made to the old version of the interface. BellSouth will support both the new industry standard version and the old industry standard version until the next set of industry standards is issued. Then, BellSouth will support the two most recent industry standard versions of the interface. If, for example, version A were based on the current industry standards, then following the implementation of version B based on the new industry standards, BellSouth would freeze version A until the implementation of version C. Upon the implementation of the version C of the interface based on the newest industry standards, BellSouth would no longer support version A, would freeze version B, and would support both version C and the frozen version B until the implementation of next set of the industry standards.

For example, in March 1998, BellSouth released a new industry standard version of EDI based on TCIF version 7.0. Between March 1998 and January 2000, BellSouth implemented a series of major releases (4.0 and 5.0) and a series of "point releases" (4.1, 4.2, etc. and 5.1, 5.2, etc.). The final "point release" of EDI was Release 5.8. In January 2000, BellSouth implemented Release 6.0 of EDI based on TCIF 9.0. When this occurred, BellSouth began maintaining Release 5.8 alongside of Release 6.0 of EDI.

NOTE: Because LENS is not an industry standard, machine-to-machine interface, LENS is not covered under the policy described above.

Release Management Project Plan Template

Document Preparation Information

PROJECT NAME - RELEASE NUMBER	PREPARED BY (PRINT)	SIGNATURE	DATE PREPARED

Scope Statement

The project scope defines the boundaries by which the project will operate. The scope statement will be used to obtain agreement and approval from the customers and stakeholders for the project funding.

See Scope Statement Template

Communication Plan

The project team will determine the type and frequency of communications that must take place during the project life cycle to enable the project's success. The table below outlines the agreed to communication vehicles.

Status Communiqué	Distribution	Frequency	Owner
Project Release Status Report	• Team Members • Enhancement Review Team	• Weekly • Monthly	Project Manager
Team Member To Do List	• Team Member	• Weekly	Project Manager
Executive Summary	• Project Sponsor	• Monthly	Project Manager
Status Meeting/Minutes	• Team Members	• Weekly	Project Manager

All escalations will be communicated by the project manager to the project sponsor.

See Project Release Status Report
See CCP To Do List/Resource (part of Microsoft Project file - Custom Report)
See CCP To Do List/Dates (part of Microsoft Project file - Custom Report)

Project Tracking Plan

Project tracking and control is the process whereby the project manager determines the degree to which the project plan is being met. The focus is on the schedule, budget and resource allocations.

The project manager will hold regularly scheduled team meetings for the purpose of updating the Work Breakdown Schedule (WBS) with accurate information. During these meetings, all new issues will be raised and assigned to an owner for resolution. All existing issues will be reviewed for current status and/or closure.

Other documents to be updated during the team meetings are as follows:

- Change Control Plans
- Risk Management Plans
- Communication Plans
- Scope Statements
- Team Roster and Responsibilities

Project status will be created and distributed as defined in the Communications Plan.

Work Breakdown Structure

The project manager will develop a Work Breakdown Structure (WBS) in the appropriate project management software application, including tasks, durations, start/end dates, dependencies, personnel resources, and related costs. A draft version of the WBS will be created by the project manager and reviewed with the project team in an effort to effectively utilize the team's time. The WBS will be revised and agreed to by the entire team to facilitate activity ownership and commitment.

While creating the WBS, the team should consider all resource, time, budget and performance constraints associated with the project.

See WBS Template (part of Microsoft Project file - Gantt View)

Roles and Responsibilities

Project roles will be defined to clearly identify expectations among project participants. Update the table below with the correct project roles and responsibilities.

ROLES	RESPONSIBILITIES
Project Manager	Identify Preliminary Resources Hold Kick-off Meeting Develop Project Plan Documents Track Project Status Time Cost Manage Change Control Manage Issues Communicate Project Status
Project Sponsor	Understand Current Project Status Single Point of Contact for Escalations Communicate Project Status Define/Approve Milestone Exit Criteria
Stakeholder	Provide Team Members / External Project Support Understand Current Project Status Define Milestone Exit Criteria
External Project Support	Perform Agreed to Activities as Defined Provide Project Manager Status
Team Members	Attend Project Team Meetings Perform Agreed to Activities as Defined Provide Project Manager Status

Project Team Roster

A list of all parties associated with or impacted by the project should be documented and distributed to the team.

See Project Team Roster

Risk Management Plan

In an effort to mitigate possible negative impacts to the project, a high-level risk assessment should be performed during the initial phase of the project. For each high-level risk, the team should develop a mitigation strategy or position. As potential risks are identified during the project life cycle, the team should again develop a mitigation strategy or position.

See High-Level Risk Assessment
See Risk Event Assessment and Planning

Change Control Plan

Throughout the project life cycle, changes will be introduced which will impact the project scope statement. These changes could be due to a new customer need/requirement or a miss communication of an existing requirement. Each change must be evaluated to effectively understand the possible impact to resources, time and/or cost.

See Scope Change Request and Evaluation
See Scope Change Request Log

Project Issues

Day to day issues will be entered on a project issues log as an interim solution until further discussion can take place among the team. Each issue could result in the addition of a new activity to the WBS, a risk to be evaluated in the Risk Management Plan, or a change to be managed through the Change Control Plan.

See Project Issue Log

Scope Statement Template

Document Preparation Information

PROJECT NAME - RELEASE NUMBER	PREPARED BY (PRINT)	SIGNATURE	DATE PREPARED

Project Definitions

PROJECT TITLE	
PROJECT MANAGER	
PROJECT TEAM MEMBERS	
GOALS/OBJECTIVES	
SCOPE STATEMENT	
ASSUMPTIONS	
MAJOR RISKS	
DELIVERABLES	
ACCEPTANCE CRITERIA	
PHASES	
KEY MILESTONES	
KEY RESOURCE REQUIREMENTS	
EXTERNAL CONSTRAINTS	
RELATED PROJECTS	

Project Release Status Report

Document Preparation Information

PROJECT NAME - RELEASE NUMBER	PREPARED BY (PRINT)	SIGNATURE	DATE PREPARED

General Information

PROJECT MANAGER	CURRENT PROJECT PHASE	SUPPORTING DOCUMENTATION ATTACHED?	WEEK ENDING DATE
		☐ Yes ☐ No	

Report Information

Status Changes from Last Report	✓	Explain
Assumptions	☐	
Scope	☐	

Schedule Information

High-Level Phase Deliverable	Original Complete Date	New Est. Complete Date	Actual Complete Date	Explanation

Budget Information

Project Tracking Element	YTD Budget	YTD Actual	YTD Diff.	% Diff.	Explanation

Deliverable Information

COMPLETED DELIVERABLES
DELIVERABLES DUE NEXT PERIOD

Attachment B-3

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

Work Breakdown Structure Template

Project Management WBS Template						
ID	Task Name	Duration	Start	Finish	Pred	Resource
1	Obtain Executive Commitment	1d	1/9/98	1/9/98		All
2	**Define Requirements**	**3d**	**1/9/98**	**1/13/98**		
3	Gather/Analyze Existing Documentation	1d	1/9/98	1/9/98		All
4	Meet to Baseline Requirements (several meetings)	1d	1/12/98	1/12/98	3	All
5	Produce Baseline Requirements Document	1d	1/13/98	1/13/98	4	All
6	**Perform Analysis**	**4d**	**1/14/98**	**1/19/98**		
7	Analyze Requirements Document	1d	1/14/98	1/14/98	5	BST
8	Produce/Distribute Updated Requirements Document	1d	1/15/98	1/15/98	7	BST
9	Meet to Understand Updated Requirements Document	1d	1/16/98	1/16/98	8	All
10	Analyze/Finalize Updated Requirements Document	1d	1/19/98	1/19/98	9	All
11	Perform Coding/Construction (design, code, unit test)	1d	1/20/98	1/20/98	10	All
12	**Perform Testing**	**5d**	**1/20/98**	**1/26/98**		
13	Create Test Plans	1d	1/20/98	1/20/98	10	All
14	Perform Internal Testing (systems, integration)	1d	1/21/98	1/21/98	13, 11	All
15	**Perform External Testing**	**3d**	**1/22/98**	**1/26/98**		
16	Perform Network Validation Testing (NVT)	1d	1/22/98	1/22/98	14	All
17	Perform End to End Testing	1d	1/23/98	1/23/98	16	All
18	Perform Stress/Volume	1d	1/26/98	1/26/98	17	All
19	Make Go/No Go Decision	1d	1/27/98	1/27/98	18	All
20	**Deploy Release/Cut Over**	**11d**	**1/15/98**	**1/29/98**		
21	Develop Recovery Plan (Back-Out)	1d	1/15/98	1/15/98	23FS-10d	All
22	Develop Migration Plan Old to New (60-90 days) (Freeze Old Code)	1d	1/28/98	1/28/98	19	All
23	Perform Cut-Over	1d	1/28/98	1/28/98	19	All
24	Develop Post Implementation Audit Report	1d	1/29/98	1/29/98	23	All
25	**Perform Training**	**8d**	**1/20/98**	**1/29/98**		
26	Develop Training Plan	1d	1/20/98	1/20/98	10	All
27	Develop Training Package	1d	1/21/98	1/21/98	26	All
28	Train Users	1d	1/29/98	1/29/98	23	All

To Do List by Resource as of 2/10/98

ID	Task Name	Duration	Start	Finish	Predecessors	Resources
Week of Jan 4						
1	Obtain Executive Commitment	1d	1/9/98	1/9/98		All
3	Gather/Analyze Existing Documentation	1d	1/9/98	1/9/98		All
Week of Jan 11						
4	Meet to Baseline Requirements (several mtgs)	1d	1/12/98	1/12/98	3	All
5	Produce Baseline Requirements Document	1d	1/13/98	1/13/98	4	All
21	Develop Recovery Plan (Back-Out)	1d	1/15/98	1/15/98	23FS-10d	All
9	Meet to Understand Updated Requirements Document	1d	1/16/98	1/16/98	8	All
Week of Jan 18						
10	Analyze/Finalize Updated Requirements Doc	1d	1/19/98	1/19/98	9	All
11	Perform Coding/Construction (design, code)	1d	1/20/98	1/20/98	10	All
13	Create Test Plans	1d	1/20/98	1/20/98	10	All
26	Develop Training Plan	1d	1/20/98	1/20/98	10	All
14	Perform Internal Tests (systems, integration)	1d	1/21/98	1/21/98	13, 11	All
27	Develop Training Package	1d	1/21/98	1/21/98	26	All
16	Perform Network Validation Testing (NVT)	1d	1/22/98	1/22/98	14	All
17	Perform End to End Testing	1d	1/23/98	1/23/98	16	All
Week of Jan 25						
18	Perform Stress/Volume	1d	1/26/98	1/26/98	17	All
19	Make Go/No Go Decision	1d	1/27/98	1/27/98	18	All
22	Develop Migration Plan Old to New	1d	1/28/98	1/28/98	19	All
23	Perform Cut-Over	1d	1/28/98	1/28/98	19	All
24	Develop Post Implementation Audit Report	1d	1/29/98	1/29/98	23	All
28	Train Users	1d	1/29/98	1/29/98	23	All

To Do List by Dates as of 2/10/98

ID	Task Name	Duration	Start	Finish	Predecessors	Resources
1	Obtain Executive Commitment	1d	1/9/98	1/9/98		All
3	Gather/Analyze Existing Documentation	1d	1/9/98	1/9/98		All
4	Meet to Baseline Requirements (several mtgs)	1d	1/12/98	1/12/98	3	All
5	Produce Baseline Requirements Document	1d	1/13/98	1/13/98	4	All
7	Analyze Requirements Document	1d	1/14/98	1/14/98	5	BST
8	Distribute Updated Requirements Document	1d	1/15/98	1/15/98	7	BST
21	Develop Recovery Plan (Back-Out)	1d	1/15/98	1/15/98	23FS-10d	All
9	Meet to Understand Updated Requirements Document	1d	1/16/98	1/16/98	8	All
10	Analyze/Finalize Updated Requirements Doc	1d	1/19/98	1/19/98	9	All
11	Perform Coding/Construction (design, code)	1d	1/20/98	1/20/98	10	All
13	Create Test Plans	1d	1/20/98	1/20/98	10	All
26	Develop Training Plan	1d	1/20/98	1/20/98	10	All

Project Team Roster

Document Preparation Information

PROJECT NAME - RELEASE NUMBER	PREPARED BY (PRINT)	SIGNATURE	DATE PREPARED

Guideline: Use this roster format as guidance, expanding or condensing as necessary.

Project Management

PROJECT MANAGER	EMAIL	PHONE	PAGER	FAX

Sponsor/Stakeholder

PROJECT SPONSOR	EMAIL	PHONE	PAGER	FAX
STAKEHOLDER(S)	EMAIL	PHONE	PAGER	FAX

External Project Support

NAME	EMAIL	PHONE	PAGER	FAX
NAME	EMAIL	PHONE	PAGER	FAX
NAME	EMAIL	PHONE	PAGER	FAX
NAME	EMAIL	PHONE	PAGER	FAX

Project Team

NAME	EMAIL	PHONE	PAGER	FAX
NAME	EMAIL	PHONE	PAGER	FAX
NAME	EMAIL	PHONE	PAGER	FAX
NAME	EMAIL	PHONE	PAGER	FAX
NAME	EMAIL	PHONE	PAGER	FAX
NAME	EMAIL	PHONE	PAGER	FAX
NAME	EMAIL	PHONE	PAGER	FAX
NAME	EMAIL	PHONE	PAGER	FAX

High-Level Risk Assessment

Document Preparation Information

PROJECT NAME - RELEASE NUMBER	EVALUATOR (PRINT)	SIGNATURE	DATE PREPARED

Instructions: Put a check in the column that provides the best answer. Use the attached sheets for an explanation of each item. After all items have been evaluated, provide an overall risk assessment based on the individual responses.

High-Level Risk Assessment

Risk Category	Level of Risk			
	Not Applicable	Low Risk	Moderate Risk	High Risk
Strategic importance				
Management support				
Budget availability				
Resource availability				
Project manager availability				
Time frame				
Clarity of and agreement on project objectives				
Participation in project definition				
Customer interest and involvement				
User involvement				
Technical complexity				
Technology maturity				
Relevant experience				
Supplier/contractor involvement				
Major obstacles				
OVERALL RISK				

Guidelines

Strategic Importance	Assess the strategic importance of the project. How essential is it to the planned corporate objectives or to the maintenance of current operations? The less essential the project, the greater the risk that it will not receive sufficient support and attention. ***Low Risk:*** The project has substantial strategic importance; it has either been mentioned directly as a major initiative or directly supports a major initiative. ***Moderate Risk:*** Failure to complete the project would jeopardize the achievement of major initiatives. Project sponsors would designate the project as "necessary." ***High Risk:*** The project does not directly relate to any major strategic initiatives. Project sponsors would designate the project as "nice to have."
Management Support	Determine the extent to which management throughout the company actively supports the project. Management support is essential if the project is to be effectively carried out. Management provides the resources by which the project is accomplished. ***Low Risk:*** Management in all organizations that will participate in the project actively supports the project initiative and willingly commits resources to the effort. ***Moderate Risk:*** Project sponsor provides strong support and establishes momentum among other managers who control resources. ***High Risk:*** Project sponsor is not strongly interested; no significant management attention or interest from any side.
Budget Availability	Evaluate the availability of funding to support the project. Determine whether funding will be available in the time frame necessary to carry out the work. Ensure funding is available for all resources—people, suppliers, material, computer time, and so on. ***Low Risk:*** Funding has been identified for the project, matching the time frame in which funds are required. ***Moderate Risk:*** Funding has not been identified specifically for the project; however, funding is available within established budgets and management has approved its use. ***High Risk:*** Funding has not been identified for the project, and funds are tight or unavailable within existing budgets.
Resource Availability	People are the most critical resource for the project. Evaluate the availability of human resources, assessing not only whether the required number of people are available but whether the right types of skills and experience levels are also available. ***Low Risk:*** A project team has already been identified with the requisite skills; team members have been committed to the effort. ***Moderate Risk:*** Project team members have not been identified specifically. Most skills are thought to be readily available within the company. ***High Risk:*** Project team members have not been identified. Resources are scarce, and obtaining the necessary skills will be difficult in the required time frame.
Project Manager Availability	The availability of a qualified project manager will increase the chances of project success. Assess whether a project manager is available and will be assigned to the project. ***Low Risk:*** A project manager has already been identified for the project and is available in the required time frame. ***Moderate Risk:*** A project manager has not been specifically identified, but qualified project managers are available. ***High Risk:*** No qualified project manager is available to assume responsibility for the project.

Time Frame	Assess the time frame in which the project is required. Tighter time frames increase overall project risk. There should be sufficient time to plan the project thoroughly and to accomplish all project tasks. ***Low Risk:*** There is sufficient time available for project planning and project execution, including provision for a reasonable amount of slack time to accommodate unforeseen delays. ***Moderate Risk:*** There is sufficient time for project planning and project execution, assuming an optimized schedule with an aggressive critical path. ***High Risk:*** Even with the most aggressive scheduling, the project time frame is unrealistic. Deadlines will possibly result in cutting corners to meet the schedule.
Clarity of and Agreement on Project Objectives	Assess the degree to which project objectives have been defined clearly. If the objectives are not clear, it is unlikely that the project will be carried out successfully. Also important is the extent to which the project objectives have been communicated and bought into by the company's organizational elements that will contribute to or support the project. ***Low Risk:*** Project objectives are clearly defined, have been communicated throughout relevant organizations, and have been agreed to. ***Moderate Risk:*** Project objectives have been generally defined, and there is general agreement with them. There is no detailed description of the objectives, however. ***High Risk:*** Project objectives have not been defined, or there is substantial disagreement with them among the organizations.
Participation in Project Definition	Determine whether the project has already been defined or if the project manager and project team will be allowed to participate in the project definition. Projects that are defined and handed to the project team are generally more difficult to complete than projects in which the project team participates in the project definition process. ***Low Risk:*** There is no current project definition; the project team will be a key player in the project definition process. ***Moderate Risk:*** There is a current project definition; however, the project team will have an opportunity to review and revise that definition during the planning process. ***High Risk:*** The project definition is already established; the project team will have no opportunity to revise it.
Customer Interest and Involvement	Evaluate the level of interest in the project on the part of the project's ultimate customer. Will the customer materially participate in the project's implementation? Customer interest and involvement is an important element in ensuring the project is completed as planned. ***Low Risk:*** The customer is actively interested in the project, has assigned a point of contact, and intends to participate in key project activities. ***Moderate Risk:*** The customer is interested in the project and intends to participate in some project activities. ***High Risk:*** The customer expresses little or no interest in the project and has no interest in participating in project activities.

User Involvement	Determine the extent to which users will be involved in the project. User participation can enhance the design and development processes and can streamline the project validation process. ***Low Risk:*** Users will definitely be involved with the project. A user team has been identified, and provisions have been made to provide adequate user participation. ***Moderate Risk:*** Users will likely be involved with the project; however, no specific plans have been made for their participation. ***High Risk:*** Users are unavailable to participate in the project.
Technical Complexity	The level of technical complexity is a direct contributor to overall project risk. Assess the complexity of the project with regard to the project's size, the type of system to be developed, the number of organizations that will participate, and the difficulty of the task. ***Low Risk:*** The project is technically straightforward. The system is limited to a specific application with little crossover or interface with other systems and applications. ***Moderate Risk:*** The project presents a technical challenge. The requirement is difficult to solve, or the system will perform multiple functions in concert with other systems. ***High Risk:*** The project is extremely difficult technically. There are substantial integration requirements with other systems.
Technology Maturity	Mature technology is easier to work with than emerging technology. Assess the level of maturity of the technology to be used in the system. Does the technology currently exist? Has it been proven in other applications? Will the technology be developed during the course of the project? ***Low Risk:*** Virtually all the technology to be used on the project has been used in other, proven applications. ***Moderate Risk:*** Most technology has been used in other applications. There will be some technology development during the project but that will be limited to specific functions and areas. ***High Risk:*** Most project technology will be developed during the project and must be proven during the validation and testing process.
Relevant Experience	Organizations that have experience with similar projects can complete projects with less risk than organizations doing a project for the first time. Determine whether the company has experience with projects that relate to or are similar to the contemplated project. ***Low Risk:*** The company has substantial experience with related or similar projects and can apply that experience to the current project. ***Moderate Risk:*** The company has some experience with related projects. ***High Risk:*** This is the first project of this type that the company has undertaken.
Supplier/ Contractor Involvement	Involving suppliers or contractors in the project can increase the risk, especially if the company has not worked with those organizations before. Determine the extent and anticipated difficulty of supplier involvement. ***Low Risk:*** Either few or no suppliers will be involved, or all suppliers have worked with BST on previous projects. ***Moderate Risk:*** Some suppliers will be involved; most will have worked with the company on previous projects. ***High Risk:*** Many suppliers will be involved. A significant number will not have worked with the company on previous projects.

Major Obstacles	Assess any other major obstacles that may exist. Identify the obstacles and whether it appears that they may be overcome. ***Low Risk:*** Few major obstacles exist; for those that exist, there are clear solutions. ***Moderate Risk:*** Some major obstacles exist; there are clear solutions for most of them. ***High Risk:*** A significant number of major obstacles exist for which there are no clear solutions.

Risk Event Assessment and Planning

Document Preparation Information

PROJECT NAME - RELEASE NUMBER	PREPARED BY (PRINT)	SIGNATURE	DATE PREPARED

General Information

RISK EVALUATOR	WBS REFERENCE	OTHER REFERENCE

Risk Event Title

ENTER ONE-LINE DESCRIPTION OF RISK EVENT

Description

PROVIDE DETAILED DESCRIPTION OF RISK EVENT

Probability

DESCRIBE THE PROBABILITY OF THE RISK EVENT OCCURRING. USE QUANTITATIVE METHODS IF APPLICABLE.

Impact

DESCRIBE THE IMPACT OF THE RISK EVENT. USE QUANTITATIVE METHODS IF APPLICABLE.

Exposure

PROVIDE AN ASSESSMENT OF THE OVERALL RISK. USE QUANTITATIVE TECHNIQUES IF POSSIBLE; OTHERWISE, USE CATEGORIZATION OF SERIOUS, THREATENING, OR MANAGABLE..

Risk Mitigation Strategies

Strategy Description	Strategy Type (Check One)			
	Avoid	Assume	Control	Transfer
ENTER A DESCRIPTION OF THE PREVENTATIVE STRATEGIES AND CONTINGENCY PLANS FOR THE RISK.				

Scope Change Request and Evaluation

Document Preparation Information

PROJECT NAME - RELEASE NUMBER	PREPARED BY (PRINT)	SIGNATURE	DATE PREPARED

(The following information must be filled in by the project manager)

Scope Change Request Information

CHANGE REQUEST NUMBER	DATE CHANGE REQUEST INITIATED	RESULTING CHANGE ORDER NUMBER	PROJECT LIBRARY FILE NUMBER

PRIORITY

☐ High ☐ Medium ☐ Low

General Information

SUPPLIER	CUSTOMER	CHANGE NAME (DESCRIPTION)

REFERENCES

SUBMITTED BY	DATE	INVESTIGATED BY	DATE STARTED	DATE COMPLETED

Impact Analysis

ALL PARTIES AFFECTED	INITIALS/DATE /
SCHEDULE IMPACT	INITIALS/DATE /
COST IMPACT	INITIALS/DATE /
QUALITY IMPACT	INITIALS/DATE /
PROJECT MANAGER'S RECOMMENDATION	INITIALS/DATE /

Scope Change Information

CHANGE APPROVED/REJECTED	DEFERRED TO	DATE
☐ Approved ☐ Rejected		

Approved By

CUSTOMER	DATE	BST IT	DATE

Scope Change Request Log

Document Preparation Information

PROJECT NAME - RELEASE NUMBER	PREPARED BY (PRINT)	SIGNATURE	DATE PREPARED

General Information

CUSTOMER	PROJECT LIBRARY FILE NUMBER

Log Information

Change Request Number	Priority H	M	L	Change Name (Description)	Assigned To	Date Opened	Date Approved	Date Closed	Cost Impact	Schedule Impact
	☐	☐	☐							
	☐	☐	☐							
	☐	☐	☐							
	☐	☐	☐							
	☐	☐	☐							
	☐	☐	☐							
	☐	☐	☐							
	☐	☐	☐							
	☐	☐	☐							
	☐	☐	☐							
	☐	☐	☐							
	☐	☐	☐							
	☐	☐	☐							

Project Issues Log

Document Preparation Information

PROJECT NAME - RELEASE NUMBER	PREPARED BY (PRINT)	SIGNATURE	DATE

Log Information

Issue ID	Issue Name/Description	Severity	Assigned to	Date Open	Follow-Up Date	Date Closed	Resolution

Attachment B-12

Jointly Developed by the EI Change Control Sub-team comprised of BellSouth and CLEC Representatives.

BST Maintenance/Defect Notification Document

Document Preparation Information

PREPARED BY (PRINT)	SIGNATURE	DATE PREPARED

Maintenance Notification

Effective Date	Interface (s) Impacted	Identification #	Explanation

Defect Notification

Effective Date	Interface (s) Impacted	Identification #	Explanation

BELLSOUTH DEFECT NOTIFICATION (SAMPLE)

PREPARED BY: _____ DATE PREPARED:

CHANGE REQUEST ID:

DATE IDENTIFIED:

DEFECT TYPE: ☐ DOCUMENTATION ☐ ELECTRONIC INTERFACE ☐ MANUAL

INTERFACES IMPACTED:

PRE-ORDERING: ☐ LENS ☐ TAG ☐ CSOTS

ORDERING: ☐ EDI ☐ LENS ☐ TAG ☐ LNP

MAINTENANCE: ☐ TAFI ☐ EC-TA LOCAL

DOCUMENTATION IMPACTED: ☐ YES ☐ NO

EXPLANATION OF DEFECT:

WORKAROUND:

RESOLUTION:

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

Preliminary Priority List

Company Name: _____

CCCM: _____

Date Submitted: _____

Change Review Meeting Date: _____

Check Interfaces Used:	☐ LENS	☐ TAG	☐ EC-TA	☐ Manual
	☐ EDI	☐ TAFI	☐ CSOTS	

If you do not use an interface, do not rate the request.

Rate request on a scale of 1 to N, with N being the greatest. Rate by Category for each interface your company uses.

Pending Change Requests to be Prioritized

Category	Rating	Interface	Change Request Log #
Pre-Ordering			
Ordering			
Maintenance			
Manual			

Attachment C-3

Monthly Status Meeting Agenda Template

Opening..... 5 Minutes

Facilitator/BellSouth opens meeting.

Regulatory Issues..... 10 Minutes

Review any issues that could impact Change Request(s) prioritization. This may include FCC rulings, PSC rulings or Industry Changes.

Change Request Status: **40 Minutes**

New
Pending
Scheduled
Implemented
Canceled
Defects
Review status of all change requests

Release Management & Implementation Status.....15 Minutes

Review status of scheduled Releases.

Issues/Action Items.....15 Minutes

Re-cap any issues and action items surfaced during the meeting. Each item is assigned an owner and a follow-up date.

Adjourn.....5 Minutes

Facilitator/BellSouth reviews next steps.

Change Review Meeting Agenda Template

Opening.....10 Minutes

Facilitator/BellSouth opens meeting.

Change Request Log Status.....30 Minutes

Change Requests to be reviewed will have a status of "P" for Pending and will follow the process flow as outlined in Part 2 – Detailed Process Flow.

Regulatory Issues.....30 Minutes

Review any issues that could impact Change Request(s) prioritization. This may include FCC rulings, PSC rulings or Industry Changes.

Release Management & Implementation Status.....30 Minutes

Review status of scheduled Releases.

Recycled Change Request(s).....30 Minutes

Determine priority disposition of Change Request(s) that are on the Candidate Request List, but have not been scheduled for a target release.

Presentation of Change Requests.....20 Minutes/Request

The presentation of each Change Request is limited to 20 minutes. The initiator of the request is allowed a maximum of five minutes of presentation time followed by a question and answer session not to exceed 15 minutes. Change Requests will be presented and prioritized by Interface.

Develop Candidate Change Request List.....60 Minutes

Participating companies will vote on the final prioritization of the Change Requests as indicated in the Change Review Section of the Change Control Process Document. Change Requests to be submitted for sizing and sequencing will be placed on the Candidate Change Request List along with the "Need-by-Date".

Present Outputs.....10 Minutes

Re-cap of final prioritization and Change Requests submitted to the Candidate Change Request List.

Issues/Action Items.....15 Minutes

Re-cap any issues and action items surfaced during the meeting. Each item is assigned an owner and a follow-up date.

Adjourn.....5 Minutes

Facilitator/BellSouth reviews next steps.

BELLSOUTH

Change Control Process
User Registration Form

Date ___/___/___

Company
Name_____

CCCM Assigned_____ Phone_____

CCCM Alternate_____ Alt Phone_____

CCM E-mail Address _____ Fax_____

CCM E-mail Alternate _____ Alt Fax_____

Please indicate participation type: ☐ CLEC ☐ Service Provider *
* If Service Provider, please attach Letter of Authorization (LOA) from CLEC you will be representing.

To receive Change Control correspondence, as well as system outages and defect notifications, you must subscribe to the BellSouth List Manager. To subscribe to the list manager, the CLEC should send an email to:

List.Manager@bridge.bellsouth.com

With the Subject Line: **SUBSCRIBE CCP**

It is not necessary to include a message with the email being sent, as the system will automatically subscribe the participant by using the sender's email address.

Interfaces Currently Used:	☐ Pre-Ordering	☐ Ordering	☐ Maintenance	☐ Manual
	☐ LENS ☐ TAG ☐ CSOTS	☐ EDI ☐ LENS ☐ TAG	☐ TAFI ☐ EC-TA Local	

Comments_____

Form Completed By
(Signature)_____

Minimum requirements to participate in the Change Control Process: Word 6.0 and Excel 5.0 or greater, Internet E-mail address, Web access

Attachment C-6

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

BELLSOUTH

Change Control Process
User Registration Form

RETURN TO: BCCM
FAX 205-321-5160

OR

Valerie Cottingham
8th Floor
600 No. 19th Street
Birmingham, AL 35203

BELLSOUTH

Change Control Process
CR LOG Legend

CR LOG #	Log number assigned to each change request.
Status	Status of change request: N=New (being reviewed for acceptance), P=Pending (accepted-to be prioritized), PC=Pending Clarification, S=Scheduled for a Release, I=Implemented in a Release, C=Canceled Request, V=Validated Defect, W=Workaround Identified, CRC=Change Review Complete, RC=Candidate Request for a Release
Type	Type of CR: Type 2=Regulatory, Type 3=Industry Standard, 4=BST Initiated, 5=CLEC Initiated, 6=CLEC Impacting Defect
Title	Title of Change Request
Step 1 **Date Sent/Date Received**	Date CR was sent/received by Change Control
Step 2 **Open & Validate CR (Target Date)** • **Types 2-5 (target is 3 bus days)** • **Type 6 (target is 1 bus day)** **Clarification Date Sent (if needed)** **Clarification Response Rec'd Date** **Open & Validate CR (Actual Date)**	Target date for the Change Control Team to open CR and validate for completeness. Interval is 2-3 business days from date received (for Types 2-5). Interval is 1 business day for Type 6 (defects). During this step, a CR Log # is assigned, acknowledgment notification is sent to originator, CR is reviewed for mandatory fields and completeness. Date clarification was sent to originator of CR. Clarification times would be in addition to cycle time. Date clarification response was received from originator. Actual date CR was opened and validated by Change Control Team.
Step 3 **Review CR for Acceptance (Target Date)** • **Types 2-5 (target is 20 bus days)** • **Type 6 (target is 3 bus days for internal validation, an additional 4 bus days to develop workaround if, applicable)** **Clarification Sent Date (if needed)** **Clarification Response Rec'd Date**	For Types 2-5, target date to review CR and determine status (20 bus day interval). CR reviewed for impacted areas. Status codes include: Pending, Pending Clarification or Canceled. For Type 6- status codes include: Pending, Pending Clarification, Validated Defect, Workaround Identified or Canceled. Date clarification notification was sent to originator of CR. Clarification times would be in addition to cycle time. Date clarification response was received from originator. Actual date CR was accepted or results provided to originator for review/discussion. Date CR was canceled and notification provided to

Attachment C-7

BELLSOUTH

Change Control Process
CR LOG Legend

Review CR for Acceptance (Actual Date)	originator/CLEC community. **NOTE**: the originator at any step in the process can cancel a CR.
Cancel CR Notify Date	
Step 4 **Prepare for CRM (Target Date)** • **5-7 business days prior to CRM date**	Target date for the Change Control Team to prepare for the Change Review Meeting (prioritization meeting). Target date is to provide CLEC community with updated Change Request Log and meeting details 5-7 business days prior to CRM meeting.
Prepare for CRM (Actual Date)	Actual date CRM details were provided to CLEC community.
Step 5 **CR Meeting Date (Actual)**	Actual date of Change Review Meeting.
Step 6 **Doc Chg Rev Mtg Results (Target)** • **2 business days**	Target date for Change Control Team to provide the meeting minutes from the Change Review Meeting to CLEC community (2 bus day interval).
Doc Chg Rev Mtg Results (Actual)	Actual date meeting minutes were distributed to CLEC community from Change Review Meeting.
Step 7 **Internal Change Mgmt Process (Target Date)** • **30 business days**	Target date for CLECs/BST to perform analysis, impact, sizing and estimating activities for the Candidate Change Requests that were prioritized in the Change Review meeting. Target interval is 30 business days.
Internal Change Mgmt Process (Actual Date)	Actual date that CLECs/BST complete the Internal Change Management Process of analysis, impact, sizing and estimating activities for Candidate Change Requests.
Step 8 **RPM (Actual Date)**	Actual date of Release Package Meeting where Change Control Team presents the proposed scope for the next major release.
Step 9 **Rel Pkg Notify (Target Date)** • **2 business days**	Target date for Change Control to develop and distribute Release Package Notification via web (target of 2 bus days).
Rel Pkg Notify (Actual Date)	Actual date release package notification was posted to web.
Step 10 **Rel Imp (Actual Date)**	Actual date of the Release associated with the CR.
Soft Rel Notif (Target Date) • **30 calendar days prior to release**	Target Date for BST posting Release Notification (target is 30 calendar days in advance of release implementation).

Attachment C-7

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BELLSOUTH

Change Control Process
CR LOG Legend

Soft Rel Notif (Actual Date)	Actual date release notification letter is posted to web.
Doc Changes Notif (Target Date) • **30 calendar days prior to release**	Target Date for BST posting documentation changes (business rules) associated with a release (target is 30 days in advance of release implementation).
Doc Changes Notif (Actual Date)	Actual Date documentation notification is posted to web.
Doc Updates Only Notif (Target Date) • **5 business days prior to documentation posting date**	Target date for BST posting notification letter for documentation updates (non-system) changes only. Target is 5 business days prior to documentation posting date.
Doc Updates Only Notif (Actual Date)	Actual date CLEC notification letter is posted to the web announcing the documentation only changes to be posted.
Notes	Area to document additional status information for each CR (i.e., date workaround notification is provided, escalations, etc.).

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BELLSOUTH

CHANGE CONTROL PROCESS

CCP2_16.DOC

FEBRUARY 16, 2001

VERSION 2.1

(WORKING DOCUMENT)

Issued: 2/19/2001

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

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VERSION CHANGE HISTORY

This section list changes made to the baseline Electronic Interface Change Control Process document since the last issue. New versions of this document may be obtained via BellSouth's Web site.

Version	Issue Date	Section Revised	Reason for Revision
1.0	04/14/98		Initial issue.
1.2	2/28/00	All	The EICCP Documentation has been modified to incorporate: - Multiple Change Request Types (CLEC Initiated, BST Initiated, Industry Standards, Regulatory and System Outages) - Incorporated manual process - Defined cycle times for process intervals and notifications - Defect Notification process - Escalation Process - Modified Change Control forms to support process changes - Changed EICCP to CCP
1.3	3/14/00	All	The CCP Documentation has been modified to incorporate: - Type 6 Change Request, CLEC Impacting Defect - Increased number of participants at Change Review meetings - Changed cycle time for Types 2-5 Step 3 from 20 days to 15 days - Defined Step 4 of the Defect Notification process to include communicating the workaround to the CLEC community - Web Site address for Change Control Process - Notification regarding the Retirement and

			Introduction of new interfaces - New status codes for Defect Change Requests - New status codes: 'S' for Scheduled Change Requests and 'I' for Implemented Change Requests (types 2-5 Change Requests) - Removed reference to EDI Helpdesk. Electronic Communications Support (ECS) will be the first point of contact for Type 1 System Outages. - Word changes to provide clarification throughout the document.
1.4	4/12/00	All	The CCP Documentation has been modified to incorporate: - Type 1 and 6 Notifications will be communicated to CLECs via e-mail and web posting - Step 3 Cycle Time (Types 2-5) changed from 15 business days to 20 business days - Verbiage to Step 10 (Types 2-5) regarding BellSouth presenting baseline requirements - Introduction and Retirement of New Interfaces Section - Dispute Resolution Process - Testing Environment Section - Word changes to provide clarification throughout the document - Monthly Status Meeting Agenda Template - RF1870 Change Request Form changes
1.5	4/26/00	Section 1 Section 8 Section 11	- Updated CCP web site address - Updated Escalation Contacts for Types 2-6 - Added definitions for Account Team and Electronic Communications Support (ECS)
1.6	7/20/00	Section 1	- Added "testing" under process changes - Clarification provided in "Change Review

		Section 2	Participants" description. - Added statement regarding submittal of Change Requests
		Section 4 Part 2	- Clarification provided for documentation changes for business rules - Step 2-Added email notification - Step 3-Removed "Cancellation by BellSouth" - Step 3-Clarification on reject reasons - Step 3-Clarification on internal validation activities
		Section 5	- Step 4-Changed cycle time from 5 to 4 bus days for develop workaround - Added defect implementation range - Changed prioritization from "by interface" to "by category"
		Section 6	- Changed timeframe for receiving a Change Request prior to a Change Review Meeting from 33 to 30 business days - Modified the prioritization voting rules - Updates to the Introduction and Retirement of Interfaces
		Section 7	- Added Type 6 escalation turnaround time
		Section 8	- Changed 3rd Level Escalation contacts for Types 2-6
		Section 11	- Removed "Cancellation by BellSouth" and "Defect Cancelled" definitions - Removed "Cancellation by BellSouth" from Change Request Form and Checklist
		Appendix A	- Added Letter of Intent Form
		Appendix C	- Changes to the following forms: Preliminary Priority List, CCP User Registration Form. Added the following forms: Defect Notification Sample, CR Log Legend.

		Appendix D All	- Added BellSouth Versioning Policy Word changes to provide clarification throughout the document.
2.0	08/23/00	Cover Section 3 Section 5 Section 10 Section 11-Terms & Definitions Appendix A All	- Removed "Interim" from cover. - Updated Type 6 definition to incorporate new defect and expedited feature definitions. - Replaced Section 5, Defect Notification Process with a "Draft" Defect/Expedite Notification Process. - Reduced the implementation interval for validated defects (High Impact) from 4 - 30 business days to 4 - 25 business days, best effort. - Added Internet Web sites for EDI and TAG Testing Guidelines - Updated definition for Defect. Added definitions for Expedited Feature, High, Medium and Low Impacts. - Modified Change Request Forms (RF1870 and RF1872) to include email address for Change Control. Also added High, Medium and Low Assessment of Impact Levels. - Referenced the handling of expedites and expedite notification where appropriate.

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1.0 INTRODUCTION

This document establishes the process by which BellSouth Telecommunications (BST) and Competitive Local Exchange Carriers (CLECs) will manage requested changes to the BellSouth Local Interfaces, the introduction of new interfaces, and provide for the identification and resolution of issues related to Change Requests. This process will cover Change Requests that affect external users of BellSouth's Electronic Interface Applications, associated manual process improvements, performance or ability to provide service including defect and expedite notification. This process shall be referred to as the Change Control Process.

All parties should recognize that deviations from this process might be warranted where unanticipated circumstances arise such that strict application of these guidelines may not result in their intended purpose. Furthermore, deviations may be required due to specific regulatory and business requirements. Parties shall provide appropriate web notification to the CLEC/BST Change Control Team participants prior to deviating from the processes established within this document. All parties will comply with all legal and regulatory requirements.

The Change Control Process will cover change requests for the following interfaces and associated manual processes that have the potential to impact the interfaces connected to BellSouth:

- Local Exchange Navigation System (LENS)
- Electronic Data Interchange (EDI)
- Telecommunications Access Gateway (TAG)
- Trouble Administration Facilitation Interface (TAFI)
- Electronic Communications Trouble Administration (EC-TA) Local
- CLEC Service Order Tracking System (CSOTS)

The types of changes that will be handled by this process are as follows:

- Software
- Hardware
- Industry Standards
- Product and Services (i.e., new services available via the in-scope interfaces)
- New or Revised Edits
- Process (i.e., electronic interfaces and manual processes relative to order, pre-order, maintenance and testing)
- Regulatory
- Documentation (i.e., business rules for electronic and manual processes relative to order, pre-order, maintenance, including User Guides that support OSS systems currently within the scope of CCP)

- Defects
- Expedited Features

The scope of the Change Control Process does not include the following which are handled through existing BellSouth processes:

- BonaFide Requests (BFR)
- Production Support (i.e. adding new users to existing interfaces, existing users requesting first time use of existing BST functionality)
- Contractual Agreements
- Collocation
- Coordination of test agreements will continue to be supported by the Account Team
- Questions regarding existing documentation should be handled by the Account Team. However, if documentation needs to be changed for clarification purposes, a defect Change Request should be submitted through Change Control Team.

OBJECTIVES OF THE CHANGE CONTROL PROCESS:

- Support the Industry guidelines that impact Electronic Interfaces and manual processes relative to order, pre-order, maintenance, and billing as appropriate
- Ensure continuity of business processes and systems operations
- Establish process for communicating and managing changes
- Allow for mutual impact assessment and resource planning to manage and schedule changes
- Capability to prioritize requested changes

The minimum requirements for participation in the Change Control Process electronically are:

- Word 6.0 or greater
- Excel 5.0 or greater
- Internet E-mail address
- Web access

The web site address for the Change Control Process is as follows:

http://www.interconnection.bellsouth.com/
Select "Local Exchange Carriers"
Select "Change Control Process"

2.0 CHANGE CONTROL ORGANIZATION

The Change Control organizational structure supports the Change Control Process. Each position within the organization has defined roles and responsibilities as outlined in the Change Control Process Flow - Section 4 of this document. Identified positions, along with associated roles and responsibilities are as follows:

Change Review Participants. Representatives from Competitive Local Exchange Carriers (CLECs) and BellSouth. This team meets to review, prioritize, and make recommendations for Candidate Change Requests. The Candidate Change Requests are used as input to the Internal Change Management Processes (refer to process step 7 for Types 2-5 changes).

CLECs and BellSouth will define points of contact in each of their companies for communicating and coordinating change notification. All change requests are made in writing (e-mail is preferred). Notifications will be provided via e-mail and posted to the BellSouth web site.

Each company may bring the number of participants necessary to represent their position. If the number of participants grows to be unmanageable, CLECs and BellSouth will revisit the issue of representation to apply some restrictions.

BellSouth Change Control Manager (BCCM). The BCCM is responsible for managing the Change Control Process and is the main point of contact for Types 2 – 6 changes. This individual maintains the integrity of the Change Requests, prepares for and facilitates the Change Review Meetings, presents the Pending Change Requests to the BST Internal Change Management Process, and ensures that all Notifications are communicated to the appropriate parties.

CLEC Change Control Manager (CCCM). The CCCM is the CLEC point of contact for Change Requests. This individual is responsible for presenting and prioritizing Change Requests at the Change Review Meetings.

Release Management Project Team. A team of CLEC and BellSouth Project Managers who manage the implementation of scheduled changes and releases.

3.0 CHANGE CONTROL DECISION PROCESS

Change requests will be classified by Type. There are six Types:

Type 1 – System Outage

A Type 1 change is a BellSouth System Outage. A System Outage is where the system is totally unusable or there is degradation in an existing feature or functionality within the interface. If the System Outage is not resolved within 20 minutes, a notification will be provided via e-mail and posted to the web within one hour. Either BellSouth or a CLEC may initiate the change request. Type 1 system outages will be processed on an expedited basis. All Type 1 System Outages will be reported to the Electronic Communications Support (ECS) Help Desk. A Type 1 System Outage is a condition where the CLEC Pre-Orders/Orders/Queries/Maintenance Requests cannot be submitted or will not be accepted by BellSouth.

Type 2 – Regulatory Change.

Any non-Type 1 change to the interfaces between the CLEC's and BellSouth's operational support systems mandated by regulatory or legal entities, such as the Federal Communications Commission (FCC), a state commission/authority, or state and federal courts are Type 2 changes. Regulatory changes are not voluntary but are requisite to comply with newly passed legislation, regulatory requirements, or court rulings. While timely compliance is required, the systems requirements and methodology to achieve compliance are usually discretionary and within the scope of change management. Either BellSouth or a CLEC may initiate the change request. Type 2 changes may be managed using the Expedited Feature Process, as discussed in Section 4, Part 3.

Type 3 – Industry Standard Change.

Any non-Type 1 change to the interfaces between the CLEC's and BellSouth's operational support systems required to bring these interfaces in line with newly agreed upon telecommunications industry guidelines are Type 3 changes. Either BellSouth or a CLEC may initiate the change request. Type 3 changes may be managed using the Expedited Feature Process, as discussed in Section 4, Part 3.

Type 4 – BellSouth Initiated Change.

Any non-Type 1 change affecting the interfaces between the CLEC's and BellSouth's operational support systems which BellSouth desires to implement on its own accord. These changes might involve system enhancements, manual and/or business processes. These type changes might also include issues for Pre-Orders, Orders, Queries, and Maintenance Requests that can be submitted and accepted, but may require clarification. This classification does not

include changes imposed upon these interfaces by third parties such as regulatory bodies (which are Type 2 Changes) or standards organizations (which are Type 3 Changes). Type 4 changes may be managed using the Expedited Feature Process, as discussed in Section 4, Part 3.

Type 5 – CLEC Initiated Change.

Any non-Type 1 change affecting interfaces between the CLEC's and BellSouth's operational support systems which the CLEC requests BellSouth to implement is a Type 5 change. These changes might involve system enhancements, manual and/or business processes. These type changes might also include issues for Pre-Orders, Orders, Queries, and Maintenance Requests that can be submitted and accepted, but may require clarification. This classification does not include changes imposed upon these interfaces by third parties such as regulatory bodies (which are Type 2 Changes) or standards organizations (which are Type 3 Changes). Type 5 changes may be managed using the Expedited Feature Process, as discussed in Section 4, Part 3.

Type 6- CLEC Impacting Defects

A Type 6 defect request is any non-Type 1 change that corrects problems discovered in production versions of an application interface. These problems are where the interface is not working in accordance to the BellSouth baseline business user requirements or the business rules that BellSouth has published or otherwise provided to the CLECs.

In addition, if functional requirements agreed upon by BellSouth and the CLECs, results in inoperable functionality, even though software business user requirements and business rules match; this will be addressed as a defect.

These problems typically affect the CLEC's ability to exchange transactions with BellSouth and may include documentation that is in error, has missing information or is unclear in nature.

Type 6 validated defects may not be managed using the Expedited Feature Process as discussed in Section 4, Part 3.

Defect Change Requests will have three (3) Impact Levels:

- High Impact – The failure causes impairment of critical system functions and no electronic workaround solution exists.
- Medium Impact – The failure causes impairment of critical system functions, though a workaround solution does exist.
- Low Impact – The failure causes inconvenience or annoyance.

The CLEC and/or BellSouth may initiate these types of changes affecting interfaces between the CLECs and BellSouth's operational support systems. These type changes might also include issues for Pre-Orders, Order, Queries, and Maintenance Requests that can be submitted and accepted, but may require workarounds or clarification.

Figure 3-1 shows the top-level process that will be used to evaluate Change Requests. The BellSouth Account Team(s) will handle BFR requests and production support issues. Enhancements, defects and expedited features will be handled through the Change Control Process.

Figure 3-1. Change Control Decision Process

4.0 CHANGE CONTROL PROCESS FLOW

The following three sub-sections describe the process flows for typical Type 1 through Type 5 changes, including Expedited Features. Each sub-section will describe the cycle times for an activity and document accountability, sub-process activities, inputs and outputs for each step in the process. Section 5 of this document describes the process flow for Type 6 changes. Based on the categorization of the request, the following diagram will help guide a CLEC or BellSouth representative to the appropriate process flow based on Change Control Request Type:

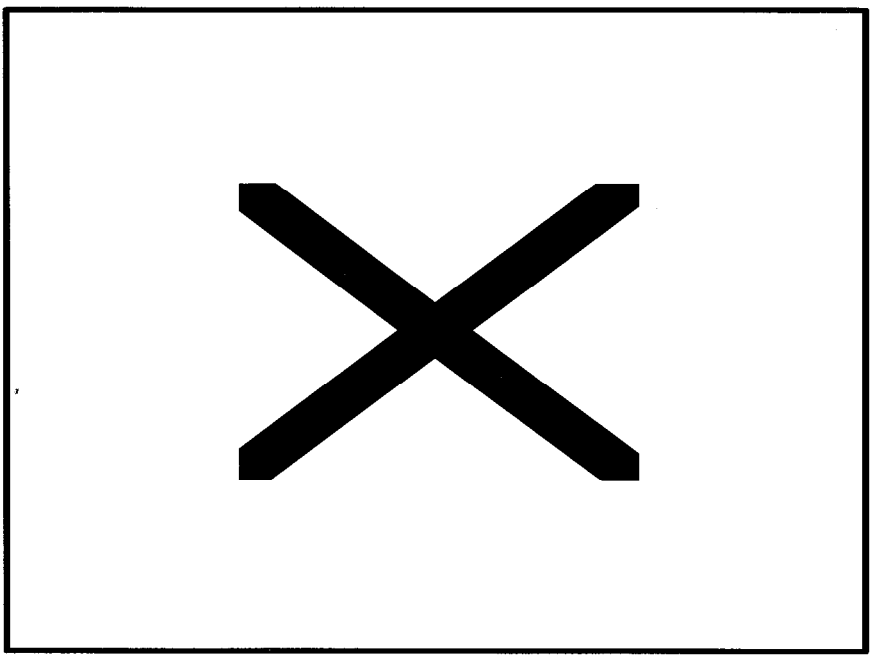


Figure 4-1. Change Control Process Flow

Part 1 - Type 1 Process Flow

Figure 4-2 provides the process flow for resolving a typical Type 1 - System Outage. The Electronic Communications Support (ECS) Group will work with the CLEC community to resolve and communicate information about system outages in a timely manner - actual cycle times are documented in table 4-1 and the sub-process steps. The ECS Helpdesk number is 888-462-8030.

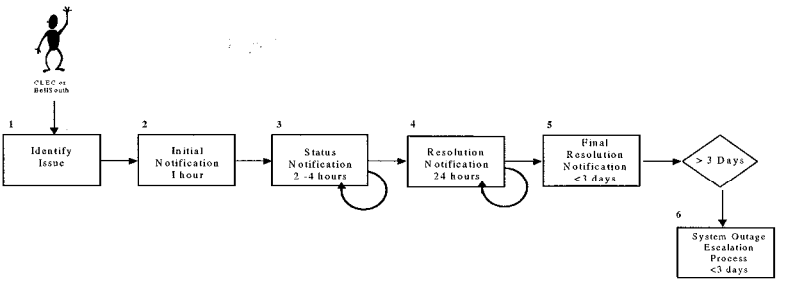


Figure: 4-2. Type 1 Process Flow

Table 4-1 describes the cycle times for each process step that is outlined in the Type 1 - System Outage Process Flow. These cycle times represent typical timeframes for completing the documented step and producing the desired output for the step. In sub-process step 2 "Initial Notification" timeframe for completing this step does not begin until after the outage has been reported. The sub-process steps 3 "Status Notification" and 4 "Resolution Notification" are iterative steps. Iterative steps will be performed one or more times until the exit criteria for that process are met. If resolution is not reached within 20 minutes, BellSouth will provide the initial notification to the CLEC community via e-mail and post outage information on the web.

Table 4-1. Type 1 Cycle Times

Process Description	1 Identify Issue	2 Initial Notification	3 Status Notification	4 Resolution Notification	5 Final Resolution Notification	6 Escalation
Cycle Time	N/A	1 hour E-mail & BST Website will be posted if outage exceeds 20 minutes	2 - 4 hours (Iterative)	24 hours (Iterative)	< 3 days	> 3 days System Outage Escalation Process

Note: The Escalation Process may be used at any time within Steps 3-6 if cycle times are not met and/or responses are not acceptable.

The table below details the steps, accountable individuals, tasks, the inputs/outputs and the cycle time of each sub-process in the Type 1 Process Flow. This process will be used to capture and communicate system outage information, status notification(s), resolution and notification(s), and final resolution to the CLEC community. Steps shown in the table are sequential unless otherwise indicated.

Table 4-2. Type 1 Detail Process Flow

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
1	CCCM ECS	**IDENTIFY ISSUE:** 1. Internally determine if outage exists with BellSouth Electronic Interface. (The CLEC should perform internal outage resolution activities to determine if the potential problem involves the BellSouth Electronic Interface). 2. Call the BST Electronic Communications Support (ECS) help desk at 888-462-8030. 3. ECS and individual CLEC will determine if the problem is likely to have no impact on the industry. If there is no impact, the outage will be worked on a bilateral basis. 4. ECS will provide the CLEC with a trouble ticket number, if requested, to record and track the outage.	**INPUTS:** • Issue Characteristics • Call to ECS Helpdesk **OUTPUTS:** • Recorded Outage	N/A
2	ECS	**INITIAL NOTIFICATION:** 1. ECS will post to the Web an Initial Industry Notification that a BellSouth Electronic Interface outage has been identified. An e-mail to the CLECs participating in Change Control will also be distributed. The system ticket number of the outage will be included in the web posting and the email notification. 2. The CLEC initiating the Type 1 System Outage will need to be available for communications on an as needed basis.	**INPUTS:** • Recorded Outage **OUTPUTS:** • Industry Notification posted on Web • E-mail to CLECs participating in Change Control	1 Hour If System Outage is not resolved within 20 minutes, a notification will be sent to CLECs via e-mail and

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		3. ECS will continue to work towards the resolution of the problem 4. If outage is resolved, this notice is the first and final notification. The process for the item has ended. Outage Information will be reported in the monthly status meeting by the BCCM.		posted to the web.
3	ECS	**STATUS NOTIFICATION:** **(ITERATIVE)** 1. If the outage is not resolved, ECS will continue to work towards the resolution on the problem. 2. ECS may communicate with the industry / affected parties. The following information may be discussed: • Clarification of outage • Current status of resolution • Agreement of resolution 3. If a resolution has not been identified continue giving status notifications to the industry and continue repeating Step 3 "Status Notification" via the web. 4. Proceed to Step 4 "Resolution Notification" when a resolution has been identified.	**INPUTS:** • Industry Notification posted on Web **OUTPUTS:** • Status Notification posted on Web • Resolution information	2-4 hour intervals
4	ECS CCCM	**RESOLUTION NOTIFICATION:** **(ITERATIVE)** 1. The resolution notification is posted to the Web. 2. If the item is determined to be a defect, the CLEC that initiated the call will submit a "Change Request Form" checking the Type 6 box. 3. If the resolution is not the final resolution the process will loop back to Step 3 "Status Notification". BellSouth will continue to work towards the final resolution. 4. When the final resolution has been created, proceed to Step 5 "Final Resolution Notification".	**INPUTS:** • Status Notification posted on Web • Resolution information **OUTPUTS:** • Resolution Information posted on Web • Final Resolution Information	24 hours after reporting outage

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
5	ECS	**FINAL RESOLUTION NOTIFICATION:** 1. The final resolution notification is posted on the Web.	**INPUTS:** • Final Resolution Information **OUTPUTS:** • Final Resolution Notification	< 3 days
6	CCCM ECS	**ESCALATION** 1. Escalation is appropriate anytime the interval exceeds the recommended guidelines for notification. 2. Refer to the Type 1 - Escalation Process documented in Section 8.	**INPUTS:** • Information or concern relating to a Type 1 - Systems Outage **OUTPUTS:** • Documented Escalation • Escalation Response	➢ 3 days (The Escalation Process may be used at any time within Steps 3-6 if cycle times are not met and/or responses are not acceptable.)

Part 2 – Types 2-5 Process Flow

Figure 4-3 provides the process flow for reviewing, scheduling and implementing a typical Type 2-5 Change Request. The process diagram applies to Change Requests submitted via the Change Control Process. Change Requests should be submitted to the BellSouth Change Control Manager using the standard Change Request form template. This template can be acquired on the Change Control web page. Change Requests may be submitted for interfaces that are currently being utilized, in the testing phase, or if a Letter of Intent is on file with the BCCM.

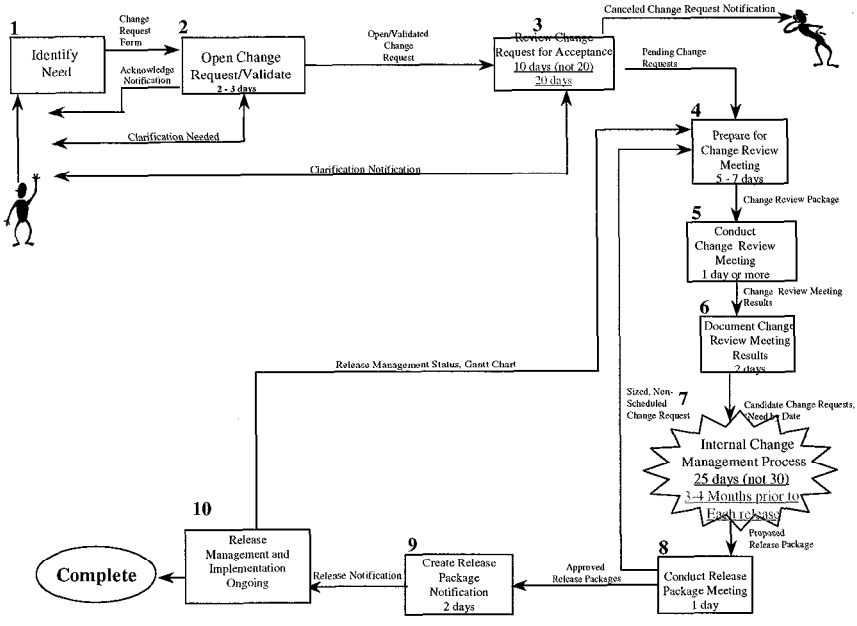


Figure 4-3. Change Control Process Flow

Based on the process flow outlined above:

- For the implementation of new features or modification of current functionality, ~~f~~Final Software Release ~~Notifications~~ requirements and specifications will be provided ~~30~~ 45 calendar days or more in advance of the implementation date.

- For the implementation of new features or modification of current functionality, ~~D~~draft requirements and specifications for software releases or systems modifications will be provided to CLECs 90 calendar days or more in advance of the implementation data.

- For the implementation of a new software version, final requirements and specifications will be provided to CLECs 180 calendar days or more in advance of the implementation date.

- All additions and changes to any BellSouth ~~D~~documentation changes that do not impact CLEC software, ~~for~~ including business rules changes, will be provided to CLECs 30 calendar days or more in advance of implementation date.

(12-7-00) CLEC community requested that for the following bullets associated with user requirements, specifications and documentation, replace "in advance of the release implementation date" with "in advance of the CLEC test date with BST".

- Draft user requirements for major software releases will be provided to CLECs at least 90 calendar days in advance of the release implementation date.

- Final user requirements for major software releases will be provided to CLECs at least 45 calendar days in advance of the release implementation date.

(12-7-00) CLEC community requested that final specifications (EDI specs and TAG API) for software releases (non-TCIF) be provided at least 45 calendar days in advance of CLEC test date with BST.

(12-7-00) CLEC community requested that the notification for a new TCIF map be provided at least 240 calendar days in advance of the CLEC test date with BST. Also begin working jointly with them in the development of the User Requirements for a new TCIF map 240 calendar days in advance of CLEC test date with BST.

- Notification for the implementation of a new TCIF map will be provided at least 180 calendar days in advance of the release implementation date. BellSouth will begin working jointly with the CLECs in the development of the User Requirements for a new TCIF map at least 180 calendar days in advance of the release implementation date.

(12-7-00) CLEC community requested draft user requirements for a new TCIF map be provided at least 180 calendar days in advance of CLEC test date with BST.

- Draft user requirements for the implementation of a new TCIF map will be provided to the CLECs at least 120 calendar days in advance of the release implementation date.

(12-7-00) CLEC community requested final user requirements for a new TCIF map be provided at least 120 calendar days in advance of CLEC test date with BST.

(12-7-00) CLEC community requested final specifications (EDI specs and TAG API) for a new TCIF map be provided at least 120 calendar days in advance of CLEC test date with BST.

- Final user requirements for the implementation of a new TCIF map will be provided to CLECs at least 60 calendar days in advance of the release implementation date. To accommodate changes that may be necessary as a result of design, construction, and testing efforts, BellSouth will distribute updates to the user requirements up to one month prior to the implementation of the new TCIF map. (Remove "BellSouth will distribute the user requirements at least once a month until one (1) month beyond implementation of the new TCIF map.")

- (1-10-01) CLEC community requested all documentation changes be provided at least 30 calendar days in advance of CLEC test date with BST.

- All additions and changes to BellSouth business rule documentation, both system and non-system impacting, will be provided to CLECs at least 30 calendar days in advance of the release implementation date.

~~CLEC notification of documentation updates (non-system changes) will be posted 5 (five) business days in advance of documentation posting date.~~ (Agree to Remove)

The table below details the steps, accountable individuals, tasks, inputs/outputs and cycle times of each sub-process in the Change Control process. This process will be used to develop Candidate Change Requests that will be used as input to the Internal Change Management Process. Steps shown in the table are sequential unless otherwise indicated.

Table 4-3. Types 2-5 Detail Process Flow

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
1	CCCM BCCM	**IDENTIFY NEED** 1. Internally determine need for change request. These change requests might involve system enhancements, manual and/or business process changes. 2. Originator and CCCM or BCCM should complete the standardized Change Request Form according to Checklist. 3. Attach related requirements and specification documents. (See Attachment A-1A, Item 22) 4. Appropriate CCCM/BCCM submits Change Request Form and related information via e-mail to BellSouth.	**INPUTS:** • Change Request Form (Attachment A-1) • Change Request Form Checklist (Attachment A-1A) **OUTPUTS:** • Completed Change Request Form with related documentation	N/A
2	BCCM	**OPEN CHANGE REQUEST/VALIDATE CHANGE REQUEST FOR COMPLETENESS** 1. Log Request in Change Request Log. 2. Send Acknowledgement Notification (Attachment A-3) via e-mail to originator. 3. Establish request status ('N' for New Request) 4. Review change request for mandatory fields using the Change Request Form Checklist. 5. Verify Change Request specifications and related information exists. 6. Send Clarification Notification via email to the originator (Attachment A-4) if needed. 7. Update Change Request Status to "PC" for Pending Clarification if clarification is needed. **CLEC or BellSouth Originator** If clarification is needed, make necessary	**INPUTS:** • Completed Change Request Form with related documentation • Change Request Form Checklist • Change Request Clarification Response **OUTPUTS:** • New Change Request • Acknowledgment Notification • Validated Change Request • Clarification Notification • Industry Notification via e-mail and web posting	2-3 Bus Days Clarification times would be in addition to cycle time.

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		corrections per Clarification Notification and submit Change Request Clarification Response (Attachment A-2).		
3	BCCM	**REVIEW CHANGE REQUEST FOR ACCEPTANCE** 1. Review Change Request and related information for content. 2. Change Request reviewed for impacted areas (i.e., system, manual process, documentation) and adverse impacts. 3. Determine status of request: • If change already exists or CLEC training issue forward Cancellation Notification (Attachment A-3) to CCCM or BCCM and update status to 'C' for Request Canceled or 'CT' for Training. If Training issue, refer to CSM or Account Team. • If Change Request Clarification Notification not received, validate with CLEC that change request is no longer needed. • If request is accepted, update Change Request status to "P" for Pending in Change Request Log. **NOTE**: See Section 11.0 Terms and Definitions – Change Request Status for valid status codes and descriptions. If BellSouth feels that a CLEC initiated change request should not be accepted because of cost, industry direction or because it is believed not technically feasible to implement, BellSouth will open an agenda item on the next monthly status meeting/call and will provide a SME on that call to present its case. With input from other participating CLECs, and subsequent to BellSouth's presentation, BellSouth and the originating CLEC will determine the disposition of the request. BellSouth shall consider all possible options for accommodating the request.	**INPUTS:** • New Change Request • Validated Change Request • Clarification Notification (if required) **OUTPUTS:** • Pending Change Request • Clarification Notification (if required) • Cancellation Notification (if required) • CR status updated on web	~~20~~ 10 Bus Days 20 Bus Days

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		(1-10-01) If BellSouth determines that a CLEC initiated change request should not be accepted because of cost, industry direction or because it is considered not technically feasible to implement. BellSouth will open an agenda item on the next monthly status meeting/call, and will provide a SME on that call to present its case. BellSouth shall consider all possible options for accommodating the request. (2-16-01) BellSouth may determine that a CLEC initiated change request cannot be accepted because of cost, industry direction or because it is considered not technically feasible to implement. If requested, the appropriate BellSouth SME will participate in the Monthly Status Meeting to address the reason for rejection and discuss alternatives with the CLEC community. The SME must be provided a minimum of two-week advance notice to participate in the upcoming Monthly Status Meeting. **OBF Issues (02-16-01)** All change requests that are being actively discussed at OBF, or are on the agenda to be discussed, will be deferred. If the issue is not active and will not be considered within the next six (6) months, and there is agreement between BellSouth and affected CLECs to proceed prior to an OBF resolution, BellSouth will determine if it can support the request. ~~4.BST may reject the change request based on the following reasons: cost, industry direction or technically not feasible to implement and will provide notification to the originating party.~~ (Agree to Remove) ~~Prior to rejecting a request, all options for accommodating the request will be exhausted. The rejection reason will be shared with the CLECs for input.~~		

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		(Agree to Remove) **NOTE**: If requested, appropriate SME will participate in the Monthly Status Meeting to address the reason for rejection and discuss alternatives with CLEC community. SME must be provided a minimum of two-week advance notice to participate in upcoming Monthly Status Meeting. (Remove)		
4	BCCM CCCM	**PREPARE FOR CHANGE REVIEW MEETING** NOTE: These activities take place to prepare for Change review meetings when prioritizations take place. **BCCM** 1. Prepare an agenda. 2. Make meeting preparations. 3. Update Change Request Log with current status for new and existing Change Requests. 4. Prepare and post Change Request to web. 5. Provide preliminary size and scope information on each pending change request to CLECs. **CCCM** 1. Analyze Pending Change Requests. 2. Determine priorities for change requests and establish "Desired/Want" dates. 3. Create draft Priority List to prepare for Change Review meeting. (2-16-01) The sizing information provided with the Change Review Meeting package is a preliminary estimate of the work effort. After prioritization, each interface is assessed in depth to determine the scope of the change request. Based on this assessment, an adjustment in the sizing may be required.	**INPUTS:** • Pending Change Request Notifications • Project Release Status (Step 10) • Change Request Log **OUTPUTS:** • Change Request Log • CLEC Draft Priority List • Preliminary Size and scope on each Pending change request	5-7 Bus Days

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		SIZING OF WORK EFFORTS: LARGE • Multiple Systems Dependencies • New Functionality MEDIUM • Limited Systems Dependencies • New/Change Existing Functionality SMALL • No system dependencies • Change Existing Functionality		
5	BCCM CCCM	**CONDUCT CHANGE REVIEW MEETING** **Monthly Status Meetings** 1. Communicate regulatory mandates. 2. Review status of pending/approved Change Requests (including defects and expedited features) at monthly status meeting. 3. Review current Release Management statuses. 4. Review issues and action items and assign owners.(Agree to Accept) 5. Present new change requests submitted since previous Monthly Status Meeting.(Agree to Accept) **Prioritization Meetings (held quarterly in March, June, September and December)** 1. Follow Steps 1-3 from Monthly Status Meetings. 2. Initiators present Change Requests. 3. BellSouth presents size and scope of each change request and potential release package combinations.	**INPUTS:** • Change Request Log • CLEC Draft Priority List • Desired/Want Dates • Impact analysis • Preliminary Size and scope on each Pending change request **OUTPUTS:** • Meeting minutes • Updated Change Request Log • Candidate Change Request List • Issues and Actions Items (if required)	1 Bus Day (or as needed based on volume) Meeting Day

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		(1-10-01) BellSouth presents the size and scope of each change request. (2-16-01) BellSouth presents the preliminary size and scope of each change request. BellSouth presents the number of major releases and dates targeted for the next 12 months. 4. Discuss Impacts. 5. Prioritize Change Requests. 6. Develop final Candidate Requests list of Pending Change Requests by category, 'Need by Dates' and prioritized Change Requests. 7. Update Change Request Log to 'CRC' for Change Review Complete, 'RC' for Candidate Request List, as appropriate. 8. Review issues and action items and assign owners.		
6	BCCM	**DOCUMENT CHANGE REVIEW MEETING RESULTS** 1. Prepare and distribute outputs from Step 5.	**INPUTS:** • Change Request Log • Final Candidate Request List **OUTPUTS:** • Updated Change Request Log • Web posting of meeting output	2 Bus Days
7	BCCM CCCM	**INTERNAL CHANGE MANAGEMENT PROCESS** 1. Both BellSouth and CLECs will perform analysis, impact, sizing and estimating activities ~~only~~(Agree to remove)-to the Candidate Change Requests ~~that meet the criteria established by the Internal Change Management Process~~.(Agree to Remove) This ensures that participating parties are reviewing capacity and impacts to schedules before assigning resources to activities. 2. Sizing and sequencing of prioritized	**INPUTS:** • Candidate Change Request List with agreed upon 'Need by Dates' • Change Request Log **OUTPUTS:** • BellSouth's Proposed Release Package • CLEC analysis.(Agree to add)	~~30~~ 25 Bus Days 3-4 months prior to each major release. (Interval will vary as a result of design, construction,

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		change requests will begin with the top priority items and continue down through the list until the capacity constraints have been reached for each future release. (1-10-01) Agree to add 'for the next release' – Delete: each future release. (2-16-01) Sizing and sequencing of prioritized change requests will begin with the top priority items and continue down through the list until the capacity constraints have been reached. 3. All Candidate Change Requests will be assigned to as many future releases as necessary to complete the assignment process. (1-10-01 BellSouth cannot support) (2-16-01) At a minimum, a target release date will be provided for the top five (5) change requests which could include the next and/or future release.		and testing efforts.)
8	BCCM CCCM	**CONDUCT RELEASE PACKAGE MEETING** 1. Prepare agenda. 2. Make meeting preparations. 3. Evaluate proposed release schedule. 4. ~~Non-scheduled Change Requests returned to Step 4 as Input for the "Prepare for Change Review Meeting" process.~~ 4. (1-10-01) BellSouth recommends the following two (2) scenarios: a) Non-scheduled Change Requests will need to be re-prioritized at the next Change Review Meeting along with new pending requests to accommodate changes in the Industry's business requirements (Return to Step 4) or b) Prioritize only the new "Pending CR's" since	**INPUTS:** • BellSouth's Proposed Release Package (2-16-01 Remove "Two Scenarios") • BellSouth's Release Schedule • Change Request Log • CLEC analysis(Agree to add) **OUTPUTS:** • Approved Release Package • Updated Change Request Log • Meeting Minutes • Scheduled Change Requests • ~~Non-Scheduled Change Requests (Return to Step 4~~ (BellSouth cannot support)	1 Bus Day 1-10-01 CLEC community requested RPM be held 6 months prior to each major release

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		the last Change Review Meeting and incorporate rankings into the overall prioritization list. CLECs, based on group consensus, may request re-ranking of all non-scheduled CR's.) 4. (2-16-01) Non-scheduled change requests will be combined with the new pending requests and re-ranked quarterly to ensure a current list of priorities is always available. This includes any of the top 5 items that may not be scheduled for a release. 5. Based on BST/CLEC consensus create Approved Release Package (s) and schedules. During this step if supported by consensus the group may shift scheduled changes among future releases, cancel changes, etc. as necessary to meet changes in business requirements or resource availability. (1-10-01) Based on BST/CLEC consensus determine which scenario should be implemented. Create the Approved Release Package and schedule. (2-16-01) Based on BST/CLEC consensus create the Approved Release Package. CLECs, based on group consensus, may request changes to the proposed scope (like for like-size CRs). BellSouth will evaluate and determine the impacts of the requested changes and re-present the proposed package to the CLEC community. 6. Identify Release Management Project Manager, if possible. 7. Establish date for initial Release Management Project Meeting for newly established releases.(for the next new release) 8. All Change Requests that are in the	• Date for initial Release Management Project Meeting for newly established releases.(for next new release)	

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		approved scheduled release (s)(Remove) will be changed to "S" status for "Scheduled".		
9	BCCM	**CREATE RELEASE PACKAGE NOTIFICATION** 1. Develop and distribute Release Notification Package via web.	**INPUTS:** • Approved Release Package (s)(Remove) **OUTPUTS:** • Release Package Notification	2 Bus Days after Release Package Mtg.
10	**BCCM** **(Project Managers from each participating company)**	**RELEASE MANAGEMENT AND IMPLEMENTATION** 1. Provide Project Management and Implementation of Release (See Release Management @ Appendix B). 2. Lead Project Manager communicates Release Management Project status to BCCM for inclusion in Monthly Status Meetings. 3. BellSouth User Requirements for software changes (Agree to accept) will be presented to CLECs. If needed, changes will be incorporated and requirements re-baselined. • For new features or changes to existing functionality, ~~D~~draft Specifications and Requirements will be provided NLT 90 days in advance of Implementation. (12-7-00) at least 90 days in advance of CLEC Test Date with BST. • Draft User Requirements for major software release will be provided to the CLECs at least 90 calendar days in advance of the release implementation date. • For new features or changes to existing functionality, ~~F~~final Specifications and Requirements will be provided NLT ~~30~~45 days in advance of Implementation. (12-7-00)	**INPUTS:** • Approved Release Package Notification **OUTPUTS:** • Project Release Status • Implementation Date • Project Plan, Work Breakdown Schedule, Risk Assessment, Executive Summary, etc • Draft Specifications and Requirements • Final Specifications and Requirements • Documentation Changes • Implemented Change Request • Draft User Requirements • Final User Requirements • Documentation Changes	Ongoing

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		At least 45 days in advance of CLEC test date with BST. • Final User Requirements for major software releases will be provided to the CLECs at least 45 days in advance of the release implementation date. • (12-7-00) Final specifications (EDI Specs and TAG API) for software releases will be provided to the CLECs at least 45 days in advance of CLEC test date with BST. • For the implementation of a new software version, final requirements and specifications will be provided to CLECs 180 days or more in advance of the implementation date. • (12-7-00) Notification for the implementation of a new TCIF will be provided at least 240 calendar days in advance of the CLEC Test Date with BST. BellSouth will begin working jointly with the CLECs in the development of the User Requirements for a new TCIF map at least 240 calendar days in advance of the CLEC test date with BST. • Notification for the implementation of a new TCIF map will be provided at least 180 calendar days in advance of the release implementation date. BellSouth will begin working jointly with the CLECs in the development of the User Requirements for a new TCIF map at least 180 calendar days in advance of the release implementation date. • (12-7-00) Draft user requirements for		

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		the implementation of a new TCIF map will be provided to the CLECs at least 180 calendar days in advance of the CLEC test date with BST. • Draft user requirements for the implementation of a new TCIF map will be provided to the CLECs at least 120 calendar days in advance of the release implementation date. • (12-7-00) Final user requirements and specifications (EDI Specs and TAG API) for the implementation of a new TCIF map will be provided to CLECs at least 120 calendar days in advance of the CLEC test date with BST. • Final User Requirements for the implementation of a new TCIF map will be provided to CLECs at least 60 calendar days in advance of the release implementation date. To accommodate changes that may be necessary as a result of design, construction, and testing efforts, BellSouth will distribute updates to the user requirements up to one month prior to the implementation of the new TCIF map. (2-16-01 Remove "BellSouth will distribute the user requirements at least once a month until one (1) month beyond the implementation of the new TCIF map") 4. BellSouth Documentation changes, including business rule changes will be provided.(Agree to add) • All such changes will be provided NLT 30 days in advance of Implementation. (12-7-00) provide at least 30 calendar days in advance of CLEC test date with BST. • All additions and changes to BellSouth business rule documentation, both		

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		system and non-system impacting, will be provided to CLECs at least 30 calendar days in advance of the release implementation date. 5. Once a Change Request is implemented in a release, the status will be changed to "I" for Change Implemented.		

Part 3 – Expedited Feature Process

An Expedited Feature is the inability for a CLEC to process certain types of LSR's based on the existing functionality to BellSouth's Operational Support Systems (OSS's) that are in the scope of CCP. The change request for an expedite must provide details of the business impact and will fall into one of two categories:

- A submitted defect that has been re-classified as a feature where the CLEC/BellSouth has determined should be expedited due to impact
- An ordering enhancement to an existing product or service interface where the CLEC/BellSouth has determined should be expedited due to impact

Re-classified Defects

When a submitted defect is re-classifed as a feature, the CLEC/BellSouth will be notified by Change Control in the defect validation. The CLEC will have the ability to ask BellSouth to expedite the reclassified feature by updating the Change request, marking it as an expedite and sending back to Change Control. The change request will then follow through the Types 2-5 Expedited feature process using agreed upon intervals.

Ordering Enhancement to an existing product or serviceinterface

A CLEC/BellSouth will also have the ability to submit a Type 2-5 change request as an expedited feature request for an ordering enhancement to an existing product or service interface where the functionality does not currently exist in BellSouth's offered products and services interfaces.

For both re-classified defects and enhancements to an existing product or service, the rules surrounding the expedited feature request will be:

- Must be an ordering enhancement to an existing product or service interface
- Will follow the Expedited Feature process flow described below which is based on the current Types 2-5 process flow using agreed upon intervals with the exception of Steps 4-6 which are eliminated.
- CLEC/BellSouth will be required to give impacts and the consequences for not implementing the feature in the current, next, or point minor release, best effort.

Figure 4.4 provides the process flow for the expedited feature process.

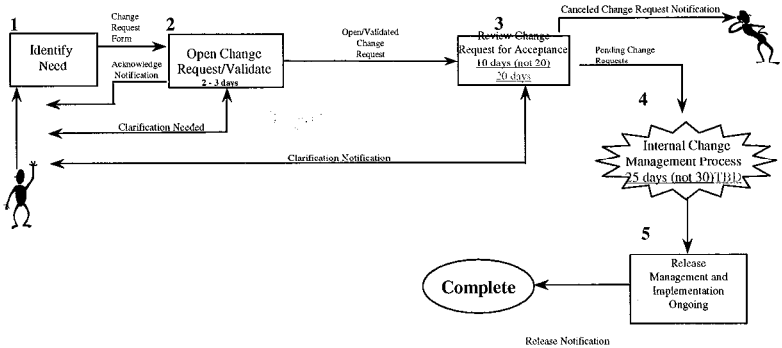


Figure 4.4 – Process Flow for Types 2-5 Expedited Feature Process

The table below details the steps, accountable individuals, tasks, inputs/outputs and cycle times of each sub-process in the expedited feature process. Steps shown in the table are sequential unless otherwise indicated.

Table 4-3. Types 2-5 Expedited Feature Detail Process Flow

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
1	CCCM BCCM	**IDENTIFY NEED** 1. Internally determine need for change request. These change requests might involve system enhancements, manual and/or business process changes. 2. Originator and CCCM or BCCM should complete the standardized Change Request Form according to Checklist. 3. Attach related requirements and Attachment A-1A, Item 22. 4. Appropriate CCCM/BCCM submits Change Request Form and related information via e-mail to BellSouth.	**INPUTS:** • Change Request Form (Attachment A-1) • Change Request Form Checklist (Attachment A-1A) **OUTPUTS:** • Completed Change Request Form with related documentation	N/A
2	BCCM	**OPEN CHANGE REQUEST/VALIDATE CHANGE REQUEST FOR COMPLETENESS** 1. Log Request in Change Request Log. 2. Send Acknowledgement Notification (Attachment A-3) via e-mail to originator. 3. Establish request status ('N' for New Request) 4. Review change request for mandatory fields using the Change Request Form Checklist. 5. Verify Change Request specifications and related information exists. 6. Send Clarification Notification via email to the originator (Attachment A-4) if needed. 7. Update Change Request Status to "PC" for Pending Clarification if clarification is needed. **CLEC or BellSouth Originator** If clarification is needed, make necessary corrections per Clarification Notification and submit Change Request Clarification Response (Attachment A-2).	**INPUTS:** • Completed Change Request Form with related documentation • Change Request Form Checklist • Change Request Clarification Response **OUTPUTS:** • New Change Request • Acknowledgment Notification • Validated Change Request • Clarification Notification • Industry Notification via e-mail and web posting	1 Bus Day Clarification times would be in addition to cycle time.

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
3	BCCM	**REVIEW CHANGE REQUEST FOR ACCEPTANCE** 1. Review Change Request and related information for content. 2. Change Request reviewed for impacted area (i.e., system, manual process, documentation) and adverse impacts. 3. Determine status of request: • If change already exists or CLEC training issue, forward Cancellation Notification (Attachment A-3) to CCCM or BCCM and update status to 'C" for Request Canceled or 'CT' for Training. If Training issue, refer to CSM or Account Team. • If Change Request Clarification Notification not received, validate with CLEC that change request is no longer needed. • If request is accepted, update Change Request status to "P" for Pending in Change Request Log. • If request does not meet the expedited feature criteria, it will exit this process and enter the standard Types 2-5 flow, Step 4. **NOTE**: See Section 11.0 Terms and Definitions – Change Request Status for valid status codes and descriptions. (1-10-01) If BellSouth determines that a CLEC initiated expedited change request should not be accepted because of cost, industry direction or because it is considered not technically feasible to implement, BellSouth will open an agenda item on the next monthly status meeting/call, and will provide a SME on that call to present its case. BellSouth shall consider all possible options for accommodating the request. (2-16-01) BellSouth may determine that a	**INPUTS:** • New Change Request • Validated Change Request • Clarification Notification (if required) **OUTPUTS:** • Validated Expedited Change Request • Clarification Notification (if required) • Cancellation Notification (if required) • CR status updated on web	20 Bus Days

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		CLEC initiated change request cannot be accepted because of cost, industry direction or because it is considered not technically feasible to implement. If requested, the appropriate BST SME will participate in the Monthly Status Meeting to address the reason for rejection and discuss alternatives with the CLEC community. The SME must be provided a minimum of two-week advance notice to participate in the upcoming Monthly Status Meeting. **(2-16-01 REMOVE) NOTE**: If requested, appropriate SME will participate in the Monthly Status Meeting to address the reason for rejection and discuss alternatives with CLEC community. SME must be provided a minimum of two-week advance notice to participate in upcoming Monthly Status Meeting.		
4	BCCM CCCM	**INTERNAL CHANGE MANAGEMENT PROCESS** 1. Both BellSouth and CLECs will perform analysis, impact, sizing and estimating activities to the Expedited Feature Change Request. This ensures that participating parties are reviewing capacity and impacts to schedules before assigning resources to activities. Expedited Features will be implemented in the current, next release, or point **minor** release, best effort. (02-16-01)	**INPUTS:** • Change Request Log **OUTPUTS:** • Release Date for Expedited Feature	~~30~~ 25 (Still under discussion)
5	**BCCM** **(Project Managers from each participating company)**	**RELEASE MANAGEMENT AND IMPLEMENTATION** 1. Provide Project Management and Implementation of Release (See Release Management @ Appendix B). 2. Lead Project Manager communicates Release Management Project status to BCCM for inclusion in Monthly Status Meetings. 3. BellSouth User Requirements for software changes will be presented to	**INPUTS:** • Approved Release Package Notification **OUTPUTS:** • Project Release Status • Implementation Date • Documentation Changes	Ongoing

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		CLECs, if applicable. If needed, changes will be incorporated and requirements re-baselined. 4. BellSouth Documentation changes, including business rules changes will be provided. 5. Once a Change Request is implemented in a release, the status will be changed to "I" for Change Implemented.		

5.0 DEFECT PROCESS

A CLEC/BST identified defect will enter this process through the Change Management Team as a Type 6 Change Request. If the defect is validated internally, it will route through this process, and notification provided to the CLEC community via e-mail and web posting.

A Type 6 defect request is any non-type 1 change that corrects problems discovered in production versions of an application interface. These problems are where the interface is not working in accordance to the BellSouth baseline business user requirements or the business rules that BellSouth has published or otherwise provided to the CLECs.

In addition, if functional requirements agreed upon by BellSouth and the CLECs, results in inoperable functionality, even though software business user requirements and business rules match; this will be addressed as a defect.

These problems typically affect the CLEC's ability to exchange transactions with BellSouth and may include documentation that is in error, has missing information or is unclear in nature.

Type 6 validated defects may not be managed using the Expedited Feature Process as discussed in Section 4, Part 3.

Defect Change Requests will have three Impact Levels:

- **High Impact**

  The failure causes impairment of critical system functions and no electronic workaround solution exists.

- **Medium Impact**

  The failure causes impairment of critical system functions, though a workaround solution does exist.

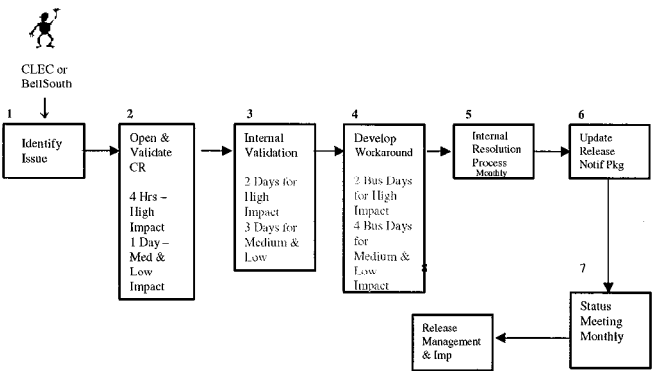
- **Low Impact**

  The failure causes inconvenience or annoyance.

The CLECs and/or BellSouth may initiate these types of changes affecting interfaces between the CLECs and BellSouth's operational support systems. These type changes might also include issues

for Pre-Orders, Orders, Queries, and Maintenance Requests that can be submitted and accepted, but may require workarounds or clarifications.

Figure 5-1 provides the process flow for the validation and resolution of a Type 6 Change – CLEC Impacting Defects.



NOTE: The intervals in the boxes above match the intervals in the tables below for High, Medium, and Low Impact defect change requests.

Figure 5-1. Type 6 Process Flow

The table below details the steps, accountable individuals, tasks, inputs/outputs and cycle times of each sub-process in the Type 6 Process Flow. This process will be used to validate defects, provide status notification(s), workarounds and final resolution to the CLEC community. Steps shown in the table are sequential unless otherwise indicated.

Table 5-1. Type 6 Detail Process Flow

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
1	CCCM BCCM	**IDENTIFY NEED** 1. Identify Defect. 2. Originator and CCCM or BCCM should complete the standardized Change Request Form indicating that it is a Type 6. 3. Include description of business need and details of business impact. 4. Attach related requirements and specification documents. These attachments must include the following, if appropriate: • PON • OCN • Specific Scenario • Interface(s) affected • Error message (if applicable) • Release or API version (if applicable) 5. Appropriate CCCM/BCCM submits Change Request Form and related information via e-mail to BellSouth Change Management Team.	**INPUTS:** • Type 6 Change Request **OUTPUTS:** • Completed Change Request Form (with related documentation if necessary)	N/A
2	BCCM	**OPEN & VALIDATE DEFECT FORM FOR COMPLETENESS** 1. Log Defect in Change Request Log. 2. Send Acknowledgment Notification via email to initiating CLEC. 3. Establish CR status ('N' for New Defect) 4. BCCM reviews change request for mandatory fields using the Change Request Form Checklist. 5. Verify specifications and related information exists. 6. Send Clarification Notification via	**INPUTS:** • Completed Change Request Form (with related documentation if necessary) **OUTPUTS:** • New Defect • Acknowledgment Notification • Clarification Notification (if required)	4 Hours for High Impact 1 Bus Day for Medium and Low Impact (Time to be calculated from time of receipt with a cutoff time of 4:00 PM

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		email to the originator if needed. 7. Update CR status to "PC" for Pending Clarification if clarification is needed. If clarification is needed, CLEC or BST originator makes necessary corrections per Clarification Notification and submits via email Change Request Clarification Response.		Eastern Time)
3	BCCM	**INTERNAL VALIDATION** 1. Validate that it is a defect. 2. Perform internal defect analysis. 3. Determine status of request: • If change already exists or CLEC training issue, forward Cancellation Notification to CCCM or BCCM and update status to 'C' for Request Canceled or 'CT' for Training. If Training issue, refer to CSM or Account Team. • Send Clarification Notification via email if needed and update status to 'PC' for Pending Clarification. • If Change Request Clarification Notification not received, validate with CLEC that change request is no longer needed. • If request is valid, update Change Request status to 'V' for Validated Defect and indicate appropriate Impact Level. • If CLEC does not agree with the validation, the CLEC may appeal the issue or escalate. • Based on detail analysis, BellSouth will reaffirm the impact level that is stated on the request. • If the process is operating as specified in the baselined requirements and published business rules, the BCCM will communicate the results via e-mail to the originator to discuss/determine the next step(s). • If issue is re-classified as a feature	**INPUTS:** • New Defect **OUTPUTS:** • Validated Defect • Defect notification to CLEC community via e-mail and web posting • Clarification Notification (if required) • Cancellation Notification (if required) • Status provided for High Impact Defects to originator via email within 24 hours.	1 Bus Day for High ~~and Medium~~ Impact 2 Bus Days for High Impact 3 Bus Days Medium and Low Impact

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		change, provide supporting information via email to the originator for review and feedback. The Change Request will exit the defect process flow and enter Types 2-5 process flow (enter at Step 3). **NOTE**: See Section 11.0 Terms and Definitions – Defect Status for valid status codes and descriptions. Defect notification will be provided to CLEC community via e-mail and web posting.		
4	BCCM	**DEVELOP AND VALIDATE WORKAROUND (IF APPLICABLE)** 1. Defect workaround identified. 2. Change Request status changed to "W" for workaround identified. 3. Workaround is communicated via e-mail to originating CLEC and to the CLEC community via email and web posting. 4. If appropriate, communication to the CLEC community regarding workaround will be discussed via conference call. If it is determined that additional time is needed to develop workaround due to the complexity of the defect, notification will be provided to CLEC community via e-mail and web posting.	**INPUTS:** • Validated Defect • Clarification Notification (if required) **OUTPUTS:** • Workaround (if applicable) • Clarification Notification (if required) • Cancellation Notification (if required) • E-mail and web posting of workaround	~~4 Bus Days~~ 1 Bus Day for High and Medium Impact 2 Bus Days for High Impact 4 Bus Days for Low Impact 4 Bus Days for Medium and Low Impact
5	BCCM	**INTERNAL RESOLUTION PROCESS** 1. Schedule and evaluate Defects based on capacity and business impacts to the CLECs and BellSouth. 2. Provide status updates to the CLEC community via email as the status changes until the defect is implemented.	**INPUTS:** • CLEC/ BST input **OUTPUTS:** • Defect Release Schedule	~~Monthly or when status changes, whichever occurs first.~~ Validated High and Medium Impact defects will be

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
				implemented within a 4 – 10 business day range, best effort. Validated High Impact Defects will be implemented within a 4-25 business day range, best effort. Medium Impact Defects will be implemented within 90 days. Low Impact defects will be implemented best effort. Low Impact defects will be implemented within a 4 – 20 business day range, best effort. (REMOVE)
6	BCCM	**UPDATE RELEASE PACKAGE NOTIFICATION** 1. Update and distribute release notification package via web. 2. All Change Requests that are in the approved scheduled release will be changed to "S" status for	**INPUTS:** • Defect Information **OUTPUTS:** • Updated Release Package Notification • Scheduled Change Request	Based on release constraints for defects (may be less than 30 days).

Step	Accountability	Sub-processes Activities	Inputs and Outputs	Cycle Time
		"Scheduled". **Note**: The release notification will be published in a timely manner, based on the release constraints associated with the defect.		
7	BCCM	**MONTHLY STATUS MEETING** 1. Provide status of Defect 2. Solicit CLEC/BellSouth input 3. Update Defect information as needed.	**INPUTS:** • Defects Received • Change Request Log • Defect Analysis • Workaround (if applicable) **OUTPUTS:** • Updated status • Updated Change Request Log • Meeting minutes	Monthly or when status changes, whichever occurs first.
8	BCCM	**RELEASE MANAGEMENT AND IMPLEMENTATION** The following release management activities will pertain to Type 6 changes: 1. Lead project manager communicates release management project status to BCCM for inclusion in Monthly status meetings. 2. Once a defect is implemented in a release, the status will be changed to "I" for Change Implemented.	**INPUTS:** • Approved Release Package Notification **OUTPUTS:** • Project Release Status • Implementation Date • Implemented Change Request	Ongoing

6.0 CHANGE REVIEW – PRIORITIZATION – RELEASE PACKAGE DEVELOPMENT AND APPROVAL

Part 1 – Change Review Meeting

The Change Review meeting provides the forum for reviewing and prioritizing Pending Change Requests, generating Candidate Change Requests, submitting Candidate Change Requests for sizing, and reviewing the status of all release projects underway. Status update meetings will be held monthly and are open to all CLEC's. Meetings will be structured according to category (pre-order/order, maintenance, manual and documentation, etc.). Prioritization meetings will be held quarterly. Remove: For non-system impacting changes, there will be a 5 (five) business day notice for documentation updates. The prioritization meeting dates will be communicated when the release schedule is published.

During the Change Review Meeting each originator of a Change Request will be allowed 5 (five) minutes to present their Change Request. A question and answer session not to exceed 15 minutes will follow this presentation. After all presentations for a particular category are complete, the prioritization process will begin.

The Change Request Log will be distributed 5 - 7 (five to seven) business days prior to the Change Review meeting. A valid and complete Change Request must be received 30 business days prior to the Change Review Meeting. Change Requests must be accepted and in "Pending" status to be placed on the agenda for the next scheduled meeting.

Note: Status Meetings will occur monthly. Prioritization meetings will be scheduled to occur in March, June, September and December and will include the monthly status meeting agenda items.

Part 2 – Change Review Package

The Change Review Package will be distributed to all participants 5 – 7 (five to seven) business days prior to the Change Review meeting. The package will include the following:

- Meeting Notice
- Agenda
- Change Request Log (List of Change Requests to be reviewed)
- BellSouth's preliminary estimate of the size and scope of each Change Request.
- Schedule of releases and capacity in each (BellSouth cannot support providing capacity information)

- Reference to Change Control Process on the BST website (for CLECs not familiar with the process, new CLECs or CLECs that choose to participate after the initial rollout)
- Status Reports from each of the active Release Management Project Teams

Part 3 – Prioritizing Change Requests

Prior to the Change Review Meeting, each participating CLEC should determine priorities for change requests and establish "desired/want" dates. The CLEC should use the Preliminary Priority List form as provided via the web.

Final prioritization will be determined at the Change Review meeting after presentation of the Change Requests for each category.

Prioritization Voting Rules

- CLEC must either be using an interface within a category (i.e. ordering), in the testing phase or have a letter of intent on file with the BellSouth Change Control Management Team to participate in the voting process
- One vote per CLEC, per category
- No proxy voting
- (2-16-01) Types 3, 4 and 5 change requests will be prioritized (non-expedites).
- Each company may bring the number of participants necessary to represent their position. If the number of participants grow to be unmanageable, CLECs and BellSouth will revisit the issue of representation to apply some restrictions.
- Forced Ranking (1 to N, with N being the highest) will be used
- CLECs may choose to vote "no" on change requests that may potentially negatively impact its business. If a majority of CLECs vote "no" on any certain change request, that request will not be implemented.
- (1-10-01) CLECs may choose to "defer" on voting on change requests that may negatively impact its business. A rating of "defer" will not be counted in the overall rating.
- (2-16-01) BellSouth accepts with the addition of the following language: "....may potentially negatively impact its business or have little value to the CLEC."
- Votes will be tallied to determine order of ranking
- Changes will be ranked by category
- Manual processes and documentation changes will be prioritized separately; however they will need to be synchronized with the electronic interface changes.
- In case of a tie, the affected Changes will be re-ranked and prioritized based on the re-ranking

Example: The top 2 Changes from high to low are E5 and E2, with E1 and E4 tied for 3rd. E1 and E4 would be re-ranked and prioritized according to the re-ranking.

Pre-Order LENS	CLEC 1	CLEC 2	CLEC 3	Total
E1	3	6	1	10
E2	4	2	6	12
E3	6	1	2	9
E4	2	4	4	10
E5	5	5	3	13
E6	1	3	5	9

Part 4 – Developing and Approving Release Packages

Subsequent to the Change Review Meeting BellSouth and the CLECs will each evaluate and analyze the Candidate Change Requests in preparation for the Release Package Meeting that will be held 25 business days later.

Subsequent to the Change Review Meeting, BellSouth and the CLECs will each evaluate and analyze the Candidate Change Requests in preparation for the Release Package Meeting that will be held three (3) to four (4) months prior to each major release.

- Sizing and sequencing of change requests will be accomplished at the Prioritization Meeting. CLECs may take into account the size and scope when prioritizing items.
- BellSouth will develop several variations of release packages to include all of the prioritized requests.

(1-10-01) BellSouth will develop and present two scenarios for the next release. Based on group consensus at the Release Package Meeting, the determination will be made as to which scenario should be implemented. BST/CLEC consensus will be used to create the Approved Release Package and schedule.

(2-16-01) At a minimum, a target release date will be provided for the top five (5) change requests, which could include the next and/or future release.

- All Candidate Change Requests will be assigned to as many future releases as necessary to complete the assignment process.

(1-10-01) BellSouth to propose two (2) scenarios: 1) Unscheduled change requests will need to be re-prioritized at the next Change Review Meeting along with the new pending requests to accommodate changes in the "Industry's business requirements or 2) Prioritize only the new "Pending" CR's since the last Change Review Meeting. Rankings will be incorporated into the overall prioritization list. CLECs, based on group consensus, may request re-ranking of all non-scheduled CR's.

(2-16-01) At a minimum, a target release date will be provided for the top five (5) change requests, which could include the next and/or future release. Non-scheduled change requests will be combined with new pending requests and re-ranked quarterly to ensure a current list of priorities is always available. This includes any of the top 5 items that may not be scheduled for a release.

During the Release Package Meeting BST will present its proposed release packages. BST and CLECs will then vote on the release package or combination of release packages to be implemented. BST/CLEC consensus will be used to create Approved Release Package (s) and schedules. During this step if supported by consensus the group may shift scheduled changes among future releases, cancel changes, etc. as necessary to meet changes in business requirements or resource availability. (1-10-01) BellSouth cannot support.

(2-16-01) During the Release Package Meeting, BellSouth will present its proposed release package for the next release, along with target dates for the top five (5) change requests. BST/CLEC consensus will be used to create the Approved Release Package. CLECs, based on group consensus, may request changes to the proposed release scope (like for like-size CRs). BellSouth will evaluate and determine the impacts of the requested changes and re-present the proposed release package to the CLEC community.

(2-16-01) Change Requests may not be implemented in priority order due to the complexity of the Change Request, the relationship between the implementation of one change and changes specified in other Change Requests, and other factors. Implementation decisions will remain with BellSouth's discretion, consistent with applicable law and regulatory authority and resource constraints. BellSouth will consider the prioritization in exercising this discretion.

~~7.~~08.0 INTRODUCTION AND RETIREMENT OF INTERFACES

Introduction of New Interfaces

BellSouth will introduce new interfaces to the CLEC Community as part of the Change Control Process. BellSouth will seek to conform to the notification process for Type 4 (BellSouth Originated) changes as described in this document. In the event that BellSouth is forced to deviate from the Type 4 (BellSouth Originated) process for new non-impacting interface functionality, BellSouth will notify all CLECs of the deviation as promptly as possible. When a new interface request is submitted, BellSouth will present information on the new interface and hold an open discussion at the next monthly status meeting. ~~A description of the proposed interface will be submitted to the BCCM. The BCCM will add an agenda item to discuss the new interface at the monthly status meeting. BellSouth will be given 30 – 45 minutes to present information on the proposed interface. If BellSouth requests additional time for the presentation, a separate meeting will be scheduled to review the proposed interface, so that, the information can be presented in its entirety. The objective will be to identify interest in the new interface and obtain input from the CLEC community.~~ BellSouth will provide specifications on the interface being developed to the CLEC Community using the timeframes established in Part 4, Section 2. As new interfaces are deployed, they will be added to the scope of this document ~~document as appropriate, based on the use by the CLEC community~~ and requested changes will be managed by this process.

BellSouth will introduce new interfaces to the CLEC Community as part of the Change Control Process. **BellSouth will seek to conform to the notification process for Type 4 (BellSouth Originated) changes as described in this document. In the event that BellSouth is forced to deviate from the Type 4 (BellSouth originated) process for new non-impacting interface functionality, BellSouth will notify all CLECs of the deviation as promptly as possible. (Need Clarification)** A description of the proposed interface will be submitted to the BCCM. The BCCM will add an agenda item to discuss the new interface at the monthly status meeting. BellSouth will be given 30-45 minutes to present information on the proposed interface. If BellSouth requests additional time for the presentation, a separate meeting will be scheduled to review the proposed interface, so that, the information can be presented in its entirety. The objective will be to identify interest in the new interface and obtain input from the CLEC community. BellSouth will provide specifications on the interface being developed to the CLEC community. As new interfaces are deployed, they will be added to the scope of this document, as appropriate, based on the use by the CLEC and requested changes will be managed by this process.

Retirement of Interfaces

As active interfaces are retired, BellSouth will notify the CLECs by submitting a Type 4 change request(Remove) through the Change Control Process and post a CLEC Notification Letter to the web six (6) months prior to the retirement of the interface. BellSouth will have the discretion to provide shorter notifications (30-60 days) on interfaces that are not actively used and/or have low volumes. BellSouth will consider a CLEC's ability to transition from an interface before it is scheduled for retirement. BellSouth will ensure that its transition to another interface does not negatively impact a CLEC's business.

BellSouth will only retire interfaces if an interface is not being used, or if BellSouth has a replacement for an interface that provides equal or better functionality for the CLEC than the existing interface.

Retirement of Versions

When software versions are retired, BellSouth will give the CLECs a 120 day notification.

A CLEC may respond to Change Control with its desire to extend a retirement date. The CLEC must explain why the scheduled retirement date is not acceptable by providing the impact to its business.

8.0 ESCALATION PROCESS

Guidelines

- The ability to escalate is left to the discretion of the CLEC based on the severity of the missed or unaccepted response/resolution.
- Escalations can involve issues related to the Change Control process itself.
- For change requests, the expectation is that escalation should occur only after normal Change Control procedures (e.g. communication timelines) have occurred per the Change Control agreement.
- Three levels of escalation will be used.
- For Type 1 issues, the escalation process is agreed to allow BellSouth a one-day turnaround for each cycle of escalation.
- For Types 2-5 issues, the escalation process is agreed to allow BellSouth a five-day turnaround for each cycle of escalation.(Excludes Expedites)
- For Type 6 High and Medium Impact(See next bullet) issues, the escalation process is agreed to allow BellSouth a ~~three~~one-day turnaround to provide a status for each cycle of escalation.
- For Type 6 High Impact issues, the escalation process is agreed to allow BellSouth a one (1) day turnaround to provide a status for each cycle of escalation. For Type 6 Medium and Low Impact issues, the escalation process is agreed to allow BellSouth a two (2) to five (5) day turnaround to provide a status for each cycle of escalation.
- For Type 6 Low Impact and Type 2-5 Expedite Process issues, the escalation process is agreed to allow BellSouth a three-day turnaround to provide a status for each cycle of escalation.(See next bullet)
- For Types 2-5 Expedite Process issues, the escalation process is agreed to allow BellSouth a three (3) day turnaround to provide a status for each cycle of escalation.
- Each level will go through the same Cycle, which is described below.

- All escalation communications may be optionally distributed by the CLEC to the industry and BellSouth Change Control e-mail unless there is a proprietary issue.

Cycle for Type 1 System Outages

Contact List for Escalation - ECS Group - Type I Changes

If the originator does not receive a call back from the EC Support Group according to the times specified in this document, they may escalate according to the following list:

Escalation Level	Name and Title	Office Number	Pager Number	Email Address
1st Level	Don Tighe Manager - EC Support Group Interconnection Operations	404-532-2233	1-800-946-4646 PIN 1440050	Don.Tighe@bridge.bellsouth.com
2nd Level	Bruce Smith Operations Director - EC Support Group Interconnection Operations	205-988-7211	1-800-542-3260	Bruce.Smith@bridge.bellsouth.com
3rd Level	Bill Reid Operations Assistant Vice President Interconnection Operations	205-988-1447	1-800-946-4646 PIN 1179523	Bill.C.Reid@bridge.bellsouth.com

NOTE: If a call is escalated without first attempting to contact the ECS Helpdesk, the caller will be referred back to the ECS Helpdesk.

Escalation Cycle for Types 2-6 Change Requests

- Item must be formally escalated as an e-mail sent to the appropriate escalation level within BellSouth with a copy to the industry and BellSouth Change Control e-mail.
- Subject of e-mail must be CLEC (CLEC Name) ESCALATION-CR#, if applicable, Level of Escalation, unless it is proprietary.
- Content of e-mail must include:
  - Definition and escalation of item.
  - History of item.
  - Reason for escalation.
  - Desired outcome of CLEC.
- Impact to CLEC of not meeting the desired outcome or item remaining on current course of action as previously discussed at the Change Control Meeting for enhancements.
- Contact information for appropriate Level including Name, Title, Phone Number, and E-mail ID.
- For escalation Level 2, forward original e-mail and include any additional information including the reason that the matter could not be resolved at Level 1.
- For escalation Level 3, forward original e-mail and include any additional information including the reason that the matter could not be resolved at Levels 1 and 2.
- BellSouth will reply to escalation request with acknowledgement of receipt within 4 hrs and begin the escalation process through Level of escalation.
- The escalating CLEC should respond to BellSouth within 5 days as to whether escalation will continue or the BellSouth response has been accepted as closure to the item.
- If the BellSouth position suggests a change in the current disposition of the item (i.e., what has already been communicated to the industry), a conference call will be held within 1 business day of the BellSouth decision in order to provide industry notification with the appropriate executives.

- BellSouth will publish the outcome of the conference call to the industry via web.
- If unsatisfied with an outcome, either party can seek appropriate relief.

Contact List for Escalation - Type 2 - 6 Changes

Types 2-5 Changes: Within 5 business days of receipt (4 from acknowledgement), BellSouth Change Control appropriate executives will reply through BellSouth Change Control with BellSouth's position and explanation for that position. Types 2-5 Changes: Within appropriate intervals, depending upon Change Request Type, BellSouth will reply through Change Control with a status and explanation. (02-16-01)

Type 6, High and Medium Impact Changes: Within 1 business day of receipt, BellSouth Change Control appropriate executives will reply through BellSouth Change Control with BellSouth's position and explanation for that position.
Type 6 High Impact Changes: Within two (2) business days of receipt, BellSouth Change Control appropriate executives will reply through BellSouth Change Control with BellSouth's position and explanation for that position. Type 6 Medium and Low Impact Changes: Within five (5) business days of receipt, BellSouth Change Control appropriate executives will reply through BellSouth Change Control with BellSouth's position and explanation for that position.
For Type 6 High Impact issues, the escalation process is agreed to allow BellSouth a one (1) day turnaround to provide a status for each cycle of escalation. For Type 6 Medium and Low Impact issues, the escalation process is agreed to allow BellSouth a two (2) to five (5) day turnaround to provide a status for each cycle of escalation. (02-16-01)

Type 6 Low Impact and Type 2-5 Expedite Changes: Within 3 business days of receipt (2 from acknowledgement), BellSouth Change Control appropriate executives will reply through BellSouth Change Control with BellSouth's position and explanation for that position.
Type 2-5 Expedite Changes: Within three (3) business days of receipt (2 from acknowledgment), BellSouth Change Control appropriate executives will reply through BellSouth Change Control with BellSouth's position and explanation for that position.
For Types 2-5 Expedite Process issues, the escalation process is agreed to allow BellSouth a three (3) day turnaround to provide a status for each cycle of escalation. (02-16-01)

Escalations should be made according to the following list.

Escalation Level	Name and Title	Office Number	Email Address
1st Level	Valerie Cottingham Director Change Control Process	205-321-2168	Valerie.cottingham@bridge.bellsouth.com
2nd Level	Terrie Hudson Director (Test Bed, User Requirements, CCP)	770-936-3740	Terrie.Hudson@bridge.bellsouth.com
	Joy Lofton Director (for Business Rules/Operations Issues)	404-927-7828	Joy.A.Lofton@bridge.bellsouth.com
	Suzie Lavett Director (TAG/LENS)	205-977-2876	Suzie.H.Lavett@bridge.bellsouth.com
	Audrey Thomas Director (EDI)	404-927-7886	Audrey.Thomas@bridge.bellsouth.com
3rd Level	Doug McDougal Senior Director (Systems Issues, Test Bed, User Requirements)	404-927-7505	Doug.McDougal@bridge.bellsouth.com
	Dee Freeman-Butler Senior Director (for Business Rules/Operations Issues)	404-927-3545	Dee.Freeman2@bridge.bellsouth.com

Dispute Resolution Process

In the event that an issue is not resolved through the Escalation Process as described herein, including (1) escalation within each company to the person with ultimate authority for Change Control operations, and (2) the services of a joint investigative team, when appropriate, comprised of representatives from BellSouth and the affected CLECs. Resolution of the dispute shall be accomplished as set forth below:

- Either BellSouth or any CLEC affected by the dispute may request mediation through the State Public Service Commission, if available. If mediation is requested, parties shall participate in good faith. If the mediation results in the resolution of the dispute, that resolution shall apply to all CLECs affected by the dispute.

- Without necessity for prior mediation, either BellSouth or any CLEC affected by the dispute may file a formal complaint with the appropriate state regulatory agency, requesting resolution of the issue.

9.0 CHANGES TO THIS PROCESS

The current, approved version of this process document will be stored under the component name "Ccp.doc" (the date of the latest CCP document will be included in the file name). The BellSouth Change Control Manager BCCM (and alternate) will be the only persons authorized to update the document version.

Requests for changes to the Change Control Process may be submitted to the BellSouth Change Control Manager (BCCM) using the Change Request form located in the Appendix A. Cosmetic changes may be made and published by the BCCM (or alternate) without further review. Other changes will be reviewed at the monthly Change Review status meetings following receipt of the request, if included in the published meeting agenda. Following this initial review the BCCM and a CLEC representative appointed by the CLECs participating in the review shall prepare an official E-mail ballot for distribution. The official ballot will detail the change being requested, and the significant arguments presented for and against the change during the review. The ballot will be distributed one week following the Status Meeting. CLEC's and BellSouth will have one week in which to cast their vote. Only ballots transmitted before midnight of the due date will be counted. Implementation of such changes will require a two-thirds affirmative ~~———~~vote for approval. ~~All changes will be submitted as a change request and reviewed~~.

(1-10-01) BellSouth continuing to review.

(2-16-01) To be discussed at the February 21, 2001 meeting.

10.0 TESTING ENVIRONMENT

Requests related to the processes of testing an interfaces will be included in the Change Control Process. Changes to BellSouth's testing environments and supporting processes will be submitted through the Change Control Process as a Type 4 or Type 5 request. The requests will follow the guidelines and intervals set forth in the Type 2-5 process flow.

BellSouth offers Carrier Testing to CLECs in an open proven test environment for Telecommunications Access Gateway (TAG) and Electronic Data Interchange (EDI) interfaces. The testing opportunities offered are BETA and New Carrier Testing.

BellSouth will also provide a pre-release testing environment for TAG and EDI that will be available to CLEC's 30 days **prior** to the implementation of any new releases. This environment will be a wholly separate, non-production environment for all preordering and ordering interfaces and will mirror the production environment.

(1-10-01) NOTE: BellSouth would prefer to re-evaluate this section after the CLEC Test Environment is implemented in 1st Qtr. 2001.

(2-16-01) NOTE: Targeted implementation date changed to 2nd Qtr. 2001.

BETA testing is offered to those CLECs that express an interest in assisting BellSouth validate a Telecommunications Industry Forum (TCIF) change for the affected interfaces. The opportunity for testing is submitted via the BellSouth Account Team and is negotiated with the Carrier Testing group. BellSouth opens the test environment for BETA testing after "major releases". CLECs are selected on a "first come, first served basis".

New Carrier Testing is offered to those CLECs who are transitioning from a manual to an electronic environment or from one TCIF issue to another. New Carrier Testing is available to all CLECs and is scheduled with the BellSouth Account Team and Carrier Testing group.

For additional details on the testing environment, regulations and guidelines, refer to the following BellSouth public Internet sites:

EDI

www.interconnection.bellsouth.com/markets/lec.html
Select "Customer Guides"
Select "Local Exchange Ordering Guides"

Select "BellSouth EDI Specifications – TCIF 9"
Select "Section 7 – EDI Testing Guidelines for CLECS"

TAG

www.interconnection.bellsouth.com/markets/lec.html
Select "OSS Information Center"
Select "TAG Documentation"

This site is password protected. You should obtain the password from your Account Team representative.

11.0 TERMS AND DEFINITIONS

A

Account Team. The Account Teams represent the CLECs and all CLEC interests within BellSouth, that is, the Account Team is the CLECs' advocate within BellSouth. Some of the Account Team functions are listed below:

- Contract Negotiations
- Enhanced Billing Options Negotiations
- Customer Education
- Technical Assistance
- General Problem Resolution
- Tariff Interpretation
- BonaFide Requests (BFR)
- Production Support
- Collocation
- Testing Support
- Project/Order Coordination
- Rate Quotations

Accountability. Individual(s) having responsibility for completing and producing the outputs of each sub-process as defined in the Detailed Process Flow.

Acknowledgement Notification. Notification returned to originator by BCCM indicating receipt of Change Request.

Approved Release Package. Calendar of Candidate Change Requests with consensus target implementation dates as determined at the Release Package Meeting.

B

BellSouth Change Control Manager (BCCM). BellSouth Point of Contact for processing all Change Requests.

BFR (Bonafide Request). Process used for providing custom products and/or services. Bonafide Requests are outside the scope of the Change Control Process and should be referred to the appropriate BellSouth Account Team.

Business Day. A business day is considered any Monday-Friday workday that does not fall on an official BellSouth holiday.

Business Rules. The logical business requirements associated with the Interfaces referenced in this document. Business rules determine the when and the how to populate data for an Interface. Examples of data defined by Business Rules are:

- The five primary transactions sets: 850, 855, 860, 865, and 997
- Data Element Abbreviation and Definition
- Activity Types at the appropriate level (account, line, feature) and the associated Usage Type (optional, conditional, required, not applicable, prohibited)
- Conditions/rules associated with each Activity and Usage Type
  - ◊ Dependencies relative to other data elements
  - ◊ Conditions which will be edited within BellSouth's OSSs
- Valid Value Set
- Data Characteristics

C

Cancellation Notification. Notification returned to originator by the BCCM indicating a Change Request has been canceled for one of the following reasons: Originator cancellation, duplicate request, training issue, or failure to respond to clarification.

Candidate Request List. List of prioritized Change Requests with associated "Need by Dates" as determined at an Change Review Meeting. These requests will be submitted for sizing and sequencing.

Candidate Change Request. Change Requests that have been prioritized at an Change Review Meeting and are eligible for independent sizing and sequencing by BellSouth and each CLEC.

Change Request. A formal request submitted on a Change Request Form, to add new functionality to existing interfaces, defects and expedited features (as identified in the scope) in a production environment.

- Type 1 – BellSouth System Outage. A System Outage is where the system is totally unusable or there is degradation in an existing feature or functionality within the interface.
- Type 2 – Regulatory Change. Any non-Type 1 changes to the interfaces between the CLEC's and BellSouth's operational support systems mandated by regulatory or legal

entities, such as the Federal Communications Commission (FCC), a state commission/authority or state and federal courts.

- Type 3 – Industry Standard Change. Any non-Type 1 changes to the interfaces between the CLEC's and BellSouth's operational support systems required to bring these interfaces in line with newly agreed upon telecommunications industry guidelines.
- Type 4 – BellSouth Initiated Change. Any non-Type 1 changes affecting the interfaces between the CLEC's and BellSouth's operational support systems which BellSouth desires to implement on its own accord.
- Type 5 – CLEC Initiated Change. Any non-Type 1 changes affecting the interfaces between the CLEC's and BellSouth's operational support systems, which the CLEC requests BellSouth to implement.
- Type 2-5 – Expedited Feature Change. The inability for a CLEC to process certain types of LSR's based on the existing functionality to BellSouth's Operational Support Systems (OSS's) that are in the scope of CCP. The change request for an expedite must provide details of the business impact and will fall into one of two categories: 1) A submitted defect that has been re-classified as a feature where the CLEC/BellSouth has determined should be expedited due to impact and 2) An ordering enhancement to an existing interface where the CLEC/BellSouth has determined should be expedited due to impact. For both re-classified defects and ordering to an existing interface, the rules surrounding the expedited feature request will be:
    - Must be an ordering enhancement to an existing interface
    - Will follow the Expedited Feature process flow which is based on the current Types 2-5 process flow using agreed upon intervals with the exception of Steps 4-6 which are eliminated
    - The CLEC/BellSouth will be required to give impacts and the consequences for not implementing the feature in the current, next, or minor release, best effort.
- Type 6 – CLEC Impacting Defect. A defect is any non-Type 1 change that corrects problems discovered in production versions of an application interface. These problems are where the interface is not working in accordance to the BellSouth baseline business user requirements or the business rules that BellSouth has published or otherwise provided to the CLECs. In addition, if functional requirements agreed upon by BellSouth and the CLECs, results in inoperable functionality, even though software business user requirements and business rules match; this will be addressed as a defect. These problems typically affect the CLEC's ability to exchange transactions with BellSouth and may include documentation that is in error, has missing information or is unclear in nature. The CLEC and/or BellSouth may initiate defect changes affecting interfaces between the CLEC's and BellSouth's operational support systems. These type changes might also include issues for Pre-Orders, Orders, Queries, and Maintenance Requests that can be submitted and accepted, but may require workarounds or clarification.

Change Request Status. The status of a Change Request as it flows through the Change Control process as described in the Detailed Process Flow.

- **A = Appeal.** Indicates a cancelled Change Request is being appealed by the originator (Step 3).
- **C = Request Cancelled.** Indicates a Change Request has been canceled due to one of the following reasons (Step 3):
  - **CC = Clarification.** Requested clarification not received in allotted time (7 days).
  - **CD = Duplicate Request.** A request for this change already exists.
  - **CT = Training.** Requested change already exists, or CLEC training issue.
- **CRC** = Change Review Complete. Indicates a Change Request has been reviewed at a Change Review Meeting, but did not reach the Candidate Request List (Step 5).
- **D** = Request Purge. Indicates the cancellation of a Change Request that has been pending for 12 months and has failed to reach the Candidate Request List (Step 3).
- **I = Change Implemented.** Indicates a Change Request has been implemented in a release (Step 10).
- **N = New Change Request.** Indicates a Change Request has been received by the BCCM, but has not been validated (Step 2).
- **P = Pending.** Indicates a Change Request has been accepted by the BCCM and scheduled for Change Review (Step 3 moving to Step 4).
- **PC = Pending Clarification.** Indicates a Clarification Notification has been sent to the originator, BCCM awaiting response (Step 2 or 3).
- **PN = Pending N times.** Indicates a Change Request reached the Candidate Request List, was sized but not scheduled for a release and has cycled through the process N number of times. Example: P1 = 2nd time through process, P2 = 3rd time through process, etc (Step 8).
- **RC = Candidate Request.** Indicates a Change Request has completed the Change Review process and been assigned to the Candidate Request List for sizing and sequencing (Step 5).
- **S – Request Scheduled**. Indicates a Change Request has been scheduled for a release (Step 8).

Change Review Meeting. Meeting held by the Change Review participants to review and prioritize pending Change Requests, generate Candidate Change Requests, and submit Candidate Change Requests for sizing and sequencing.

Change Review Package. Package distributed by the BCCM 5 – 7 business days prior to the Change Review Meeting. The package includes the Meeting Notice, Agenda, Release Management Status Report, Change Request Log, etc.

Clarification Notification. Notification returned to the originator by the BCCM indicating required information has been omitted from the Change Request and must be provided prior to acceptance of the Change Request. The Change Request will be cancelled if clarification is not received by the date indicated on the Clarification Notification.

CLEC Affecting Change. Any change that requires the CLEC to modify the way they operate or to rewrite system code.

CLEC Change Control Manager (CCCM). CLEC Point of Contact for processing Change Requests.

CSM. Customer Support Manager which supports resale and facility based CLECs.

Cycle Time. The time allotted to complete each step in the Change Control Process prior to moving to the next step in the process.

D

Defect. Any non-type 1 change that corrects problems discovered in production versions of an application interface. These problems are where the interface is not working in accordance to the BellSouth baseline business user requirements or the business rules that BellSouth has published or otherwise provided to the CLECs. In addition, if functional requirements agreed upon by BellSouth and the CLECs, results in inoperable functionality, even though software business user requirements and business rules match; this will e addressed as a defect. These problems typically affect the CLEC's ability to exchange transactions with BellSouth and may include documentation that is in error, has missing information or is unclear in nature. Type 6 validated defects may not be managed using the Expedited Feature Process as discussed in Section 4, Part 3.

The CLEC and/or BellSouth may initiate these types of changes affecting interfaces between the CLEC's and BellSouth's operational support systems. These type changes might also include issues for Pre-Orders, Orders, Queries, and Maintenance Requests that can be submitted and accepted, but may require workarounds or clarifications.

Defect Status. The status of a CLEC Impacting Defect Change Request as it flows through the Change Control process as described in the Detailed Process Flow.

- **A = Appeal.** Indicates a cancelled Change Request is being appealed by the originator (Step 3).
- **C = Cancelled.** Indicates a Change Request has been canceled due to one of the following reasons (Step 3):
  - **CC = Clarification.** Requested clarification not received in allotted time (2 days).
  - **CD = Duplicate Request.** A request for this change already exists.
  - **CT = Training.** Requested change already exists, or CLEC training issue.
- **I = Implemented.** Indicates a Defect Change Request has been implemented in a release (Step 6).
- **N = New Defect Change Request.** Indicates a Defect Change Request has been received by the BCCM and the change request form validated for completeness (Step 2).
- **PC = Pending Clarification.** Indicates a Clarification Notification has been sent to the originator, BCCM awaiting response (Step 2 or 3).
- **S = Scheduled for Release.** Indicates a Defect Change Request has been scheduled for a release (Step 6).
- **V = Validated Defect.** Indicates internal analysis has been conducted and it is determined that it is a validated defect (Step 3).
- **W = Workaround Identified.** Indicates a workaround has been developed and communicated to impacted CLEC community (Step 4).

E

Electronic Communications Systems (ECS). ECS is the help desk for reporting system outages or degradation in an existing feature/functionality within an interface. The ECS group works

with the CLEC community to resolve system outages/degradation in a timely manner. The telephone number for the ECS group is 1-888-462-8030.

Enhancement. Functions which have never been introduced into the system; improving or expanding existing functions; required functional changes to system interfaces (user and other systems), data, or business rules (processing algorithms – how a process must be performed); any change in the User Requirements in a production system.

Expedited Feature. An expedited feature is the inability for CLEC to process certain types of LSR's based on the existing functionality to BellSouth's operations support systems (OSS's) that are in the scope of Change Control. The change request for an expedite must provide details of the business impact and will fall into one of two categories: 1) a submitted defect that has been re-classified as a feature where the CLEC has determined should be expedited due to impact and 2) an ordering enhancement to an existing product or service interface where the CLEC has determined should be expedited due to impact. For both re-classified defects and ordering to an existing interface, the rules surrounding the expedited feature request will be:

- Must be an ordering enhancement to an existing interface
- Will follow the Expedited Feature process flow which is based on the current Types 2-5 process flow using agreed upon intervals with the exception of Steps 4-6 which are eliminated.
- The CLEC/BellSouth will be required to give impacts and the consequences for not implementing the feature in the current, next, or minor release, best effort.

H

High Impact. The failure causes impairment of critical system functions and no electronic workaround solution exists.

I

Internal Change Management Process. Internal process unique to BellSouth and each participating CLEC for managing and controlling Change Requests.

L

Low Impact. The failure causes inconvenience or annoyance.

M

Medium Impact. The failure causes impairment of critical system functions, though a workaround solution does exist.

N

Need-by-Date. Date used to determine implementation of a Change Request. This date is derived at the Change Review Meeting through team consensus. Example: 1Q99 or Release XX.

P

Points of Contact (POC). An individual that functions as the unique entry point for change requests on this process.

Priority. The level of urgency assigned for resource allocation to implement a change. Priority may be initially entered by the originator of the Change Request, but may be changed by the BCCM with concurrence from the originator or the Review Meeting participants. In addition, level of priority is not an indication of the timeframe in which the Change Request will be worked. It is the originator's label to determine the priority of the request submitted.

One of four priorities may be assigned:

1-Urgent. Should be implemented as soon as possible. Resources may be pulled from scheduled release efforts to expedite this item. A need-by date will be established during the Change Review Meeting. A special release may be required if the next scheduled release does not meet the agreed upon need-by date.

2-High. Implement in the next possible scheduled major release, as determined during the Release Package Meeting.

3-Medium. Implement in a future scheduled major release. A scheduled release will be established during the Release Package Meeting.

4-Low. Implement in a future scheduled major release only after all other priorities. A scheduled release will be established during the Release Package Meeting.

Project Plan. Document which defines the strategy for Release Management and Implementation, including Scope Statement, Communication Plan, Work Breakdown Structure, etc. See Release Management Project Plan template, Attachment B-1.

Proposed Release Package: Proposed set of change requests slated for a release that the BCCM presents to the CLEC community during the Release Package Meeting

R

Release – Major. Implementation of scheduled Change(s) which may or may not impact all CLECs; may or may not require CLECs to make changes to their interface and may or may not prohibit the use of an interface upon implementation of the Change(s). Application-to-Application and Machine-to-Human.

Release – Minor. Implementation of scheduled Change(s) which do not require coordination with the entire CLEC industry, do not require CLECs to make changes to their interface or do not prohibit the use of an interface upon implementation of the Change(s). Machine-to-Human.

Release Package. Package distributed by the BCCM listing the Candidate Change Requests that have been targeted for a scheduled release.

Release Package Notification. Package distributed by the BCCM and used to conduct an initial Release Management and Implementation meeting. The package includes the list of participants, meeting date, time, Approved Release Package, Defect and/or Expedite Notification, etc.

Release Schedule: Schedule that contains the intended dates for implementation of software enhancements. This release schedule is created annually.

S

Specifications. Detailed, exact document(s) describing enhancement and/or defects, business processes and documentation changes requested and included with the Change Request as additional information.

System Outage. A System Outage is where the system is totally unusable or there is degradation in an existing feature or functionality within the interface.

V

Version (Document). Indicates variation of an earlier Change Control process document. Users can identify the latest version by the version control number.

APPENDIX A – CHANGE CONTROL FORMS

See Attached Forms

This section identifies the forms to be used during the initial phases of the Change Control process accompanied by a brief explanation of their use. Attachments A1 – A-4A contains sample Change Control forms and line by line Checklists.

Change Request Form. Used when submitting a request for a change (Attachment A-1).

Change Request Form Checklist. Provides line-by-line instructions for completing the Change Request form (Attachment A-1A).

Change Request Clarification Response. Used when responding to request for clarification or Clarification Notification (Attachment A-2).

Change Request Clarification Checklist. Provides line-by-line instructions for completing the Change Request Clarification Response (Attachment A-2A).

Acknowledgement Notification. Advises originator of receipt of Change Request by BCCM (Attachment A-3).

Acknowledgement Notification Checklist. Provides line-by-lines instructions for completing the Acknowledgement Notification. (Attachment A-3A).

Cancellation Notification. Advises the originator of cancellation of a Change Request (Attachment A-3).

Cancellation Notification Checklist. Provides line-by-line instructions for completing the Cancellation Notification. (Attachment A-3B).

Clarification Notification. Advises originator that a Change Request is being held pending receipt of additional information (Attachment A-4).

Clarification Notification Checklist. Provides line-by-line instructions for completing the Clarification Notification. (Attachment A-4A).

Letter of Intent. CLEC provides notice of intent to implement a TCIF compliant interface within a specified timeframe. (Attachment A-5).

APPENDIX B – RELEASE MANAGEMENT

See Attached Forms

Release Management and Project Implementation is described in Step 10 of the Change Control Process. Project Managers are responsible for confirming the release date, developing project plans and requirements, providing the WBS, Gantt chart and Executive Summary to the BCCM for input to the Change Review Package and ensuring the successful implementation of the release.

The BST Change Control Manager (BCCM) will distribute the Release Notification Information via web. The Notification should contain the following information:

- List of participants (Project Managers from each stakeholder)
- Date(s) for the next Project Manage Release meeting(s)
- Times
- Logistics
- Meeting facilitator and minutes originator (rotated between stakeholders)
- Current Approved Release Package (email attachment)
- Current Maintenance/Defect Notification Information (web posting)
- Draft Release Project Plan - WBS (email attachment created by the Lead Project Manager (s) assigned in step 8 of the Change Control Process)
- Lead Project Manager (s) assigned to the Release with reach numbers (s)

Attachments B1 – B12 contain templates designed to assist the Project Manager(s) in conducting project management responsibilities as needed for Release Management and Implementation.

APPENDIX C –ADDITIONAL DOCUMENTS

See Attached Documents

APPENDIX D –BST VERSIONING POLICY FOR INDUSTRY STANDARD ORDERING INTERFACES

Since August 1998, BellSouth's policy, which is stated in its Statement of Generally Accepted Terms (SGAT) and standard interconnection agreement, has been to support two industry standard versions of the applicable electronic interfaces at all times. Currently, the EDI and TAG electronic interfaces are maintained this way, because they are the interfaces that require the CLEC to "build" its side of the interface to use the new standard. The two industry standard versions of an interface are maintained when BellSouth is implementing an entirely new version of an interface based on new industry standards, not when BellSouth is simply enhancing an existing interface. Periodically, the standards organizations for an interface will issue a new set of standards. After submitting the new standards to the CCP to determine how and when they will be implemented, BellSouth will introduce a new version of that interface based on the new standards. BellSouth will keep the "old" version of the interface based on the old industry standards "up" for those CLECs that have not had enough time to build their side of the interface to the new industry standards. BellSouth gives CLECs six (6) months advance notice of the implementation of electronic interfaces based on new industry standards.

When a new industry standard for the interface is issued, the most recent prior industry standard version of the interface will be frozen - no changes will be made to the old version of the interface. BellSouth will support both the new industry standard version and the old industry standard version until the next set of industry standards is issued. Then, BellSouth will support the two most recent industry standard versions of the interface. If, for example, version A were based on the current industry standards, then following the implementation of version B based on the new industry standards, BellSouth would freeze version A until the implementation of version C. Upon the implementation of the version C of the interface based on the newest industry standards, BellSouth would no longer support version A, would freeze version B, and would support both version C and the frozen version B until the implementation of next set of the industry standards.

For example, in March 1998, BellSouth released a new industry standard version of EDI based on TCIF version 7.0. Between March 1998 and January 2000, BellSouth implemented a series of major releases (4.0 and 5.0) and a series of "point releases" (4.1, 4.2, etc. and 5.1, 5.2, etc.). The final "point release" of EDI was Release 5.8. In January 2000, BellSouth implemented Release 6.0 of EDI based on TCIF 9.0. When this occurred, BellSouth began maintaining Release 5.8 alongside of Release 6.0 of EDI.

NOTE: Because LENS is not an industry standard, machine-to-machine interface, LENS is not covered under the policy described above.

Bradbury,J M (Jay) - LGA

From: Bradbury,J M (Jay) - LGA
Sent: Sunday, February 11, 2001 6:50 PM
To: 'Change.Control@bridge.bellsouth.com'; Annette.Cook@espire.net; apatel3@telcordia.com; BellSouth@quintessent.net; best2@surfsouth.com; brutter@kpmg.com; bszafran@covad.com; c_and_m@bellsouth.net; cassandrap@networktelephone.net; Catherine.Gray@alltel.com; cecilia.ortiz@adelphiacom.com; cflanigan@uslec.com; Chapmanwe@cepb.com; charrison@mpowercom.com; cheryl@eatel.com; chrisg@pvtel.net; christine.shelton@cc.gte.com; colleen.e.sponseller@wcom.com; Craig@exceleron.com; Craig.B.Douglas@MCI.com; CSteele@nuitele.com; daddymax@netbci.com; Debra.Pasquale@btitele.com; DElliott@connectsouth.com; desiree@communitytelephone.com; dfoust@deltacom.com; dkane@aspiretelecom.com; dlasher@eftia.com; DoBeck@MediaOne.com; donnas@intetech.com; dpetry@ix.netcom.com; drodrigu@accessone.cc; Dwight.Scrivener@wcom.com; ed.ramsden@cc.gte.com; epadfield@nextlink.com; ESingleton@eztalktelephone.com; evdoty@nextlink.com; frankb@cellone-ms.com; Gary@CSII.net; generalg@cris.com; george@accesscomm.com; jason.estep@adelphiacom.com; jbritton@phonesforall.com; Jdavid4715@aol.com; JDoherty@accessone.cc; JDuffey@PSC.STATE.FL.US; jeffrey@cellularsouth.com; JG6837@ctmail.snet.com; jhoze@kmctelecom.com; jmclau@kmctelecom.com; JMMaxwell@Intermedia.com; jnovo@mpowercom.com; jrwilliamson@ATT.COM; JtWilson2@ATT.COM; Katherine.Hudler@espire.net; kcooper@eftia.com; kelley.dunne@onepointcom.com; khudson@nextlink.com; Kimberly.O.Williams@MCI.com; kmarshall@telstar.org; kmiller@northpointcom.com; kschwart@covad.com; lhall@floridadigital.net; lisa@annox.com; Lminasola@MediaOne.com; Lorraine.Watson@wcom.com; mark@annox.com; marybethkeane@kpmg.com; matt@albionconnect.com; mconquest@itcdeltacom.com; mer@networkwcs.com; microsun@bellsouth.net; mmclaughlin@dset.com; mt7210@momail.sbc.com; nglugno@kpmg.com; Nicole.Moorman@adelphiacom.com; PBarker@aol.com; PBohn@MediaOne.com; Pkinghorn@eztalktelephone.com; prehm@nightfire.com; prichardson@Trivergent.com; rbennett@floridadigital.net; rbuffa@interloop.net; rhonda.calvert@adelphiacom.com; robert@alternativephone.com; rszczepanski@kpmg.com; sandra.k.evans@mail.sprint.com; Sandrajf@intetech.com; sbowling@caprock.com; shane@eatel.com; sharon.arnett@mail.sprint.com; sharon.russo@btitele.com; sjenning@nowcommunications.com; smason@interloop.net; smoore@Trivergent.com; smurray@rhythms.net; snole@kpmg.com; srober@kmctelecom.com; SStapler@itcdeltacom.com; steve.taff@allegiancetelecom.com; talleylinda@mindspring.com; Tanya.Finney@espire.net; TAYLORJG@LCI.COM; TLA@MAGICNET.NET; tmontemayer@MANTISS.com; Todd@CSII.net; usfloridaoss@kpmg.com; Williamsal@cepb.com; wmknapek@Intermedia.com; wolfsbrg@cris.com; Yvette.Brown@espire.net; Tyra.Hush@wcom.com; trsmith@Trivergent.com; chaynes@Trivergent.com; ssmith@dset.com; sangelo@bellsouth.net; gulfcoast@dotstar.net; Mark.Mecca@dsl.net; Connie@albionconnect.com; ASamson@birch.com; heidi.a.crow@mail.sprint.com; rbreckin@telcordia.com; msykes@telcordia.com; billg@telcordia.com; svc-gate@telcordia.com; karen.grim@mail.sprint.com; mike.norris@mindspring.com; csti@bellsouth.net; mdominick@Trivergent.com; dgraham@MANTISS.com; KKester@STIS.com; Jim.Meyers@wcom.com; Hwhittington@mpowercom.com; Taldinger@mpowercom.com; Rdupraw@mpowercom.com; Jim.Meyers@wcom.com; JOliver@birch.com; reym@networktelephone.net; LHinton@PrismCSI.net; dmcmanus@Trivergent.com; bmurdo@kmctelecom.com; david.burley@wcom.com; SLively@Trivergent.com; TThompson2@broadband.att.com; blsinterfacecontrol@kpmg.com; Kathryn.Phipps@btitele.com; ronald.l.thompson@xo.com; MPatyk@connectsouth.com; schula.hobbs@dsl.net; AZerillo@birch.com; EGunn@birch.com; clhawk@kmctelecom.com; jim.lee@dsl.net; TJStokes@Trivergent.com; Faye.Restaino@dsl.net; Elliot.Wrann@dsl.net; changecontrol.bellsouth@onepointcom.com; carl.taylor@lecstar.com; Glenn.Sonnier@usunwired.com; arobison@kpmg.com; default.user@bellsouth.com; KUchida@northpoint.net; ESaeed@northpoint.net; PPinick@birch.com; lynn@mfn.net; ruth@mfn.net; mcbrunnhilde@juno.com; lavernek@arrowcom.com; Micki.Jones@wcom.com; jfuller@fairpoint.com; Farnell,Edward - Broadband; Ellen.Neis@mail.sprint.com; Ronald.Klamer@wcom.com; conniec@arrowcom.com; CoDavis@covad.com; timw@networkonecom.com; Nancy.Watt@RHTelCo.com; wendy.hernandez@RHTelCo.com; swargo@rhythms.net; Alan.Flanigan@twtelecom.com; DDougherty@birch.com; Andrew.Broder@lightyearcom.com; Renee.Clark@espire.net; Mandy.S.Jenkins@alltel.com; bwellman@idstelcom.com; gerrig@lightyearcom.com; cheryl_acosta@stratosoilandgas.com; Candice.Hamilton@wcom.com; suee@lightyearcom.com; Michelle.Boger@lightyearcom.com; Renee.Clift@dsl.net; JWilwerding@birch.com; lgriffi@lightyearcom.com; annettey@lightyearcom.com; joanneb@networktelephone.net; Doreen.E.Raia@wcom.com; stuartw@networkonecom.com; Bradbury,J M (Jay) - LGA; Bobik,Richard A - NCAM;

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To: sandra.k.evans@openmail.mail.sprint.com; tonya.mcfall@wcom.com; Kevin@albionconnect.com; Jeff.Walker@accesscomm.com; michael.dekorte@lightyearcom.com; Travis.Tindal@om1.al.bst.bls.com; fjohnson@covad.com; karind@covad.com; launch-now.notify@cscoe.accenture.com; tami.m.swenson@accenture.com; linda@networkonecom.com; JoanC@networktelephone.net; ts1336@sbc.com; jjohnson@idstelcom.com; ldavidov@dset.com; Tfcorreia@idstelcom.com; jayala@rhythms.net; eodell@dset.com; don@amexcomm.com; cchiavatti@usatelecominc.com

Cc: 'Pate, Ronald'; 'Marshall, Brent'

Subject: RE: CCP Improvement Meeting - 01-10-01 - Meeting Minutes

Changing the Process.doc

Change Control, Participants in the January 10, 2001 Meeting, and Observers:

I am writing to request clarification, possible revision, and inclusion of a number of items contained in and missing from the minutes of this meeting.

I recognize that producing minutes for lengthy and free flowing dialogue is a difficult undertaking. Typically in such circumstances I am accustomed to seeing some sort of "review" or "approval" process among the participants. I can't find any guidelines in the CCP document, or past minutes going back a year or so - since the dissolution of the Steering Committee. Please accept my comments and requests below as being offered in good faith to produce a fully meaningful record of significant discussion and not as any criticism of the BellSouth scribe's intent.

(1) During the Changes to the Process section (page 2, item 2), Bill Grant of Telcordia asked that the BellSouth CC Team specify the scope of its empowerment to act during the meeting. Valerie Cottingham stated that the CC Team could only agree to and support BellSouth's proposals established before the meeting and was not empowered to commit BellSouth to any changes in position at the meeting.

I believe that this discussion is fundamental to an understanding of the process and request that it be included in a corrected version of the minutes.

(2) In the same section, the minutes state "BellSouth agreed to the e-mail ballot as long as BellSouth has the right to 'veto' a change that could not be supported as proposed. There were no objections."

BellSouth's statement was not presented as something upon which the other participants could vote, it was simply BellSouth's statement. It has not been the group's practice to object to statements made by other participants. Further, the sentence could be read to indicate that other participants agreed that BellSouth could veto changes, which is not the case. The phrase "There were no objections." should be stricken from the minutes. In addition, the minutes should reflect that there was considerable discussion of where the burden to complain (dispute) would lie when BellSouth exercised its "veto" - this discussion resulted in the first bulleted action item on page 3 and needs to be reflected in this section of the minutes.

(3) In the E-mail Ballot section (page 2, item 3), the minutes state "It was agreed the email ballot would be used for changes discussed in today's meeting only." While this is accurate, its is also incomplete -- the participating CLECs clearly indicated that the email ballot process was also their current desired permanent solution. I included a full write-up of the process for possible inclusion in the ballot, and no CLEC has subsequently voiced any objection to that proposal. I understand that BellSouth in good faith does not believe that such a CLEC consensus exists.

Given that the item was not balloted, I proposed this matter be discussed during the meeting scheduled on February 21, 2001, and request that any participating CLEC having an objection to the CLEC process recommendation or my representation of the CLEC position please contact me directly. For convenience, I have attached the CLEC Recommendation to this email.

Thank you for your consideration.

Jay M. Bradbury
AT&T
404-810-8005

[The following is the complete CLEC proposal seeking permanent adoption of the process discussed and used during the January 10, 2001 CCP-IP Meeting]

The current, approved version of this process document will be stored under the component name "Ccp.doc" (the date of the latest CCP document will be included in the file name). The BellSouth Change Control Manager BCCM (and alternate) will be the only persons authorized to update the document version.

Requests for changes to the Change Control Process may be submitted to the BellSouth Change Control Manager (BCCM) using the Change Request form located in the Appendix A. Cosmetic changes (format, typographical errors, clarifications of meaning, etc.) may be made and published by the BCCM (or alternate) without further review. Other changes will be reviewed at the monthly Change Review status meetings following receipt of the request, if included in the published meeting agenda. The CCP participants present at the meeting (in person or by teleconference) will reach an initial determination regarding the requested change(s) by "consensus". For this purpose consensus will mean that no participant has serious objection to the determination of the group. The following initial determinations may be applied:

- Meeting Consensus (BellSouth and the other meeting participants have no serious objection to the change. The change will be balloted for Industry Consensus with the indication that a meeting consensus was reached.)
- Contested Issue (BellSouth and the other meeting participants are unable to reach consensus and the proposals of the parties are firm. The proposals will be balloted for Industry Consensus and the structure of the ballot will indicate that a choice between alternatives must be made.)
- Not Ready for Balloting (BellSouth and the other meeting participants are unable to reach consensus and the proposals of the parties are not firm. The request will not be balloted and will remain open for review during subsequent monthly meetings. The CCP participants will continue to use the associated current change control process. Working documentation reflecting both the current and proposed language may be created to facilitate further discussion.)
- Implement as Cosmetic (BellSouth and the other meeting participants determine that the requested change is a clarification of meaning with no potential negative impact. The change will be implemented and the Change Request will be updated to implemented status and update distributed as per the normal process.)

Subsequent to this initial review the BCCM and a CLEC representative appointed by the CLECs participating in the review shall prepare an official E-mail ballot for distribution to determine the Industry Consensus. The official Industry Consensus ballot will detail the change(s) being requested, and the significant arguments presented for and against the change during the review. As noted above, the ballot will indicate whether issues are being voted upon as the result of a Meeting

Consensus or as a Contested Issue. Each issue presented on the ballot will contain a statement of the change to be approved and in the case of a Contested Issue, a summary of arguments for and arguments against the alternatives. The ballot will be distributed one week following the Status Meeting. CLEC's and BellSouth will have one week in which to cast their votes. Only ballots transmitted before midnight of the due date will be counted. BellSouth and each CLEC are allowed one vote on each issue presented on the ballot. The CCCM, or other designated individual will cast each CLEC's votes. The BCCM, or other designated individual will cast BellSouth's votes.

The ballot (a sample ballot may be found in Appendix __) will allow BellSouth and the CLECs to indicate their agreement or disagreement with the proposed change across a five-step continuum as shown here:

A	B	C	D	E
Agree	**Generally Agree**	**Neutral**	**Somewhat Disagree**	**Disagree**

When a Contested Issue is presented on the ballot there will be a continuum for each of the alternatives and the voter must disagree with one (and only one) of the two.

Industry Consensus will exist and the change will be implemented whenever two-thirds of votes cast by the due date are cast in categories A through D. No consensus will exist if over 1/3 of votes for a change are cast in category E – "disagree".

BELLSOUTH TELECOMMUNICATIONS, INC.

DIRECT TESTIMONY OF RONALD M. PATE

BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION

DOCKET NO. 11900-U

November 13, 2000

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

A. My name is Ronald M. Pate. I am employed by BellSouth Telecommunications, Inc. ("BellSouth") as a Director, Interconnection Services. In this position, I handle certain issues related to local interconnection matters, primarily operations support systems ("OSS"). My business address is 675 West Peachtree Street, Atlanta, Georgia 30375.

Q. PLEASE SUMMARIZE YOUR BACKGROUND AND EXPERIENCE.

A. I graduated from Georgia Institute of Technology in Atlanta, Georgia, in 1973, with a Bachelor of Science Degree. In 1984, I received a Masters of Business Administration from Georgia State University. My professional career spans over twenty-five years of general management experience in operations, logistics management, human resources, sales and marketing.

I joined BellSouth in 1987, and have held various positions of increasing responsibility.

Q. HAVE YOU TESTIFIED PREVIOUSLY?

A. Yes. I have testified before the Public Service Commissions in Alabama, Florida, Georgia, Louisiana, South Carolina, the Tennessee Regulatory Authority and the North Carolina Utilities Commission.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A The purpose of my testimony is to address BellSouth's response to Issue 5, Line Sharing and Issue 7, Operations Support Systems ("OSS") as identified in Georgia Public Service Commission Docket No. 11900-U, Second Procedural and Scheduling Order. I will also address the FCC'S Third Report And Order And Fourth Further Notice Of Proposed Rulemaking In CC Docket 96-98 (FCC 99-238); Released November 5, 1999, (UNE Remand Order) as its relates to BellSouth's OSS including a new requirement that BellSouth must provide Competitive Local Exchange Carriers ("CLEC"s) access to loop make-up data via BellSouth's OSS. Additionally, I will address BellSouth's OSS solution to satisfy the FCC's Third Report and Order in CC Docket No. 98-147 and Fourth Report and Order in CC Docket No. 96-98, released December 9, 1999 (Line Sharing

Order) requiring that incumbent LECs unbundle the high frequency portion of the loop to permit the CLECs to provide xDSL-based service by sharing the lines with the incumbent's voiceband service.

Issue (7) (a) Operations Support Systems ("OSS"): What pre-ordering and ordering functionalities must BellSouth make available to CLECs to support CLECs ordering of xDSL Loops, in what form must BellSouth make such functionalities available, and by when must BellSouth make such functionalities available?

(7) (b) Operations Support Systems ("OSS"): Should BellSouth be required to make available to CLECs an integrated pre-ordering and ordering electronic interface OSS, and if so by what date?

Q. DID THE FCC'S UNE REMAND ORDER IMPACT BELLSOUTH'S OSS AS THESE OSS ARE USED BY CLECS?

A. The UNE Remand Order did not impact the existing CLEC OSS access offered by BellSouth other than to specify at paragraph 426 that "the pre-ordering function includes access to loop qualification [make-up] information."

Q. WHAT IS BELLSOUTH'S RESPONSE TO THE FCC'S REQUIREMENT THAT LOOP MAKE-UP INFORMATION BE AVAILABLE TO CLECS AS PART OF THE PRE-ORDERING FUNCTION?

A. BellSouth has developed and implemented procedures to provide CLECs with detailed loop make-up information via the manual Service Inquiry (SI) process. Additionally, BellSouth has under development a detailed mechanized Loop Make-up pre-order process that is accessible through all current electronic interfaces that support pre-order functions (LENS, TAG, and RoboTAG™). This process will be available to any CLEC that is interested in incorporating these procedures into its interconnection agreement. BellSouth witnesses Ms. Caldwell and Ms. Cox address the costs and BellSouth's proposed rates associated with the work required to incorporate this process into the pre-ordering function.

Q. PLEASE DESCRIBE THE MANUAL LOOP MAKE-UP SI PROCESS.

A. The loop make-up data is defined as the physical characteristics of the loop facilities. The data begins at the BellSouth central office, is listed in sequential order, and ends at the serving distribution terminal. Loop make-up data consists of such information as cable gauge and length, bridged taps, load coils, presence of Digital Loop Carrier ("DLC"), and other equipment that is part of local loop facilities.

The CLEC completes the "Customer Information" section of the Loop Make-up SI form indicating if it wants the loop make-up by telephone number or address/circuit identifier. The CLEC submits the Loop Make-up SI form to the Complex Resale Services Group ("CRSG") or their Account Team with a Local Service Request ("LSR"). The CRSG/Account Team forwards the SI form to BellSouth's Outside Plant Engineering Service Advocacy Center ("SAC"). The SAC verifies the availability of loop facilities. If the Loop Make-up SI indicates the CLEC wants the make-up by telephone number or circuit identifier the SAC will return a specific make-up for the requested telephone /circuit identifier. If the Loop Make-up SI indicates the CLEC wants the make-up by address, the SAC will return a specific make-up for the requested address.

The SAC will supply make-up for either suitable copper pair(s) or DLC pairs as requested by the CLEC for the requested address, telephone number or circuit identifier. If either a copper pair, or DLC, but not both exists at that address/telephone number/circuit identifier, the SAC will indicate in the "Comments Section" which is not available at the requested address/telephone number. The following is an example comment for an existing DLC make-up where a copper pair does not exist: "Provided DLC make-up at above address, no copper pairs exist at this location". Again, the loop make-up will be listed in sequential order starting at the central

office and ending at the end user terminal. The SAC will return the completed Loop Make-up SI to the CRSG/Account Team. The CRSG/Account Team reviews the SI form for completeness and forwards the loop make-up SI request along with the LSR to the Local Carrier Service Center ("LCSC") for confirmation of a complete and accurate LSR. The CLEC returns the Loop make-up response to the CLEC via electronic mail. The LCSC provides a firm Order Confirmation ("FOC") to the CLEC and generates a service order that automatically completes for billing the service.

Q. IS THE MANUAL LOOP MAKE-UP SERVICE INQUIRY MERELY AN INTERIM PROCESS UNTIL ELECTRONIC ACCESS IS AVAILABLE?

A. No. The manual Loop Make-up ("LMU") SI process will continue to be a means for obtaining loop make-up information, even after electronic Loop Make-up functionality is available. It will be necessary to use this process for those situations where the Loop Facilities Assignment Control System ("LFACS") is not sufficiently populated with the data needed to make a decision and thus the electronic LMU query does not meet the CLEC's need. Additionally, this process will remain for those CLECs who choose not to deploy the systems needed for the electronic query for LMU. CLECs may obtain documentation for the current Unbundled Network Element ("UNE") pre-ordering and ordering information pertaining to

BellSouth's manual loop make-up at BellSouth's Website:
http://www.interconnection.bellsouth.com/guides/bpobr.html

Q. CAN YOU ESTIMATE THE QUANTITY OF BELLSOUTH LOOPS THAT HAVE DETAILED LOOP INFORMATION POPULATED WITHIN LFACS THEREBY REDUCING THE NEED FOR A MANUAL SI?

A. While 100% of BellSouth's loops are populated in LFACS with certain basic information, not all will have the detailed loop make-up information. As a rule, BellSouth has populated detailed loop make-up for its designed services which require special engineering and provisioning and often are served by more than one central office or wire center. BellSouth has not populated LFACS in the past with detailed loop make-up information for non-designed services that require no special provisioning and are served by one central office or wire center because it did not need the detailed loop make-up information on these services. However, in the high-populated metropolitan areas where the marketing efforts of CLECs are most likely to be concentrated, it is approximated that as much as 80% of loops with detailed loop make-up information are populated in LFACS. So it is only for that remaining small percentage of loops that the manual SI process may have to be utilized. And whenever CLECs must use the manual SI process for these remaining loops, BellSouth will load the resulting loop make-up information in LFACS for future queries.

Q. DID THE UNE REMAND ORDER REQUIRE ELECTRONIC ACCESS TO BELLSOUTH'S OSS FOR CLEC XDSL SERVICE REQUESTS?

A. No. The FCC UNE Remand Order did not require access to pre-order and ordering functionality associated with xDSL service request be electronic. The FCC stated "That interface and gateway issues are already captured in the nondiscriminatory access requirements of the Local Competitive First Report and Order."[1] The FCC further stated that the "LEC must provide the requesting carrier with nondiscriminatory access to the same detailed information about the loop that is available to the incumbent LEC."[2]

Q. IS BELLSOUTH DEVELOPING A MEANS TO PROVIDE CLECS WITH ELECTRONIC ACCESS TO LOOP MAKE-UP INFORMATION AND ELECTRONIC ORDERING OF XDSL LOOPS?

A. Yes. BellSouth is developing a comprehensive electronic process for pre-ordering and ordering for CLECs via the Telecommunications Access Gateway ("TAG"), RoboTAG™and Local Exchange Navigation System ("LENS"). It provides electronic access to loop make-up information from the Loop Facilities Assignment and Control System ("LFACS") and

[1] CC Docket 96-98, Paragraph 426, page 193, released November 5, 1999
[2] CC Docket 96-98, Paragraph 427, page 193, released November 5, 1999

electronic ordering of xDSL loops. BellSouth is also enhancing the Electronic Data Interchange ("EDI") to provide electronic ordering of xDSL loops. These enhancements are currently in beta testing with selected CLECs. Interested CLECs will need to conduct System Readiness Testing ("SRT") with BellSouth prior to using these new functions when they become available in production. If they have not done so already, CLECs must also upgrade their TAG interfaces to the TCIF 9.0 version in order to test the new functions and then use them in production. CLECs may obtain information on the manual and electronic ordering of BellSouth Loop Make-up at the BellSouth Website: http://interconnection.bellsouth.com/products/UNE/bstlmu.pdf.

Q. HOW WILL BELLSOUTH IMPLEMENT THIS PLAN FOR ELECTRONIC ACCESS TO LOOP MAKE-UP INFORMATION AND ELECTRONIC ORDERING OF XDSL LOOPS?

A. BellSouth is implementing a vendor solution provided by Telcordia Technologies, Inc. to provide the OSS necessary for the pre-ordering, ordering and provisioning of CLEC xDSL loops. This extensive technical solution provides Pre-Existing Licensed Software and Marketable Licensed Software and Services to integrate Licensed Software for CLEC xDSL into BellSouth's operations environment. As an example, the solution includes the establishment of a new corporate gateway along with

a new system architecture for the processing of Local Service Requests ("LSRs") for xDSL loops.

The Corporate gateway establishes a single entry point for processing of xDSL requests. It provides a flexible and expandable independent gateway that has security, logging and mapping capabilities, The Corporate gateway is configured to provide CORBA interfaces for the TAG client APIs from the CLECs and an interface for BellSouth's OSS. This allows pre-ordering and ordering functionality utilizing BellSouth's LENS, TAG, and Robo®Tag electronic interfaces. It also provides a navigator interface for the Local Service Requests Router ("LSRR"), which permits firm ordering functionality utilizing the BellSouth EDI electronic interface.

The new system architecture known as Delivery Order Manager will automate many of the service requests functions. Delivery Order Manager can be described as a work flow sequencing and control "engine" that works with partner applications to accept and process service requests. Delivery Order Manager will manage the access to all the databases needed to process a request. Some commonly known databases for pre-order and order functionality are CRIS, CABS, RSAG, ATLAS, and P/SIMS. In addition, Delivery Order Manager will access LFACS for queries for loop make-up information. Delivery Order Manager

also interfaces with a new Service Order Generator for mechanized service order creation allowing flow through of the requests to BellSouth's Service Order Communications System ("SOCS"). In addition to the software requirements and associated software Right-To-Use ("RTU") fees, the Telcordia provided solution also provides support services. Support services include such items as:

- Platform planning and support
- Installation and system administration support
- Services integration testing
- Training and documentation

Q. WHAT IS THE CURRENT VALUE OF THE SOFTWARE AND SERVICES SCOPE OF WORK THAT WILL BE PERFORMED BY TELCORDIA FOR BELLSOUTH IN THE UNE REMAND FOR XDSL?

A. The software and service fees total approximately $28,500,000 for the pre-ordering and ordering software and services provided by Telcordia Technologies, Inc. This includes 3 enhancements to incorporate newly identified functionality necessary to provide a full compliment of pre-order and order capabilities.

Q. BASED ON CURRENT PLANS, WHEN WILL ELECTRONIC PRE-ORDER AND ORERING CAPABILITIES BE AVAILABLE UNDER THE TELCORDIA SOLUTION?

A. BellSouth currently has the pre-order functionality which includes, loop make-up and the xDSL compatible loop firm order functionality in a Beta testing environment. The pre-ordering functionality for xDSL is targeted for deployment into the production environment in mid-to-late November 2000. BellSouth has encountered some problems that have delayed deployment of xDSL firm ordering functionality. BellSouth is working with Telcordia to establish dates when these problems will be corrected.

Q. PLEASE SUMMARIZE THE BENEFITS OF THE TELCORDIA SOLUTION FOR CLEC XDSL PRE-ORDERING AND ORDERING.

A. The Telcordia solution provides CLEC xDSL pre-ordering and ordering functionality that is fully integrated, highly extendable and scalable end-to-end with maximum reuse of function. Through a strategic supplier relationship, BellSouth benefits from expert planning assistance from a world-class OSS and technology supplier. Finally, and very important, BellSouth and its CLEC customers realize reduced costs from elimination of complex product selection and multi-supplier systems integration work.

Q. DOES BELLSOUTH PROVIDE ACCESS TO OTHER DATABASES THAT MAY BE USEFUL IN OBTAINING PRE-ORERING INFORMATION IN CONNECTION WITH THE PROVISIONING OF CLEC XDSL SERVICE?

A. Yes. BellSouth provides information from its Loop Qualification System ("LQS"). LQS was designed as a tool for Network Service Providers, the purchasers of BellSouth's tariffed industrial class ADSL offering (as opposed to BellSouth's business class ADSL offering) to determine whether a particular service location is qualified for BellSouth's industrial class ADSL offering based on BellSouth's defined technical parameters. In other words, by entering a telephone number, LQS provides the user with a qualified "yes/no" response based on the technical parameters of BellSouth's industrial class ADSL offering. LQS does not provide loop make-up information as contemplated by the FCC's xDSL requirement. Subsequent to the FCC's UNE Remand order, LQS was made available for use by CLECs on an interim basis until the mechanized loop make-up interface is deployed. However, the purpose of LQS did not change with providing access to CLECs – it remains a tool designed to provide a response to the inquirer if the location is qualified for BellSouth's ADSL service. Once again, LQS does not provide the level of detailed information in order that a CLEC may make an independent judgment about whether the loop is capable of supporting advanced services equipment the CLEC intends to install.

Q. HOW DOES A CLEC OBTAIN ACCESS TO LQS?

A. A CLEC may contact its BellSouth account team to obtain information on gaining access to LQS. The account team will assist with the appropriate documentation necessary to obtain a password and resulting access to LQS. CLECs may obtain a Loop Qualification System DLEC/CLEC Job Aid via the BellSouth Website:
http://www.interconnection.bellsouth.com/guides/bpobr.html

Q. YOU HAVE REFERRED TO BOTH BELLSOUTH INDUSTRIAL CLASS ADSL AND BUSINESS CLASS ADSL. PLEASE DIFFERENTIATE.

A. My reference to BellSouth's industrial class ADSL is describing a low speed service, downstream data rate up to 1.5 Mbps and upstream data rate up to 256 Kbps. The cost structure for this offering does not support special actions by BellSouth to either condition an existing loop or to provide a new loop in order to make ADSL work at a given location. The 1.5 Mbps x 256 Kbps offering, referred to as industrial service, is a "best effort", low cost, mass market offering.

My reference to BellSouth's business class ADSL is describing a high-speed service with data rates of:

- 384 Kbps x 384 Kbps
- 768 Kbps x 512 Kbps
- 1.5 – 1.8 Mbps x 512 - 768 Kbps
- 2 – 4 Mbps x 640 – 896 Kbps
- 4 – 6 Mbps x 640 – 896 Kbps
- 192 Kbps x 192 Kbps.

The business class offering will provide network performance levels to be obtained in BellSouth's network and loop conditioning to provide a desired class of service including symmetric and asymmetric data rates.

The BellSouth business class ADSL is the comparable service to CLEC loops requiring loop make-up in this docket because performance levels for both are guaranteed.

Q. WHAT IS THE SOURCE OF THE LOOP INFORMATION CONTAINED WITHIN LQS?

A. The database of record for loop make-up information is LFACS. Thus, the source of loop information in LQS is LFACS. However, LQS also utilizes the additional software systems described below:

- Loop Engineering Information System ("LEIS") - An umbrella system with several modules, one of which is LEAD.

- Loop Engineering Assignment Data ("LEAD") - LEAD is a snapshot of the LFACS database. It receives current data once a month for all wire centers. LEAD is completely updated each month.

- Hands-Off Assignment Logic - ("HAL") HAL is a BellSouth developed software system designed to pull information from LFACS and join transactions that can not be performed by LFACS, including assignment of most service orders, among which includes assignments on ADSL facilities.

Q. IS DIRECT ACCESS TO LFACS OR LEIS/LEAD REQUIRED IN ORDER TO PROVIDE CLECS WITH DETAILED INFORMATION ABOUT THE LOOP?

A. No. BellSouth's obligation is to provide requesting carriers the same underlying information that BellSouth has in any of its own databases or other internal records[3]. BellSouth's mechanized OSS interface and manual interface provides a means to submit either a mechanized LMU pre-order query or a manual LMU Service Inquiry ("SI") to LFACS and

[3] CC Docket 96-98, paragraph 427, page 193, released November 5, 1999

receive a response. In the case of LEIS/LEAD, access may be obtained by CLECs for LQS which provides a "yes/no" qualified response.

Issue (5) (b) Line Sharing: How and under what rates, terms, and conditions should line sharing be provided?

Q. WHAT PORTION OF THIS ISSUE ARE YOU ADDRESSING?

A. I will discuss BellSouth's implementation of line sharing as it relates to BellSouth's OSS and BellSouth's associated cost of implementation. The issue relating to Line Sharing rates will be addressed by Ms. Cindy Cox.

Q. PLEASE DESCRIBE BELLSOUTH'S APPROACH TO DEVELOPING OSS FUNCTIONALITY THAT WILL ELECTRONICALLY PROCESS LINE SHARING SERVICE REQUESTS.

A. The vendor solution provided by Telcordia Technologies, Inc. previously described for CLEC xDSL pre-ordering and ordering functionality also has a module to provide the OSS necessary for the pre-ordering, ordering and provisioning of Line Sharing service.

Q. PLEASE SUMMARIZE THE BENEFITS OF THE TELCORDIA SOLUTION FOR LINE SHARING TO BELLSOUTH AND ITS CLEC CUSTOMERS.

A. In addition to those benefits previously described, the Telcordia solution offers electronic processing of Line Sharing service requests allowing flow-through within BellSouth's OSS. This includes the ability to inventory and assign BellSouth facilities and splitters at the pre-specified CLEC meet points. These capabilities provided by the Telcordia solution translate into reliable, fast and accurate processing of CLEC Line Sharing service requests. It provides state-of-the-art technology with the ability to process the anticipated volumes of requests in a cost-effective manner and to build future applications and functionalities.

Q. IS THE SCOPE OF WORK THAT IS TO BE PROVIDED BY TELCORDIA EXCLUSIVELY FOR CLEC OSS CAPABILITIES ASSOCIATED WITH THE CLEC XDSL AND LINE SHARING?

A. No. The majority of the work done in this effort is for OSS capabilities associated with CLEC xDSL and Line Sharing orders; however, Telcordia is performing additional work on Electronic Access Ordering ("EAO") functionality. EAO will provide ASR pre-order functionality for address validations and Connecting Facility Assignment ("CFA") inquiries. Approximately $3.2 million is committed for licensed software Right-to-Use fees associated with EAO.

Q. WHAT IS THE CURRENT VALUE OF THE SOFTWARE AND SERVICES SCOPE OF WORK THAT WILL BE PERFORMED BY TELCORDIA FOR BELLSOUTH IN THE LINE SHARING EFFORT?

A. The software and service fees total approximately $41,000,000 for the Line Sharing software and services provided by Telcordia Technologies, Inc. This does not include the approximate $3,200,000 for software fees described previously for EAO functionality.

Q. BASED ON CURRENT PLANS WHEN WILL ELECTRONIC PRE-ORDERING AND ORDERING CAPABILITIES BE AVAILABLE UNDER THE TELCORDIA SOLUTION?

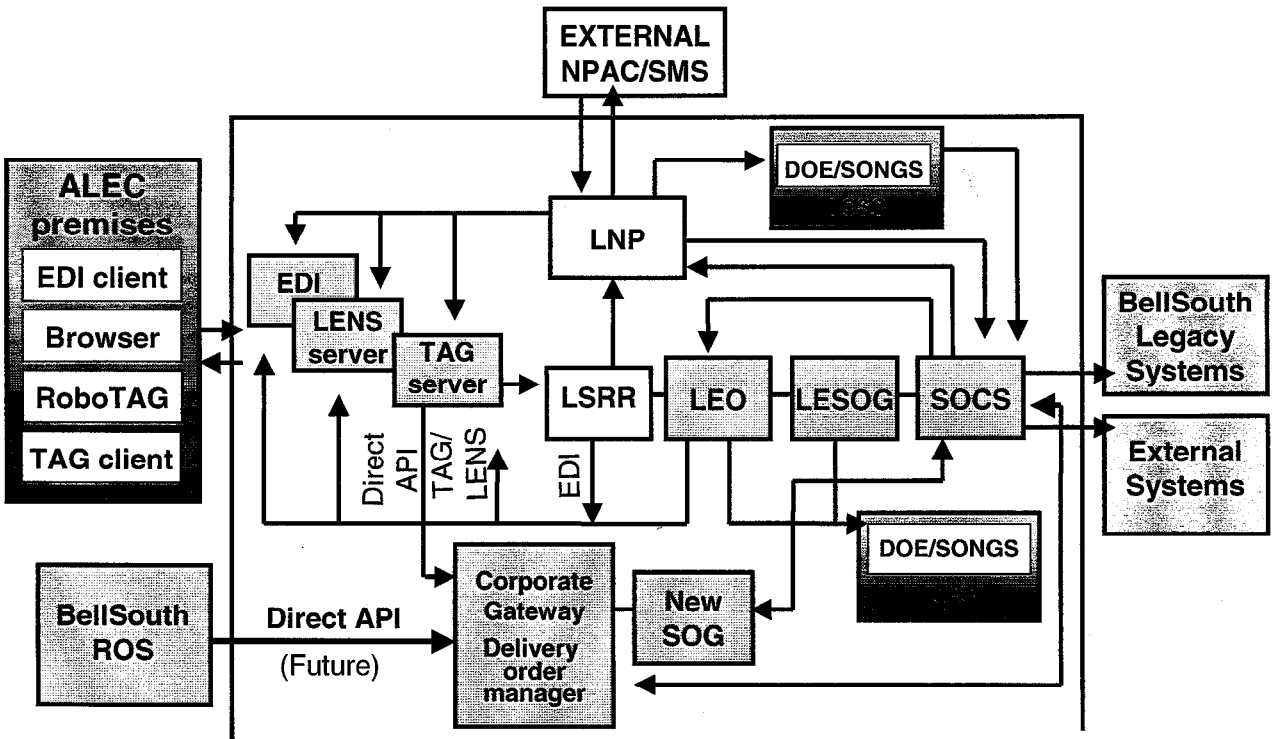
A. As previously stated with the pre-ordering of xDSL, the deployment for pre-ordering of Line Sharing is planned for mid-to-late November 2000. Firm Order Line Sharing utilizing the vendor supplied solution by Telcordia does not yet have a firm deployment schedule established. In cooperation with the CLEC Line Sharing collaborative teams, BellSouth has implemented an interim solution in the existing OSS utilizing the Local Exchange Service Order Generator ("LESOG") to allow mechanized firm ordering of CO-based BellSouth-owned splitter Line Sharing. This interim solution was implemented for the production environment on September 30, 2000. This interim solution will be supplemented and replaced utilizing

the Telcordia solution in mid-to-late 2001. BellSouth plans to also offer mechanized firm order of CO-based CLEC owned splitter Line Sharing and Remote Line Sharing. These products are being developed jointly in the Line Sharing Collaborative teams and will be mechanized as they are developed.

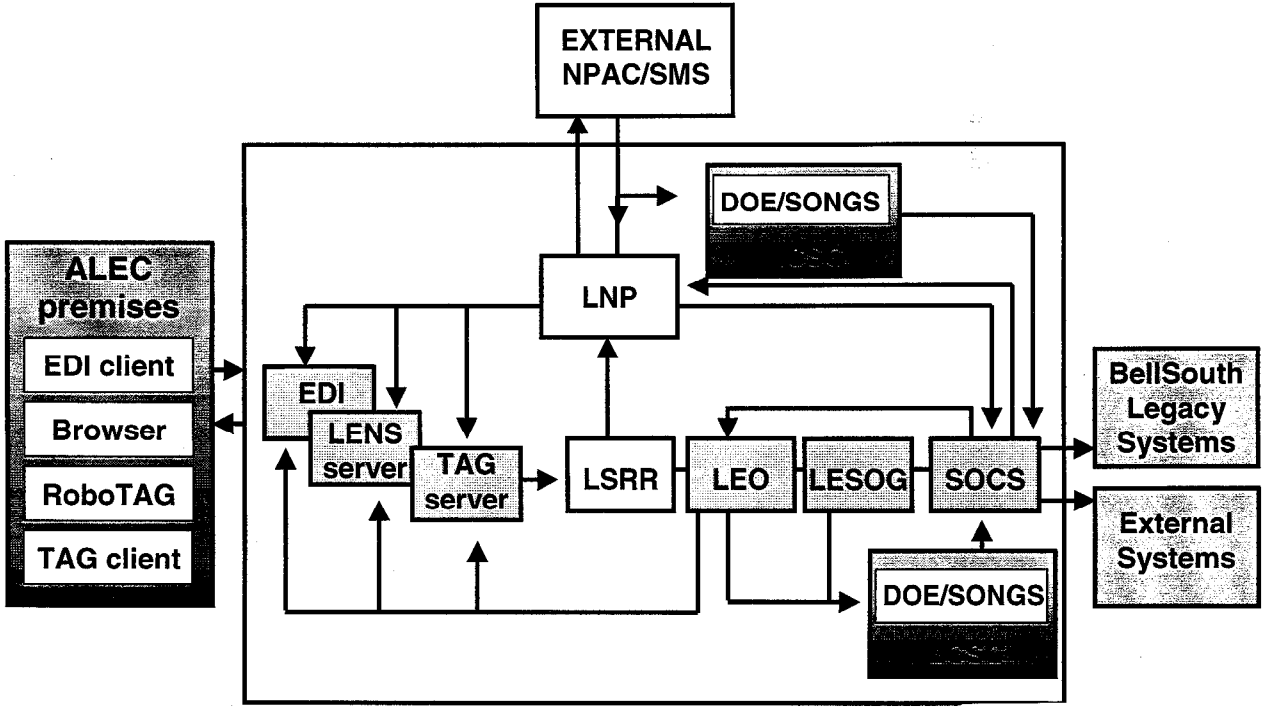
Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes.

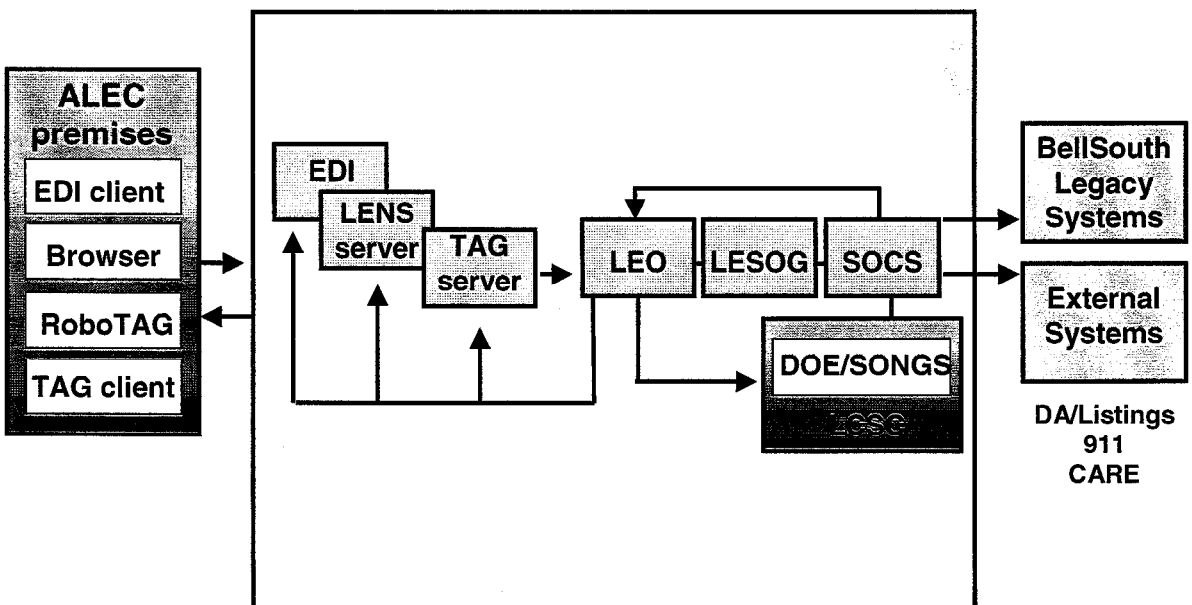
Architecture for ALEC LSRs
LNP & DSL



Architecture for ALEC LSR processing including LNP



Architecture for ALEC LSR processing pre-LNP



BELLSOUTH

encDocUserReq
enc9651.DOC
CMVC Version 1.1

ENCORE USER REQUIREMENTS

ESTABLISH NEW TEST ENVIRONMENT FOR CLEC/Vendor USE

FINAL
ENC9651.DOC
DOCUMENT VERSION 1.0
DECEMBER 13, 2000

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1. SCOPE

User Requirement Source (check all that apply)				
	PSC Mandate		**CLEC Request**	**X**
	Regulatory		**Increase Productivity/Flow-through**	
	Other (Specify)		**System Stability and Performance**	

The scope of this document is to allow the CLEC/Vendor to test their applications against new release functionality. These transactions are:

- Pending Order Status
- Firm Order Confirmations
- Rejects
- Simulated Completion Notices
- Clarifications
- Jeopardies
- Functional Acknowledgements

The test environment will include ENCORE & Local Number Portability Systems that will be duplicated to match the ENCORE and Local Number Portability production systems. (LENS will be reproduced in the test environment for BellSouth internal use only.) The production legacy reference systems will be used in this CLEC test environment.

The scope of the CLEC Test Environment does not include interfacing with NPAC SMS (Number Portability Administration Center Service Management System) by BellSouth or the CLECs.

2. ASSUMPTIONS

Number	Description
5.1	This applies to TCIF-9.
5.2	TCIF-7 will not be supported.
5.3	The CLEC Test Bed will be brought forward to all new TCIF issues.
5.4	LSRs will originate at CLEC/Vendor premises using CLEC/Vendor applications and hardware.
5.5	EDI & TAG shall be supported for CLEC/Vendor use.
5.6	A maximum of ten (10) CLECs/Vendors shall be able to test at any given time across all applications.
5.7	Failover or redundancy of test bed platforms will not be provided in this environment.
5.8	BellSouth will do connectivity testing with each CLEC/Vendor in this test bed at the beginning of the test window.
5.9	Handling of application defects shall follow each application's normal production defect handling process.
5.10	Support of the CLEC test bed shall be Monday thru Friday, 9AM to 5 PM EST, excluding BellSouth Holidays.
5.11	Certification must be completed before use of the CLEC test bed.
5.12	BellSouth reserves the right to determine, based on functional changes, whether a minor release will be available for testing and provide the availability window via the CLEC notification process. **NOTE:** A minor release may not be available for testing until the next Major release.
5.13	The CLEC test bed will not support unscheduled testing.
5.14	The CLEC test bed will not support regression testing.
5.15	The CLEC test bed will not support after hours testing.
5.16	No backup or redundancy will be provided for this environment.
5.17	The CLEC test bed will not support volume or performance testing.
5.18	The CLEC test bed will be used for functional testing of CLEC/Vendor applications.
5.19	Billing and provisioning will not be completed in the test bed environment.
5.20	CLEC/Vendor LSRs that are designed to fallout will follow the normal process in this test environment.
5.21	Normal service rep profile capability will be provided in the test environment. New profiles will need to be established as desired in this environment. Existing production profiles will not function in this environment.

3. USER Requirements

Requirement #	Description
UR9651.0001	A new test environment will be created by the ENCORE system & LNP for CLEC/Vendor testing and will be available with the exclusion of scheduled down times.
UR9651.0002	This applies to TCIF-9 & any future issues.
UR9651.0003	The CLEC test bed will support one release at a time.
UR9651.0004	The test bed will be capable of supporting CLEC/Vendor testing of a release 30 days prior to implementation into production and 60 days after production.
UR9651.0005	Transaction entry will be via the Electronic Data Interchange & the Telecommunications Access Gateway only. **NOTE:** Transaction entry via the Web Based Interface will not be allowed in this test environment for CLEC/Vendor use.
UR9651.0006	The CLEC test bed will be used to test the pre-order process from query to response.
UR9651.0007	The CLEC/Vendor test bed will be used to test the ordering process from LSR entry through simulated Completion Notices.
UR9651.0008	The web-based interface will provide a web site for the purpose of simulating a completion notice.
UR9651.0009	Test Bed support will be available to the users for testing Monday – Friday 9:00 a.m. to 5:00 p.m. EST, excluding scheduled down time.
UR9651.0010	Revenue Accounting Offices (RAOs) for all 9 states may be used in testing.
UR9651.0011	Transactions identified as "New Solutions" will be rejected by the processing systems and an error message will be returned to the CLEC.

4. Glossary

Name	Description
ATLAS	Application for Telephone Number Local Administration and Selection
CABS	Carrier Access Billing System
CC	Company Code
CLEC	Competitive Local Exchange Carrier
COG	Corporate Order Gateway
CRIS	Customer Records Inquiry System
DOM	Delivery Order Manager
EDI	Electronic Data Interchange
ETET	End-to-End Testing
FA	Functional Acknowledgement

FOC	Firm Order Confirmation
IMS	Information Management System
IT	Information Technology
ITS	Information Technology Services
LCSC	Local Customer Service Center
LENS	Local Exchange Navigation System
LEO	Local Exchange Ordering
LESOG	Local Exchange Service Order Generator
LNP	Local Number Portability
LSR	Local Service Request
NPAC SMS	Number Portability Administration Center Service Management System
NS-CS	Network Services – Customer Service
NS-ESD	Network Services – Electronic Solutions Delivery
OCN	Operating Company Number
OSS	Operating System Standards
PAWS	Provisioning Analyst Work Station
PON	Purchase Order Number
PSIMS	Product and Services Inventory Management System
QA	Questionable Activity
RAO	Revenue Accounting Office
SOCS	Service Order Communication System
SOG	Service Order Generator
SRT	System Readiness Testing
TAG	Telecommunications Access Gateway
TCIF-7	Telecommunication Industry Forum – Issue 7
TCIF-9	Telecommunication Industry Forum – Issue 9
UAT	User Acceptance Testing
WSM	Work Station Manager

CLEC TEST BED ENVIRONMENT (CTBE)
Issue Log

Issue No.	Issue	BST Response
1031-01	Jill (AT&T) requested that BST add to the objective 997's, rejects, clarifications and completions.	BellSouth will provide the following when applicable: ▪ Acknowledgements ▪ Rejects ▪ Clarifications ▪ Confirmations ▪ Pending order statuses ▪ Jeopardies ▪ Completions
1031-02	Provide Phase I, II and III distinctions to reflect what functionality will be supported in each phase.	Full functionality will be delivered at implementation.
1031-03	Multiple CLECs testing simultaneously. Number of CLECs that can test simultaneously is not known at this time. Number will be scaleable. CLECs questioned if the capacity will be specific to each application. CLECs also expressed concern for availability of enough test slots given the 60/60 and 30/30 Test Bed windows.	BellSouth will provide 10 simultaneous test slots. Slots will not be allocated per application, but across all applications. A 90-day window will be provided for CTBE on all major releases. BellSouth will determine, based on functional changes, whether a minor release will be available for testing in CTBE and provide the availability window in via CLEC notification process.
1031-04	60 Days/30 Days prior and post production for Major and Minor releases, respectively. CLECs expressed concern on how defects will be managed.	New releases will be available 30 days prior to production date and 60 days after production date pursuant to criteria listed in 1031-03.
1031-05	Determine how defects will be managed with the 60/60 and 30/30 timeframes.	Two issues need to be addressed: 1) pre-prod defects, and 2) post-prod defects. What will be process to communicate; load to CTBE.
1031-06	Determine if regression testing will be supported.	Regression testing will not be supported
1031-07	Dedicated test accounts in production spread over all RAOs (dedicated to that region)	BellSouth confirms.

CLEC TEST BED ENVIRONMENT (CTBE)
Issue Log

Issue No.	Issue	BST Response
1031-08	Order entry via EDI, and TAG interface (applies to both Interim and Full Production phases)	Interim phase no longer applies.
1031-09	LSRs submitted with a desired due date of 30 days in future (applies to Phase I only)	Since this requirement only applied to the Interim solution, it will be deleted.
1031-10	CLEC pending orders purged after finite number of days	CLEC pending orders purged ___ days after testing completed.
1031-11	Service orders originate at CLEC premise equipment – CLEC is responsible. The connectivity for the test bed will be the same for the CLEC as what is supported in production for the interface utilized (i.e., if accessing LENS via internet, testing for LENS would be supported via internet).	BellSouth confirms.
1031-12	Time of operation – Monday through Friday, 8am to 5pm EST (applies to both Interim and Full Production phases)	Test Bed support will be available to users for Monday through Friday, 8am to 5pm ET, excluding published holidays. Test cases may be sent Monday through Friday, 8am to 8pm ET, excluding published holidays, based on OSS availability.
1031-13	Determine if after hours testing will be supported.	No.
1031-14	Provide list of REQTYP's/ACT types that will be supported in each phase of the test bed implementation.	CTBE will support all REQTPYE/ACTTYPE combinations that are identified in the BBR-LO for the release loaded. If a new release implements a new REQTPYE/ACTTYPE, it will be implemented in CTBE also. Please consult the BBRLO to determine which REQTPYE/ACTTYPE(s) are supported.
1031-15	No backup or redundancy provided for this environment.	BellSouth confirms.

Issue No.	Issue	BST Response
1031-16	Does not replace existing connectivity and interface certification testing requirements	All parties wishing to test in CTBE must present Test Certification in non-LNP and/or LNP from CLEC Certification Test Manager. Access will be dependent upon which functionality party has been certified (i.e. LNP, Resale, or UNE). CLEC certification testing process is currently under revision.
1031-17	Functional test desk environment that supports pre-order and firm order transactions, TAG and EDI, flow through and non-flow through transactions. The Helpdesk will provide support to the CLECs during testing. The CLECs recommended that the Help Desk functions include: scheduling, assistance on order entry, trouble reporting, coding problems, and documentation errors.	The Test Desk/Help Desk functions are being developed and will be covered in project roll-out.
1031-18	Provide clarification on roles and responsibilities of Help Desk. Will there be a separate Test Desk?	See 1031-17
1031-19	Ensure that the following two problems in current testing platform/process will not be present in new Test Bed: (1) IT Business Requirements conflict with CLEC User Requirements and Business Rules. Test cases in application testing for TAG won't get pass edits because cases do not mirror business rules and requirements, (2) Inability to simulate production environment in current test environment because orders aren't allowed to process to completion.	CLEC User Requirements and CLEC Test Cases will follow business rules and system requirements for each release. Test cases will be allowed to process through to "simulated" completion.
1031-20	Volume testing not supported	BellSouth confirms.

Issue No.	Issue	BST Response
1031-21	Provide CLECs ability to test a release before implementation. CLECs stated that TAG implementers need 60 days from time they receive API and documentation to code. They would not be ready to test in the "60 days prior" timeframe unless API and documentation are made available 30-60 days prior to start of Test Bed pre-production timeframe.	Pre-production testing in CTBE will start 30 days prior to production and continue to be available 60 days post production. The API Reference Guide will be available 60 days prior to CTBE, and 30 days prior to CTBE. This should allow CLECs time to complete coding and development prior to or during CTBE development.
1031-22	Ensure that the new Test Bed mirrors production (i.e., need the ability to test the full suite of transactions from 997, to FOC, Rejects, Clarifications, Rejects, Statuses and Completions).	See 1031-01.
1031-23	Investigate the 60/60 and 30/30 days' timeframes.	See 1031-04 and 1031-03.
1031-24	Investigate the ability for a CLEC to test a specific scenario at any given time.	Unscheduled testing will not be supported.
1031-25	Investigate the management of the release structure. Since BellSouth currently has several APIs active, how will the multiple APIs be managed in the Test Bed? What will be available for testing?	CLEC testing will be conducted with the most current production release. Only one API release (same as ENCORE release) will be available at a time in CTBE.
1031-26	Determine if impromptu testing will be supported.	See 1031-24.
1031-27	If a CLEC does not implement all functionality in a release but decides at a later date to implement the functionality, determine if a CLEC will be allowed to test the functionality at that time, say 3 months later, in the Test Bed.	See 1031-06. Releases will not remain available on CTBE beyond 90 days.
1031-28	Determine if the current release and the next release will be available for testing in the new Test Bed.	No. Only one release will be available for testing at any given time. 30 days prior to production it will be the next release and will be the current release 60 days post production.
1031-29	Order entry thru FOC; no order completion	See 1031-01

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Issue No.	Issue	BST Response
1031-30	No billing, no provisioning	BellSouth confirms.
1031-31	Order entry via EDI, and TAG.	See 1031-08.
1031-32	Interim Test Bed deployment by December (will use production databases)	No longer applicable
1031-33	Full Test Bed Solution by February, 2001 (incorporate copies of production databases)	Target date for Full Test Bed Solution is 03/31/01.
1031-34	Use live "test" accounts in production OSSs (applies to Phase I only). BST will establish test accounts.	BellSouth confirms that "live" test accounts in production OSSs will be used Full Test Bed solution.
1031-35	Establish shortened defect correction process	See 1031-05.
1031-36	Formal testing-there will be a managed schedule.	BellSouth confirms.
1031-37	Confirm if a CLEC can randomly send in test transactions or will they have access to Test Bed only through formal, scheduled testing.	See 1031-24.
1031-38	Provide clarification on whether connectivity, application and validation testing will be conducted in the Test Bed.	See 1031-16
1031-39	Determine if production date will be slipped if defects are found during CLEC pre-production testing.	BellSouth will continue to evaluate releases based on existing guidelines to determine if production date should be impacted.
1031-40	Determine if BellSouth will maintain its current testing requirements. Provide information on the difference between application and validity testing versus the functional testing for the Test Bed.	See 1031-16.
1031-41	Confirm if XDSL will be included in Phase III implementation.	XDSL will not be supported in Full Test Bed solution.
1031-42	Provide a process flow for CLECs to understand the steps and what will be required of them.	Process flow will be provided with application rollout.

Issue No.	Issue	BST Response
1031-43	The Interim Test Bed solution utilizes production application platforms to allow CLECs to begin testing before the end of 2000. The full test bed solution will comprise test bed versions of Encore applications, but continue to rely on production OSS platforms. Refer to "CLEC Test Bed Overview" presentation for architecture diagrams.	Interim Test Bed no longer applicable. BellSouth confirms that the full test bed will be comprised of test bed versions of Encore applications, but continue to rely on production OSS platforms.
1031-44	Planning Dates Interim Test Bed Solution — December 2000 LNP Capability — January 2001 Full Test Bed Solution — February 2001	Interim dates no longer apply. Planning date for Full Test Bed Solution targeted for 03/31/01

Bradbury,J M (Jay) - LGA

From: Bradbury,J M (Jay) - LGA
Sent: Monday, February 19, 2001 3:29 PM
To: 'Change.Control@bridge.bellsouth.com'; Alan.Flanigan@twtelecom.com; Andrew.Broder@lightyearcom.com; Annette.Cook@espire.net; annettey@lightyearcom.com; apatel3@telcordia.com; ASamson@birch.com; AZerillo@birch.com; BellSouth@quintessent.net; best2@surfsouth.com; billg@telcordia.com; blsinterfacecontrol@kpmg.com; bmurdo@KMCTELECOM.com; Bobik,Richard A - NCAM; Bradbury,J M (Jay) - LGA; brutter@kpmg.com; bszafran@covad.com; bwellman@idstelcom.com; c_and_m@bellsouth.net; carl.taylor@lecstar.com; cassandrap@networktelephone.net; Catherine.Gray@alltel.com; cchiavatti@usatelecominc.com; cecilia.ortiz@adelphiacom.com; cflanigan@uslec.com; changecontrol.bellsouth@onepointcom.com; Chapmanwe@cepb.com; charrison@mpowercom.com; chaynes@trivergent.com; cheryl@eatel.com; cheryl_acosta@stratosoilandgas.com; chrisg@pvtel.net; christine.shelton@cc.gte.com; clhawk@KMCTELECOM.com; CoDavis@covad.com; colleen.e.sponseller@wcom.com; Connie@albionconnect.com; conniec@arrowcom.com; Craig@exceleron.com; Craig.B.Douglas@MCI.com; CSteele@nuitele.com; csti@bellsouth.net; daddymax@netbci.com; david.burley@wcom.com; DDougherty@birch.com; Debra.Pasquale@btitele.com; default.user@bellsouth.com; DElliott@connectsouth.com; desiree@communitytelephone.com; dfoust@deltacom.com; dgraham@mantiss.com; dkane@aspiretelecom.com; dlasher@eftia.com; dmcmanus@trivergent.com; DoBeck@MediaOne.com; don@amexcomm.com; donnas@intetech.com; Doreen.E.Raia@wcom.com; dpetry@ix.netcom.com; drodrigu@accessone.cc; Dwight.Scrivener@wcom.com; ed.ramsden@cc.gte.com; Farnell,Edward - Broadband; EGunn@birch.com; Ellen.Neis@mail.sprint.com; Elliot.Wrann@dsl.net; eodell@dset.com; epadfield@nextlink.com; ESaeed@northpoint.net; ESingleton@eztalktelephone.com; evdoty@nextlink.com; Faye.Restaino@dsl.net; fjohnson@covad.com; frankb@cellone-ms.com; Gary@CSII.net; generalg@cris.com; george@accesscomm.com; gerrig@lightyearcom.com; Glenn.Sonnier@usunwired.com; gulfcoast@dotstar.net; heidi.a.crow@mail.sprint.com; Hwhittington@mpowercom.com; jason.estep@adelphiacom.com; jayala@rhythms.net; jbritton@phonesforall.com; Jdavid4715@aol.com; JDoherty@accessone.cc; JDuffey@PSC.STATE.FL.US; Jeff.Walker@accesscomm.com; jfuller@fairpoint.com; JG6837@ctmail.snet.com; jhoze@KMCTELECOM.com; jim.lee@dsl.net; Jim.Meyers@wcom.com; jjohnson@idstelcom.com; jmclau@KMCTELECOM.com; JMMaxwell@Intermedia.com; jnovo@mpowercom.com; JoanC@networktelephone.net; joanneb@networktelephone.net; JOliver@birch.com; jrwilliamson@att.com; JtWilson2@att.com; JWilwerding@birch.com; karen.grim@mail.sprint.com; karind@covad.com; Katherine.Hudler@espire.net; Kathryn.Phipps@btitele.com; kcooper@eftia.com; kelley.dunne@onepointcom.com; Kevin@albionconnect.com; khudson@nextlink.com; Kimberly.O.Williams@MCI.com; KKester@STIS.com; kmarshall@telstar.org; kmiller@northpointcom.com; KPollard@birch.com; kschwart@covad.com; KUchida@northpoint.net; launch-now.notify@cscoe.accenture.com; lavernek@arrowcom.com; ldavidov@dset.com; lgriffi@lightyearcom.com; lhall@floridadigital.net; LHinton@PrismCSI.net; linda@networkonecom.com; lisa@annox.com; Lminasola@MediaOne.com; Lorraine.Watson@wcom.com; lynn@mfn.net; Mandy.S.Jenkins@alltel.com; mark@annox.com; Mark.Mecca@dsl.net; marybethkeane@kpmg.com; mcbrunnhilde@juno.com; mconquest@itcdeltacom.com; mdominick@trivergent.com; mer@networkwcs.com; michael.dekorte@lightyearcom.com; Michelle.Boger@lightyearcom.com; Micki.Jones@wcom.com; microsun@bellsouth.net; mike.norris@mindspring.com; mmclaughlin@dset.com; MPatyk@connectsouth.com; msykes@telcordia.com; mt7210@momail.sbc.com; Nancy.Watt@RHTelCo.com; ngiugno@kpmg.com; Nicole.Moorman@adelphiacom.com; PBarker@aol.com; PBohn@MediaOne.com; Pkinghorn@eztalktelephone.com; PPinick@birch.com; prehm@nightfire.com; prichardson@trivergent.com; rbennett@floridadigital.net; rbreckin@telcordia.com; rbuffa@interloop.net; Rdupraw@mpowercom.com; Renee.Clark@espire.net; Renee.Clift@dsl.net; reym@networktelephone.net; rhonda.calvert@adelphiacom.com; robert@alternativephone.com; Ronald.Klamer@wcom.com; ronald.l.thompson@xo.com; rpwhite@z-tel.com; rszczepanski@kpmg.com; ruth@mfn.net; sandra.k.evans@mail.sprint.com; sandra.k.evans@openmail.mail.sprint.com; Sandrajf@intetech.com; sangelo@bellsouth.net; sbowling@caprock.com; schula.hobbs@dsl.net; Selange.Roberts@espire.net; shane@eatel.com; sharon.arnett@mail.sprint.com; sharon.russo@btitele.com; sjenning@nowcommunications.com; SLively@trivergent.com; smason@interloop.net; smoore@trivergent.com; smurray@rhythms.net; snole@kpmg.com; srober@KMCTELECOM.com; ssmith@dset.com; SStapler@itcdeltacom.com; steve.taff@allegiancetelecom.com; suee@lightyearcom.com; svc-gate@telcordia.com;

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Cc: 'Pate, Ronald'; 'Marshall, Brent'
Subject: RE: 02-21-01 CCP Improvement Mtg Agenda, Working Document & CLEC Testbed Issue Log

Change Control,

I have been able to conduct only a brief review of the "new" working document, however that brief review has raised questions.

The first thing I noticed was that portions of the "baseline" text did not match the Version 2.1 document posted on February 9, 2001 and dated February 1. I notice that Version 2.1.A was posted on February 16, 2001 - perhaps it and the "baseline" test of the working document match? I haven't had time to check.

Also I don't recall any notification that 2.1.A was being posted. Was this posting designed to correct the mismatch in posting and publication dates for Version 2.1?

The working document also does not reflect all of the open issues. Two examples - Changing the Process and Dispute Resolution.

Changing the Process does not contain the full CLEC position that I provided as the CLEC's representative during the construction of the e-mail ballot and that has been confirmed twice since the January 10, 2001 as being the current CLEC Recommendation.

Dispute Resolution reflects only BellSouth's language despite the indication at the January 31, 2001 meeting that it and all seven Contested Items from the ballot would be discussed in this meeting. Is the CLEC recommendation for the other items also not included in the working document?

I will only be able to join the meeting by telephone from 9 to about 10:30 or 11 am, but look forward to the discussion.

Thanks,
Jay

-----Original Message-----
From: Change.Control@bridge.bellsouth.com
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Sent: Friday, February 16, 2001 1:38 PM
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Subject: ID: 02-21-01 CCP Improvement Mtg Agenda, Working Document & CLEC Testbed Issue Log

CLECs,

Attached is the agenda for the CCP Improvement Meeting, scheduled for 02-21-01 in Atlanta at the BellSouth Center.

In addition, included is a "new" version of the working document (colored) that will be used during the discussion. This document has been updated to include those items that were balloted and voted on by the CLECs as well as issues that remain "open". Please note that some "cosmetic" changes were made to this document, such as changing the terminology "defects/expedites" to read "Defects and Expedites" or defects and/or expedited features where appropriate. This was done to support agreed upon changes from the 01-10-01 meeting.

Also attached is a copy of the CLEC Testbed issue log that will be discussed at the 02-21 meeting.

Please let us know if you have any questions.

Thanks.

Change Control Team

Distributed Message

Message sent by: Change Control /m6,mail6a

To unsubscribe from CCP, send a message to
List Manager /m1,mail1a with the Subject line: UNSUBSCRIBE CCP

For online help, send a message with the subject HELP.

Docket No. 2000-465
JMB-R15
Page 4 of 4

BELLSOUTH

(4/00)
Change Request Log

CR Log #	Status	Type	Title	Date Sent	Open & Validate CR (Target Date)	Open & Validate CR (Cor Date Sent)	Open & Validate CR (Cor Resp. Rec'd Date)	Open & Validate CR (Actual Date)	Review CR for Accept. (Target Date)	Rev CR for Accept. (Clarification Sent Date)	Rev CR for Accept. (Cor Resp. Rec'd)	Rev CR for Accept. (Actual Date)	Cancel CR Notify Date	Prepare for CRM (Target Dates)	Prepare for CRM (Actual Date)	CR Mtg Date (Actual)	Doc Chg Rev. Mtg. Results (Target Dates)	Doc Chg Review Mtg. Results (Actual Date)	Internal Change Mgmt Process (Target Date)	Internal Change Mgmt Process (Actual Date)	BPM (Actual Date)	Rel Pkg Notify (Target Date)	Rel Pkg Notify (Actual Date)	Rel Imp (Actual Date)	Soft Rel Notif (Target Date)	Soft Rel Notif (Actual Date)	Doc Changes Note (Target Dates)	Doc Changes Notif. (Actual Date)	Doc Updates Only Notif (Target Date)	Doc Updates Only Notif (Actual Date)	Notes
Status Codes: NotNew, PC=Pending Clarification, PePending, PI=2nd time through process, Sc=Scheduled, I=Implemented, C=Canceled, V=Validated Defect, W=Workaround Identified, CRC=Change Review Complete, RC=Candidate Request																														
NEW CRs																															
RDD00000_001	N	5	UNE via ASR21 (AT&T & WorldCom)	3/1/00		N/A	N/A	03/03/00				4/10/00 (See Notes)																			1pp-Rev. 4-17-00 Appeal in progress. 4-26-00 BST response to appeal. 5-1-00 Re-appeal in progress. 6-9-00 BST response to re-appeal. 6-20-00 CR updated to add capability to order EELs via ASR21. Originators advised to leave CR open.
80012	N	5	TAR Functionality via ECTA Interface (AT&T)	04/18/00	04/21/00	N/A	N/A	04/19/00	05/17/00	N/A	N/A	5/1/00 (See Notes)																			5-1-00 Provided BST response to originator for review. Originator advised to leave this CR open.
80100	N	4	Accurately calculate due date on deny/restore (BST)	07/07/00	07/10/00	N/A	N/A	07/07/00	07/12/00			07/10/00																			7/10/00 Initially submitted as a defect; reclassified as a feature.
80105	N	5	Drop the RES ID Requirement for XDSL Order (Nightfire)	07/12/00	07/17/00	N/A	N/A	07/17/00	08/14/00			08/14/00																			originator for review/09/15 conf call with Peggy, Manuel Lianne** 10/24/00 e-mail list DONE CALL at 10/30/00 with LIANNE
80132	N	5	Related Completion Notifications (WorldCom)	08/09/00	08/14/00	N/A	N/A	08/14/00	09/12/00	09/25/00		09/12/00																			11/22/00 SIM Mtg for ORIG CLEC to Reply to BellSouth Response
80166	N	5	Cable ID Defect (AT&T)	09/20/00	09/21/00	N/A	N/A	09/20/00	10/24/00 rev'd / 9/26/00			09/26/00																			9/26/00- Initially submitted as a defect; reclassified as a feature.
80171	N	5	Modify CCP document (AT&T)	09/20/00	09/25/00	N/A	N/A	09/25/00	10/23/00			10/17/00 See Notes																			10/17/00- AT&T to coordinate mtg with CLECs & BST to further review. 10/27 Mtg held with CLEC community. 11/6/00 - AT&T provided updated marked-up version of CCP document. 11/13/00- under review by BST. 12/7/00 Discussions began at CCP Process improv mtg. Next
80184	N	5	LENS-Ability to view resold CSR's(XO Comm Westlink)	09/28/00	09/29/00	N/A	N/A	09/29/00	10/26/00			10/26/00																			10/24/00 BellSouth REQ extend investigation til 11/01/00* 10/26/00 response sent to Orig CLEC* 11/02 CLEC APPEAL BST Response 11/10 BST provided
80198	N	5	Increase Transaction Size Limit(AT&T)	10/11/00	10/16/00	N/A	N/A	10/12/00	11/09/00																						11/13/00 - Initially submitted as a defect; reclassified as a feature to be implemented in 12/00.
80201	N	5	Retirement of TAG 3.1.1.1 (Mantis/Access One)	10/16/00	10/17/00	N/A	N/A	10/17/00	11/14/00			11/01/00																			12/01/00 BellSouth respond to APPEAL
80221	N	4	Allow User to Populate COTY in LENS. (BST)	12/12/00	12/15/00	N/A	N/A	12/12/00	01/11/01																						12/12/00 Being reviewed for acceptance
80222	N	5	Unknown USOCS (OC Dallacom)	11/13/00	11/16/00	N/A	N/A	11/13/00	12/13/00 *12/14/00	11/20/00	11/21/00																				11/20/00 Clarification Notification sent to Orig CLEC 11/21/00 Clarification response sec'd fr Orig CLEC
80226	N	4	Provide Bus Rules/RECTYP M&E ACTTYP T (BST)	12/01/00	12/06/00	N/A	N/A	12/01/00	01/02/01																						12/01/00 Being reviewed for acceptance

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(4/08)
Change Request Log

CR Log #	S I G N	T Y P E	Title	Date Sent	Open & Validate CR (Target Date)	Open & Validate CR (Clar Resp Rec'd Date)	Open & Validate CR (Clar Resp Rec'd Date)	Open & Validate CR (Actual Date)	Review CR for Accept (Target Date)	Rev CR for Accept (Clarification sent Date)	Rev CR for Accept (Clar resp Rec'd	Rev CR for Accept (Actual Date)	Cancel CR Notify Date	Prepare for CRM (Target Date)	Prepare for CRM (Actual Date)	CR Mtg Date (Actual)	Doc Chg Rev. Mtg. Results (Target Date)	Doc Chg Review Mtg. Results (Actual Date)	Internal Change Mgmt Process (Target Date)	Internal Change Mgmt Process (Actual Date)	RPM (Actual Date)	Rel Pkg Notify (Target Date)	Rel Pkg Notify (Actual Date)	Rel Imp (Actual Date)	Soft Rel Notif (Target Date)	Soft Rel Notif (Actual Date)	Doc Changes Notif (Target Date)	Doc Changes Notif (Actual Date)	Doc Updates Only Notif (Target Date)	Doc Updates Only Notif (Actual Date)	Notes
100232	N	5	Alteration to Business Rules (Gulf Coast Communications)	11/28/00	12/01/00	N/A	N/A	12/01/00	01/02/01																						12/01/00 Being reviewed for acceptance
100234	N	5	Connect Direct Fix (ALLTEL)	11/29/00	12/04/00	12/04/00	12/5/2000	12/04/00	01/04/01																						12/05/00 Clarification received from Orig CLEC. Request being reviewed for acceptance
100235	N	5	When A Number Has Been Ported In Error (ALLTEL)	11/30/00	12/05/00	N/A	N/A	12/04/00	01/03/01																						12/04/00 Being reviewed for acceptance.
100236	N	5	Mail Notification Lists for System Outages (Network One)	12/06/00	12/11/00	N/A	N/A	12/11/00	01/10/01																						12/11/00 Being reviewed for acceptance.
100241	N	6	CN Returned on Incorrect LSR version (AT&T)	12/12/00	12/13/00	N/A	N/A	12/12/00	12/15/00			12/14/00																			12/14/00 - BellSouth determined to not be a defect. Waiting on originator to authorize closure. 12/15/00 - AT&T appealed the validation response. BellSouth responded back that this is a feature are will be implemented in a yet
100243	N	5	Class of Service (Telepak Inc)	12/14/00	12/19/00	N/A	N/A	12/14/00	01/15/01																						12/14/00 Being reviewed for acceptance.
100244	N	5	Center Measurements & Reports for LCSC (Network One)	12/14/00	12/19/00	N/A	N/A	12/14/00	01/15/01																						12/14/00 Being reviewed for acceptance.
100245	N	8	LENS/TAG/EDI Manual vs Mechanized notification (Birch)	12/15/00	12/20/00	N/A	N/A	12/18/00	01/16/01																						12/18/00 Being reviewed for acceptance.
100246	N	5	LENS/TAG - ability to view reject/UNE-P CSRs (Birch)	12/15/00	12/20/00	N/A	N/A	12/18/00	01/16/01																						12/18/00 Being reviewed for acceptance.
100247	N	4	Interval from 5 to 4 days for SL1 in TAG (BST)	12/15/00	12/20/00	N/A	N/A	12/18/00	01/16/01																						12/18/00 Being reviewed for acceptance.
PENDING CRs																															
10812000003	RC	5	The ability to use form for air lifting that drops from d13/DA (AT&T)	8/12/99			8/16/99					N/A	6/19/00	6/19/00	6/28/00 (2nd) 9/28/99 (1st)	6/30/00	6/30/00	8/11/00	9/12/00	9/22/00 (2nd) / 11/30/99 (1st)	8/16/00 Target	9/22/00 (rev) / 9/20/00								8-24-00 Subteam met to discuss a standard form presented at 10/25 MSM. Standard form target imp date 2/01/01. The possibility of an Electronic process for submitting d13 does being investigated. 9-29-00 Subteam being formed to perform planning & analysis during 2000. 10-5-00 Devil still meet with CLEC community. 10-19-00 Subteam met to review & reach consensus on data elements to be passed. 11-16 Subteam mtg to finalize CLEC requirements. 1-18-
10812000003	RC	5	Parsed CSR via TAG Pre Order (AT&T)	8/12/99		N/A	N/A					N/A	6/19/00	6/19/00	6/28/00 (2nd) 9/28/99 (1st)	6/30/00	6/30/00	8/11/00	9/12/00	9/18/00 (2nd) / 11/30/99 (1st)										
10020	RC	5	LENS - View Multiple CSRs in chronology (Divergent)	05/02/00	05/05/00	N/A	N/A	05/02/00	05/31/00	N/A	N/A	05/31/00	N/A	9/19/00 (2nd) / 6/19/00 (1st)	9/19/00 (2nd) / 6/19/00 (1st)	9/27/00 (2nd) / 6/28/00 (1st)	9/29/00 (2nd) / 6/30/00 (1st)	9/29/00 (2nd) / 6/30/00 (1st)	9/29/00 (2nd) / 6/30/00 (1st)	11/13/00 (2nd) / 8/11/00 (1st)	9/12/00 (1st)									7-28-00 The date field requires a 4-digit entry for the year in LENS due to Y2K compliance. Part 2 of CR re: viewing multiple CSRs placed in pending status.

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Change Request Log

CR Log #	Status	Type	Title	Date Sent	Open & Validate CR (Target Date)	Open & Validate CR (Clar. Date Sent)	Open Validate CR (Clar. Resp. Rec'd Date)	Open & Validate CR (Actual Date)	Review CR for Accep. (Target Date)	Rev CR for Accep. (Clarifica tion Sent Date)	Rev CR for Accep. (Clar. Resp. Rec'd)	Rev CR for Accep. (Actual Date)	Cancel CR Notify Date	Prepare for CRM (Target Date)	Prepare for CRM (Actual Date)	CR Mtg Date (Actual)	Doc Chg Rev. Mtg. (Target Date)	Doc Chg Review Mtg. Results (Actual Date)	Internal Change Mgmt. Review (Target Date)	Internal Change Mgmt. Review (Actual Date)	IRPM (Actual Date)	Rel Pkg Notify (Target Date)	Rel Pkg Notify (Actual Date)	Rel Imp (Actual Date)	Soft Rel Notif (Target Date)	Soft Rel Notif (Actual Date)	Doc Changes Notif (Target Date)	Doc Changes Notif (Actual Date)	Doc Updates Only Notif (Target Date)	Doc Updates Only Notif (Actual Date)	Notes
PR0031	RC	5	Change Listing Account In LENS (Alltel)	05/08/00	05/11/00	N/A	N/A	05/09/00	06/07/00	N/A	N/A	06/02/00	N/A	9/19/00 (2nd) / 6/19/00 (1st)	9/19/00 (2nd) / 6/19/00 (1st)	9/27/00 (2nd) / 6/28/00 (1st)	9/29/00 (2nd) / 6/30/00 (1st)	9/29/00 (2nd) / 6/30/00 (1st)	11/13/00 (2nd) / 8/11/00 (1st)	9/12/00 (1st)											10-13-00 RealTyp JIACT=B functionality currently exists in LENS for non-BST exchanges. Originator validating and will advise if CR can be closed.
PR0053	RC	5	CLEC Ordering Guide not up to date with LSOG 4 (Adelphia)	05/22/00	05/25/00	5/24/00	8/30/00	05/24/00	09/28/00			09/15/00		9/19/00	9/19/00	9/27/00	9/29/00	9/29/00	11/13/00												
PR0085	RC	4	Web-based LSR (BST)	06/16/16	06/21/00	N/A	N/A	06/16/00	07/17/00	N/A	N/A	06/16/00	N/A	9/19/00 (2nd) / 6/19/00 (1st)	9/19/00 (2nd) / 6/19/00 (1st)	9/27/00 (2nd) / 6/28/00 (1st)	9/29/00 (2nd) / 6/30/00 (1st)	9/29/00 (2nd) / 6/30/00 (1st)	11/13/00 (2nd) / 8/11/00 (1st)	9/12/00 (1st)											
PR0088	RC	5	UNEW Loop Service requests via EDI (Media One)	06/15/00	06/20/00	N/A	N/A	06/19/00	07/18/00	N/A	N/A	07/17/00		9/19/00	9/19/00	9/27/00	9/29/00	9/29/00	11/13/00												
PR0096	RC	5	LENS Enhancement - Add New Listings (Alltel)	06/28/00	07/03/00	06/29/00 07/24/00	06/30/00 07/28/00	06/30/00	7/31/20 08/04/00			09/08/00		9/19/00	9/19/00	9/27/00	9/29/00	9/29/00	11/13/00												Dates revised due to CR going back to clarification.
PR0101	RC	5	EDI Pre-Ordering (Nightlite)	07/07/00	07/12/00	7/10/00	7/12/00	07/10/00	08/09/00			08/08/00 (See Notes)		9/19/00	9/19/00	9/27/00	9/29/00	9/29/00	11/13/00												08-08 BST response provided to originator for review//12/11/00 RELATED TO CR0186
PR0104	RC	5	Lens Large Account Inquiry (Marietta Ebsenet)	07/12/00	07/17/00	7/17/00	07/25/00	07/26/00	08/23/00			09/26/00				9/27/00	9/29/00	9/29/00	11/13/00												
PR0113	RC	5	LENS Inquiry - View Customer Record (Southern Telecom)	07/27/00	07/28/00	N/A	N/A	07/27/00	08/01/00			8/21/00 (rev) 8/1/00		9/19/00	9/19/00	9/27/00	9/29/00	9/29/00	11/13/00												however a feature is being recommended for a future release. 8/21/00 - Placed in Pending Status
PR0127	RC	5	Provide Pending Service Order for CSR via TAG (ITC Deltacom)	08/04/00*	08/09/00			08/09/00	09/07/00			09/13/00		9/19/00	9/19/00	9/27/00	9/29/00	9/29/00	11/13/00												*advised CLEC of correct date CR submitted on 8/4, not 6/7
PR0135	P	5	Merging of Accounts (AT&T)	08/09/00	08/14/00	N/A	N/A	08/14/00	09/12/00			09/06/00																			09/06/00 response sent to original CLEC 10/23/00 Request placed in PDG Status after appeal by org
PR0137	RC	5	Request, REQTYP CB, ACT P&Q for TNP Orders (AT&T)	08/15/00	08/18/00	N/A	N/A	08/17/00	09/15/00			09/15/00		9/19/05	9/19/00	9/27/00	9/29/00	9/29/00	11/13/00												09/15/00 SEE CR0003 AND CR0160
PR0139	RC	4	Update API guide to better relate the Guide to the BellSouth Pre-order Business rules	08/17/00	08/22/00	N/A	N/A	08/22/00	09/20/00	N/A	N/A	09/08/00		9/19/00	9/19/00	9/27/00	9/29/00	9/29/00	11/13/00												
PR0144	P	4	Add LSR Codes in LENS (BST)	08/30/00	09/05/00	N/A	N/A	08/30/00	09/28/00			09/28/00																			
PR0145	P	4	Remove a TN from A LENS LSR (BST)	08/30/00	09/05/00	N/A	N/A	08/30/00	09/28/00			09/29/00																			
PR0146	P	4	Default the Listed TN (BST)	08/30/00	09/05/00	N/A	N/A	08/30/00	09/28/00			09/28/00																			

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CR Log #	S t a t u s	T y p e	Title	Date Sent	Open & Validate CR (Target Date)	Open& Validate CR (Clar Done Sent)	Open Validate CR (Clar Rec'd Date)	Open & Validate CR (Actual Date)	Review CR for Accep. (Target Date)	Rev CR for Accep. (Clarifica tion Sent Date)	Rev CR for Accep. (Clar Resp. Rec'd	Rev CR for Accep. (Actual Date)	Cancel CR Notify Date	Prepare for CCM (Target Date)	Prepare for CCM (Actual Date)	CR Mtg Date (Actual)	Doc Chg Rev Mtg Results (Target Date)	Doc Chg Review Mtg Results (Actual Date)	Internal Change Mgmt Process (Target Date)	Internal Change Mgmt Process (Actual Date)	RPM (Actual Date)	Rel Pkg Notify (Target Date)	Rel Pkg Notify (Actual Date)	Rel Imp (Actual Date)	Soft Rel Notif (Target Date)	Soft Rel Notif (Actual Date)	Doc Changes Notif (Target Date)	Doc Changes Notif (Actual Date)	Doc Updates Only Notif (Target Date)	Doc Updates Only Notif (Actual Date)	Notes
00149	RC	4	Modify and Resend FOCs and Clarifications (BST)	08/30/00	08/31/00	N/A	N/A	08/30/00	09/05/00	N/A	N/A	08/30/00		9/19/00	9/19/00	9/27/00	9/29/00	9/29/00	11/13/00													9-1-00 Further validation results. CR determined to be a feature targeted for a future release.
00151	P	5	Error Code Defect (LNP) (AT&T)	09/01/00	09/05/00	N/A	N/A	09/01/00	09/06/00			09/06/00																				9/6/00 - Determined to not be a defect. Error messages are valid according to documentation. Waiting on originator to cancel. 9/8/00 BellSouth is recommending that a "Feature" be opened to correct the LNP truncation as
00152	P	4	Electronic Payphone Service Orders (BST)	09/05/00	09/08/00	N/A	N/A	09/06/00	10/04/00			09/28/00																				
00160	RC	5	Flow Through Change Request-RESTYP 88, ACT P&Q for LOOP with LNP Orders (AT&T)	08/15/00	08/18/00	N/A	N/A	08/17/00	09/15/00			09/15/00		9/19/00	9/19/00	9/27/00	9/29/00	9/29/00	11/13/00													09/15/00 SEE CR0003 AND CR0137
00176	P	5	Allow PIC & LPIC to be Submitted as "No Change" in LENS & TAG (Network One)	09/26/00	09/29/00	N/A	N/A	09/28/00	10/26/00 11/07/00	10/20/00	10/31/00	11/07/00																				10/20/00 Clarification sent to ORIGINATOR 10/31/00 Clarification rec'd fr ORIG
00177	P	5	Response Type Request (RRR) TAG (Sprint)	09/25/00	09/28/00	N/A	N/A	09/28/00	10/26/00 11/02/00	10/29/00	10/26/00	11/02/00																				ORIGINATOR 10/26/00 Clarification rec'd fr ORIG 11/03 ORIG Appeal BST Response/12/11/00 BST Change to
00178	P	4	Provide Solicitated Notifications in TAG (BST)	09/28/00	09/29/00	N/A	N/A	09/29/00	10/27/00			10/27/00																				
00179	P	4	TAG Navigator to CORBA Bridge (NCB) Router (BST)	09/28/00	09/29/00	N/A	N/A	09/29/00	10/27/00			10/27/00																				
00180	P	4	Recommendations for CLEC Notif Server and Listener (BST)	09/28/00	09/29/00	N/A	N/A	09/29/00	10/27/00			10/27/00																				
00181	P	4	Disconnect Number Field in TAG for all Svcs. (BST)	09/28/00	09/29/00	N/A	N/A	09/29/00	10/27/00			10/27/00																				
00186	P	5	Interactive Agent TCIP/SSL3 (WorldCom)	09/26/00	09/29/00	N/A	N/A	09/29/00	10/27/00			10/27/00																				12/11/00 Pending Status/Ind. Change Request can be implemented with CR0101
00215	P	5	UNE to UNE Bulk Migrations (AT&T)	11/08/00	11/13/00	N/A	N/A	11/08/00	12/08/00			12/18/00																				12/18/00 BellSouth placed in Pending Status
00196	P	4	Allow Changes in Directory Deliveries - LENS99 (BST)	10/06/00	10/11/00	N/A	N/A	10/10/00	11/07/00	N/A	N/A	11/06/00																				
00218	P	4	EDI Map Change For Error Text	11/13/00	11/16/00	N/A	N/A	11/13/00	12/12/00			12/11/00																				12/11/00 Pending Status. LNP portion Imp w/Rel 5.4 on 12-16-00
00225	P	4	Notes Added to the LACT Field in the BSR (BST)	11/21/00	11/27/00	N/A	N/A	11/21/00	12/21/00			12/18/00																				12/18/00 BellSouth placed this request in Pending Status

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Change Request Log

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3D229	P	4	Validation in LensTAG to Allow Creating new LOC (BST)	11/30/00	12/04/00	N/A	N/A	11/30/00	12/29/00			12/18/00																			12/18/00 BellSouth placed this request in Pending Status
Scheduled CRs																															
20812990004	S	5	Allow 1 LSR to be submitted to change the main account number on a listings only account. "J"	8/12/99									N/A	6/19/00	6/19/00	6/28/00 (2nd) 9/28/99 (1st)	6/30/00	6/30/00	8/11/00	9/12/00	9/18 & 9/22/00 (2nd) / 11/30/99 (1st)	8/16/00 Target	9/22/00 (rev) / 9/26/00	6/30/01 Target	5/30/01		5/30/01				Targeted for Rel. 10.0 on 6/30/01.
20812990005	S	5	Jointly audit BST in the development of fields to support the handling of remaining lines when the main account is migrating	8/12/99									N/A	6/19/00	6/19/00	6/28/00 (2nd) 9/28/99 (1st)	6/30/00	6/30/00	8/11/00	9/12/00	9/18 & 9/22/00 (2nd) / 11/30/99 (1st)	8/16/00 Target	9/22/00 (rev) / 9/26/00	6/30/01 Target	5/30/01		5/30/01				Targeted for Rel. 10.0 on 6/30/01.
20812990007	S	5	Restrictions on LEAN/LEATN be fitted in order for complex services with different classes of service	08/12/99									N/A	6/19/00	6/19/00	6/28/00 (2nd) 9/28/99 (1st)	6/30/00	6/30/00	8/11/00	9/12/00	9/18 & 9/22/00 (2nd) / 11/30/99 (1st)	8/16/00 Target	9/22/00 (rev) / 9/26/00	6/30/01 Target	5/30/01		5/30/01				Targeted for Rel. 10.0 on 6/30/01.
AG0812990001	S	5	Provide CFA on Pre-Order via TAG (AT&T)	8/12/99		8/27/99	8/30/99						N/A	6/19/00	6/19/00	6/28/00 (2nd) 9/28/99 (1st)	6/30/00	6/30/00	8/11/00	9/12/00	9/22/00 (2nd) / 11/30/99 (1st)	8/16/00 Target	9/22/00 (rev) / 9/26/00	6/30/01 Target	5/30/01		5/30/01				Targeted for Rel. 10.0 on 6/30/01.
1N121S990001 (80133 Cloned)	S	5	BST validate an address using the IN vs RSAG (A161) Migration of LINE-P Notifications (WorldCom).	12/15/99				12/20/99					N/A	6/19/00	6/19/00	6/28/00	6/30/00	6/30/00	8/11/00	9/12/00	9/18/00	8/16/00 Target	9/22/00 (rev) / 9/26/00	6/30/01 Target	5/30/01		5/30/01				Targeted for Rel. 10.0 on 6/30/01.
1G030100_001	S	5	BST Test Environment for EDI (AT&T)	3/3/00		N/A	N/A	03/03/00		N/A	N/A	05/19/00	N/A	6/19/00	6/19/00	6/28/00	6/30/00	6/30/00	8/11/00	9/12/00	8/14/00 Target	8/16/00 Target	9/22/00 (rev) / 9/26/00	1Q01 Target							Full test bed solution - targeted for Imp 1Q01
20002	S	5	Pre-Order/Order Business Rules Discrepancies (AT&T)	3/1/00	3/2/00	N/A	N/A	3/3/00	3/6/00	N/A	N/A	3/9/00	N/A	6/19/00	6/19/00	6/28/00	6/30/00	6/30/00	8/11/00	9/12/00	9/18/00	8/16/00 Target	9/22/00 (rev) / 9/26/00	06/30/01 Target	5/30/01		5/30/01				Targeted for Rel. 10.0 on 6/30/01.
20003	S	5	RPON Business Rules and Error Messages (AT&T)	3/2/00	3/3/00	N/A	N/A	3/3/00	3/8/00	N/A	N/A	3/17/00	N/A	6/19/00	6/19/00	6/28/00	6/30/00	6/30/00	8/11/00	9/12/00	9/18/00	8/16/00 Target	9/22/00 (rev) / 9/26/00	6/30/01 Target	5/30/01		5/30/01				Advance copy of RPON bus rules provided on 3-16-00. RPON rules published on web 8-31-00. **09/15/00 SEE CR0137 AND CR 0160. RPON flow-through & electronic reject targeted for
20014	S	5	LENS Changes and Updating Reference Guides (Invergard)	04/21/00	04/26/00	N/A	N/A	04/24/00	05/22/00	N/A	N/A	5/9/00 & 5/23/00 (See Notes)	N/A	6/19/00	6/19/00	6/28/00	6/30/00	6/30/00	8/11/00	9/12/00	9/18/00	8/16/00 Target	9/22/00 (rev) / 9/26/00	12/16/00 (Rev) / 12/9/00 (Rev) / 12/2/00 (Rev)	10/18/00	12/14/00 (Rev) / 12/7/00 (Rev) / 11/22/00 (Rev)	10/18/00	10/18/00	N/A	N/A	5-24-00 1st part of CR re: screen change. To LENS placed in pending status. 2nd part of CR re: LENS guide on hold until ting comp by originator. 6-22-00 Per originator, LENS guide change no longer needed. Sch. For Rel. R.C 3. On 12/16/00

BELLSOUTH

(4/00)
Change Request Log

CR Log #	Status	Priority	Title	Date Sent	Open & Validate CR (Target Date)	Open & Validate CR (Actual Date)	Open Validate CR (CRs Rec'd Prior Week)	Open & Validate CR (Actual Date)	Review CR for Accep. (Target Date)	Rev CR for Accep. (Critical Isn Sent Date)	Rev CR for Accep. (Clar. Resp. Recd)	Rev CR for Accep. (Actual Date)	Cancel CR Notify Date	Prepare for CRM (Target Date)	Prepare for CRM (Actual Date)	CR Mtg Date Decided	Doc Chg Rev. Mtg. Results (Target Date)	Doc Chg Review Mtg. Results (Actual Date)	Internal Change Mgmt. Process (Target Date)	Internal Change Mgmt. Process (Actual Date)	RPM (Actual Date)	Rel Pkg Notify (Target Date)	Rel Pkg Notify (Actual Date)	Rel Imp (Actual Date)	Soft Rel Notif. (Target Date)	Soft Rel Notif. (Actual Date)	Doc Changes Notif. (Target Date)	Doc Changes Notif. (Actual Date)	Doc Updates Only Notif (Target Date)	Doc Updates Only Notif (Actual Date)	Notes
R0015	S	4	LENS - ACT of C - Change Basic Class of Service (BST)	04/24/00	04/27/00	N/A	N/A	04/24/00	05/22/00	N/A	N/A	05/19/00	N/A	6/19/00	6/19/00	6/28/00	6/30/00	6/30/00	8/11/00	9/12/00	9/18/00	8/16/00 Target	9/22/00 (rev) / 9/20/00	12/16/00 (Rev) / 12/9/00 (Rev) / 12/2/00 (Rev)	10/18/00	12/14/00 (Rev) / 12/7/00 (Rev) / 11/22/00 (Rev)	10/18/00	10/18/00	N/A	N/A		Scheduled for Rel. 8.0.3 on 12/16/00
R0016	S	5	Service Inquiry Enhancement-SL1, SL2, DSO, DS1, ISDN (AT&T)	04/26/00	05/01/00	N/A	N/A	04/26/00	05/24/00	N/A	N/A	05/23/00	N/A	6/19/00	6/19/00	6/28/00	6/30/00	6/30/00	8/11/00	9/12/00	9/18/00	8/16/00 Target	9/22/00 (rev) / 9/20/00	6/30/01 Target	5/30/01		5/30/01				Targeted for Rel. 10.0 on 6/30/01.
R0029	S	4	Partial Migration of UNE Loops (RegTyp A) (BST)	05/09/00	05/12/00	N/A	N/A	05/09/00	06/07/00	N/A	N/A	05/30/00	N/A	6/19/00	6/19/00	6/28/00	6/30/00	6/30/00	8/11/00	9/12/00	9/18/00	8/16/00 Target	9/22/00 (rev) / 9/20/00	6/30/01 Target	5/30/01		5/30/01				Targeted for Rel. 10.0 on 6/30/01.
R0030	S	4	UNE to UNE Migrations (BST)	05/09/00	05/12/00	N/A	N/A	05/09/00	06/07/00	N/A	N/A	05/30/00	N/A	6/19/00	6/19/00	6/28/00	6/30/00	6/30/00	8/11/00	9/12/00	9/18/00	8/16/00 Target	9/22/00 (rev) / 9/20/00	01/06/01 Target	12/7/00	12/7/00	N/A				Targeted for Rel. 9.0 on 31/06/01.
R0038	S	4	TOS Field on LSR - ReqTyp J (POR 9) (BST)	05/19/00	05/24/00	N/A	N/A	05/22/00	06/20/00	N/A	N/A	06/16/00	N/A	6/19/00	6/19/00	6/28/00	6/30/00	6/30/00	8/11/00	9/12/00	9/18/00	8/16/00 Target	9/22/00 (rev) / 9/20/00	6/30/01 Target	5/30/01		5/30/01				Targeted for Rel. 10.0 on 6/30/01.
R0040	S	5	Order Tracking Request (AT&T)	05/11/00	05/16/00	N/A	N/A	05/11/00	6/21/00 (Rev) 6/9/00	06/02/00	06/14/00	6/21/00 (See Notes)		6/19/00	6/19/00	6/28/00	6/30/00	6/30/00	8/11/00	9/12/00	9/18/00	8/16/00 Target	9/22/00 (rev) / 9/20/00	6/30/01 Target	5/30/01		5/30/01				Targeted for Rel. 10.0 on 6/30/01.
R0078	S	5	Extended Loops (AT&T)	06/09/00	06/14/00	6/16/00	6/16/00	06/13/00	07/12/00	N/A	N/A	06/16/00	N/A	6/19/00	6/12/00	6/28/00	6/30/00	6/30/00	8/11/00	9/12/00	9/18/00	8/16/00 Target	9/22/00 (rev) / 9/20/00	6/30/01 Target	5/30/01		5/30/01				Targeted for Rel.10.0 on 6/30/01.
R0169	S	2	Number Conservation Rules for Number Pooling (BST)	09/22/00	09/27/00	N/A	N/A	09/23/00	10/20/00	N/A	N/A	09/22/00												01/06/01 Target	12/7/00	12/7/00	N/A				Targeted for Rel. 9.0 on 31/06/01 and 01/20/01.
R0183	S	4	Modify the Usage Indicator in the "TRA" in the un-filtered IDENT section for Number Pooling (BST)	09/28/00	09/29/00	N/A	N/A	09/29/00	10/27/00			10/27/00												01/06/01 Target	12/7/00	12/7/00	N/A				Targeted for Rel. 9.0 on 31/06/01.
R0209	S	4	Changes to CCP User Registration Form (RF-1874) (BST)	10/30/00	11/02/00	N/A	N/A	10/30/00	11/29/00																						CCP User Registration Form updated on web 11-15-00. New RF-1874 scheduled for next update of the CCP documents.
R0223	S	6	LENS ACT of V Defect (AT&T)	11/20/00	11/21/00	N/A	N/A	11/20/00	11/28/00	11/30/00	11/21/00	11/20/00												01/06/01							11/20/00 - Pending Clarification - Need additional information in order to validate. 11/21/00 - Validated as a defect and will be targeted for a future release. 12/01/00 - BellSouth re-evaluation revealed that this is not a defect. 12/04/00 - AT&T responded.
R0240	S	6	LENS Line Class of Service Defect (AT&T)	12/12/00	12/13/00	N/A	N/A	12/12/00	12/15/00			12/14/00												01/06/01		01/06/01	N/A	N/A	N/A	N/A	12/14/00- BellSouth determined as a defect and will be corrected in Release 9.0, test. scheduled for 31-06-01.
plemented																															

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(4/00)
Change Request Log

CR Log #	Status	Priority	Title	Date Sent	Open & Validate CR (Target Date)	Open& Validate CR (Clar Date Sent)	Open& Validate CR (Clar Resp Rec'd Date)	Open & Validate CR (Actual Date)	Review CR for Accep. (Target Date)	Rev CR for Accep. (Clarification Sent Date)	Rev CR for Accep. (Clar Resp Rec'd	Rev CR for Accep. (Actual Date)	CoNotif CR Notify Date	Prepare for CRM (Target Date)	Prepare for CRM (Actual Date)	CR Mtg Date (Actual)	Doc Chg Rev. Mtg Results (Target Date)	Doc Chg Review Mtg Results (Actual Date)	Internal Change Mgmt Process (Target Date)	Internal Change Mgmt Process (Actual Date)	RTM (Actual Date)	Rel Pkg Notify (Target Date)	Rel Pkg Notify (Actual Date)	Rel Imp (Actual Date)	Soft Rel Notif (Target Date)	Soft Rel Notif (Actual Date)	Doc Changes Notif (Target Date)	Doc Changes Notif (Actual Date)	Doc Updates Only Notif (Target Date)	Doc Updates Only Notif (Actual Date)	Notes
RD162	I	6	OTN Defect Issue 7 (ITC Deltacom)	09/15/00	09/18/00	N/A	N/A	09/15/00	09/20/00			09/20/00																				9/20/00 - Validated as a defect to be targeted in a future release. 12/12/00 - Implemented on 11/09 in an emergency release.
RD193	I	4	TAG Hardware/Software Upgrade to UNIX 11.0 Platform (BST)	10/06/00	10/11/00	N/A	N/A	10/10/00																12/16/00 (Rev) / 12/9/00 (Rev) / 12/2/00 (Rev)	10/18/00	12/16/00 (Rev) / 12/7/00 (Rev) / 11/22/00 (Rev) /	10/18/00	11/22/00 (Rev) / 10/17/00	N/A	N/A	TAG 7.5.0.2 (Issue 9) Scheduled for Rel 8.0.3 on 12/16/00. TAG 2.3 (Issue 7) Scheduled for Rel 9.0 on 01/06/01. 12/18/00 - Implemented in 8.0.3 on 12/16/00.
RD194	I	6	Missing Interval Guide for Port/Loop Combos (AT&T)	10/09/00	10/10/00	N/A	N/A	10/09/00	10/13/00			10/18/00																				documentation defect and will be corrected in the next update of the Interval Guide targeted for 12/00. 12/12/00 - Implemented in Interval Guide Update on 12/15/00
RD226	I	6	Calculate Correct Due Date Intervals (BST)	11/20/00	11/21/00	N/A	N/A	11/20/00	11/28/00	11/20/00		11/20/00												12/16/00 (Rev) / 12/9/00		12/16/00 (Rev) / 12/5/00						11/20/00 - Determined to not be a defect, however BellSouth will treat as an "Expedited Feature" targeted for 1st Qtr., 2001. 12/5/00 - SL1 & SL2 Loops will be impl on 12-16-00 for TAG Releases
RD236	I	6	Incorrect Calculation of Due Date Intervals for PIC/LPIC (BST)	12/04/00	12/05/00	N/A	N/A	12/04/00	12/07/00			12/04/00												12/16/00 (Rev) / 12/9/00		12/16/00 (Rev) / 12/5/00	N/A	N/A	N/A	N/A	12/4/00 - Determined to be a defect and will be corrected in TAG 7.5.0.2 with is targeted for 12/16/00. 12/18/00 - Implemented in Rel. 8.0.3 on 12/16/00
ancelled CRs																															
RD223	C	6	OSS '99 Ordering Guidelines (AT&T)	05/03/00	05/04/00	N/A	N/A	05/04/00	05/09/00			05/08/00																				7/19 - Waiting on customer to notify if request can be closed. 12/18/00 - Closed by originator.
RD265	C	5	Add LENS 6.3 Tutorial (Telergent)	05/30/00	06/02/00	05/31/00	05/31/00	06/28/00	N/A		N/A	6/21/00 (See Notes)	12/12/00																			originator. Originator to place CR on "HOLD" until future updates to LENS are completed. 7-19-00 BST provided add'l infor to originator for review. 9-5-00 Originator advised to leave CR on hold
RD156	C	6	Connect:Direct Request (AT&T)	09/12/00	09/13/00	N/A	N/A	09/12/00	09/18/00			09/18/00																				AT&T to submit as a defect due to the problems encountered in testing. System changes have been made and AT&T will verify if changes have corrected the
Misc/Expedite s																															
RD049	PC	6	LENS TNs for each PON on Bulk order (BST)	05/19/00	05/22/00	N/A	N/A	05/19/00	05/22/00	05/25/00		05/25/00																				5/25 - Pending Clarification Status
RD074	V	6	End User Address in error for ReaTyp E; ACT of C (BST)	06/08/00	06/09/00	N/A	N/A	06/08/00	06/13/00			06/13/00																				6/9 - Determined to be a defect and is targeted for a future release.

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(4/00)
Change Request Log

CR Log #	Status	Type	Title	Date Sent	Open & Validate CR (Target Date)	Open & Validate CR (Actual Date)	Open & Validate CR (Actual Date)	Review CR for Accep. (Target Date)	Rev CR for Accep. (Additional Info Sent Date)	Rev CR for Accep. (Clar Resp Rec'd	Rev CR for Accep. (Actual Date)	Cancel CR Notify Date	Prepare for CRM (Target Date)	Prepare for CRM (Actual Date)	CR Mtg Date (Actual)	Doc Chg Rev. Mtg. Results (Target Date)	Doc Chg Review Mtg. Results (Actual Date)	Internal Change Mgmt Process (Target Date)	Internal Change Mgmt Process (Actual Date)	RPM (Actual Date)	Rel Pkg Notify (Target Date)	Rel Pkg Notify (Actual Date)	Rel Imp (Actual Date)	Soft Rel Notif (Target Date)	Soft Rel Notif (Actual Date)	Doc Changes Notif (Target Date)	Doc Changes Notif (Actual Date)	Doc Updates Only Notif (Target Date)	Doc Updates Only Notif (Actual Date)	Notes
R0079	N	6	TAG is requiring INIT for ReqTyp A (BST)	06/12/00	06/13/00	N/A	N/A	06/12/00	06/15/00			06/15/00																			6/15/00 Validated as not a defect. System is working according to baselined req. Waiting on originator to close.
R0080	N	6	LESOG is failing to issue Port Loop Combo accurately (BST)	06/13/00	06/14/00	N/A	N/A	06/13/00	06/16/00			06/15/00																			6/15/00 - Validated as a defect and is targeted for a future release. 7/19 - Further testing revealed that this is not a defect. Waiting on originator to close.
R0082	PC	6	LEO IS FAILING TO EDIT FOR LOOCITY (BST)	06/14/00	06/15/00	N/A	N/A	06/14/00	06/19/00			06/15/00																			6/15/00 Need additional information from originator.
R0098	N	6	Re-calculate Due Date intervals (BST)	07/05/00	07/06/00	N/A	N/A	07/05/00	07/11/00			07/11/00																			7/19 - Not a defect. Waiting on originator to close.
R0099	N	6	Order MA'd and SO Info Deleted (BST)	07/05/00	07/06/00	N/A	N/A	07/05/00	07/11/00			07/11/00																			7/19 - Determined to not be a defect. Investigation continuing to determine if needed to be a feature.
R0154	N	6	Missing Completion Notices Defect (AT&T)	09/12/00	09/13/00	N/A	N/A	09/12/00	09/18/00			09/18/00																			9/18/00 - Provided initial validation response, however additional time was requested from originator to finish final analysis.
R0202	N	6	Sup to cancel Defect Request (AT&T)	10/18/00	10/19/00	N/A	N/A	10/18/00	10/23/00			10/23/00																			10/23/00 - Determined to not be a defect. Waiting on originator to authorize closure.
R0210	N	6	error on LNAuG when OTN is populated (High Impact)	11/01/00	11/02/00	N/A	N/A	11/01/00	11/06/00																						11/01/00 - Determined to be a defect and will be corrected in a yet to be determined release.
R0212	N	6	Response on Size Limitation Defect (AT&T) (High Impact)	11/01/00	11/02/00	N/A	N/A	11/01/00	11/07/00			11/07/00																			originator. Request is tied to CR0198 which is being corrected in a future release.
R0213	N	6	Investigate discrepancies and misinformation concerning dk fistings (DCO) (High Impact)	11/02/00	11/03/00	N/A	N/A	11/02/00	11/07/00			11/07/00																			investigate. Three requests. Resolution of one a defect in first two parts. Part 3 is asking for more examples from CLEC to investigate published directory closing dates.
R0227	V	6	Stop auto clarifying on REQTYP M from Resale acct with MAN FID (BST)	11/21/00	11/22/00	N/A	N/A	11/21/00	11/29/00	11/20/00		11/21/00																			11/21/00 - Determined to be a defect and will be targeted for a future release.
R0233	N	6	RORD field in LEO listed as unused (ITC/Deltacom)	11/28/00	11/29/00	N/A	N/A	11/28/00	12/01/00			11/30/00																			11/30/00 - Determined to not be a defect. Waiting on customer to authorize closure.
R0237	V	6	Modify Due Date Calculation module to process REQTYP M as a one Product (BST)	12/08/00	12/11/00	N/A	N/A	12/11/00	12/14/00			12/11/00																			12/11/00 - Determine to be a defect and will be targeted for a future release.
R0230	N	6	LENS Quality of Service Defect (AT&T)	12/11/00	12/12/00	N/A	N/A	12/12/00	12/15/00			12/14/00																			12/14/00 - BellSouth explained recent Server upgrades to the CLEC community to address LENS outage problems. Not classified as a "defect" response.
R0242	N	6	Invalid TNs on CSR Defect (AT&T)	12/12/00	12/13/00	N/A	N/A	12/12/00	12/15/00																						

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Implemented Change Requests 1999 - 2000

Date	Title
December 2000	
12/18/2000	CR0236 - Incorrect Calculation of Due Date Intervals for PIC/LPIC
12/18/2000	CR0226 - Calculate Correct Due Date Intervals
12/18/2000	CR0193 - TAG Hardware/Software upgrade to UNIX 11.0 Platform
12/12/2000	CR0211 - Different Information displayed on TAG than LENS
12/12/2000	CR0194 - Missing Interval Guide for Port/Loop Combos
12/11/2000	CR0216 - NPORD Date for FOC (Issue 7)
12/11/2000	CR0230 - NPORD Defect
12/11/2000	CR0219 - Due Date Intervals for LNP with Loop (REQTYP BB)
12/11/2000	CR0091 - Add DFDT to the FOC
12/11/2000	CR0068 - Pipe Cross USOC
12/08/2000	CR0131 - Split Billing Requests
November 2000	
11/21/2000	CR0224 - Invalid error message on REQTYP M for Line class of Svc
11/21/2000	CR0214 - Documentation error on 2 wire UNE-P Bus/Res/PBX document
11/20/2000	CR0204 - LESOG Not Processing REQTYP JB/ACT=A Correctly
11/20/2000	CR0203 - LESOG Should Allow Manual Handling Instead of Auto-Clarifying
11/20/2000	CR0045 - Strip Non-Resellable USOCs
11/20/2000	EDI020900_001 - Electronically Order Routing to OS/DA
11/14/2000	CR0162 - OTN Defect Issue 7
11/14/2000	CR0148 - LESOG not recognizing disposition of addl/foreign listing
11/14/2000	CR0136 - Address validating in LENS but not in TAG - Old RSAG
11/14/2000	CR0126 - LESOG not pulling the correct CFN number for enhanced MMC
11/14/2000	CR0108 - Listings over the number of 2 not shown on LSR or order
11/14/2000	CR0073 - LEO not pulling Ported Number on FOC/CN
11/14/2000	CR0024 - LOCNUM = HT = TN not found on CSR or LSR
October 2000	
10/27/2000	CR0191 - Suppress the premise visit indicator
10/27/2000	CR0188 - Release 7.1 Caused Defects
10/26/2000	CR0205 - Listing Order Defect
10/23/2000	CR0150 - Add NPT Data Element to the ESDQ Query
10/23/2000	CR0147 - Seasonal Suspend

10/16/2000 CR0187 - LESOG should recognize street directional for validation
10/16/2000 CR0167 - Incorrect Circuit # on FOC
10/16/2000 CR0163 - LESOG should not bring over FIDS on line USOCs
10/16/2000 CR0109 - GA 912/229/478 NPA Splits
10/10/2000 CR0134 - TN Reservation Display of Switch CLLI
10/10/2000 CR0106 - Delay Sunset of LSOG 2 XDSL Ordering via Fax
10/06/2000 TAG011700_001 - Migration As Specified for OSS99
10/06/2000 CR0125 - Change order to add a VCA and RJ11C in LENS
10/06/2000 CR0124 - LESOG to cancel N&D if unsuccessful in generating both
10/06/2000 CR0102 - NUM = TELNO = ACCT is Final Reject
10/06/2000 CR0089 - TN Reservation via LENS
10/06/2000 CR0081 - LESOG Populating incorrect due date interval
10/09/2000 CR0061 - Implement NC Overlay for 704/980
10/09/2000 CR0060 - Implement Kentucky NPA Split (606/859)
10/02/2000 CR0153 - Electronic Ordering of CO Based Line Sharing
10/02/2000 CR0129 - LESOG Failing to apply ZRTI to Orders
10/02/2000 CR0118 - Remove Housenumprefix for TAG API 2.2.0.10
10/02/2000 CR0116 - Premise Visit Indicator
10/02/2000 CR0115 - Partial Pre-Order Query Due Date Calculation
10/02/2000 CR0112 - Conversion As Is-ACT W Defect
10/02/2000 CR0159 - Documentation Discrepancies in BBR-LO Issue 9G
10/02/2000 CR0117 - Update TAG Issue 7 Map Due Date Calculation Tables

August 2000

08/29/2000 CR0092 - DFDT & CHC
08/29/2000 CR0077 - Subscription Version Cancellations
08/29/1999 LSR0623990001 - Workflow Mechanization
08/22/2000 CR0119 - LESOG Auto-Clarifying NUM=TELNO=TN not in CRIS
08/22/2000 CR0047 - Display Enhanced MemoryCall Access Number in LENS
08/16/2000 EDI0812990001 - EDI Ordering for Unbundled xDSL Loops
08/16/2000 TAG0812990002 - Pre-Order Loop Inquiry
08/14/2000 CR0076 - Generate Port Side of Order when Adding Line
08/14/2000 CR0075 - LESOG is Clarifying for 1MBFE in Error
08/14/2000 CR0071 - ECCKT data on FOC/CN
08/14/2000 OSS011300_001 - Migration as Specified for OSS99
08/07/2000 CR0084 - TAG 2.2.0.8 Security Exception Error Defect
08/03/2000 CR0062 - ReqTyp P/TOS 2nd Char of E

July 2000

07/28/2000 CR0067 - Call Return Invalid with Class of Service USOC UEPRX
07/12/2000 CR0022 - Flow Through Matrix

June 2000

06/17/2000 CR0060 - Implement Kentucky NPA Split (606/859)
06/16/2000 CR0084 - TAG Unknown Security Exception Types

May 2000

05/23/2000 CR0054 - Versioning Defect 5.23.00

05/07/2000 CR0006 - YPQTY WPQTY

April 2000

04/30/2000 CR0007 - VER Field on Rejected LSRs for LNP

04/29/2000 CR0019 - ECCKT Defect

04/18/2000 CR0024 - Hunt Group Defect on a Separate CSR

04/18/2000 CR0011 - LENS Directory Defect

04/15/2000 CR0026 - NC Code not populating on Tag Loop Order

March 2000

03/23/2000 CR0004 - Line Class of Service

03/01/2000 CR0001 - Room Field Defect

February 2000

02/03/2000 ALL020900_002 6 - Character Yellow Page Heading (YPH) Code

1999

12/1999 TAG0907990001 - TAG Pre-Order Doc Enhancements

08/12/1999 LEO812990001 - Error Code List Note Modification

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2000 Change Requests

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Date	Title
December	
12/18/2000	CR0247 - Reduce Due Date Interval from 5 to 4 days for SL1 in TAG
12/18/2000	CR0246 - LENS/TAG - Ability to view resold/UNE-P CSRs
12/18/2000	CR0245 - LENS/TAG/EDI Manual vs Mechanized Notification
12/18/2000	CR0229 - Enhance Address Validation in LENS/TAG to Allow Creating New LOC
12/18/2000	CR0225 - Notes Added to the LACT Field in the BBR
12/18/2000	CR0215 - UNE to UNE Bulk Migrations
12/14/2000	CR0244 - Establish Standard Call Center Measurements 7 Reports for LCSC
12/14/2000	CR0243 - Class of Service
12/12/2000	CR0221 - Allow User To Populate LQTY in Lens
12/12/2000	CR0242 - Invalid TNs on CSR Defect
12/12/2000	CR0241 - CN returned on incorrect LSR version
12/12/2000	CR0240 - LENS Line Class of Service Defect
12/12/2000	CR0239 - LENS Quality of Service Defect
12/12/2000	CR0238 - Provide Separate E-Mail Notification Lists for System Outages
12/12/2000	CR0237 - Modify Due Date calculation mod to process RECTYP M as UNE
12/12/2000	CR0236 - Incorrect calculation of Due Date intervals for PIC/LPIC
12/12/2000	CR0233 - RORD field in LEO listed as unused
12/12/2000	TAG8120003 - Parsed CSR
12/11/2000	CR0218 - EDI Map Change for Error Text
12/11/2000	CR0201 - Extension of the retirement of TAG 3.1.1.1
12/11/2000	CR0186 - Interactive Agent TCIP/SSL
12/11/2000	CR0177 - Support Value="D" for Response Type Request (RTR) TAG
12/11/2000	CR0143 - Notification - MDR (Mechanized Disaster Reports)
12/08/2000	CR0015 - ACT of C - Change Basic Class of Service
12/08/2000	CR0014 - Change LENS Screen-"Number of Features to Add/Change/Delete"
12/05/2000	CR0183 - TAG to display TTRA in IDENT Section for Number Pooling
12/05/2000	CR0014 - Change LENS Screen on Features/Services Section
12/04/2000	CR0235 - Notification to CLECS When A Number Has Been Posted in Error
12/04/2000	CR0234 - Connect Direct Fix

12/04/2000 CR0232 - Alteration to Business Rules
12/04/2000 CR0183 - TAG display the TTRA in unfielded IDENT Section
12/01/2000 CR0228 - Provide Business Rules for REQTYP M and E, ACTTYP T

November

11/27/2000 CR0223 - LENS ACT of V Defect
11/21/2000 CR0227 - Stop auto-clarifying on REQTYP M from Resale acct w/MAN FID
11/21/2000 CR0226 - Calculate Correct Due Date Intervals
11/21/2000 CR0223 - LENS ACT of V Defect
11/20/2000 CR0222 - Unknown USOCS
11/20/2000 CR0209 - Changes to CCP User Registration Form
11/20/2000 CR0078 - Extended Loops (EELS)
11/20/2000 CR0003 - RPON Flow-Through & Electronic Reject
11/20/2000 EDI1215990001 - TN vs RSAG Validation
11/16/2000 CR0207 - Extension of TAG 3.1.1.1 Sunset Date
11/13/2000 CR0218 - EDI Map Change for Error Text
11/13/2000 EDI030300_001 - CLEC Test Environment
11/10/2000 CR0184 - Lens-Ability to View Resold CSR's
11/08/2000 CR0213 - LENS/LCSC discrepancies on Directory Listings
11/08/2000 CR0211 - Different information displayed on TAG than LENS
11/08/2000 CR0210 - LENS generating an error on LNA=G when OTN is populated
11/08/2000 CR0208 - TAG 2.2.x not processing Digital Loop Orders
11/08/2000 EDI1215990001 - TN vs RSAG Validation
11/07/2000 CR0176 - Allow PIC & LPIC to be Submitted as "No Change"
11/07/2000 TAG0812990001 - Provide CFA via Pre-Order
11/06/2000 CR0201 - Extension of the Release of TAG 3.1.1.1
11/06/2000 CR0196 - Allow Changes in Directory Deliveries - LENS99

October

10/27/2000 CR0190 - RSAG Address vs. CSR Address
10/27/2000 CR0130 - LESOG not responding to "C" order adding line & features
10/27/2000 CR0110 - LESOG not populating ZNEA & ZNHC on ACT of N or C
10/27/2000 CR0050 - LENS 6.3 - # of directories for white & yellow pages
10/27/2000 CR0181 - Add Grid Values for Disconnect Nbr Field in TAG
10/27/2000 CR0180 - API Reference Guide Recommendations-CLEC Notif
10/27/2000 CR0179 - TAG Navigator to CORBA Bridge
10/27/2000 CR0178 - Provide Solicitated Notifications in TAG
10/26/2000 CR0206 - LNP Qualifier Defect
10/24/2000 CR0040 - Order Tracking Request
10/24/2000 CR0038 - TOS Field on ReqTyp J
10/24/2000 CR0029 - Partial Migration of UNE Loops
10/24/2000 CR0016 - SI Enhancement for SL1, SL2, DS0, DS1 and ISDN
10/24/2000 CR0002 - Pre-Order/Order Business Rule Discrepancies
10/24/2000 EDI0812990007 - Use of LEAN/LEATN Fields
10/24/2000 EDI0812990005 - Handling of Remaining Service
10/24/2000 EDI0812990004 - Change Main Account Number
10/23/2000 CR0194 - Missing Interval Guide for Port/Loop Combos (UNE-P)

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10/23/2000 CR0151 - Error Code Defect

10/23/2000 CR0135 - Merging of Accounts

10/16/2000 CR0165 - Discrepancies in BellSouth Guidelines - LNUM Field on Loop Service Page

10/16/2000 CR0143 - Notification of Mechanized Disaster Reports

10/12/2000 CR0198 - Increase Transaction Size Limit

10/10/2000 CR0197 - Remove LOCNUM from LNA Charts in the BBR-LO

10/09/2000 CR0104 - Lens Large Account Inquiry

10/06/2000 CR0020 - View Multiple CSRs Simultaneously

10/05/2000 CR0139 - Update TAG API to Better Relate to Pre-Order Rules

10/05/2000 CR0053 - Improvements to the BBR-LO

10/05/2000 CR0160 - Flow Through for ReqTyp BB, ACT P & Q for Loop w/LNP

10/05/2000 CR0149 - Modify & Resend FOCs & Clarifications

10/05/2000 CR0137 - Flow Through for ReqTyp CB, ACT P & Q for LNP

10/05/2000 CR0096 - LENS Enhancement - Add New Listings

10/05/2000 CR0088 - Mech of Unbundled Network Terminating Wire (UNTW)

10/05/2000 CR0085 - Web-based LSR

10/05/2000 CR0031 - Ability to Change Listing Account in LENS

10/04/2000 CR0171 - Baseline Change Control Document

10/03/2000 CR0127 - Provide Pending Service Order for CSR via TAG

10/03/2000 CR0113 - LENS Inquiry - View Customer Record

10/03/2000 CR0101 - EDI Pre-Ordering

September

09/28/2000 CR0152 - Electronic Ordering of Payphone Service Orders

09/28/2000 CR0146 - Default the Listed TN

09/28/2000 CR0145 - Remove a Tn from a LENS LSR

09/28/2000 CR0144 - Add LSR Codes in LENS

09/26/2000 CR0166 - Cable ID Defect

09/25/2000 CR0169 - Number Conservation Rules for Number Pooling

09/25/2000 CR0030 - UNE to UNE Migrations

09/18/2000 CR0158 - Already pending error message on LSRs

09/18/2000 CR0157 - Need to handle HTG USOCs for all calling plans on Port/Loop Combos

09/12/2000 CR0132 - Fielded Completion

09/07/2000 CR0133 - Migration OF UNE-P

09/07/2000 CR0105 - Drop the RES ID Requirement For xDSL Order

09/04/2000 CR0154 - Missing Completion Notices Defect

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August

08/28/2000 CR0142 - Remove business reference for RCFRE, RCFRF, RCFRG, RCFRN in LEO-IG

08/17/2000 CR0128 - Loop/Port Combo for Res/Bus Lines

08/09/2000 CR0080 - LESOG Failing to issue Port Loop Combo correctly

July

07/28/2000 CR0100 - TAG Failing to accurately calculate Due Dates on Deny/Restor

07/28/2000 CR0111 - UNE Cannot Generate Class of Svc. USOC Error

07/17/2000 CR0099 - Order MA'd and Service Order Info Deleted

07/17/2000 CR0098 - Re-Calculate Due Date Intervals

June

06/29/2000 CR0012 - TAFI Functionality via ECTA Interface

06/27/2000 ORD030200_001 - UNE VIA ASR21

06/20/2000 CR0079 - TAG Requiring INIT on ReqType A

06/20/2000 CR0074 - TAG Requiring enduser address in error

May

05/19/2000 CR0049 - LENS TNs on Bulk Orders

April

January

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> Cancelled Change Requests >>

December 2000

12/18/2000 CR0156 - Connect:Direct Request

12/12/2000 CR0065 - LENS 6.3 Tutorial

12/11/2000 CR0217 - CSR With 888 USOC

November 2000

11/27/2000 CR0231 - Inability to view order statuses for UNE-P Conversions in CSOTS

11/16/2000 CR0192 - Pre-Order/Firm Order Data Element Inconsistencies-TCIF 9

11/15/2000 CR0059 - 45 day TN Reservation

11/14/2000 CR0212 - Response on Size Limitation Limit

11/14/2000 CR0202 - Sup to Cancel Defect Request

11/14/2000 CR0185 - TAG/COF Lead Project Mgr Role Change Request

11/14/2000 CR0175 - TAG CLEC Test Environment Application Support

11/14/2000 CR0174 - CR LOG - Reference to Application and Release Number

11/14/2000 CR0173 - Tables in BBR-LO Ref Applicability to TAG Releases

11/14/2000 CR0023 - OSS'99 Ordering Guidelines

11/14/2000 CR0008 - YPQTY/WPQTY (Iss 7) REQTYP E Reject Code must be 2 numerics

October 2000

10/27/2000 CR0093 - Electronic Change Notifications

10/25/2000 CR0095 - ECTA-Attribute Validation

10/16/2000 CR0123 - LENS Application Enhancement

10/16/2000 CR0107 - Documentation Defect

10/16/2000 CR0070 - Call Forwarding USOC Defect

10/16/2000 CR0066 - Invalid USOC for Basic Class of Service / CREX7/TN

10/16/2000 CR0051 - LENS application defect

10/16/2000 CR0039 - FOC not populating order number on Port Order

10/16/2000 CR0018 - USOC Segmentation Request

10/10/2000 CR0087 - "C" Order Process for UNE-P

10/09/2000 CR0138 - Fielded Completion Notices

10/09/2000 CR0027 - Displaying Directory Information on FOC

10/09/2000 CR0044 - LENS Application Enhancement

10/06/2000 ORD032700_001 - Post-FOC Clarification

10/06/2000 CR0155 - Ringmaster Defect

10/06/2000 CR0121 - Discrepancies in BellSouth Guidelines - CG LSOR-002

10/06/2000 CR0120 - SOCS RT60 Invalid NPA NXX for Routing Sub 001

10/06/2000 CR0114 - TN Reservation Defect

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10/06/2000 CR0103 - Disconnect of Port Loop Combo going into RECYCLE
10/06/2000 CR0097 - LENS Defect
10/06/2000 CR0072 - LEO not pulling BAN1 from the SO
10/06/2000 CR0013 - Date Sent/Century Defect (EDI)
10/06/2000 CR0056 - Invalid Sup, Subscription version defect

September 2000

09/11/2000 CR0033 - EDI Multiple ReqTyp Enhancement
09/07/2000 CR0140 - Update the Due Date Calculation Tables

August 2000

08/04/2000 CR0046 - EDI Reject Process Modification
08/01/2000 CR0052 - WSOP Field Requirements

July 2000

07/28/2000 EDI0812990002 - Pre-Order Digital Loop Qual. EDI & TAG
07/28/2000 EDI0812990006 - Mechanization of XDSL Loops
07/28/2000 SOTO11200_001 - Remarks Section Added to Svc. Order Tracking System
07/28/2000 TAG030900_001 - LNA of V Functionality - Pre OSS'99
07/28/2000 EDI030200_001 - Modify Line Activities to Align with Industry Guidelines
07/28/2000 CR0005 - TAG Pre-Order Test
07/28/2000 CR0009 - Expand CLLI Code in the AVQ in TAG Pre-Order
07/28/2000 CR0010 - TAG Pre-Order unstable results
07/28/2000 CR0017 - Invalid TOS
07/28/2000 CR0025 - Clarification on ATN Usage Rules
07/28/2000 CR0028 - LSO2 & LSOG 4 Differences
07/28/2000 CR0032 - TR Reservation
07/28/2000 CR0034 - Act. Code "T" (EUMI Field)
07/28/2000 CR0035 - One Page Sup for DD Changes
07/28/2000 CR0036 - Transfer of Call Options - INP REQTYP B
07/28/2000 CR0037 - Introduction of AIN Internet Call Waiting
07/28/2000 CR0041 - Documentation of Interface Changes and Releases
07/28/2000 CR0042 - Open IWBAN Field on the EU Form
07/28/2000 CR0043 - Conversion As-Is Error - Invalid USOC
07/28/2000 CR0048 - Fields that cannot be changed on a Supp.
07/28/2000 CR0057 - EDI Issue 9 PON Cancelled on Port/Loop Combo
07/28/2000 CR0058 - Fraud Management Process
07/28/2000 CR0063 - Memory Call-Forwarding Number
07/28/2000 CR0069 - Reserving Telephone Numbers
07/28/2000 CR0083 - Customer Service Record Error Message
07/28/2000 CR0086 - EELS via ASR
07/28/2000 CR0094 - TAG6015VAL REFNUM=CFA FORMAT INVALID
07/28/2000 CR0103 - Disconnect of Port/Loop Combo into RECYCLE

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(4/00)
Change Request Log

CR Log #	Status	Type	Title	Date Sent	Open & Validate CR (Target Date)	Open& Validate CR (Clar Date Sent)	Open& Validate CR (Clar Resp Rec'd Date)	Open & Validate CR (Actual Date)	Review CR for Accep. (Target Date)	Rev CR for Accep. (Clarificat ion Sent Date)	Rev CR for Accep (Clar Resp Rec'd	Rev CR for Accep. (Actual Date)	Cancel CR Notify Date	Prepare for CRM (Target Date)	Receive for CRM (Actual Date)	CR Mtg Date (Actual)	Doc Chg Rev. Mtg. Results (Target Date)	Doc Chg Review Mtg. Results (Actual Date)	Internal Change Mgmt Process (Target Date)	Internal Change Mgmt Process (Actual Date)	RPM (Actual Date)	Rel Prg Notify (Target Date)	Rel Prg Notify (Actual Date)	Rel Imp (Actual Date)	Soft Rel Notif (Target Date)	Soft Rel Notif (Actual Date)	Doc Changes Notif (Target Date)	Doc Changes Notif (Actual Date)	Doc Updates Only Notif (Target Date)	Doc Updates Only Notif (Actual Date)	Notes
Status Codes: N=New, PC=Pending Clarification, P=Pending, S=Scheduled, I=Implemented, C=Canceled, V=Validated Defect, W=Workaround Identified, CRC=Change Review Complete, RC=Candidate Request																															
Implemented Rls																															
1D0623990001	I	S	Redirection of UNE LSRs in the LCSC (AT&T) Change the Error	6/23/99				7/20/99								9/28/99									8/27/00	N/A	N/A	N/A	N/A	N/A	N/A	Internal feature to be implemented for the sorting/routing of UNE LSRs. No process change required for the CLEC.
1O0812990001	I	S	Code headings to match the terminology used (WorldCom)	8/12/99												9/28/99					11/30/99			12/99							Implemented 12/99.
1K0812990001	I	S	The ability to order XDSL unbundled electronically (WorldCom)	8/12/99		N/A	N/A	08/16/99								9/28/99					11/30/99			07/29/00	06/29/00	6/29/00	6/29/00	6/29/00 / Rev: 7/19/00 & 7/27/00	N/A	N/A	Beta testing Impl. W/Rel 7.0 July 29, 2000. Firm order bus rules posted 8/14/00.
1A0812990002	I	S	Mechanize the SI process for XDSL loops ordered through TAG (AT&T)	8/12/99		N/A	N/A									9/28/99					11/30/99			7/29/00	06/29/00	6/29/00	6/29/00	6/29/00 / Rev: 7/19/00 & 7/27/00	N/A	N/A	Beta testing Impl. W/Rel 7.0 July 29, 2000 Pre-order bus rules posted 7/14/00.
1G0812990001	I	S	ATT requested that BST document the business rules for TAG (AT&T)	8/12/99												9/28/99					11/30/99			12/99							Posted to web site 12/99.
1S011300_001	I	S	Migration as Specified for OSS99 (AT&T)	1/12/00		N/A	N/A	1/12/00																7/29/00 EDI / 8/12/00 LENS	3/29/00 (EDI) 4/29/00 (LENS)	3/16/00 & 5/25/00 (Rev) & 6/29/00 &	6/29/00 (LENS)	6/29/00 / 7/19/00 Rev & 7/27/00 &	N/A	N/A	Implemented for EDI only. LENS imp in Release 7.0. Bus Rules to be posted 5/25/00.
1G011200_001	I	S	Migration as Specified for OSS99 (Sprint)	1/17/00		N/A	N/A	1/18/00																6/01/00	05/01/00	05/31/00 & 3/16/00					Scheduled for 6/01/00 TAG 3.1.1.2 Regene
1D20900_001	I	S	Electronically Order Routing to OS/DA (AT&T)	2/7/00		N/A	N/A	2/9/00					N/A	6/19/00	6/19/00	6/28/00	6/30/00	6/30/00	8/11/00	9/12/00	9/18/00	8/16/00 Target	9/22/00 (rev) / 9/20/00	11/18/00		11/22/00	N/A	N/A	N/A	N/A	IDT 1-FOI This CR removed from Release 8.0 scope. 10/16/00 Conf. Call to discuss OLNS option. 11-13-00 included in Release 8.0 scope. Imp w/Rel 8.0 on 11-
1D20900_002	I	4	6 Character Yellow Page Heading (YPH) Code (BST)	2/3/00		N/A	N/A	2/9/00																4/15/00	3/15/00	3/16/00					Implemented 4/15/00
2001	I	S	Room Field Defect (AT&T)	3/1/00	3/7/00	N/A	N/A	3/3/00	3/6/00	N/A	N/A	3/7/00	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A			4/15/00	3/15/00	3/16/00					Workaround provided 3-7-00. Implemented 4/15/00 (Old log # DEF030100_001)
2004	I	S	Line Class of Service (AT&T)	03/23/00	03/24/00	N/A	N/A	03/24/00	03/28/00	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	3/28/00		3/28/00 e-mail					3-29 Expedited change implemented 3/28/00. (Old log # DEF032300_001)
2006	I	S	Y=CTY W=CITY (Verify CB or BB/ACT=V/NPT=D) (AT&T)	3/30/00	3/31/00	N/A	N/A	3/30/00	4/4/00	N/A	N/A	4/3/00	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A			5/7/00		4/21 e-mail & 6/5/00 CNL					Workaround notification provided 4/3/00. Expedited Feature Imp date 5/7/00.

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

BELLSOUTH

(4/00)
Change Request Log

CR Log #	Source	Type	Title	Date Sent	Open & Validate CR (Target Date)	Open & Validate CR (Clar Date Sent)	Open & Validate CR (Clar Resp Rec'd Date)	Open & Validate CR (Actual Date)	Review CR for Accep (Target Date)	Rev CR for Accep (Clarification Sent Date)	Rev CR for Accep (Clar Resp Rec'd)	Rev CR for Accep (Actual Date)	Concat. CR Notify Date	Prepare for CRM (Target Date)	Prepare for CRM (Actual Date)	CR Mtg Date (Actual)	Doc Chg Rev Mtg Results (Target Date)	Doc Chg Review Mtg Results (Actual Date)	Internal Change Mgmt Process (Target Date)	Internal Change Mgmt Process (Actual Date)	BPM (Actual Date)	Rel Pkg Notify (Target Date)	Rel Pkg Notify (Actual Date)	Rel Imp (Actual Date)	Soft Rel Notif (Target Date)	Soft Rel Notif (Actual Date)	Doc Changes Notif (Target Date)	Doc Changes Notif (Actual Date)	Doc Updates Only Notif (Target Date)	Doc Updates Only Notif (Actual Date)	Notes
000007	I	5	VER Field on Rejected LSRs for UNP (AT&T)	4/4/00	4/5/00	4/6/00	4/6/00	4/4/00	4/7/00	4/6/00	4/6/00	4/7/00	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A				4/30/00		4/27 e-mail & 6/5/00 CNL					Workaround notification provided 4/7/00. Expedited Feature Imp date 6/30/00.
000011	I	5	LENS Directory Defect (NewLink)	04/18/00	04/19/00	N/A	N/A	04/18/00	04/21/00	N/A	N/A	04/25/00												4/29/00		4/25 e-mail					Expedited feature implemented 4/29/00
000019	I	6	ECCKT (AT&T)	04/28/00	05/01/00	N/A	N/A	05/01/00	05/04/00			05/04/00												4/29/00		5/4/00 e-mail					05-04 Defect notification sent via e-mail and web posting to CLEC community.
000022	I	5	Request for New Matrix for Issue 9 Ordering Guide (AT&T)	05/03/00	05/04/00	N/A	N/A	05/04/00	06/02/00	N/A	N/A	05/30/00	N/A	6/19/00	6/19/00	6/28/00	6/30/00		8/11/00		8/14/00 Target	8/16/00 Target		06/30/00	N/A	N/A	N/A	N/A	6/23/00	06/20/00	
000024	I	6	Hunt Group Defect on a Separate CSR (Addenbrooke)	04/26/00	04/27/00	N/A	N/A	05/02/00	05/05/00			05/04/00												6/17/2000							7/31 - Determination is being confirmed as to when defect will be targeted. 11/14/00 - Implemented in Release 6.4 on 6/17/00.
000026	I	6	TAG Could Not populating on TAG loop orders (American Metrocom)	04/24/00	04/25/00	N/A	N/A	04/25/00	04/28/00			05/05/00												4/15/00							Implemented with TAG 3.1.1
000045	I	5	Conversion AT& - LENS 6.3 not stripping non-resellable USOCs (One Point)	05/16/00	05/17/00	N/A	N/A	05/16/00	05/19/00	N/A	N/A	05/17/00	N/A	6/19/00	6/19/00	6/28/00	6/30/00	6/30/00	8/11/00	9/12/00	9/18/00	8/16/00 Target	9/22/00 (rev) / 9/20/00	11/18/00	10/18/00	10/17/00	10/18/00	10/18/00	N/A	N/A	Implemented w/ Rel 8.3 on 11/18/00
000047	I	5	Display Enhanced MemoryCall Access Number in LENS (One Point)	05/18/00	05/23/00	N/A	N/A	05/22/00	06/20/00	N/A	N/A	06/16/00	N/A	6/19/00	6/19/00	6/28/00	6/30/00	6/30/00	8/11/00		8/14/00 Target	8/16/00 Target		8/12/00							Implemented in Release 7.0.
000054	I	6	Versioning Defect 5.23.00 (AT&T)	05/23/00	05/24/00	N/A	N/A	05/23/00	05/26/00	N/A	N/A	05/26/00												5/24/00		5/25/00 e-mail & web posting					Defect notification provided 6-25-00
000060	I	4	Implement Kentucky NPA Split (606/859) (BST)	05/26/00	06/01/00	N/A	N/A	05/26/00	06/26/00	N/A	N/A	05/26/00												6/17/00	5/17/00	5/31/00	N/A	N/A	N/A	N/A	
000061	I	4	Implemen NC Overlay for 704/980 (BST)	05/26/00	06/01/00	N/A	N/A	05/26/00	06/26/00	N/A	N/A	05/26/00												6/17/00	5/17/00	5/31/00	N/A	N/A	N/A	N/A	
000062	I	4	Open Relay PF/PI and TOS of E to Identify Centrex Services (manual) (BST)	06/06/00	06/09/00	N/A	N/A	06/06/00	07/05/00	N/A	N/A	06/16/00	N/A	6/19/00	6/19/00	6/28/00	6/30/00	6/30/00	8/11/00		8/14/00 Target	8/16/00 Target		07/18/00							
000067	I	6	Call Return Invalid with Class of Service USOC UEPBX (AT&T)	06/01/00	06/02/00	N/A	N/A	06/01/00	06/01/00			06/01/00												6/7/00							6/13/00 Determined to be a defect. Corrected on 6/7/00.
000068	I	5	Pre-cross USOC defect (AT&T)	06/01/00	06/02/00	N/A	N/A	06/01/00	06/01/00					9/19/00	9/19/00	9/27/00	9/29/00	9/29/00	11/13/00					12/10/00	11/10/00	11/6/00	N/A	N/A	N/A	N/A	Submitted as a type 6. 7/19 change to implement feature to modify requirements. Imp with JNP Release 5.4 on 12/10/00

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(4/00)
Change Request Log

CR Log #	Status	Type	Title	Date Sent	Open & Validate CR (Target Date)	Open & Validate CR (Clar Date Sent)	Open, Validate CR (Clar Resp Rec'd Date)	Open & Validate CR (Actual Date)	Review CR for Accept. (Target Date)	Rev CR for Accept. (Clarification Sent Date)	Rev CR for Accept. (Clar Resp Rec'd)	Rev CR for Accept. (Actual Date)	Cancel CR Notify Date	Prepare for CRM (Target Date)	Prepare for CRM (Actual Date)	CR Mtg Date (Actual)	Doc Chg Rev Mtg Results (Target Date)	Doc Chg Review Mtg Results (Actual Date)	Internal Change Mgmt Process (Target Date)	Internal Change Mgmt Process (Actual Date)	RPM (Actual Date)	Rel Pkg Notify (Target Date)	Rel Pkg Notify (Actual Date)	Rel Imp (Actual Date)	Soft Rel Notif (Target Date)	Soft Rel Notif (Actual Date)	Doc Changes Notif (Target Date)	Doc Changes Notif (Actual Date)	Doc Updates Only Notif (Target Date)	Doc Updates Only Notif (Actual Date)	Notes
R00071	1	6	LEO sending BOCRT data on FOC/CN in absence of CLS or CLF (BST)	06/08/00	06/09/00	N/A	N/A	06/08/00	06/13/00			06/13/00												8/12/00	06/29/00	06/29/00	N/A	N/A	N/A	N/A	05-26-00 Re-classified as a feature. 06/14/00 Scheduled Release 7.0
R00073	1	6	LEO should pull ported number & return on FOC/CN (BST)	06/08/00	06/09/00	N/A	N/A	06/08/00	06/13/00			06/13/00												08/12/00							6/9 - Determined to be a defect and is targeted for a future release. 11/13/00 - Implemented in Rel. 7.0 on 8/12/00
R00075	1	6	LESOG is clarifying for TMBFE in prep (BST)	06/08/00	06/09/00	N/A	N/A	06/08/00	06/13/00			06/13/00												08/12/00	06/29/00	6/29/00	N/A	N/A	N/A	N/A	6/13/00 Verified as a defect and targeted for Release 7.0 (target 7/29/00)
R00076	1	6	LESOG is failing to generate port side of order when adding line (BST)	06/08/00	06/09/00	N/A	N/A	06/08/00	06/13/00															8/12/00		8/11/00	N/A	N/A	N/A	N/A	7/19 - Targeted for Rel 7.0
R00077	1	5	Subscription Version Cancellations (AT&T)	06/09/00	06/14/00	N/A	N/A	06/12/00	07/11/00			06/16/00												8/27/00	7/27/00	07/24/00	N/A	N/A	N/A	N/A	
R00081	1	6	LESOG is populating an incorrect due date interval on SL1: ACT of A (BST)	06/14/00	06/15/00	N/A	N/A	06/14/00	06/19/00			06/15/00												8/12/2000							8/22/00 - Validated as a defect and corrected on 8-12-00
R00084	1	6	TAG 2.2.0.3 Security Exception Error Defect (BST)	06/14/00	06/15/00	N/A	N/A	06/14/00	06/19/00			06/15/00												6/20/000		6/15/00					6/15/00 Validated as a defect and will be corrected in an emergency release on 6-20-00.
R00089	1	6	Reserving TNs via LENS (Ady-Tel)	06/15/00	06/16/00	N/A	N/A	06/19/00	06/23/00			06/26/00												6/17/00	06/17/00		N/A	N/A	N/A	N/A	6/20/00 CR originally submitted as a Type 5. 9/26/00 - implemented in Rel. 6.4 - LENS on 6-17-00.
R00090	1	6	EDI/TAG LSR Auto-Clarify (BST)	06/16/00	06/17/00	N/A	N/A	06/16/00	06/19/00			06/19/00												7/0/2000			N/A	N/A	N/A	N/A	6-16 Defect was corrected in UNP Release 4.2 on 7/0/00
R00091	1	5	Add DRDT to the FOC (AT&T)	06/26/00	06/27/00	N/A	N/A	06/27/00	07/26/00	N/A	N/A	08/09/00		9/19/00	9/19/00	9/27/00	9/29/00	9/29/00	11/13/00					12/10/00	11/10/00	11/6/00	N/A	N/A	N/A	N/A	8/9/00 1st level escalation. 8/14/00 BST response to 1st level escalation. CR being re-considered 09/05/00 Placed in Pending Status. Imp. W/UNP Rel 6.4 on 12/10/00
R00092	1	6	DEDT & CHC (AT&T)	06/27/00	06/28/00	N/A	N/A	06/27/00	06/30/00															8/27/00	7/27/00	7/24/00 / 8/16/00 (Rev)	7/27/00	8/1/00	N/A	N/A	7-13 2nd Level Escalation. 7-14 BST response to 2nd level escalation. 8-1 BST provided bus rules. 8-16 Bus Rules reviewed via Conier Nash. Ltr
R00102	1	6	NUMsTELNO=ACC1 is Final Reject (Access One)	07/07/00	07/10/00	N/A	N/A	07/10/00	07/13/00			07/13/00												07/29/00			N/A	N/A	N/A	N/A	7/28 - Originally determined to be a defect. Further investigation has uncovered the need for a feature. 9/8/00 Implemented in Rel. 7.0 7/29/00.
R00106	1	5	Delay Sunset of LSOG2 xav Ordering via Fax (Watchlite for Caveat)	07/12/00	07/17/00	N/A	N/A	07/17/00	08/14/00			07/26/00 see notes												8/22/00							7/26/00 BST resp provided to Originator for review 7/26/00. CLEC appeal response from BST 08/11. BST reply to appeal to CLEC 8/10 08/22/00 Delay Sunset LSOG2
R00108	1	6	Lenngs over the number of 2 are not shown on LSR or order (BST)	07/25/00	07/26/00	N/A	N/A	07/25/00	07/28/00			07/28/00												8/12/2000							7/28 - Determined to be a defect to be fixed in a future release. Workaround: Manual. 11/13/00 - Implemented in Rel. 7.0 on 8/12/00.

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PR0109	I	4	GA 912/229/478 NPA Split (BST)	07/13/00	07/18/00	N/A	N/A	07/18/00	08/15/00	N/A	N/A	08/11/00												10/14/00	9/14/00	9/12/00	N/A	N/A	N/A	N/A	Imp w/Rel. 7.2 on 10/14/00.
PR0118	I	6	Conversion Axis ACI W Detect (Southern Telecom)	07/27/00	07/28/00	N/A	N/A	07/27/00	08/01/00			07/28/00												9/30/00		N/A	N/A	N/A	N/A	7/28 - Determined to be a defect. Implemented w/Release 7.1 on 9/30/00.
PR0115	I	4	Partial Pre-Order Query DOC (BST)	07/28/00	08/02/00	N/A	N/A	07/31/00	08/28/00	N/A	N/A	08/11/00												9/30/00	8/16/00 / 8/30/00 (Rev)	8/16/00 / 8/30/00 (Rev)	8/16/00 / 8/30/00 (Rev)	8/16/00 / 8/30/00 (Rev)	N/A	N/A	Implemented w/Rel. 7.1 on 9/30/00.
PR0116	I	4	Premise Visit Indicator (BST)	07/28/00	08/02/00	N/A	N/A	07/31/00	08/28/00	N/A	N/A	08/11/00												9/30/00	8/16/00 / 8/30/00 (Rev)	8/16/00 / 8/30/00 (Rev)	8/16/00 / 8/30/00 (Rev)	8/16/00 / 8/30/00 (Rev)	N/A	N/A	Imp w/Rel. 7.1 on 9/30/00.
PR0117	I	4	Update Issue 7 Map Due Date Calculation Tables w/info from BST Products & Services Interval Guide (BST)	07/28/00	08/02/00	N/A	N/A	07/31/00	08/28/00	N/A	N/A	08/11/00	9/19/00	9/19/00	9/27/00	9/29/00	9/29/00	11/13/00						9/21/00							Imp w/TAS Release 2.2.0.11 on 9/21/00
PR0118	I	6	Remove Housenumprefix for TAG API 2.2.0.10 (BST)	07/31/00	08/01/00	N/A	N/A	07/31/00	08/03/00			08/03/00												9/30/00	8/16/00 / 8/30/00 (Rev)	8/16/00 / 8/30/00 (Rev)	8/16/00 / 8/30/00 (Rev)	8/16/00 / 8/30/00 (Rev)	N/A	N/A	8/16 - Validated as a defect corrected in Release 7.1 9/30/00.
PR0119	I	6	LESOG Auto-clarifying NUM=TELNO=TN not in CRIS (BST)	07/28/00	07/31/00	N/A	N/A	07/31/00	08/03/00			08/03/00												08/12/00			N/A	N/A	N/A	N/A	8/3/00 - Validated as a defect to be corrected in Release 7.0.
PR0124	I	6	LESOG to Cancel N & D if unsuccessful in generating both (BST)	08/04/00	08/07/00	N/A	N/A	08/04/00	08/09/00			08/08/00												8/12/00			N/A	N/A	N/A	N/A	8/8/00 - Determined to be a defect and was corrected in Release 7.0.
PR0125	I	6	Error when placing a change order to add VCA and RJ11C in LENS (New South)	08/04/00	08/05/00	N/A	N/A	08/04/00	08/09/00			08/08/00												8/12/00							8/8/00 - Determined to be a defect and will be corrected in a future release TBD. Workaround N/A. 9/25/00 - Implemented in Rel. 7.0 8-12-00.
PR0126	I	6	LESOG should pull the correct CFN number for enhanced MMC (BST)	08/04/00	08/05/00	N/A	N/A	08/04/00	08/09/00			08/08/00												8/12/2000							8/8/00 - Determined to be a defect and will be corrected in a future release TBD. Workaround N/A. 11/13/00 - implemented in Rel. 7.0 on 8/12/00
PR0129	I	6	LESOG failing to apply ZZH to orders (BST)	08/14/00	08/15/00	N/A	N/A	08/14/00	08/17/00			08/17/00												9/30/00	8/16/00 / 8/30/00 (Rev)	8/16/00 / 8/30/00 (Rev)	8/16/00 / 8/30/00 (Rev)	8/16/00 / 8/30/00 (Rev)	N/A	N/A	8/17/00 - Determined to be a defect and will be corrected in a future release TBD. Workaround N/A. 9/8/00. Corrected in Rel. 7.1 9/30/00.
PR0131	I	4	Soft Billing Requests (BST)	08/15/00	08/018/00			08/15/00	09/13/00			09/08/00	9/19/00	9/19/00	9/22/00	9/29/00	9/29/00	11/13/00						12/01 BBR-LO	N/A	N/A			11/22/00	11/1/00	Implemented with the 12/01/00 BBR-LO update (impacts manual only).
PR0134	I	5	TN Reservation display of switch CLLI (AT&T)	08/09/00	08/14/00	N/A	N/A	08/14/00	09/12/00			*9/5/2000												10/10/00							08/18/00 Guidelines added 10/10/00 to the HELPFUL HINTS section of the BellSouth Pre-Order Business Rules document to further clarify the BellSouth
PR0136	I	6	Address validating in LENS but not in TAG - ignoring old RSAG History (BST)	08/15/00	08/16/00	N/A	N/A	08/15/00	08/18/00			08/18/00												09/30/00							8/18/00 - Determined to be a defect and will be corrected in a future release TBD Workaround N/A. 11/13/00 - implemented in Rel. 7.1 on 9/29/00

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20141	1	6	LESOG should D & E vs. C&T when no CFN changes (BST)	08/25/00	08/28/00	N/A	N/A	08/25/00	08/28/00			08/28/00												8/12/00							8/28/00 - Determined to be a Feature and will be targeted for a future release. 9/25/00 - Implemented in Rel. 7.0 8-12-00
20142	1	6	Remove the business reference for RCRE, RCRFF, RCRRG, & RCRRN in the RCF matrix o the LEO IG	08/25/00	08/28/00	N/A	N/A	08/25/00	08/28/00			08/28/00												09/29/00							8/28/00 - Determined to be a documentation defect and correction is targeted for the end of Sept. 00. 11/13/00 - Implemented on 9-29.
20147	1	4	Seasonal Suspend (BST)	08/30/00	09/05/00	N/A	N/A	08/30/00	09/28/00			09/28/00												8/12/00							Implemented w/Rel 7.0 on 8/12/00
20148	1	6	LESOG not recognizing disposition of additional/foreign listing (BST)	08/30/00	08/31/00	N/A	N/A	08/30/00	09/04/00			09/04/00												09/29/00							9/4/00 - Determined to be a defect and will be corrected in a future release TBD. 11/13/00 - Implemented in Rel. 7.1 on 9/29/00.
20150	1	6	Add NPT Data Element to the ESOG Query (BST)	08/31/00	09/01/00	N/A	N/A	08/31/00	08/31/00	N/A	N/A	08/31/00												10/20/00	9/20/00	10/12/00	9/20/00	9/12/00	N/A	N/A	8/31 - Validated as an expedited feature implemented in with TAG Release 7.1.2.1 on 10/20/00.
20153	1	2	Electronic Ordering of CO Based Line Sharing (BST)	09/08/00	09/13/00	N/A	N/A	09/11/00	10/06/00	N/A	N/A	09/11/00												9/30/00	8/30/00	8/30/00			N/A	N/A	Imp w/Rel 7.1 on 9/30/00
20159	1	6	Discrepancies in BBR-LO Version 9G (BST)	09/14/00	09/15/00	N/A	N/A	09/14/00	09/19/00	N/A	N/A	09/14/00												09/29/00					9/21/00	09/14/00	9/14 - Validated as a documentation defect and corrections made in BBRLO Version 9H posted on 9/29/00.
20162	1	6	OTN Defect Issue 7 (ITC Deltacom)	09/15/00	09/18/00	N/A	N/A	09/15/00	09/20/00			09/20/00												11/9/2000							9/20/00 - Validated as a defect to be targeted in a future release. 11/13/00 - Implemented on 11/9/00 in an emergency release.
20163	1	6	LESOG should not bring over FIDs on line USOCs for LNA of G (BST)	09/15/00	09/18/00	N/A	N/A	09/15/00	09/20/00			09/20/00												10/14/00					N/A	N/A	9/20/00 - Validated as a defect to be targeted in a future release. Imp w/Rel 7.2 on 10-14-00.
20165	1	6	Discrepancies in BellSouth Guidestnes-CC-LEOO 009-LNUMfield on Loop	09/15/00	09/20/00	N/A	N/A	09/18/00	10/16/00	N/A	N/A	10/16/00												12/01 BBR-LO		12/01/00		12/01/00			10-16-00 Reclassified from feature to doc defect. To be corrected in next BBR-LO update targeted for 12/00. 12/11/00 - Implemented 12/01/00.
20167	1	6	Incorrect Circuit # on FOC (BST)	09/20/00	09/21/00	N/A	N/A	09/21/00	10/24/00 (rev) / 9/26/01	N/A	N/A	09/27/00												10/14/00 Additional issue corrected					N/A	N/A	9/26/00- Determined to be a feature and will be targeted for a future release. 10-13-00 Scheduled for implementation in Rel. 7.2 on 10-14-00. Imp w/Rel 7.2 on 10-14-00.
20187	1	6	LESOG should recognize street directional for correct validation (BST)	09/30/00	09/31/00	N/A	N/A	09/30/00	09/05/00	N/A	N/A	09/05/00												10/14/00					N/A	N/A	Determined to be a defect and targeted for Release 7.2 Tent. scheduled for 10-14-00. Imp w/Rel 7.2 on 10/14/00.
20188	1	6	Release 7.1 Caused Defects (AT&T)	10/03/00	10/04/00	N/A	N/A	10/03/00	10/06/00	N/A	N/A	10/05/00												10/04/00					N/A	N/A	10/6 - Validated as a defect and was corrected on 10/6/00.
20191	1	6	Suppress the premise visit indicator (BST)	10/05/00	10/06/00	N/A	N/A	10/05/00	10/10/00	N/A	N/A	10/09/00												10/09/00					N/A	N/A	Determined to be a feature and was implemented in a TAG software release on 10/09/00.

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

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Change Request Log

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020195	1	6	ATN Business Rule Change	10/09/00	10/10/00	N/A	N/A	10/09/00	10/09/00			11/07/00												11/22/00		11/22/00		11/22/00			11/07/00 - Validated as a documentation defect and will be corrected in the next release on LEO-IG Version 7T on 11/22/00. 12/11/00 - Implemented.
020203	1	6	LESOG should allow manual handling instead of auto-clarify (BST)	10/18/00	10/19/00	N/A	N/A	10/18/00	10/18/00															11/18/00		11/22/00	N/A	N/A	N/A	N/A	10/18/00 - Determined to be a valid defect. Imp w/Rel 8.0 on 11/18/00.
020204	1	6	LESOG not processing REQTYP-B ACT-A on TOF 7 correctly. (BST)	10/18/00	10/19/00	N/A	N/A	10/18/00	10/18/00			10/19/00												11/18/00		11/22/00	N/A	N/A	N/A	N/A	10/18/00 - Determined to be a valid defect. Imp w/Rel 8.0 on 11/18/00.
020205	1	6	Listing Order Defect (AT&T)	10/19/00	10/20/00	N/A	N/A	10/19/00	10/24/00	N/A	N/A	10/21/00												10/21/00					N/A	N/A	10/23/00 - Determined to be a defect and was implemented in Release 7.2A on 10/21/00.
020206	1	6	LNP Qualifier Defect (AT&T)	10/19/00	10/20/00	N/A	N/A	10/19/00	10/24/00			10/24/00																		10/31/00	10/31/00	11/03/00 - Determined to be a documentation defect. The EDI specs were updated effective 11-01-00
020208	1	6	TAG 2.2.X not processing Digital Loop Orders (High Impact)	10/25/00	10/26/00	N/A	N/A	10/25/00	10/30/00			10/30/00												11/22/00		11/29/00		11/22/00			documentation defect and will be corrected in the next issue of the LEO IG on 11-22-00. 12/11/00 - Implemented.
020214	1	6	on 2 wire UNE-P Bus/Res/PBX document (Fastpoint) (Medium	11/06/00	11/07/00	N/A	N/A	11/06/00	11/09/00			11/09/00												11/17/00						11/17/00	11/17/00	CLEC on which document specified. 11/20/00 - Validated as a defect and was corrected on 11/17/00.
020216	1	6	NPORD Date for FOC (Issue 7) (BST)	11/13/00	11/16/00	N/A	N/A	11/13/00	12/12/00															12/10/00	11/10/00	11/6/00	N/A	N/A	N/A	N/A	Imp. W/ LNP Release 5.4 on 12/10/00
020219	1	4	Standard Interval Changes For Loop (LNP) (BST)	11/13/00	11/16/00	N/A	N/A	11/13/00	12/12/00															12/10/00	11/10/00	11/6/00	N/A	N/A	N/A	N/A	Imp. W/ LNP Release 5.4 on 12/10/00
020234	1	6	Invalid error message on REQTYP M for Line Class of Svc (BST)	11/20/00	11/21/00	N/A	N/A	11/20/00	11/20/00			11/20/00												11/03/00							11/20/00 - Determined to be a valid defect and was corrected in Rel. 8.0 on 11/03/00.
020230	1	6	NPORD Defect (AT&T)	11/21/00	11/22/00	N/A	N/A	11/21/00	11/29/00			11/27/00												12/10/00		12/10/00	N/A	N/A	N/A	N/A	and will be targeted for a future release. 12/01/00 - Scheduled to be in LNP Release 5.4 on 12-10-00. 12/11/00 -
Uncalled CRs																															
10812990002	C	5	The ability (inq pre-ord (EDI & TAG) to do digital loop qualification XDSL loops (WorldCom)	8/12/99												9/28/99					N/A			CANCEL							9-28-99 Change Request accepted for TAG only. CLECs agreed to cancel.
10812990006	C	5	ATT would like to order XDSL loops electronically (AT&T)	8/12/99												9/28/99					N/A			CANCEL							9-28-99 Change Request combined with EDI081299001
11011200_001	C	5	Added to Service Order Tracking System (Advanced Tel)	1/12/00		N/A	N/A	1/16/00				4/7/00				N/A					N/A			CANCEL							4-7-00 Pending Cancellation Acknowledgement

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(4/00)
Change Request Log

CR Log #	Status	Priority	Title	Date Sent	Open & Validate CR (Target Date)	Open & Validate CR (Clar Date Sent)	Open & Validate CR (Clar Resp Rec'd Date)	Open & Validate Clr (Actual Date)	Review CR for Accep. (Target Date)	Rev CR for Accep. (Clarification Sent Date)	Rev CR for Accep. (Clar Resp Rec'd	Rev CR for Accep. (Actual Date)	Cancel CR Notify Date	Prepare for CRM (Target Date)	Prepare for CRM (Actual Date)	CR Mtg. Date (Actual)	Doc Chg Rev. Mtg. Results (Target Date)	Doc Chg Review Mtg. Results (Actual Date)	Internal Change Mgmt Process (Target Date)	Internal Change Mgmt Process (Actual Date)	RPM (Actual Date)	Rel Pkg Notify (Target Date)	Rel Pkg Notify (Actual Date)	Rel Imp (Actual Date)	Soft Rel Notif (Target Date)	Soft Rel Notif (Actual Date)	Doc Changes Notif (Target Date)	Doc Changes Notif (Actual Date)	Doc Updates Only Notif (Target Date)	Doc Updates Only Notif (Actual Date)	Notes
OR030900_001	C	3	Modify Line Activities to Align with Industry Guidelines (AT&T)	3/2/00		N/A	N/A	3/3/00				4/19/00 (See Notes)	06/26/00																		4-19-00 Provided BST response to originator for review. 4-20-00 1st level Escalation in progress. 4-25-00 provided BST response to 1st level escalation. 5-01-
AG030900_001	C	5	LNA Functionality of V-PIP-QS500 (Sprint)	3/6/00		N/A	N/A	3/10/00					3/20/00												CANCEL							4-26-00 Rec'd cancelation acknowledgment from originator
VS030700_001	C	6	Post-FOC Clarification (AT&T)	03/23/00	03/28/00	N/A	N/A	03/27/00	04/21/00			4/19/00 (See Notes)	09/27/00																			4-19-00 Provided BST response to originator for review. 4-20-00 1st level Escalation in progress. 4-25-00 provided BST response to 1st level escalation. 5-1-
R0005	C	5	TAG Pre-Order Testing Environment (ITC Deltacom)	03/27/00	03/30/00	N/A	N/A	03/29/00					4/7/00												CANCEL							4-7-00 Issue Resolved by Originating CLEC.
R0008	C	6	REQTYPE "E" Reject code"WQTY/VQTY must be 2 numeros or blank (ITC Deltacom)	04/17/00	04/18/00	04/17/00	04/17/00	04/17/00	04/20/00	N/A	N/A	N/A	10/27/00																			4-25 Appeal in progress 10/25/00 Originator Cancelled request.
R0009	C	5	Expand CLEC code in the AVQ pre-order (TAG) from 8 A/N to 11 A/N (Sprint)	04/12/00	04/17/00	N/A	N/A	04/17/00	05/15/00	N/A	N/A	5/11/00 & 5/12/00 (See Notes)	05/22/00												CANCEL							5-1-00 & 5-12-00 Provided BST response to originator for review. 5-18-00 Originating CLEC advised change request could be closed.
R0010	C	5	TAG-Pre Order Unusable Results (ITC Deltacom)	04/17/00	04/20/00	N/A	N/A	04/17/00					04/19/00												CANCEL							4-19-00 Referred to ECS to report degradation in service.
R0013	C	6	Date Sent/Century Defect (ZDD) (Nextlink)	04/20/00	04/21/00	N/A	N/A	04/21/00	04/26/00	N/A	N/A	04/26/00	09/08/00																			4-26-00 Provided validation results to originator. 9/8/00 - Request cancelled by originator.
R0017	C	6	Invalid TOS (AT&T)	04/27/00	04/28/00	N/A	N/A	04/28/00	05/03/00				05/04/00																			
R0018	C	5	USOC Segmentation Request (AT&T)	04/27/00	05/02/00	N/A	N/A	04/28/00	05/26/00	N/A	N/A	05/26/00 (See Notes)	08/23/00																			5-26-00 Provided BST response to originator for review. 5-30-00 Add'l info requested. 7-21 BST provided add'l info to originator.
R0025	C	4	Clarification on AIN Usage Rules (BST)	05/22/00	05/25/00	N/A	N/A	06/22/00	06/20/00				06/16/00												CANCEL							6-16-00 Documentation clarification only.
R0027	C	5	FOC on ReqTyp CB does not show listing order only Rloper info (manual orders)	05/03/00	05/05/00	N/A	N/A	05/05/00	06/05/00	N/A	N/A	6/9/00 (See Notes)	07/10/00												CANCEL							6-8-00 Provided BST response to originator for review.
R0028	C	6	Document LSOG 2 & LSOG 4 Differences (ITC Deltacom)	05/08/00	05/11/00	N/A	N/A	05/08/00	06/06/00	N/A	N/A	6/8/00 (See Notes)	07/28/00																			6-8-00 Provided BST response to originator for review.
R0032	C	5	TN Reservation (Sprint)	05/09/00	05/12/00	N/A	N/A	05/09/00	06/07/00	05/11/00			06/23/00																			6-23-00 Cancelled by originator.

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Change Request Log

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20033	C	5	EDI Multiple ReqTyp Enhancement (Re-Write)	05/09/00	05/12/00	N/A	N/A	05/10/00	08/04/00 (Rev) 6/8/00	06/02/00	07/31/00	8/4/00 (See Notes)	09/11/00																		6-2-00 Pending Clarification 7-31-00 Clar Resp Rec'd. New "Review CR for Acceptance Date" is 8/4/00. 8/4/00 BST response to originator for review.
20034	C	4	ACT code "T" (EUMI Field) (BST)	05/10/00	05/15/00	N/A	N/A	05/10/00	06/08/00	N/A	N/A	06/02/00	06/16/00											CANCEL							6-16-00 Documentation clarification only.
20035	C	4	One Page SUP for DD Changes (BST)	05/10/00	05/15/00	N/A	N/A	05/10/00	06/08/00	N/A	N/A	06/02/00	06/16/00											CANCEL							6-16-00 To be included in a future CR.
20036	C	4	Transfer of Call Options - INP REQTYP B (BST)	05/10/00	05/15/00	N/A	N/A	05/10/00	06/08/00	N/A	N/A	06/06/00	06/16/00											CANCEL							6-16-00 Documentation clarification only.
20037	C	4	AIN Internet Call Waiting (BST)	05/10/00	05/15/00	N/A	N/A	05/15/00	06/14/00				06/16/00											CANCEL							6-16-00 New product offering.
20039	C	6	FOC: NOT Populating Order Number on Port Order (American Metrocom)	04/27/00	04/28/00	N/A	N/A	04/28/00	05/17/00	05/05/00	05/12/00	05/16/00	06/28/00																		5/16/00 - Target Date changed due to clarification requested. 05/16/00 BellSouth responded to CLEC and CSM that CR is not a defect. Waiting on
20041	C	5	Documentation of Interface Changes and Releases (AT&T)	05/11/00	05/16/00	N/A	N/A	05/11/00	06/09/00	N/A	N/A	06/06/00	06/26/00											CANCEL							6-16-00 Verbal agreement from originator to cancel request.
20042	C	4	Open IWBAN field on the EU form (BST)	05/10/00	05/15/00	N/A	N/A	05/15/00	06/14/00	06/12/00	06/14/00	06/14/00	06/28/00	6/19/00	6/19/00	6/28/00								CANCEL							
20043	C	4	Conversion As Is - LENS 6.3 Invalid USOC for Basic Class of Svc (One Entry)	06/15/00	05/16/00	N/A	N/A	05/15/00	05/15/00				07/26/00																		7/26 - Originator has notified BellSouth that defect can be cancelled.
20044	C	4	LENS Calculate Due Date Enhancement (BST)	05/15/00	05/18/00	N/A	N/A	05/15/00	06/14/00	05/14/00			07/24/00																		6-14-00 Pending Clarification.
20046	C	5	EDI Reject Process Modification (GTE)	05/17/00	05/22/00	N/A	N/A	05/22/00	06/20/00	N/A	N/A	06/09/00 (See Notes)	08/04/00																		6-9-00 BST response to originator for review. 6-19-00 1st level escalation in progress. 6-26-00 BST response to 1st level. 6-27-00 2nd level escalation. 7-12-00 BST
20048	C	4	Fields that can not be changed on a SUPP (BST)	05/22/00	05/25/00	N/A	N/A	05/22/00	06/20/00				06/16/00											CANCEL							6-16-00 Documentation clarification only.
20050	C	4	LENS 6.3 - # of directories for white & yellow pages (BST)	05/19/00	05/22/00	N/A	N/A	05/19/00	05/22/00	N/A		05/22/00	10/23/00																		5/22 - Not a defect, but will be entered as a feature to be targeted for a future release. 10/23 - Cancelled by Originator.
20051	C	4	LENS 6.3 - expand service details for floating FIDs (BST)	05/19/00	05/22/00	N/A	N/A	05/19/00	8/16/00 (Rev) 5/25/00	05/25/00	07/19/00		08/11/00																		7/19 - Reclassified as a feature to be reviewed for acceptance.

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00052	C	5	WSOP Field Requirements Regarding EDI Type Orders (One Point)	05/19/00	05/26/00	N/A	N/A	05/19/00	06/20/00	N/A	N/A	06/09/00 (See Notes)	08/01/00																		6-9-00 Provided BST response to originator for review.
00056	C	6	Invalid SUP, Subscription Version Defect (AT&T)	05/23/00	05/24/00	N/A	N/A	05/24/00	05/26/00			05/26/00	09/28/00																		5-26-00 Determined to be a training issue. Pending feedback from originator. 9/28/00 - Canceled by originator.
00057	C	6	Port/Loop Combo Conversion (AT&T)	05/23/00	05/24/00	N/A	N/A	05/26/00	05/26/00																						7/19 - Originator has notified BellSouth that defect can be canceled.
00058	C	5	Fraud Management Process (AT&T)	05/24/00	05/30/00	N/A	N/A	05/30/00	06/27/00	N/A	N/A	6/22/00 (See Notes)	06/26/00																		6-22-00 BST response to originator.
00059	C	2	TN Reservation Changed to 45 Days (BST)	05/26/00	06/01/00	N/A	N/A	05/26/00					11/16/00																		Order filed 6-16-00. CIC docket 99-268. Effective date changed to 12/00. Determined to not impact CLEC TN reservations.
00063	C	6	Incorrect Call Forwarding Number given for Memory Call in LENS (Nextlink)	05/30/00	06/01/00	N/A	N/A	06/01/00	06/01/00				07/26/00																		7/27 - Originator has notified BellSouth that defect can be canceled.
00066	C	6	Invalid USOC for Basic Class of Svc. Format SAE 434 # CREX7/TN (AT&T)	06/01/00	06/02/00	N/A	N/A	06/01/00	06/01/00			06/01/00	09/25/00																		Feature will be opened and targeted for Rel. 7.0. 7/31 - A change in the rate database is needed to complete this change. 8/1 - CREX7 is not valid for LINE's and will not be added to rate database. 8/8 - Validated doc defect. 8/10 - work aid provided to CLECs. 9/25/00 Originator
00069	C	6	Reserving Telephone numbers (Adelphia)	06/06/00	06/07/00	N/A	N/A	06/06/00	06/06/00			06/13/00																			7/19 - Originator has cancelled change request.
00070	C	6	Call Forwarding USOC Defect (AT&T)	06/01/00	06/02/00	N/A	N/A	06/01/00	06/01/00			06/13/00	09/28/00																		6/13/00 Not a defect. USOC populated is not valid with the FID provided. Waiting on originator to close out.9/28/00 - Canceled by Originator.
00072	C	6	LEO should pull BAN1 from Svc Order & return on the FOC/CN (BST)	06/08/00	06/09/00	N/A	N/A	06/08/00	06/13/00			06/13/00	08/04/00																		8/4 - Defect was corrected in Release 6.4 on 6/17. Originator has cancelled change request.
00083	C	6	CSR Error (Advanced Tel)	06/14/00	06/15/00	N/A	N/A	06/14/00	06/19/00			06/15/00	07/26/00																		7/27 - Originator has notified BellSouth that defect can be cancelled.
00086	C	5	EELS via ASR (WorldCom)	06/14/00	06/19/00	N/A	N/A	06/16/00	07/17/00				06/26/00																		6-26-00 Combined with CR0030200_001 (AT&T and WorldCom)
00087	C	5	"C" Order process for UNE-P (Sprint)	06/15/00	06/20/00	N/A	N/A	06/19/00	8/14/00 (Rev) 6/28/00	N/A	N/A	8/28/00 *7/17/00	10/06/00																		CR originally submitted as a Type 6. Defect was corrected with Rel 6.4 re: N & D orders. 08/28/00 BellSouth responds to original CLEC 06/28/00 CLEC approval

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R0093	C	5	Electronic Change Notifications (ISSMN) (WorldCom)	06/22/00	06/30/00	N/A	N/A	06/27/00	07/06/00			* see notes	10/27/00																		10/26/00 E-MAIL to original CLEC Change Control team req additional time to handle. 8/28/00 ntf being investigated by BellSouth./09/12/00 response sent to orig CLEC./09/15/00 CRIS CLEC REQ PLACE ON "HOLD"/10/03
R0094	C	6	REPNUM=CFA FORMAT INVALID (American Metrocom)	06/22/00	06/28/00	N/A	N/A	06/27/00	06/30/00			07/10/00	07/26/00																		7/27 - Originator has notified BellSouth that defect can be cancelled.
R0095	C	4	ECTA-Attribute Validation (BST)	06/30/00	07/06/00	N/A	N/A	06/30/00	07/31/00			7/26/00 (see Notes)	10/25/00																		7-26 CLEC Community reviewing internally and will provide feedback on whether this feature should be pursued.
R0097	C	6	LENS Defect (AT&T) Disconnect of Hunt	06/30/00	07/01/00	N/A	N/A	06/30/00	07/07/00			07/07/00	08/21/00																		7/7/00 BellSouth determined not a defect. Waiting on originator to close. 8/21/00 - Originator agreed to cancel.
R0103	C	6	Loop Comb is going into RECYCLE (BST)	07/11/00	07/12/00	N/A	N/A	07/11/00	07/14/00				07/26/00																		7/27 - Originator has notified BellSouth that defect can be cancelled.
R0107	C	6	Documentation Defect - CIC (AT&T)	07/14/00	07/17/00	N/A	N/A	07/17/00	07/20/00			07/20/00	09/25/00																		7/27 - Originator has notified BellSouth that defect can be cancelled. 9/25/00 - Originator authorized BST to cancel.
R0110	C	4	LENS/TAG not populating 2NEA & 2NHC on ACT or N or C - LNA of N (BST)	07/26/00	07/27/00	N/A	N/A	07/26/00	07/31/00			07/31/00	10/27/00																		7/27 - Determined not a defect. Will open a feature targeted for a future release. 10/27/00 - Originator canceled request.
R0114	C	6	TN Reservation Defect (AT&T)	07/28/00	07/29/00	N/A	N/A	07/29/00	08/02/00			08/02/00	09/21/00																		9/21/00 - Determined to not be a defect. Canceled by originator.
R0120	C	6	SOCS R60 Invalid NPA/NXX for Routing SUB 001 (BST)	07/31/00	08/01/00	N/A	N/A	07/31/00	08/03/00			08/03/00	09/25/00																		9/25/00 - Validated as a defect to be corrected in a yet to be determined release. Workaround N/A. 9/25/00 - Originator authorized to cancel.
R0121	C	6	Discrepancies in BellSouth Guidelines - CSI-LEO9-022 (Nextlink)	07/27/00	08/01/00	N/A	N/A	08/01/00	08/29/00				09/28/00																		9/28/00 - Canceled by Originator
R0123	C	4	LENS Application Enhancement (Gulf Coast Comm)	08/03/00	08/04/00	N/A	N/A	08/03/00	08/08/00			08/07/00	08/28/00																		8/7/00 - Determined to not be a defect. Waiting on originator to determine status. 8/28/00 - Canceled by originator.
R0130	C	4	SOCS not responding to "C" order adding line & features on Resale Accounts (BST)	08/14/00	08/15/00	N/A	N/A	08/14/00	08/17/00			08/17/00	10/27/00																		8/22/00 - Re-classified as a "Feature" 10/27/00 - Originator closed request.
R0133	C	5	Migration of UNE-P Notifications (WorldCom)	08/09/00	08/14/00	N/A	N/A	08/14/00	09/12/00			09/06/00	09/27/00			9/27/00	9/29/00	9/29/00													9/25/00 Conf Call w/originator & BST SME. 9/27/00 Combined with CR #EDI21599001
R0138	C	5	Fielded Completion Notice (WorldCom)	08/14/00	08/17/00	N/A	N/A	08/18/00	09/14/00				08/21/00																		8/21/00 - Due to duplication of requests originator agreed to cancel
R0140	C	4	Update the DDC intervals in TAG to match the intervals listed in the BRSG (BST)	08/17/00	08/22/00	N/A	N/A	08/22/00	09/20/00				09/07/00																		Combined with CR0117

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R0143	C	5	Notification-MDR(Mechanized Disaster Reports) (Verizon)	08/24/00	08/29/00	08/30/00	09/19/00	08/30/00	10/17/00			10/16/00																				10/16/00 response sent to original CLEC11/13/00 RESENT response to CLEC "out of Scope" /12/11/00 NO Response fr Orig CLEC-cancel request
R0155	C	6	Ringmaster Defect (AT&T)	09/12/00	09/13/00	N/A	N/A	09/12/00	09/18/00			09/18/00	09/28/00																			9/18/00 - Determined to not be a defect. Validated as a training issue with originator. 9/28/00 - Canceled by
R0157	C	4	Need to Handle HTG USOCs for all calling plans on Port/Loop	09/13/00	09/14/00	N/A	N/A	09/13/00	10/12/00 (rev) / 9/18/00			09/14/00																				9/14/00 - Determined to be a feature and will be targeted for a future release. 11/13/00 - Canceled by originator.
R0158	C	4	Already Pending Error message on LSRs where order is being held to not auto clarify	09/13/00	09/14/00	N/A	N/A	09/13/00	10/13/00 (rev) / 9/18/00			09/18/00																				9/14/00 - Determined to be a feature and will be targeted for a future release. 11/13/00 - Canceled by originator.
R0173	C	5	New Tables To BBP-LO referencing applicability to various TAG Releases (Albion	09/21/00	09/26/00	N/A	N/A	09/28/00	10/26/00				10/26/00																			10/26/00 - Canceled by Originator.
R0174	C	5	Change Control Log-Application and Release Number Reference (Albion	09/21/00	09/26/00	N/A	N/A	09/28/00	10/26/00				10/26/00																			10/26/00 - Canceled by Originator.
R0175	C	5	TAG CLEC Test Environment-Application Support	09/26/00	09/29/00	N/A	N/A	09/28/00	10/26/00				10/26/00																			10/26/00 - Canceled by Originator.
R0185	C	5	TAG/COG Lead Project Mgr Role Change Request	09/28/00	09/29/00	N/A	N/A	09/29/00	10/27/00			10/16/00	10/26/00																			10/26/00 - Canceled by Originator.
R0190	C	6	Address (ITC^DeltaCom)	10/05/00	10/06/00	N/A	N/A	10/05/00	10/11/00			10/09/00	10/27/00																			defect. Waiting on originator to authorize closure. 10/27/00 - Originator closed

BELL SOUTH

Directory Listing (DL)

Administrative Section

CCNA | PON | VER | DSRNO | ATN | AN

SC1 | SC2 | PG | OF

Listing Control Section

LACT | ALI | RTY | LTY | TT | STYC | TOA | DOI | WPP | LOCNUM | DLNUM | MTN | PPTN

DDQTY | LTXQTY

Listing Indicators Section

DML | NOSL | TMKT | BRO | ADV | STR | DLNM | PROF | DIRIDL | DIRNAME

DIRSUB | LID1 | LID2 | OMSD

OMSD (continued)

Listing Instruction Section

LTN | NSTN | OMTN | LEX | DNA | LNPL | (LNLN) ① Pate

LNLN (continued) | (LNFN) ② Ronald

LNFN (continued) | DES

TL | TITLE1 | TITLE2 | NICK | PLA

PLA (continued) | LTXNUM | LTXTY | LTEXT

LTEXT (continued)

LTEXT (continued)

LTEXT (continued)

ADI | LAPR | LANO | LASF | LASD | LASN

LATH | LASS | LALO

LALOC | LAST | LAZC

Docket No. 2000-465
JMB-R17
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-----Original Message-----
From: Change.Control@bridge.bellsouth.com
[mailto:Change.Control@bridge.bellsouth.com]
Sent: Tuesday, December 05, 2000 5:48 PM
To: bhamilton@idstelcom.com; bwellman@idstelcom.com;
david.burley@wcom.com; generalg@cris.com; Jane.Hunter@mail.sprint.com;
Mae.Means@mail.sprint.com; rlthompson@xo.com; ronald.l.thompson@xo.com;
sangelo@bellsouth.net; SLively@trivergent.com; Tyra.Hush@wcom.com;
wolfsbrg@cris.com
Subject: Tentative Parsed CSR Implementation Schedule

Parsed CSR Sub Team,

Attached is the tentative implementation schedule for the Parsed CSR change request. We are working to better the dates if at all possible.

We plan to have the responses to the outstanding action items to you by no later than Friday, December 8.

Just a reminder to let us know by Wednesday, December 6 if you concur with the updated requirements we distributed on 11/21 or if you have any questions/comments. The final CLEC Parsed CSR requirements will be shared with the CLEC community for feedback once the Sub Team has completed their review.

Please let me know if you have any questions.

Thanks,

Cheryl Storey
Change Control Team
205-321-2113

BELLSOUTH

TENTATIVE PARSED CSR IMPLEMENTATION TIMELINE

ACTIVITY	TENTATIVE SCHEDULED DATE(s)	ACTUAL COMPLETION DATE
CLEC Requirements Developed	10/3/00 – 11/20/00	11/20/00
CLEC Requirements Completed	11/20/00 - 12/6/00	
CLEC Requirements Distributed to CLEC Community	12/7/00 – 12/8/00	
Planning & Analysis Phase	11/27/00 - 04/10/01	
Internal Kick-off Meeting	11/27/00 - 12/1/00	11/27/00
- Project Team P&A	11/27/00 - 12/29/00	
Requirements Phase	11/27/00 - 04/10/01	
Internal Requirements Developed	11/27/01 - 03/30/01	
- User Requirements	01/02/01 - 02/19/01	
- User Requirements BLR	02/20/01	
- System Requirements	2/21/01 - 04/09/01	
Internal Requirements Baselined	04/10/01	
Design Phase	04/11/01 - 06/18/01	
Construction Phase	06/19/01 - 10/01/01	
Internal Testing Phase	10/02/01 - 12/01/01	
Internal Testing	10/02/01 - 11/30/01	
Internal Implementation	12/1/01	
External Testing Phase	12/3/01 - 12/28/01	
Process Implementation	12/31/01	
Project Closeout	01/31/02	

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DOCKET# 7892
DOCUMENT# 44192

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DOCKET NO. 7892-U

ORDER

In re: Performance Measurements For Telecommunications Interconnection, Unbundling And Resale

BY THE COMMISSION:

This matter comes before the Georgia Public Service Commission ("Commission") to establish generic performance measurements for BellSouth Telecommunications, Inc., for interconnection, unbundling and resale and to establish appropriate enforcement mechanisms for those performance measurements.

I. INTRODUCTION

A. Background

This Commission first held hearings in this docket in November 1997, and has required BellSouth to submit performance reports since May 1998. The purpose of these reports was to assist the Commission and the parties in determining whether BellSouth provides nondiscriminatory service to CLECs. BellSouth's Service Quality Measurements ("SQM") originated in 1998 as the result of the Commission's decision in Docket No. 7892-U. Since the Commission issued its order in May 1998, the Federal Communications Commission ("FCC") has stated more definitively its requirements for an adequate performance measurement plan. In addition, the parties have had the time to observe the Georgia plan in action, test its effectiveness, and identify many of its strengths and weaknesses.

The Commission initiated this phase of this Docket with a Procedural and Scheduling Order issued on June 8, 2000. The Scheduling Order stated that the purpose of this proceeding was to establish performance measurements, and to establish appropriate enforcement mechanisms for those

performance measurements, for telecommunications interconnection, unbundling and resale. Given the more extensive experience available since the 1997 hearings, the Commission initiated this new phase to refine and upgrade the set of performance measures so that it will more clearly reveal whether BellSouth is adequately opening its market to competition on a nondiscriminatory basis and to adopt a complete remedies plan that will provide adequate consequences should BellSouth fail to meet the standards.

Hearings were held before the Commission on July 5-7, 2000. Briefs were filed by BellSouth and the CLEC Coalition (AT&T Communications of the Southern States. Inc., Broadslate Networks, Inc., DIECA Communications, Inc. d/b/a Covad Communications Company, ICG Telecom Group, Inc. and Intermedia Communications, Inc., ITC^DeltaCom Telecommunications, Inc., MediaOne Telecommunications of Georgia, LLC., NewSouth Communications Corp., Rhythms Links, Inc., The Southeastern Competitive Carriers Association, US LEC Corp., WorldCom, Inc., and Z-Tel Communications, Inc.).

B. Jurisdiction

The Commission has general authority and jurisdiction over the subject matter of this proceeding, conferred upon the Commission by Georgia's Telecommunications and Competition Development Act of 1995 (Georgia Act), O.C.G.A. §§46-5-160 *et seq.*, and generally O.C.G.A. §§ 46-1-1 *et seq.*, 46-2-20, 46-2-21, and 46-2-23. Under the Federal Telecommunications Act of 1996 (Federal Act), State Commission's are also authorized to set terms and conditions for interconnection and access to unbundled elements pursuant to Sections 251 and 252 of the Federal Act.

II. FINDINGS AND CONCLUSIONS

There are three basic parts to a comprehensive performance plan: An appropriate set of performance measurements; an appropriate set of benchmarks and retail analogs to apply to those measurements; and, a remedy plan to ensure compliance with the performance goals.

A. Performance Measures.

A well-defined, effective and meaningful set of performance measurements is essential in order to provide the Commission with the information necessary to assess BellSouth's service to CLECs. This includes comparative measurements that monitor all areas of support, i.e., pre-ordering, ordering, provisioning, collocation, maintenance and repair, operator services, directory assistance, E911, trunk group performance, and billing. Measurements and appropriate methodologies must be documented in detail so that clarity exists regarding what will be measured, how it will be measured, and in what situations a particular event may be excluded from monitoring. Measurement results must be sufficiently disaggregated so that only the results for similar operational conditions are compared and so that the results will not mask discrimination.

1. BST Proposed SQM

BellSouth has proposed a set of SQM to the Commission. BellSouth's SQM covers 9 different functional categories including: Pre-ordering; ordering; provisioning; maintenance and repair; billing; operator services and directory assistance; E911; trunk group performance; and, collocation. Coon, Tr. at 99. BellSouth states that each of these categories corresponds to a function on which BellSouth's performance to CLECs should be measured. Within each of these functional categories BellSouth proposes a series of measurements. Each measurement is broken down into 10 categories including: The measurement itself; a definition of the measure; any exclusions to the measure; business rules; levels of disaggregation; a calculation of the measurement; report structure; data retained relating to CLEC experience; data retained relating to BST experience; and, retail analog/benchmark. Coon, Tr. at 100. BellSouth asserts that these 10 categories provide all of the information necessary to understand the measurement, analyze the result of the measurement, and assess performance against the retail analogue or benchmark. BellSouth states that the format of the SQM is comparable to that of both the Bell Atlantic plan and the Southwestern Bell plan. Coon, Tr. at 100-01.

BellSouth states that in addition to adopting BellSouth's current SQM, the Commission should adopt the five additional measurements that BellSouth is in the process of adding to the SQM. The five additional measures are:

(1) Service Inquiry with Firm Order (Manual);
(2) Loop Makeup Inquiry (Manual and Electronic);
(3) Timeliness of Change Management Notice;
(4) Percent Functional Acknowledgments Returned On Time; and,
(5) Percent Troubles Within 7 Days of a Hot Cut.

In addition, BellSouth has added a measure for Hot Cut Timeliness Percentage Within Interval and Average Interval (P-6A, BST Ex. 1) to the SQM. BellSouth also states that it is in the process of adding additional levels of disaggregation to the current SQM to break out xDSL loops, ISDN unbundled loops, and line sharing. Coon, Tr. at 107. Finally, BellSouth states that it has revised its Trunk Blockage Report. BellSouth Exhibits 1 and 2; Coon, Tr. at 150.

After considering BellSouth's proposal and the testimony and arguments presented in this matter, the Commission hereby approves the use of BellSouth's proposed SQM as modified below in Table 1. Any of BellSouth's proposed SQMs not listed below and not otherwise addressed in this order are approved.

TABLE 1

BST Proposed SQMs	Commission Determination
Service Inquiry with Firm Order (Manual)	Adopt BST SQM: Benchmark: 95% returned within 5 business days.
Loop Make Up Inquiry (Manual and Electronic)	See **Table 2** for Average Response Time to LMU Information (Manual and Electronic).
Timeliness of Change Management Notices and Documentation	Adopt this BST SQM. 30 days after this order Change Management Team shall file with the Commission the interval to include in this measure.
Percent FAs Returned On Time	See **Table 2** for Acknowledgment Timeliness.
Percent Troubles Within 7 days of a HOT CUT.	Adopt BST SQM.
OSS-1 Avg. Response Time and Response Interval	Adopt this SQM with the following Business Rule change: The response interval starts when the client application (LENS or TAG for CLECs and RNS for BST) submits a request to the legacy system and ends when the appropriate response is returned to the client application.
P-1 Percent Flow Through Service Request	Adopt this SQM with the following addition: Add the following measure to the flow-through report: BellSouth Achieved Flow-Through Issued Service Orders Total Mech. LSR's- [(Auto Clarify)+(CLEC fallout)] x 100 The Commission includes the current CLEC Error Excluded Calculation in the VSEEM III Plan. BST and the CLECs shall form an Improvement Task Force. This Task force shall jointly prepare an implementation report, that includes implementation target dates to eliminate the high BellSouth Caused Failures and the designed manual fallout for electronically submitted LSR's. This report shall be filed with the Commission 3 months after the date of this Commission Order. BST is ordered to resume reporting its retail business flow-through results and provide data back to May of 2000.
O-6 Reject Interval	Adopt this SQM with the following amendments: Fully Mechanized: The elapsed time form receipt of a valid electronically submitted LSR (date and time stamp in EDI, LENS or TAG) until the LSR is rejected (date and time stamp or reject in EDI, TAG OR LENS). Auto Clarifications are considered in the Fully Mechanized Category.

	Partially Mechanized: The last sentence should read: "The stop time on partially mechanized LSRs is when the LCSC Service Representative clarifies the LSR back to the CLEC via (LENS, EDI or TAG)."
O-7 FOC Timeliness	The stop time is meant to represent the time that BST actually returns the FOC to the CLEC.
O-9 LNP- Percent Rejected Service Requests O-10 LNP- Reject Interval Distribution & Average Reject Interval O-11 LNP- FOC Timeliness Interval Distribution & FOC Average Interval P-10 LNP Missed Installation Appointments P-2 Average Jeopardy Notice Interval & % of Orders Given a Jeopardy Notice P-5 Average Completion Notice Interval P-11 LNP Disconnect Timeliness P-12 LNP Total Service Order Cycle Time	These measures **should not exclude** Non-Mechanized LSRs.
P-5 Average Completion Notice Interval	Adopt the SQM with the following change: Business Rules: The start time is the completion time stamp either by the field technician or the 5PM due date stamp; the end time is the time stamp the notice is transmitted to the CLEC Interface (LENS, EDI or TAG).
P-8 Total Service Order Cycle Time	Adopt the SQM with the following changes: Definition: This report measures the total service order cycle time from receipt of a valid service order request to the return of a completion notice to the CLEC Interface. Business Rules: This measurement combines three reports: FOC Timeliness, Average Order Completion Interval and Average Completion Notice Interval. This interval starts with the receipt of a valid service order request and stops when a completion notice is sent to the CLEC Interface (LENS, TAG or EDI).
MR-3 Maintenance Average Duration	Adopt the SQM with the following Change: Exclusions: Delete Trouble Reports greater than 10 days.
P-9 Service Order Accuracy	Adopt the SQM with the following Change: Benchmark: 95% Accurate
C-1 Average Response Time	Adopt with the following changes: Definition: Measures the average time (counted in calendar days) from receipt of a complete and accurate collocation application (including receipt of application fees) to the date BellSouth responds in writing. Within 10 calendar days after

	having received a bona fide application for physical collocation, BellSouth must respond as to whether space is available or not. Level of Disaggregation: Caged/Cageless shall be added. Benchmark: Now Virtual- 20 Calendar Days Physical- 30 Calendar Days Caged/Cageless- 30 Calendar Days 6 Months Virtual- 10 Calendar Days Physical- 20 Calendar Days Caged/Cageless- 20 Calendar Days
C-2 Average Arrangement Time	Adopt with the following changes: Definition: Measures the average time from receipt of a complete and accurate Bona Fide firm order (including receipt of appropriate fee) to the date BST completes the collocation arrangement and notifies the CLEC (counted in calendar days). Level of Disaggregation: Caged/Cageless shall be added Benchmark: Virtual: 50 Calendar Days (Ordinary) 75 Calendar Days (Extraordinary) Physical/Caged: 90 Calendar Days Cageless: 60 Calendar Days (Ordinary) 90 Calendar Days (Extraordinary)
C-3 Percent Due Dates Missed	Adopt with the following changes: Level of Disaggregation: Caged/Cageless shall be added Benchmark: 95% on time

2. Additional CLEC Proposed SQM

The CLEC Coalition argues that BellSouth's SQM are inadequate and do not meet the needs of CLECs and the Commission to evaluate the local market. The CLEC Coalition states that the BellSouth plan lacks many key measures and has proposed that thirty-nine additional performance measurements be added to BellSouth's SQM. Emch Dir. Ex. 1; Emch Rebuttal Ex. 4.

The CLEC Coalition states that a comparison of the measures included in the Texas and New York plans approved by the FCC demonstrates the inadequacies of the measures currently provided by BellSouth. More than 70% of the New York measures are missing from the BellSouth SQM. Emch Dir. Ex. 2. Similarly, 48 of the measures in the Texas plan are not included in BellSouth's SQM. Emch Dir. Ex. 3. The deficiencies in BellSouth's proposal include: Loop hot cuts; software issues; xDSL pre-ordering; ordering and provisioning; change management; data base accuracy and timely updates; order status completeness; and, billing completeness. Emch Rebuttal 3. The CLEC Coalition argues these are significant shortcomings, not minor issues, as BellSouth has contended.

The Commission agrees that some, but not all, of the CLEC Coalition's proposed additional SQM should be adopted. After considering the CLEC Coalition's additional proposed SQM and the testimony and arguments presented in this matter, the Commission hereby approves the use of the following additional measures as set forth below in Table 2.

TABLE 2

CLEC SQM PROPOSALS	COMMISSION DETERMINATION
Average Response time for LMU information (MANUAL)	A) Disaggregation: ADSL, HDSL, Other DSL and Line Sharing. B) LMU Information: BST shall deliver all the information it has on the makeup of the loop. This list may be updated pending the outcome of Docket 11900-U C) Benchmark 95% in 3 business days
Average Response time for LMU information (ELECTRONIC)-EDI, TAG, LENS & RoboTAG.	A) Disaggregation: ADSL, HDSL, Other DSL and Line Sharing. B) LMU Information: BST shall deliver all the information it has on the makeup of the loop. This list may be updated pending the outcome of Docket 11900-U. C) Benchmark

	90% within 5 minutes. 6 months – 95% within 1 minute.
Acknowledgment Timeliness (ELECTRONIC)	A) Functional Acknowledgment Response Interval Definition: The correct start time is the receipt time of the LSR at BellSouth's side of the interface (gateway). The end time is when the acknowledgment is transmitted by BellSouth at BellSouth's side of the interface (gateway). B) Exclusions: none C) Benchmark: 6 Months EDI- 90% within 30 minutes. 95% within 30 minutes. TAG- 95% within 30 minutes.
Acknowledgment Completeness (Fully Mechanized, Partially Mechanized and Total Mechanized)	A) Percent of Functional Acknowledgments Returned. Definition: This measurement provides the percent of LSRs received via EDI or TAG, which are acknowledged electronically. B) Exclusions: none C) Benchmark: 100% Returned
Firm Order Confirmation and Reject Response Completeness.	Adopt the CLEC SQM. Deletions: Business Rules: Everything after and including ILEC Results. Calculation –Multiple or Differing FOC/Reject Responses. Level of Disaggregation: Volume Benchmark: 95 % Returned
Timeliness of Response to Request for BST- to CLEC Trunks Mean Time to Provide Response % Within 7 days % Negative Responses	DO NOT ADOPT AT THIS TIME. Please provide the Commission with the BellSouth's detailed process for Trunk Augmentation.
Percent Completion/ Attempts without notice or with Less than 24 hours notice.	Adopt the CLEC SQM. Do not report by MSA. Benchmark: DIAGNOSTIC
Percent Service Loss for Early Cuts Percent Service Loss for Late Cuts	DO NOT ADOPT AT THIS TIME. ADOPT BST MEASURE P-6A. Coordinated Customer Conversion- Hot Cut Timelines % within Interval and Average Interval.
Percent Orders Canceled or Supplemented at the request of the ILEC.	DO NOT ADOPT AT THIS TIME.

Percent of Coordinated Cuts Not Working as Initially Provisioned.	DO NOT ADOPT AT THIS TIME. THIS INFORMATION WILL BE CAPTURED IN BST PROPOSED PROVISIONING TROUBLES WITHIN 7 DAYS OF HOT CUT COMPLETION.
Average Recovery Time for Coordinated Cuts	Adopt the CLEC SQM with the following deletions or additions: 1) Exclusion: add Cutovers where service disruptions are due to end-user or CLEC caused reasons. 2) Delete the business rule For ILEC Results. 3) Delete BST Aggregate 4) Delete MSA and Volume Category. 5) This measure is Diagnostic.
Mean Time to Restore a Customer to ILEC Percent of Customers Restored to ILEC	DO NOT ADOPT AT THIS TIME.
Cooperative Acceptance Testing (What percentage of xDSL Loops are tested)	Adopt the following measure: Title: % of cooperative testing attempts for xDSL lines to cooperative line tests requested. Definition: The loop will be considered cooperatively tested when the BellSouth tech places a call to the CLEC representative to initiate cooperative testing and jointly perform the test with the CLEC. Exclusions: a) xDSL lines requested for testing by the CLEC but the CLEC contact number is incorrect or the CLEC representative is not available or not ready for testing. b) xDSL lines of CLEC who do not request cooperative testing. Business Rules: When a BellSouth tech finishes delivering an xDSL Loop at the customer premise, he is to call a toll free number to the CLEC's testing center. The tech and the CLEC rep. at the center then test the line. As an example of the type of testing performed, the testing center may ask the tech to put a short on the line, so that the center can run a test to see if it can identify the short. Calculation: (Total number of successful xDSL cooperative test for xDSL lines where cooperative testing was requested)/ (Total number of xDSL line tests requested by the CLEC and scheduled in the reporting period. Report Structure: CLEC Aggregate CLEC Specific

	Specific as to the loop type Level of Disaggregation: Region State ADSL HDSL UCL Other DSL Benchmark: 95% of requested lines tested.
Percent Completion of Loop Modification/Conditioning on xDSL Loops.	DO NOT ADOPT AT THIS TIME. The time to perform loop modification/conditioning is included in the Order Completion interval for the xDSL Loops.
Percent Billing Errors Corrected in X Days	DO NOT ADOPT AT THIS TIME.
Usage Timeliness	DO NOT ADOPT AT THIS TIME.
Recurring and Non-recurring Charge Completeness	Adopt CLEC SQM BST has 90 days to put this measure into production.
Percent On-Time Mechanized Local Services Invoice Delivery.	DO NOT ADOPT AT THIS TIME.
Meantime To Notify CLEC of Network Outages	Adopt the CLEC SQM with the following deletions: Level of Disaggregation: Delete By Switch and Tandem. Retail Analog/ Benchmark: Parity by design.
Average Database Update Interval Percent Database Update Accuracy NXX and LRN(s) Loaded by LERG Effective Date	Adopt CLEC SQM
Notification of Interface Outages	Adopt CLEC SQM.
Timeliness of Change Management Notices Timeliness of Final Versions of Documents Associated w/ Change Average Delay Days for Notices Average Delay Days for Documentation	Adopt the BST SQM of Timeliness of Change Management Notice with Average Delay Days. 30 days after this order Change Management Team shall file with the Commission the interval to include in this measure.
% ILEC vs. CLEC Changes Made Accuracy of Change Notices Percent Software Certification Failures Software Problem Resolution Timeliness Software Problem Resolution Avg. Delay Days	DO NOT ADOPT AT THIS TIME.
Percent Response Commitments Met (On-Time)	DO NOT ADOPT AT THIS TIME.
Percentage of Request Processed within 30 Business Days (TX)	Adopt CLEC SQM with following change: Exclusions: Excludes weekends and holidays

Percentage of Quotes provided for Authorized BFR/Special requests Within X (10, 30, 60) days. (TX)	Adopt the CLEC SQM with the following changes. Exclusions: Requests that are subject to pending arbitration. Retail analog/Benchmark: Change calendar days to business days.

3. Performance Measurements Audit

BellSouth states that its proposed audit policy provides the Commission and the CLECs with adequate audit opportunities to ensure that the data used to measure performance is reliable. BellSouth's Audit Policy states as follows:

> If requested by a Public Service Commission or by a CLEC exercising contractual audit rights, BellSouth will agree to undergo a comprehensive audit of the aggregate level reports for both BellSouth and the CLEC(s) for each of the next five (5) years (2000-2005), to be conducted by an independent third party. The results of that audit will be made available to all parties subject to proper safeguards to protect proprietary information. This aggregate level audit includes the following specifications:
>
> 1. The cost shall be borne 50% by BellSouth and 50% by the CLEC or CLECs;
>
> 2. The independent third party auditor shall be selected with input from BellSouth, the PSC, if applicable, and the CLEC(s);
>
> 3. BellSouth, the PSC and the CLEC(s) shall jointly determine the scope of the audit."

BST Ex. 2, Appendix C. Moreover, BellSouth states that it provides the CLECs with the raw data underlying many of the SQMs as well as a user manual describing how to manipulate the data into reports. Coon, Tr. at 162. The CLECs can use this raw data to validate the results in the SQM reports posed every month on the BellSouth website. Id.

Sprint has requested an audit mechanism that would include "mini-audits" of individual measurements. See Lenihan Rebuttal, at 2-5. BellSouth argues that Sprint's proposal is unworkable and would place an unreasonable burden on BellSouth for little incremental gain over the value of BellSouth's proposed yearly audit.

The Commission adopts BellSouth's audit proposal with the following change: Revise "(2000-2005)" in the Audit Policy to read "(2001-2005)." The Commission does not adopt the

Sprint proposal.

B. Benchmarks and Retail Analogs.

Analogs and benchmarks are the measuring sticks of a good performance measurements plan. As described by CLEC Coalition witness Emch:

> A retail analog is service or function that BellSouth provides for itself, its customers or its affiliates that is analogous to a service or function that BellSouth provides to CLECs. When a BellSouth retail analog exits, BellSouth's performance for itself, its customers and its affiliates should be compared to its performance for CLECs to determine if BellSouth is meeting The Act's parity requirement. If no retail analog exists, BellSouth's performance must be gauged by a performance standard, also known as a benchmark.

Emch Dir. 24. The CLECs argue that benchmarks should be established based on a level of performance that will allow CLECs to compete, not simply on BellSouth's historical performance. Where BellSouth provides service to its affiliate that is superior to the service provided to its retail operations, the CLECs argue that comparisons should be made between performance for CLECs and performance for the BellSouth affiliate. The CLEC Coalition proposes the analogs and benchmarks set forth in Exhibit 7 to Ms. Emch's Rebuttal Testimony, as clarified for xDSL loops by Exhibit A to the CLEC Coalition's Brief.

BellSouth argues that the Commission should adopt the retail analogs and benchmarks set forth in BellSouth Exhibit 2 (DAC-2). BellSouth states that each analog and/or benchmark will provide the Commission with the information it needs to assess BellSouth's performance with respect to the CLEC community. BellSouth states that its current set of proposed analogs and benchmarks are based on collaborative work between BellSouth and the CLECs in the Louisiana performance measurement workshops, as well as on input from KPMG and the Commission and its Staff during the Georgia OSS testing and performance measurement audit. Coon, Tr. at 110. BellSouth states that, in large part, its proposed analogs and benchmarks mirror those established by the Commission in its July 5, 2000 Order in Docket No. 8354-U. BellSouth states, however, that there are certain analogs and benchmarks that the Commission should amend from the 8354-U Order. These analogs and benchmarks are as follows:

(1) Business and UNE Flow-Through;
(2) Average Response Time;
(3) Reject Interval (Electronic);
(4) Average Disconnect Timeliness Interval for LNP;
(5) Average Arrangement Time for Collocation Orders; and,
(6) FOC and Reject Intervals for Interconnection Trunks.

After considering the testimony and arguments presented in this matter, the Commission

hereby approves the benchmarks and retail analogs set forth below in Table 3. The Commission does not adopt the CLEC proposal that where BellSouth provides service to its affiliate that is superior to the service provided to its retail operations, comparisons should be made between performance for CLECs and performance for the BellSouth affiliate. If a CLEC believes that BellSouth is showing preference to its affiliate, however, the CLEC may file a complaint with the Commission. See, e.g., O.C.G.A. §§ 46-5-163(d) and 46-5-169(6).

TABLE 3

CATEGORY	MEASURES AND SUB-METRICS	BENCHMARK/ANALOG
PRE-ORDERING	**Percent Response Received within"X" Seconds (LENS & TAG)** Customer Service Record Due Date Availability Address Validation Product and Service Availability Telephone No. Availability	Parity
	Service Inquiry with Firm Order (Manual)	95% in 5 business days
	Loop Makeup Inquiry (Manual) ADSL HDSL UCL Other DSL Line Sharing	95% in 3 business days
	Loop Makeup Inquiry (Electronic: EDI, TAG and LENS) ADSL HDSL UCL Other DSL Line Sharing	90% in 5 minutes 6 months after going into production 95% in 1 minute
	OSS Interface Availability (All Systems)	99.5%
ORDERING	**Acknowledgment Timeliness (Electronic)**	EDI: 90% in 30 mins. TAG: 95% in 30 mins. **6 months** EDI: 95% in 30 mins.
	Acknowledgment Completeness (Fully Mechanized, Partially Mechanized & Total Mechanized	100% Returned
	Percent Flow Through Service Request Resale Residence Resale Business UNE LNP	 95% 90% 85% 85%
	Percent Rejected Service Request (Mechanized, Partially Mechanized & Non- Mechanized)	Diagnostic
	Reject Interval (Mechanized) Resale Residence Resale Business Resale Design Resale PBX Resale Centrex	97% within 1hour

CATEGORY	MEASURES AND SUB-METRICS	BENCHMARK/ANALOG
	Resale ISDN 2W Analog Loop Design 2W Analog Loop Non-Design 2W Analog Loop w/ INP Design 2W Analog Loop w/ INP Non- Design 2W Analog Loop w/ LNP Design 2W Analog Loop w/ LNP Non- Design UNE xDSL (ADSL, HDSL, UCL) Line Sharing INP Standalone LNP Standalone Switch Ports Loop + Port Combinations Local Transport UNE Other Non- Design UNE Other Design Local Interconnection Trunks	
	Reject Interval (Partially Mechanized) Resale Residence Resale Business Resale Design Resale PBX Resale Centrex Resale ISDN 2W Analog Loop Design 2W Analog Loop Non-Design 2W Analog Loop w/ INP Design 2W Analog Loop w/ INP Non- Design 2W Analog Loop w/ LNP Design 2W Analog Loop w/ LNP Non- Design UNE xDSL (ADSL, HDSL, UCL) Line Sharing INP Standalone LNP Standalone Switch Ports Loop + Port Combinations Local Transport UNE Other Non- Design UNE Other Design Local Interconnection Trunks	85% w/in 18 hours (3 months) 85% w/in 10 hours (6 months)
	Reject Interval (Non- Mechanized) **(Same as above)** Local Interconnection Trunks	85% within 24 hours 85% within 4 days
	Firm Order Confirmation Timeliness **Mechanized** **Partially Mechanized**	95% within 3 hours 85% w/in 18 hours (3 months)

CATEGORY	MEASURES AND SUB-METRICS	BENCHMARK/ANALOG
	Non-Mechanized Local Interconnection Trunks	85% w/in 10 hours (6 months) 85% within 36 hours 95% within 10 days
	Firm Order Confirmation and Reject Response Completeness	95% Returned
	Speed of Answer in Ordering Center	Parity with retail
PROVISIONING	Mean Held Order Interval Resale Residence Resale Business Resale Design Resale PBX Resale Centrex Resale ISDN 2W Analog Loop Design 2W Analog Loop Non-Design 2W Analog Loop w/ INP Design 2W Analog Loop w/ INP Non- Design 2W Analog Loop w/ LNP Design 2W Analog Loop w/ LNP Non- Design UNE Digital Loop < DS1 UNE Digital Loop >= DS1 UNE xDSL (ADSL, HDSL, UCL) UNE ISDN Line Sharing INP Standalone LNP Standalone Switch Ports Loop + Port Combinations UNE Combo Other Local Transport UNE Other Non-Design UNE Other Design Local Interconnection Trunks	 Parity with retail Residence Parity with retail Business Parity with retail Design Parity with retail PBX Parity with retail Centrex Parity with retail ISDN Retail Res. and Bus. Dispatch Retail Res. and Bus. (POTS)* Retail Res. and Bus. Dispatch Retail Res. and Bus. Dispatch Retail Res. and Bus. Dispatch Retail Res. and Bus. Dispatch Retail Digital Loop < DS1 Retail Digital Loop ≥ DS1 ADSL provided to retail Retail ISDN- BRI ADSL provide to retail Retail POTS Retail POTS Retail POTS Retail Res. and Bus. (POTS) Retail Res, Bus &Design (Dispatch) Retail DS1/DS3 Interoffice Retail Res. & Bus. Retail Design Parity with retail
	Percent Orders given Jeopardy Notice (Electronic) Resale Residence Resale Business Resale Design Resale PBX Resale Centrex Resale ISDN 2W Analog Loop Design 2W Analog Loop Non-Design 2W Analog Loop w/ INP Design	 Parity with retail Residence Parity with retail Business Parity with retail Design Parity with retail PBX Parity with retail Centrex Parity with retail ISDN Retail Res. and Bus. Dispatch Retail Res. and Bus. (POTS)* Retail Res. and Bus. Dispatch

CATEGORY	MEASURES AND SUB-METRICS	BENCHMARK/ANALOG
	2W Analog Loop w/ INP Non- Design	Retail Res. and Bus. Dispatch
	2W Analog Loop w/ LNP Design	Retail Res. and Bus. Dispatch
	2W Analog Loop w/ LNP Non- Design	Retail Res. and Bus. Dispatch
	UNE Digital Loop < DS1	Retail Digital Loop < DS1
	UNE Digital Loop >= DS1	Retail Digital Loop ≥ DS1
	UNE xDSL (ADSL, HDSL, UCL)	ADSL provided to retail
	UNE ISDN	Retail ISDN- BRI
	Line Sharing	ADSL provide to retail
	INP Standalone	Retail POTS
	LNP Standalone	Retail POTS
	Switch Ports	Retail POTS
	Loop + Port Combinations	Retail Residence and Business
	UNE Combo Other	Retail Res, Bus &Design (Dispatch)
	Local Transport	Retail DS1/DS3 Interoffice
	UNE Other Non-Design	Retail Res. & Bus.
	UNE Other Design	Retail Design
	Local Interconnection Trunks	Parity with retail
	Order Completion Interval	
	Resale Residence	Parity with retail Residence
	Resale Business	Parity with retail Business
	Resale Design	Parity with retail Design
	Resale PBX	Parity with retail PBX
	Resale Centrex	Parity with retail Centrex
	Resale ISDN	Parity with retail ISDN
	2W Analog Loop Design	Retail Res. and Bus. Dispatch
	2W Analog Loop Non-Design	Retail Res. and Bus. (POTS)*
	2W Analog Loop w/ INP Design	Retail Res. and Bus. Dispatch
	2W Analog Loop w/ INP Non- Design	Retail Res. and Bus. Dispatch
	2W Analog Loop w/ LNP Design	Retail Res. and Bus. Dispatch
	2W Analog Loop w/ LNP Non- Design	Retail Res. and Bus. Dispatch
	UNE Digital Loop < DS1	Retail Digital Loop < DS1
	UNE Digital Loop >= DS1	Retail Digital Loop ≥ DS1
	UNE xDSL (ADSL, HDSL, UCL)	7 bus days (w/o conditioning)
		14 bus days (w/conditioning)
	UNE ISDN	Retail ISDN- BRI
	Line Sharing	ADSL provide to retail
	INP Standalone	Retail POTS
	LNP Standalone	Retail POTS
	Switch Ports	Retail POTS
	Loop + Port Combinations	Retail Residence and Business
	UNE Combo Other	Retail Res, Bus &Design (Dispatch)
	Local Transport	Retail DS1/DS3 Interoffice
	UNE Other Non-Design	Retail Res. & Bus.
	UNE Other Design	Retail Design

CATEGORY	MEASURES AND SUB-METRICS	BENCHMARK/ANALOG
	Local Interconnection Trunks	Parity with retail
	Average Jeopardy Notice Interval (Electronic) Same Disaggregation as above.	95%>= 48 hours
	Percent Missed Installation Appointments **Average Completion Notice Interval (Electronic)** **% Provisioning Troubles within 30 days**	Same analog and benchmarks as Held Orders
	Total Service Order Cycle Time	Diagnostic
	Cooperative Acceptance Testing ADSL HDSL UCL Other DSL	95% of requested lines tested
MAINTENANCE & REPAIR	**Missed Repair Appointments** **Customer Trouble Report Rate** **Maintenance Average Duration** **% Repeat Troubles within 30 days** **Out of Service > 24 hours** Resale Residence Resale Business Resale Design Resale PBX Resale Centrex Resale ISDN LNP (Standalone) 2W Analog Loop Design 2W Analog Loop Non-Design UNE Switch Ports UNE Loop + Port Combo UNE Combo Other UNE xDSL (HDSL, ADSL & UCL) UNE ISDN UNE Line Sharing UNE Other Design UNE Other Non-Design Local Interconnection Trunks Local Transport	 Parity with retail Residence Parity with retail Business Parity with retail Design Parity with retail PBX Parity with retail Centrex Parity with retail ISDN Retail POTS Retail Res. and Bus. Dispatch Retail Res. and Bus. (POTS)* Retail POTS Retail Residence and Business Retail Res, Bus &Design (Dispatch) ADSL provided to retail Retail ISDN- BRI ADSL provide to retail Retail Res. & Bus. Retail Design Parity with retail Retail DS1/DS3 Interoffice
	OSS Response Interval TAFI (Front End) CRIS	 Parity with retail Parity by design

CATEGORY	MEASURES AND SUB-METRICS	BENCHMARK/ANALOG
	DLETH DLR LMOS LMOSupd LNP MARCH OSPCM Predictor SOCS	
	Average Answer time - Repair Center	Parity with retail
BILLING	**Invoice Accuracy** **Mean time to Deliver Invoices** **Usage Data Delivery Timeliness** **Usage Data Delivery Completeness** **Mean time to Deliver Usage**	Parity with retail
	Recurring and Non-Recurring Charge Completeness Resale UNE Interconnection	 Parity 90% 90%
OPERATOR SERVICES	**Average Speed to Answer**	Parity by design
	% Answered in "X" Seconds	Parity by design
DA	**Average Speed to Answer**	Parity by design
	% Answered in "X" Seconds	Parity by design
E911	**Timeliness** **Accuracy** **Mean Interval**	Parity by design
LNP	**Average Disconnect Timeliness**	95% within 15 minutes
CUSTOMER COORDINATED CONVERSIONS	**Coordinated Customer Conversions- UNE Loops w LNP** **Coordinated Customer Conversions- UNE Loops w/o LNP**	95% <= 15 minutes

***Exclude switch based orders. Separate for both (UNEs and Retail) orders that require only Central Office work from those that require fieldwork.**

C. Remedies and Enforcement Plan.

The development of an effective performance measurement plan does not end with the establishment of a set of comprehensive, adequately defined measures, benchmarks and analogs. It also includes an appropriate remedies plan to provide incentives for BellSouth to meet the established benchmarks and analogs. The FCC identified five key characteristics of an effective enforcement plan:

1. Potential liability that provides a meaningful and significant incentive to comply with the designated performance standards;
2. Clearly articulated, pre-determined measures and standards, which encompass a comprehensive range of carrier-to-carrier performance;
3. A reasonable structure that is designed to detect and sanction poor performance when it occurs;
4. A self-executing mechanism that does not leave the door open unreasonably to litigation and appeal; and,
5. Reasonable assurances that the reported data is accurate.

BA NY Order, ¶ 433.

A well-developed remedies plan serves several important purposes. First, it promotes the initial development of competition by providing further incentive for BellSouth to allow nondiscriminatory access to its network. The ability to offer customers at least the same level of service that they would receive from BellSouth is critical to CLEC efforts to attract and retain customers. Second, once competition develops, self-enforcing penalties help to guarantee that BellSouth will continue to provide CLEC customers with the same quality service it provides to its retail customers. Third, where BellSouth does provide discriminatory or non-parity service to CLEC customers, penalties are paid to CLECs to partially defray the additional costs attributable to inferior service provided by BellSouth. Fourth, uncovering discriminatory service may lead to the discovery of underlying problems in BellSouth's systems and/or procedures. Once such problems are identified, penalties provide the incentive for BellSouth to address them head-on rather than to simply implement quick, short term fixes. Fifth, rather than waiting for problems to be discovered, the prospect of remedies for discriminatory performance will provide an incentive for BellSouth to take proactive steps to avoid providing poor quality performance to CLECs. Finally, adverse consequences for discriminatory behavior will discourage backsliding once BellSouth has attained approval to enter the interLATA market.

The object of a self-executing remedies plan is to avoid coming to the Commission to resolve disputes about poor performance. Self-executing remedies remove the delays and expense of pursuing litigation. As the FCC stated, an effective enforcement plan shall "have a self-executing mechanism that does not leave the door open unreasonably to litigation and appeal." BA NY Order ¶ 433.

BellSouth argues that the Commission should adopt BellSouth's proposed penalty plan, BellSouth's Voluntary Self-Effectuating Enforcement Mechanism (VEESM) proposal. BellSouth states that VEESM is based on key outcome-oriented measurements contained in the BellSouth SQM as well as the corresponding analogs and benchmarks and that it meets all five of

the key characteristics expressed by the FCC. The VSEEM Plan establishes a three-tiered schedule for penalties for non-performance. The three tiers are as follows:

- Tier-1 enforcement mechanisms are triggered when BellSouth fails on any one of the Tier-1 VSEEM measurements for a particular month and are paid directly to the individual CLECs;

- Tier-2 enforcement mechanisms are triggered when BellSouth fails at the CLEC aggregate level on any one of the Tier-2 VSEEM measurements in a calendar quarter. These payments would be made directly to the State;

- Tier-3 enforcement mechanisms are triggered when BellSouth consistently fails at the CLEC aggregate level on any 5 of the 12 Tier-3 VSEEM measurements for 3 consecutive months in a calendar quarter. Under Tier-3, BellSouth will voluntarily discontinue marketing long distance service in Georgia until such time as BellSouth's performance improves.

Coon, Tr. at 114. Moreover, BellSouth states, VSEEM recognizes that not all metrics are created equal and that some are more important to end users than others by offering greater remedies for certain measurements, such as UNE Installation Intervals, than others, such as OSS Response Interval. Coon, Tr. at 123. Also, the multi-tiered structure of the plan is designed to incent BellSouth to continue to provide service parity by creating escalating penalties for continuing violations. Coon, Tr. at 123.

In contrast to BellSouth, the CLECs recommend that the Commission adopt a remedies plan with a two tiered structure that measures: (1) the quality of support delivered to each individual CLEC (Tier 1), and (2) the quality of support delivered to the CLEC industry as a whole (Tier 2). For Tier 1 violations, BellSouth would pay penalties directly to the affected CLEC as compensatory damages. For Tier 2 violations, BellSouth would make payment directly to a governmental agency, to protect the public interest, as regulatory fines. Bursh Dir. 8. The dollar value of the consequences for both Tier 1 and Tier 2 violations depend on the severity of the violation.

All measures proposed by CLECs in the performance measurement plan are included in the CLECs proposed remedies plan. The CLECs argue that if a measure is important enough to be included in the performance measurement plan, then the plan must provide the incentive for BellSouth to meet the applicable analog or benchmark by including the measure in the remedies plan. The CLECs recommend the use of the modified z score as the appropriate statistical methodology. Where there is no retail analog to the service provided to CLECs and a benchmark has been established, BellSouth either passes or fails. Bursh, Direct 9. In either case, the monetary consequences increase with the severity of the violation

The CLECs argue that increasing penalties as the severity of the violation increases is appropriate because the more severe the violation, the more disruption and inconvenience experienced by CLECs and their customers. In addition, increasing the consequences as severity increases will encourage BellSouth

to provide the best service possible even if BellSouth recognizes that it will not meet a certain measure within a given month. Under the CLECs' remedy plan, Tier 1 violations would be assessed on a monthly basis and penalties for noncompliant performance would be paid directly to the CLEC that received the degraded service. Bursh, Dirrct 9. The CLEC plan addresses chronic performance failures by increasing the monthly penalty payment to the rate assessed for severe violations ($25,000) beginning in the third month that a particular submeasure is violated. This additional payment would continue monthly until BellSouth complied with that measure. Id. at 11.

The CLECs state that payments for Tier 2 violations would be made to a state-designated fund. Bursh, Direct 12. Penalties for Tier 2 violations also would increase depending on severity, with parameters defined for those violations, which are market impacting, and those designated as market damaging or market constraining. In addition, a factor "n" would be applied as a multiplier to the basic penalty amount. The value of "n" would decrease as the CLEC market penetration increases. Id. at 13. Thus, the CLECs argue, the plan is devised to encourage BellSouth to open its market by reducing its exposure to penalties as it does so.

BellSouth states that the Commission should not adopt the CLECs' penalty plan because: Its Tier-1 remedies are unsubstantiated; it uses a per measure approach; it incorporates all of the CLECs' performance measures as opposed to a subset of key measures; it fails to incorporate a balancing critical value; it misuses the Z-statistic; it incorporates the wrong statistical test; and, it inappropriately bases BellSouth's liability on market share.

After considering the testimony and arguments presented in this matter, the Commission, using the provisions of the VSEEM plan as a starting point, hereby finds that the remedy plan shall be adopted with the following characteristic:

1. Truncated–Z Methodology using the balancing critical value.

BellSouth's VSEEM plan is based on a statistical methodology known as the "Truncated Z," a methodology invented by Dr. Colin Mallows of AT&T during a collaborative process in Louisiana. Mallows, Tr. at 950-51. The Truncated Z represents a significant enhancement to the LCUG version 1.0 modified Z methodology, the statistical methodology proposed by the CLECs. Mulrow, Tr. at 472. In general terms, the Truncated Z statistic is a summary of the results of many statistical comparisons made with like-to-like categories. These categories, or cells, are formed by sorting both CLEC transactions, and BellSouth retail analog transactions on such factors as service type, order type, time of month, and wire center. Mulrow, Tr. at 465. In each comparison cell, a "modified Z" type statistic is calculated. The form of the Z statistic may vary depending on the performance measure, but it should be distributed approximately as a standard normal "bell curve" with a mean zero and a standard deviation of one.

One of the keys of the Truncated Z methodology, which the CLECs' proposed methodology lacks, is the ability to balance Type I and Type II errors. A Type I error occurs when the statistical test decision rule indicates that BellSouth is favoring its own customers when it is not. A Type II error, on the other hand, occurs when the statistical test decision rule indicates BellSouth is not

favoring its own customers when in fact, it is. Mulrow, Tr. at 467. The concept of "balancing" is crucial because if the methodology balances, it will ensure that the two error probabilities are equal and neither the ILEC nor the CLEC is unfairly prejudiced. Mulrow, Tr. at 468. The formula to balance the critical values depends on the materiality factor of "delta," the number of BellSouth transactions, and the number of CLEC transactions. Id.

The Commission adopts the Truncated–Z Methodology using the balancing critical value.

2. Effect 45 days from issuance of order.

BellSouth maintains that remedies should only be adopted to prevent backsliding once BellSouth has entered the long distance market. Yet avoiding backsliding is only one of the purposes served by a remedies plan. By delaying adoption of a penalty plan until BellSouth enters the long distance market, the Commission would forego the opportunity to enable more rapid development of competition. At the hearing, many CLECs testified that they are currently experiencing problems with the quality of service they are receiving from BellSouth. These problems could make it more difficult for CLECs to attract and retain customers. An appropriate penalty plan will further encourage BellSouth to provide nondiscriminatory service during the critical early stages of competition, while providing some compensation to CLECs for the additional costs they incur when BellSouth's performance falls short. The Commission finds that the remedy plan shall go into effect 45 days from issuance of order. This time will allow BST to put statistical methods and the remedy plan into operation.

3. Delta.

The "delta" is a measure of the meaningful difference between BellSouth performance and CLEC performance. In other words, certain levels of differing performance may have statistical significance, but in terms of impact on the end user, be meaningless. See Varner, Tr. at 39. The delta takes into account this fact and ensures that a component of materiality is present in the statistical methodology. As explained by Mr. Varner, "the delta provides a way to determine whether a difference in performance measurements indicates that a difference in performance provided by BellSouth to itself and to a CLEC is material and should trigger the application of penalties." Varner, Tr. at 39. The FCC has recognized the need for a delta. In the *Bell Atlantic Order*, the FCC noted that random variation is inherent in the ILEC's process of providing interconnection and access to UNEs. Consequently, it is appropriate to determine whether or not such difference is material. Varner, Tr. at 39; Bell Atlantic Order, ¶ 59.

In its VSEEMs plan, BellSouth has proposed a delta of 1.0 to evaluate individual CLEC performance (Tier-1), and a delta value of 0.5 to evaluate CLEC aggregate results (Tier-2). Varner, Tr. at 40. The CLECs propose that this Commission adopt .25 as the parameter delta value. The CLECs state that this value is based on a judgment of an acceptable disparity in the number of CLEC customers and BellSouth customers receiving like quality service.

The Commission finds that the following delta values are appropriate and reasonable and shall be adopted for use in the plan: .50 for individual CLECs and .35 for CLEC Aggregate.

4. Absolute Cap.

The VSEEM Plan sets an automatic financial cap based on a percentage of BellSouth's net revenues in Georgia. Coon, Tr. at 115-16. The CLECs recommend a review threshold, or procedural cap, that only determines the point at which the ILEC is permitted to seek relief from additional penalties from the state commission. The CLECs argue that, even after reaching the review threshold, BellSouth should be required to continue Tier 1 payments to CLECs because Tier 1 payments are intended in part to compensate CLECs for the harm incurred due to BellSouth's poor performance. In addition, while the review process is ongoing, BellSouth should continue to make Tier 2 payments into an interest-bearing registry or escrow account. To escape penalties beyond the threshold, BellSouth would have the burden of showing during the review hearing that its performance for CLECs in the aggregate did not merit the remedies invoked.

The Commission finds that this plan shall have an absolute cap of 44% of BellSouth's net revenues, which equals approximately $340 million dollars.

5. Remedy Plan is subject to modification.

The Commission recognizes that the enforcement plan and the SQM are still largely untested and intends to closely monitor the effectiveness of the plan. Accordingly, the Commission reserves the right to modify the enforcement plan or SQMs at any time it deems necessary.

6. Tier II and III measures determined on a 3-month rolling basis.

Under BellSouth's proposal, Tier-2 enforcement mechanisms are triggered when BellSouth fails at the CLEC aggregate level on any one of the Tier-2 VSEEM measurements in a calendar quarter. Tier-3 enforcement mechanisms are triggered when BellSouth consistently fails at the CLEC aggregate level on any 5 of the BellSouth's 12 Tier-3 VSEEM measurements for 3 consecutive months in a calendar quarter.

The CLECs complain that VSEEM would permit a pattern of Tier 2 violations so long as they were timed so as not to occur within all three months of the same calendar quarter. Under BellSouth's proposal, for example, BellSouth could miss two months, be compliant for one month and avoid Tier 2 sanctions. Further, BellSouth could miss even four months in a row not in the same calendar quarter such as February, March, April and May and still not face Tier 2 sanctions.

To trigger Tier 3 consequences, BellSouth would need to violate the same five measures for an entire quarter. Coon Tr. 405. All five measures would need to be violated within the same quarter. Therefore, if BellSouth violated five measures in January, the same five measures in February and four of the same measures in March along with a different measure not violated in January and February, Tier 3 would not be invoked. Id. at 406. Further, BellSouth could violate the same five measures in February, March, April and May and Tier 3 would still not be invoked

because the violations did not continue through an entire calendar quarter

The Commission finds that Tier II and III measures should be determined on a 3-month rolling basis. For example, Tier-2 enforcement mechanisms shall be triggered when BellSouth fails at the CLEC aggregate level on any one of the Tier-2 VSEEM measurements for three consecutive months.

7. Tier III failures.

As discussed below, Tier III now contains 26 submetrics. When any 12 of the 26 experience failures for 3 consecutive months, Tier III is triggered. For a Tier III failure, BST may begin marketing long distance when all 12 of the 26 failed sub-metrics show favorable results for 3 consecutive months.

8. Approved Metrics.

The Commission approves the Metrics set forth below in each Tier of enforcement. The Performance Measures below represent the same SQMs, analogs/benchmarks approved in this Order.

ENFORCEMENT PLAN SUBMETRICS

TIER I AND TIER II SUBMETRICS

- Percent Response Received within "X" seconds
- Interface Availability (All Systems)**(Exclude from Tier I Metric)**
- Average Response Time for LMU Information (Non- Mechanized & Electronic)
- Percent Flow-Through Service Request (Electronic- Residence, Business, UNE and LNP)
- Reject Interval (Mechanized)
- FOC Timeliness (Mechanized, Partially Mechanized and Non-Mechanized)
- Acknowledgment Timeliness
- Acknowledgment Completeness
- FOC and Reject Completeness
- Order Completion Interval
  - Resale POTS
  - Resale Design
  - Loop + Port Combo
  - UNE Loops
  - UNE xDSL
  - UNE Line Sharing
  - Interconnection Trunks
- Percent Cooperative Testing for xDSL Loops

- Percent Missed Installation Appointments
  - Resale POTS
  - Resale Design
  - Loop + Port Combo
  - UNE Loops
  - UNE xDSL
  - UNE Line Sharing
  - Interconnection Trunks
- Percent Provisioning Troubles within 30 days
  (Same disaggregation as Order Completion Interval)
- Missed Repair Appointments
  (Same disaggregation as Order Completion Interval)
- Customer Trouble Report Rate
  (Same disaggregation as Order Completion Interval)
- Percent Troubles within 7 days of Hot Cut
- Coordinated Customer Conversion- Hot Cut Timeliness % within Interval and Average Interval
- Coordinated Customer Conversion
- Maintenance Average Duration
  (Same disaggregation as Order Completion Interval)
- Percent Repeat Troubles Within 30 Days
  (Same disaggregation as Order Completion Interval)
- LNP Disconnect Timeliness
- LNP Missed Installation Appointments
- Invoice Accuracy
- Mean Time to Deliver Invoices
- Usage Data Delivery Accuracy
- Trunk Group Performance
  - Aggregate
  - CLEC Specific
- Percent Missed Collocation Due Dates
- Timeliness of Change Management Notices and Documentation

TIER III SUBMETRICS

- Order Completion Interval
  - Resale POTS
  - Resale Design
  - Loop + Port Combo
  - UNE Loops
  - UNE xDSL

UNE Line Sharing
Interconnection Trunks

- Percent Missed Installation Appointments
  Resale POTS
  Resale Design
  Loop + Port Combo
  UNE Loops
  UNE xDSL
  UNE Line Sharing
  Interconnection Trunks
- Percent Missed Repair Appointments
  (Same disaggregation as Percent Missed Installation Appointments)
- Invoice Accuracy
- Mean Time to Deliver Invoices
- Trunk Group Performance-Aggregate
- Timeliness of Change Management Notice and Documentation
- Percent of Collocation Due Dates Missed

9. Late and incomplete reports.

In addition to Tier 1 and Tier 2 payments, the CLECs also propose that the Commission set consequences for certain problem activities related to the implementation of the performance measurements plan itself such as late performance reports. Since the performance plan is completely dependent on timely and reliable reporting, BST shall pay the following for late and incomplete reports:

Late performance reports - If performance reports are not available to a CLEC by the due day, BST should be liable for payments of $2,000 to the CLEC for every day past the due date of the reports posting on the web.

Incomplete or revised reports – If performance reports are incomplete, or if previously reported data are revised, then BST should be liable for payments of $400 to the effected CLEC for every day past the due date of the original reports posting on the web.

10. Market penetration adjustment.

BellSouth shall implement a market penetration adjustment for new and advanced services as follows:

1 In order to ensure parity and benchmark performance where CLECs order low volumes of advanced and nascent services, BST shall make additional payments to the Commission for deposit in the Georgia State Treasury when there are more than 10 and less than 100 observations for those measures

listed below on average statewide for a three-month period.

- Percent Missed Installation Appointments
  - UNE Loop+Port Combo
  - UNE xDSL
  - UNE Line Sharing
- Average Completion Interval
  - UNE Loop+Port Combo
  - UNE xDSL
  - UNE Line Sharing
- Missed Repair Appointments
  - UNE Loop+Port Combo
  - UNE xDSL
  - UNE Line Sharing
- Maintenance Average Duration
  - UNE Loop+Port Combo
  - UNE xDSL
  - UNE Line Sharing
- Average Response Time for Loop Make-Up Information
  - UNE Loop+Port Combo
  - UNE xDSL
  - UNE Line Sharing

2 The additional payments referenced in 1, above, shall be made if BST fails to provide parity for the above measurements as determined by the use of the Truncated Z-Test and the balancing critical value for 3 consecutive months.

3 If, for the three months that are utilized to calculate the rolling average, there were 100 observations or more on average for the sub-metric, then no additional voluntary payments under this market penetration adjustment provision will be made to Commission for deposit with the State Treasury. However, if during the same time frame there is an average of more than 10 but less than 100 observations for a sub metric on statewide basis, then BST shall calculate the additional payments to the Commission for deposit with the State Treasury by trebling the normal Tier II remedy and applying the method of calculating affected volumes ordered by the Commission.

4 Any payments made under this market penetration adjustment provision are subject to the Absolute Cap set by the Commission.

11. Corrective action plans.

If any measure fails twice in any 3 consecutive months in a calendar year, BST must perform a "root cause analysis" and file with the Commission a corrective action plan within 30 days after the failure. The Commission will recommend to the Change Control Committee the priority to be given to the corrective action plan.

12. Staff Review.

Staff shall conduct a 6-month review of the SQMs as follows:

1 8 months after the date of a Commission order and every 6 months thereafter, the Commission Staff shall conduct a review of the measurements, benchmarks and analogs applicable to the performance of BellSouth. This review shall be for the purpose of modifying the SQMs and applicable analogs and benchmarks as deemed necessary by the Commission.

2 BellSouth, the CLEC Coalition, and any other interested parties shall file any proposed revisions to the SQMs, benchmarks and analogues 1 month prior to the beginning of each review period.

3 BellSouth, the CLEC Coalition, and any other interested party shall be allowed to submit comments on proposed changes and to submit any proposed additions.

4 The Commission Staff shall prepare a recommendation as to appropriate action to be taken by the Commission, if any, in connection with the review and shall submit this recommendation to the Commission for formal review and adoption.

5 The Commission Staff shall be authorized to modify this schedule at any time with written notice to interested parties.

13. Payments to the State.

All payments to the state under the enforcement plan shall be paid to the Commission for deposit in the State Treasury as penalties under O.C.G.A. § 46-2-91.

14. Force majeure.

The Commission recognizes that BellSouth's performance data may be influenced by factors beyond its control. Accordingly, in the event of a force majeure, BellSouth may file a petition for an exception with the Commission seeking to have the monthly service quality results modified. BellSouth will also be allowed to file an expedited petition seeking immediate relief from a payment pursuant to the enforcement plan in the event of a force majeure. In any such petition, BellSouth shall have the burden of demonstrating that the performance standard was not met due to causes beyond BellSouth's control and which could not have been avoided by

exercise of due care. The filing of any such petition shall not stay any payments under the enforcement plan unless otherwise ordered by the Commission.

III. CONCLUSION AND ORDERING PARAGRAPHS

The Commission finds and concludes that the performance measurements, the benchmarks and retail analogs, and the enforcement mechanisms set forth above are reasonable and appropriate and should be adopted pursuant to Georgia's Telecommunications and Competition Development Act of 1995 and Sections 251 and 252 of the Telecommunications Act of 1996.

WHEREFORE IT IS ORDERED, that all findings, conclusions, statements, and directives made by the Commission and contained in the foregoing sections of this Order are hereby adopted as findings of fact, conclusions of law, statements of regulatory policy, and orders of this Commission.

ORDERED FURTHER, the performance measurements, the benchmarks and retail analogs, and the enforcement mechanisms set forth in the body of this Order are adopted and BellSouth shall submit such compliance filings as are necessary to reflect and implement the standards and mechanism established by this Order.

ORDERED FURTHER, that a motion for reconsideration, rehearing, or oral argument or any other motion shall not stay the effective date of this Order, unless otherwise ordered by the Commission.

ORDERED FURTHER, that jurisdiction over these matters is expressly retained for the purpose of entering such further Order or Orders as this Commission may deem just and proper.

The above by action of the Commission in Administrative Session on the 3rd day of October, 2000.

Helen O'Leary
Executive Secretary
01/12/01
Date

Bob Durden
Chairman
01/12/01
Date

Bradbury,J M (Jay) - LGA

From: jrwilliamson@att.com
Sent: Friday, June 30, 2000 12:53 PM
To: sr271lib@lga.att.com; bradbury@att.com
Subject: FW: Mechanization Project

-----Original Message-----
From: Mcallorum, K P (Kevin), NCAM
Sent: Monday, June 12, 2000 9:11 AM
To: Williamson, Jill R, NCAM
Subject: FW: Mechanization Project

-----Original Message-----
From: Beverly.Sheltonwilliams@bridge.bellsouth.com
[mailto:Beverly.Sheltonwilliams@bridge.bellsouth.com]
Sent: Friday, June 09, 2000 3:20 PM
To: Mcallorum, K P (Kevin), NCAM
Cc: Cheryl.Richardson@bridge.bellsouth.com
Subject: Mechanization Project

Kevin,

Please find attached a copy of the minutes from today's mechanization meeting.

If any changes or additions need to be made, please do so by cob on Tuesday, June 13.

Beverly

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BellSouth AT&T Account Team/AT&T Mechanization Meeting
June 9, 2000

Attendees:

Kevin McAllorum- AT&T
Cheryl Richardson – BellSouth – AT&T Account Tam
Beverly Shelton-Williams- BellSouth – AT&T Account Team

Today's meeting was designed to discuss the joint mechanization project between BellSouth's AT&T Account Team and AT&T. For the purpose of this project the sub-team will primarily focus on those components associated with the analysis, design, and validation phase.

Kevin will provide a copy of the updated project plan to the Account Team by close of business on Monday, June 12.

Beverly will provide a copy of the flow through matrix for Issue 9 to AT&T by close of business on Friday, June 16.

Bradbury,J M (Jay) - LGA

From: jrwilliamson@att.com
Sent: Friday, June 30, 2000 12:53 PM
To: sr271lib@lga.att.com; bradbury@att.com
Subject: FW:

> -----Original Message-----
> From: Mcallorum, K P (Kevin), NCAM
> Sent: Monday, June 12, 2000 10:51 AM
> To: Williamson, Jill R, NCAM
> Subject:
>
> <<FlowThrough Project.mpp>>
> Updated project plan.
>
> Kevin P McAllorum
> OSS Manager
> AT&T Local Service and Access Management
> (404)810-6923
> 1-800-258-0000 Pin # 2589095
> kmcallorum@att.com
>
>

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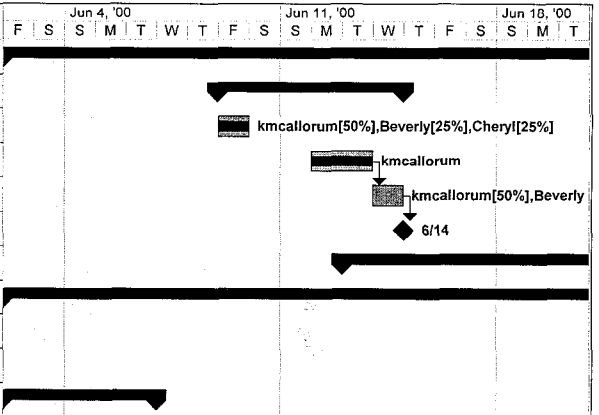
ID	Task Name	Duration
1	**Mechanization FlowThrough Project**	**42 days**
2	**Scope**	**4 days**
3	Determine project scope	1 day
4	Secure project sponsorship	2 days
5	Define preliminary resources	1 day
6	Scope complete	0 days
7	**Analysis**	**14 days**
18	**Design**	**23 days**
27	**Finalization/Validation**	**4 days**
32	**Deployment**	**22 days**
45	**Post Implementation Review**	**3 days**



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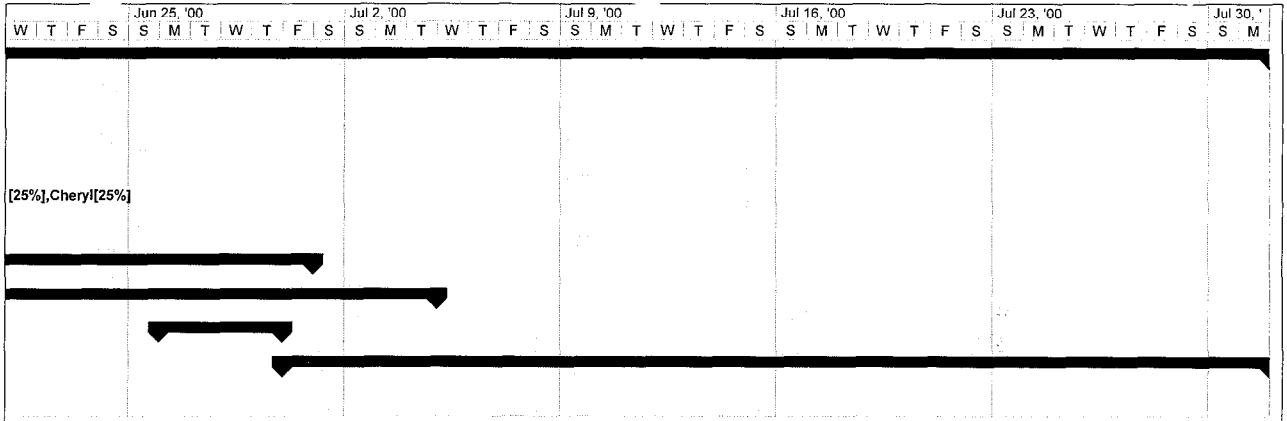
Project: Infrastructure Deployment
Date: Wed 12/13/00

Task	Summary	*Rolled Up Milestone	
Split	Project Summary	*Rolled Up Progress	
Progress	*Rolled Up Task	External Tasks	
Milestone	*Rolled Up Split	External Milestone	



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Project: Infrastructure Deployment
Date: Wed 12/13/00

Task		Summary		*Rolled Up Milestone	
Split		Project Summary		*Rolled Up Progress	
Progress		*Rolled Up Task		External Tasks	
Milestone		*Rolled Up Split		External Milestone	

Bradbury,J M (Jay) - LGA

From: jrwilliamson@att.com
Sent: Friday, June 30, 2000 12:57 PM
To: gpterry@att.com; edwardgibbs@att.com; crafton@att.com; sr271lib@lga.att.com; bradbury@att.com; eppsteiner@att.com; bettybarrett@att.com; mrule@att.com; ktimmons@att.com; grady@att.com; katherinegrabil@att.com; mlacy@att.com; bseigler@att.com; vctate@att.com
Subject: FW: Flow Through Matrix

Importance: High

REQAC9FT.PPT

All,

Attached is BellSouth's flow-through matrix for OSS'99 (Issue 9). We will use this document to begin facilitating the flow-through of additional order types with BellSouth. If you have any questions, please let us know.

Jill

-----Original Message-----
From: Beverly.Sheltonwilliams@bridge.bellsouth.com
[mailto:Beverly.Sheltonwilliams@bridge.bellsouth.com]
Sent: Friday, June 30, 2000 10:29 AM
To: Williamson, Jill R, NCAM; Mcallorum, K P (Kevin), NCAM
Subject: Flow Through Matrix
Importance: High

Jill and Kevin,

Please find attached a copy of the flow through matrix.

Beverly

Bradbury,J M (Jay) - LGA

From: jrwilliamson@att.com
Sent: Monday, August 02, 1999 12:42 PM
To: augier@att.com; bradbury@att.com; sr271lib@lga.att.com
Subject: FW: BST Mechanization Project

systems mechanization

As FYI

> ----------
> From: Williamson, Jill R, NCAM
> Sent: Monday, August 02, 1999 9:58 AM
> To: Seigler, Bernadette M, NLSOP; Lacy, Michael L, LSOP LSBM; Tweedle,
> Timothy E (Tim), NLSOP; Hill, James S (Jim), NCAM
> Subject: BST Mechanization Project
>
> I'm working with BellSouth to improve on the mechanization and flow
> through of orders and have developed a matrix to categorize orders. The
> attached sheet is my first draft and I'd like your input prior to my
> sharing it with BellSouth.
>
> I've attempted to capture all of the types of orders we send or will send
> to BellSouth post OSS'99. I'd like to get as detailed as possible, so any
> corrections or additions you can make would be helpful. I'd appreciate
> your feedback as soon as possible.
>
> Jill
> <<systems mechanization>>
>

AT&T BELLSOUTH MECHANIZATION PROJECT

	Fully Electronic	CLEC Electronic; BST Partially Mechanized	CLEC Manual; Could be Sent Electronically	CLEC Manual; Cannot be Sent Electronically
Directory Listing Orders				
New Directory Listing	1			
Change Main Listing	2			
Add Additional Listing	1			
Delete Additional Listing	1			
Delete Listing Account	1			
Delete and Add Additional Listing	1			
LNP Orders				
Port a block of 20 DID numbers		1		
Port </= 50 TNs				
Port > 50 TNs				
Full Migration of a BST Account		1		
Partial Migration of a BST Account	1			
LNP w/Directory Listing Orders				
Port a block of 20 DID numbers w/simple DL		1		
Port </= 50 TNs w/simple DL				
Port > 50 TNs w/simple DL				
Full Migration of a BST Account w/simple DL	1			
Partial Migration of a BST Account w/simple DL		1		
Port a block of 20 DID numbers w/complex DL				1
Port </= 50 TNs w/complex DL				1
Port > 50 TNs w/complex DL				1
Full Migration of a BST Account w/complex DL				1
Partial Migration of a BST Account w/complex DL				1
INP Orders				
Port a block of 20 DID numbers				
Port </= 50 TNs				
Port > 50 TNs				
Full Migration of a BST Account				
Partial Migration of a BST Account				
Loop Orders				
<= 14 SL1 Loops				
> 14 SL1 Loops				
<= 14 SL2 Loops				
>14 SL2 Loops				
<= 14 DS0 Loops				
>14 DS0 Loops				
<= 14 DS1 Loops				
>14 DS1 Loops				
<= 14 ISDN BRI Loops				
>14 ISDN BRI Loops				

AT&T BELLSOUTH MECHANIZATION PROJECT

	Fully Electronic	CLEC Electronic; BST Partially Mechanized	CLEC Manual; Could be Sent Electronically	CLEC Manual; Cannot be Sent Electronically
Loop Orders with LNP				
<= 14 SL1 Loops w/LNP				
> 14 SL1 Loops w/LNP				
<= 14 SL2 Loops w/LNP				
>14 SL2 Loops w/LNP				
<= 14 DS0 Loops w/LNP				
>14 DS0 Loops w/LNP				
<= 14 DS1 Loops w/LNP				
>14 DS1 Loops w/LNP				
<= 14 ISDN BRI Loops w/LNP				
>14 ISDN BRI Loops w/LNP				

Loop Orders with LNP and Directory Listings				
<= 14 SL1 Loops w/LNP and simple DL				
> 14 SL1 Loops w/LNP and simple DL				
<= 14 SL2 Loops w/LNP and simple DL				
>14 SL2 Loops w/LNP and simple DL				
<= 14 DS0 Loops w/LNP and simple DL				
>14 DS0 Loops w/LNP and simple DL				
<= 14 DS1 Loops w/LNP and simple DL				
>14 DS1 Loops w/LNP and simple DL				
<= 14 ISDN BRI Loops w/LNP and simple DL				
>14 ISDN BRI Loops w/LNP and simple DL				
<= 14 SL1 Loops w/LNP and complex DL				
> 14 SL1 Loops w/LNP and complex DL				
<= 14 SL2 Loops w/LNP and complex DL				
>14 SL2 Loops w/LNP and complex DL				
<= 14 DS0 Loops w/LNP and complex DL				
>14 DS0 Loops w/LNP and complex DL				
<= 14 DS1 Loops w/LNP and complex DL				
>14 DS1 Loops w/LNP and complex DL				
<= 14 ISDN BRI Loops w/LNP and complex DL				
>14 ISDN BRI Loops w/LNP and complex DL				

Other				
RPON'd Orders		2+		
LNP Port from <=4 non-complex BST accounts to one AT&T account		1		
LNP Port from >4 non-complex BST accounts to one AT&T account		2+		
LNP Port from >1 complex BST account to one AT&T account		2+		
INP Port from many BST accounts to one AT&T account		2+		

Louisiana Public Service Commission
Docket U-22252 Sub-Docket C
Exhibit B

BellSouth Flow-through Analysis for CLECs

Please define the following terms:

Complex Order: An order for a complex service.

Complex service: Any service which requires manual handling, such as negotiations with the customer, and manual service order generation.

Designed Service: Requires special engineering and provisioning, and may be served by more than one Central Office or Wire Center.

Non-Designed Service: Doesn't require special provisioning, and is served by one Central Office or Wire Center.

Hand-off package: The package of material and information which BellSouth account teams gather on a complex service which describes the customer's requirements and specifications of the service ordered.

Service Inquiry: The request from a customer (including CLECs) to inquire about ordering a complex service.

Project: An order for either a complex service or a large number of UNEs, for example, which requires coodination to ensure that related services are worked simultaneously or in the proper sequence to fulfill the order.

"Project Managed": The act of handling a project.

What specific activities does the LCSC perform for an error-free complex service ordered electronically which falls out for manual processing? *Response*: *The LCSC manually generates the service order into DOE or SONGS.*
Please provide a detailed flow-chart, including details of Account Team involvement in the process after the LSR has been electronically submitted. Please provide copies of any associated forms the LCSC must complete, and copies of LCSC instructions or methods and procedures. *LCSC methods and procedures are intellectual property and cannot be viewed by CLECs.*

In its January performance results, BellSouth reported that 5,720 (11% of total LENS LSRs) LSRS fell out of LENS for manual processing, and 3,022 (15% of total EDI LSRs) LSRs fell out of EDI for manual processing. Please provide a quantified breakdown of the reasons for fall out, i.e. the number of each type of service ordered which caused fallout, the number of various order or quantity types that caused fall-out, etc. Please provide this information by interface type. *See the matrix, which also requests this information.*

The following table addresses services and whether orders for those services will flow-through, and if not, why not. Are there other reasons other than types of services ordered that will cause

an error-free order not to flow through, e g quantity, partial migrations, etc ? If so, please provide all such reasons *See the matrix*

Note· Please add any services provided as resale or UNEs to CLECs but omitted from the following matrix.

Response Please see attached flow-through explanation and flow chart

BellSouth Flow-through Analysis
For CLECS LSRs placed via EDI or TAG

	BellSouth Service Offered to CLEC via resale or UNE	Flow-through if no BST or CLEC Errors (Yes/No)	Complex Service (Yes/No)	Complex Order (Yes/No)	Design Service (Yes/No)	Can ordering this service cause fall out for a reason other than errors or complex? If so, what reason?
1	Flat Rate/Residence	Yes	No	No	no	
2	Flat Rate/Business	Yes	No	No	no	
3	Pay Phone Provider	No	No	No	no	
4	Measured Rate/Res.	Yes	No	No	no	
5	Measured Rate/Bus.	Yes	No	No	no	
6	Area Plus	Yes	No	No	no	
7	Package/Complete Choice and area plus	Yes	No	No	no	
8	Optional Calling Plan	Yes	No	No	no	
9	Ga. Community Calling	Yes	No	No	no	
10	Call Waiting Deluxe	Yes	No	No	no	
11	Call Waiting	Yes	No	No	no	
12	Caller ID	Yes	No	No	no	
13	Speed Calling	Yes	No	No	no	
14	3 Way Calling	Yes	No	No	no	
15	Call Forwarding-Variable	Yes	No	No	no	
16	Remote Access to CF	Yes	No	No	no	
17	Enhanced Caller ID	Yes	No	No	no	
18	Memory Call	Yes	No	No	no	
19	Memory Call Ans. Svc.	Yes	No	No	no	
20	MTS	Yes	No	No	no	
21	RCF	Yes	No	No	no	
22	Ringmaster	Yes	No	No	no	
23	Call Tracing	Yes	No	No	no	
24	Call Block	Yes	No	No	no	
25	Repeat Dialing	Yes	No	No	no	
26	Call Selector	Yes	No	No	no	
27	Call Return	Yes	No	No	no	
28	Preferred Call Forward	Yes	No	No	no	
29	Touchtone	Yes	No	No	no	
30	Visual Director	Yes	No	No	no	
31	INP (all types?)	Yes	UNE	No	no	
32	Unbundled Loop-Analog 2W, SL1, SL2	Yes	UNE	No	Yes-designed, no-non-designed	
33	2 wire analog port	Yes	UNE	No	no	
34	Local Number Portability (always?)	Yes	UNE	No	no	
35	Accupulse	No	Yes	Yes	yes	See note at bottom of matrix.
36	Basic Rate ISDN	Yes	Yes	Yes	yes	
37	DID	No*	Yes	Yes	Yes	* yes with OSS'99 – 9/99
38	Frame Relay	No	Yes	Yes	yes	
39	Megalink	No	Yes	Yes	yes	
40	Megalink-T1	No	Yes	Yes	yes	

	BellSouth Service Offered to CLEC via resale or UNE	Flow-through if no BST or CLEC Errors (Yes/No)	Complex Service (Yes/No)	Complex Order (Yes/No)	Design Service (Yes/No)	Can ordering this service cause fall out for a reason other than errors or complex? If so, what reason?
41	Native Mode LAN Interconnection (NMLI)	No	Yes	Yes	yes	
42	Pathlink Primary Rate ISDN	No	Yes	Yes	yes	
43	Synchronet	Yes	Yes	Yes	yes	
44	PBX Trunks	Yes	Yes	Yes	Yes	
45	LightGate	No	Yes	Yes	yes	
46	Smartpath	No	Yes	Yes	yes	
47	Hunting	Yes	Yes	no	no	
48	CENTREX	No	Yes	Yes	no	
49	FLEXSERV	No	Yes	Yes	yes	
50	Multiserv	No	Yes	Yes	yes	
51	Off-Prem Stations	No	Yes	Yes	yes	
52	SmartRING	No	Yes	Yes	yes	
53	FX	No	Yes	Yes	yes	
54	Tie Lines	No	Yes	Yes	Yes	
55	WATS	No	Yes	Yes	yes	
56	4 wire analog voice grade loop	No	UNE	Yes	yes-designed, no-non-designed	
57	4 wire DS1 & PRI digital loop	No	UNE	Yes	yes	
58	2 wire ISDN digital loop	No	UNE	Yes	yes	
59	4 wire DS1 & PRI digital loop	No	UNE	Yes	yes	
60	ADSL	No*	UNE	Yes	yes	* yes as of OSS'99?
61	HDSL	No	UNE	Yes	yes	
62	2 wire analog DID trunk port	No	UNE	Yes	Yes	
63	2 wire ISDN digital line side port	No	UNE	Yes	yes	
64	4 wire ISDN DS1 digital trunk ports	No	UNE	Yes	yes	
65	UNE Combinations	y-loop+port	UNE	Yes	yes	
66	Directory Listings (simple)	No*	UNE	Yes	no	* yes as of OSS'99
67	Directory Listings (complex)	No*	UNE	yes	no	* yes as of OSS'99, captions and indentions
68	ESSX	No	Yes	Yes	no	

Note for last column: For all services that indicate 'No' for flow-through, the following reasons, in addition to errors or complex services, also prompt manual handling: expedites from CLECs, special pricing plans, for denials – restore and conversion or disconnect and conversion both required, partial migrations (although conversions-as-is flow through), class of service invalid in certain states with some TOS – e.g. gov't, or cannot be changed when changing main TN on C activity, low volume – e.g. activity type T=move, pending order review required, more than 25 business lines, restore or suspend for UNE combos, transfer of calls option for CLEC end user – fixed with release 6.0, new TN not yet posted to BOCRIS. All but the last one are unique to the CLEC environment.

BellSouth Retail Flow-Through

Please define the following terms:

(See previous page – all the same definitions.)
Complex Order:

Complex service:

Designed Service:

Non-Designed Service:

Hand-off package:

Service Inquiry:

Project:

"Project Managed":

In its January performance results, BellSouth reported that 4.90% of its retail residence orders did not flow through, and that 21.24% of its retail business orders did not flow through. Please explain at what point in the process the orders failed to flow-through. *Response: The business retail flow-through is actually zero. This is due to the fact that all service orders entered into DOE or SONGS have to be manually generated by the service representatives. BellSouth has been incorrectly reporting its business retail flow-through, and will begin reporting it correctly as zero as of the March flow-through report. For residence, SOCS errors, other order errors, or orders that require manual handling such as inaccurate CSRs or low volume services cause fallout from flow-through.*

Please provide a quantified breakdown of the reasons for fall out, i.e. the number of each type of service ordered which caused fallout, the number of various order or quantity types that caused fall-out, etc. If BellSouth orders fall out for manual processing for different reasons than CLECs, please indicate. *Please see the matrix.*

What specific activities do the BellSouth retail order centers perform in order to successfully submit into SOCS an error-free BellSouth order that initially failed to flow-through? Please provide copies of any associated forms the retail centers must complete, and copies of instructions or methods and procedures. *Retail business office methods and procedures are intellectual property and therefore cannot be viewed by CLECs.*

The following table addresses services and whether orders for those services will flow-through, and if not, why not. Are there other reasons other than types of services ordered that will cause an error-free order not to flow through, e.g. quantity, partial migrations, etc.? If so, please provide all such reasons.

Louisiana Public Service Commission
Docket U-22252 Sub-Docket C
Exhibit B

BellSouth Flow-through

	BellSouth Services Offered to Retail Customers	Flowthrough if no BST Errors (Yes/No)	Complex Service (Yes/No)	Complex Order (Yes/No)	Design Service Yes/No	Can ordering this service cause "fall out" for a reason other than errors or complex? If so, what reason?	Order input into RNS/DOE/ SONGS? Yes/No	If order requires manual handling, please indicate if manual handling occurs prior to input into RNS/DOE/SONGS or after input into RNS/DOE/SONGS
1	Flat Rate/Residence	Yes	No	No	no		yes	
2	Flat Rate/Business	No	No	No	No	All business orders are manually service order generated.	Yes	Man. During DOE/SONGS
3	Pay Phone Provider	No	No	No	No	"	yes	
4	Measured Rate/Res.	Yes	No	No	no		yes	
5	Measured Rate/Bus.	No	No	no	No	"	yes	Man. during DOE/SONGS
6	Area Plus	Yes	No	No	no		Yes	
7	Package/Complete Choice and area plus	Yes	No	No	no		Yes	
8	Optional Calling Plan	Yes	No	No	no		Yes	
9	Ga. Community Calling	Yes	No	No	no		Yes	
10	Call Waiting Deluxe	Yes	No	No	no		Yes	
11	Call Waiting	Yes	No	No	no		Yes	
12	Caller ID	Yes	No	No	no		Yes	
13	Speed Calling	Yes	No	No	no		Yes	
14	3 Way Calling	Yes	No	No	no		Yes	
15	Call Forwarding-Variable	Yes	No	No	no		Yes	
16	Remote Access to CF	Yes	No	No	no		Yes	
17	Enhanced Caller ID	Yes	No	No	no		Yes	
18	Memory Call	Yes	No	No	no		Yes	
19	Memory Call Ans. Svc.	Yes	No	No	no		Yes	
20	MTS	Yes	No	No	no		Yes	
21	RCF	Yes	No	No	no		Yes	
23	Call Tracing	Yes	No	No	no		Yes	
22	Ringmaster	Yes	No	No	no		Yes	

Louisiana Public Service Commission
Docket U-22252 Sub-Docket C
Exhibit B

	BellSouth Services Offered to Retail Customers	Flowthrough If no BST Errors (Yes/No)	Complex Service (Yes/No)	Complex Order (Yes/No)	Design Service Yes/No	Can ordering this service cause "fall out" for a reason other than error or complex? If so, what reason?	Order input into BNS/DOE/ SONGS? Yes/No	If order requires manual handling, please indicate if manual handling occurs prior to input into BNS/DOE/SONGS or after input into BNS/DOE/SONGS
24	Call Block	Yes	No	No	no		Yes	
25	Repeat Dialing	Yes	No	No	no		Yes	
26	Call Selector	Yes	No	No	no		Yes	
27	Call Return	Yes	No	No	no		Yes	
28	Preferred Call Forward	Yes	No	No	no		Yes	
29	Touchtone	Yes	No	No	no		Yes	
30	Visual Distinctive	Yes	No	No	no		Yes	
31	Local Number Portability (already?)	No?	No	No	no		Yes	
32	Acceptable	No	Yes	Yes	yes	All business orders are manually service order generated.	Yes	Man. during DOE/SONGS
33	Basic Rate ISDN	No	Yes	Yes	yes	"	Yes	"
34	DID	No	Yes	Yes	yes	"	Yes	"
35	Frame Relay	No	Yes	Yes	yes	"	Yes	"
36	Megalink	No	Yes	Yes	yes	"	Yes	"
37	Megalink-TI	No	Yes	Yes	yes	"	Yes	"
38	Native Mode LAN Interconnection (NMLI)	No	Yes	Yes	yes	"	Yes	"
39	Portlink Primary Rate ISDN	No	Yes	Yes	yes	"	Yes	"
40	Synchronet	No	Yes	Yes	yes	"	Yes	"
41	PBX Trunks	No	Yes	Yes	yes*	* o equally yes; no if loop test trunks	Yes	"
42	LightGate	No	Yes	Yes	yes	"	Yes	"
43	SmartPath	No	Yes	Yes	yes	"	Yes	"
44	Hunting	Yes*	No	No	no	* for RNS only **no for large business	Yes	"
45	CENTREX	No	Yes	Yes	no	"	Yes	"
46	FLEXSERV	No	Yes	Yes	no	"	Yes	"
47	Multisery	No	Yes	Yes	no	"	Yes	"

Louisiana Public Service Commission
Docket U-22252 Sub-Docket C
Exhibit B

48	Off-Prem Stations	No	Yes	Yes	yes	"	Yes	"
	BellSouth Services Offered to Retail Customers	Flowthrough if no BST Errors (Yes/No)	Complex Service (Yes/No)	Complex Order (Yes/No)	Design Service Yes/No	Can ordering this service cause "fall out" for a reason other than errors or complex? If so, what reason?	Order input into RNS/DOE/SONGS? Yes/No	If order requires manual handling, please indicate if manual handling occurs prior to input into RNS/DOE/SONGS or after input into RNS/DOE/SONGS
49	SmartRING	No	Yes	Yes	yes	All business orders are manually service order generated.	Yes	Man. during DOE/SONGS
50	FX	No	Yes	Yes	yes	"	Yes	"
51	Tie Lines	No	Yes	Yes	yes	"	Yes	"
52	WATS	No	Yes	Yes	yes	"	Yes	"
53	Directory Listings (simple)	Yes	Yes	Yes	no		Yes	
54	Directory Listings (complex)	No	Yes	Yes	no	"	Yes	"
55	ESSX	No	Yes	Yes	no	"	Y+EOMS	

Note: Please add any services provided by BST at retail but omitted from the following matrix.

ADSL	no	yes	yes	yes	All business orders are manually service order generated.	yes	"
Broadband ATM svc.	No	yes	yes	yes	"	yes	"
Adv. Telecomm. Svc.	No	yes	yes	yes	"	yes	"
Connectionless Data	no	yes	yes	yes	"	yes	"
Managed Netw. Svcs.	No	yes	yes	yes	"	yes	"
- LAN monitoring							
- Electr. Commerce							
CrisisLink	no	yes	yes	yes	"	yes	"
Video conferencing	no	yes	yes	yes	"	yes	"
Fax messaging	no	yes	yes	yes	"	yes	"
Zipconnect	no	yes	yes	yes	"	yes	"
Back-up Line	no	yes/no	yes/no	yes/no	"depending on if the service backed up is a complex or designed service		yes

Note: for BST residence orders, other causes of fallout include manual handling for CSR inaccuracies and low volume services.

PLACE: Dobbs Building, Raleigh, North Carolina

DATE: August 2, 2000

TIME IN SESSION: 9:00 a.m. - 1:05 p.m.

BEFORE: Chair Jo Anne Sanford, Presiding
Commissioner Ralph A. Hunt
Commissioner Judy Hunt
Commissioner William R. Pittman
Commissioner J. Richard Conder
Commissioner Robert V. Owens, Jr.
Commissioner Sam J. Ervin, IV

IN THE MATTER OF:
Docket Number P-140, Sub 73
and Docket Number P-646, Sub 7.

AT&T Communications and TCG of the Carolina's
Arbitration with BellSouth Telecommunications.

VOLUME 4

A P P E A R A N C E S:

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Docket No. 2000-465
JMB-R22
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APPEARANCES CONTINUED

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FOR THE USING AND CONSUMING PUBLIC:

Lucy E. Edmondson, Staff Attorney
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Post Office Box 29520
Raleigh, North Carolina 27626-0520

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didn't make assumptions, you actually had the actual data, it's a different result. He doesn't have full knowledge of this information.

Q. And the significance of that different result is what?

A. Is I see no significance in Mr. Bradbury's analysis.

Q. I guess I don't understand why you took the time to debunk it then.

A. Because Mr. Bradbury took the time to put it in his deposition or -- excuse me, not his deposition, his testimony, and I had to respond to it.

Q. I'd like to direct your attention to, I guess, a customer service assistant sitting in front of the ROS interface.

A. Okay. Excuse me one second. I'm going to try to get myself a little organized up here. Let me straighten up the desk here.

Q. Sure, take all the time you need. I'll do the same.

A. Thank you. I'm ready.

Q. Can you -- while the customer service assistant is sitting in front of ROS, can you tell me any service that that BellSouth representative can't type in

information and get an order out the other end, any service or element that they can't use ROS to enter information for?

A. I am not aware of any service element that they cannot type in in a sales service order SOCS acceptable format.

Q. Okay. And they can do that even for complex orders, correct?

A. Yes, just like DOE is utilized in the LCSC.

Q. That's assuming that all the appropriate manual work has been done, right?

A. Yes.

Q. And perhaps beating a dead horse here, if I'm the customer service rep, I'm sitting in front of ROS, I've entered in the information and the order comes out in SOCS, I have available to me other databases that have been populated by the one act of entering information, don't I?

A. Yes, you do, just like the CLECs do. They have access to the same databases.

Q. But they don't have it in their own databases like BellSouth does, do they?

A. No, they're responsible for their databases.

Q. So they would have to make an additional entry

BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION

In the Matter of:	:	
AT&T'S Petition for Arbitration of Rates, Terms and Conditions with BellSouth Telecommunications	:	Docket No. 11853-U

Hearing Room 507
47 Trinity Avenue
Atlanta, Georgia

Tuesday, October 31, 2000

The above-entitled matter came on for hearing pursuant to adjournment at 2:03 p.m.

BEFORE:

ROBERT DURDEN, Chairman
DAVID BURGESS, Vice Chairman
LAUREN "BUBBA" MCDONALD, Commissioner
ROBERT BAKER, Commissioner

* * *

APPEARANCES:

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PROCEEDINGS

CHAIRMAN DURDEN: This hearing of the Georgia Public Service Commission in Docket Number 11853-U will now come to order.

Cross examination of Mr. Talbott is proceeding.

VICE CHAIRMAN BURGESS: No, he's got to presented.

COMMISSIONER BAKER: He has to be sworn.

CHAIRMAN DURDEN: Oh, he's just now coming up?

MR. ROSS: Yes, sir.

CHAIRMAN DURDEN: Well, go ahead and call him then.

MR. ROSS: Just one housekeeping matter, Mr. Chairman. I believe BellSouth forgot to introduce into evidence BellSouth Exhibits 4 and 5 and we'd ask that that be done at this time.

CHAIRMAN DURDEN: Any objection?

(No response.)

CHAIRMAN DURDEN: Admitted without objection.

(The documents, heretofore marked as BellSouth Exhibits 4 and 5, were received in evidence.)

MR. LAMOUREUX: AT&T calls as its next witness Dave Talbott.

Whereupon,

DAVID TALBOTT

gateway interface. What AT&T really wants is entirely new non-industry standard machine-to-machine maintenance and repair interface. This simply isn't required. Through TAFI, BellSouth provides AT&T access to the same system used by BellSouth's own retail units. AT&T's representatives who use TAFI see the same screens, can perform the same functions and have absolutely nondiscriminatory access to BellSouth's maintenance and repair system.

What AT&T complains about is that it can't be integrated into AT&T's back office systems. That may well be true, but as the FCC has said in Texas and New York, that is not necessary as long as AT&T has the same access to BellSouth's maintenance and repair system as does BellSouth retail units. And it does.

If AT&T actually wants a machine-to-machine interface for maintenance and repair, it can ask for one, as long as it is willing to pay for the development of such a system, it can have one. Instead, AT&T is simply asking this Commission to provide AT&T with more than it is entitled to, and to provide the service at no cost to AT&T. If it can get away with that kind of approach, I suppose it makes good business sense. But in this case, parity doesn't require such a systems. If AT&T wants it, it should pay for it.

Thank you, this concludes my summary.

CROSS EXAMINATION

BY MS. RULE:

Q Good afternoon, Mr. Pate.

A Good afternoon.

Q I'm Marsha Rule and we've met before, haven't we, Mr. Pate?

A Yes.

Q I recognize that the hour is late, so I will endeavor not to keep y'all very long. I've got a couple of questions for you about change control, Mr. Pate --

A Certainly.

Q -- Issue 41. This Commission has actually been a leader in the region on the issue of change control, hasn't it?

A Yes, they have.

Q And, in fact, the original change management process was established by BellSouth in connection with this Commission's guidance, wasn't it?

A The Commission was very active back several years -- well not years, but months -- roll over years -- yes.

Q So you would agree, wouldn't you, that the Commission certainly has the expertise and the historic knowledge to review the current change control process to determine if it should be modified as AT&T requests?

A Well now, I don't know that I agree with that.

I'm not saying -- not the expertise in the Commission, by any means. While they've given some guidance from their understanding of what the need is, I think the expertise lies with BellSouth and the CLECs.

Q Have you reviewed Mr. Bradbury's rebuttal Exhibit Number 3 that shows all the changes to the change control process that AT&T is requesting?

A Yes, I have.

Q And do you understand that AT&T isn't asking BellSouth to adopt this exhibit, or asking the Commission to adopt the exhibit and write it in stone, but to adopt it as part of the ongoing change control process?

A I'm not quite sure that I understood it that way. The way I heard Mr. Bradbury state it was he wanted the Commission to order us to do these. To me, that's pretty much adopted in stone. I haven't heard, or did not pick out in his testimony where he was referring that this would just be a starting point.

Q Now you've described the change control process as collaborative, haven't you?

A Yes, I have.

Q And changes to BellSouth's business rules are supposed to go through the collaborative change control process, aren't they?

A That's as currently defined, yes.

Q Okay. Now BellSouth recently released some business rule changes that didn't go through the process, is that correct?

A Which ones are you referring to?

Q Issue 9-G of BellSouth's business rule changes.

A I think there were some that did not get the proper coverage, I would agree.

Q And some of those business rule changes required CLECs to do some coding on the CLEC side of the interface in order to continue passing orders, is that correct?

A I have not personally reviewed it but, subject to check, I'll accept that.

Q And are you aware that the CLECs have explained to BellSouth that they didn't have enough notice or time to do the coding that would be required?

A That's what I've heard, yes, that specific one that you're referring to.

Q And BellSouth released Issue 9-G of the changes in any event, didn't it?

A That's what happens -- to my understanding, that's correct. However, let me just clarify that this has been an evolving process, evolving from not just a standpoint of the documentation, but also evolving from BellSouth in developing its internal processes to support the process. So while what you say has happened in that case, there may

be other instances where we didn't follow it as well as it is currently documented today. It hasn't always been clearly documented that way. And our internal processes have been refined, and we are committed to the -- to the process.

Q What's the current version number of the change control process?

A 2.0.

Q When was that adopted as 2.0?

A August -- I think it -- I've forgot the exact date. August 23rd or something along that time frame.

Q And when was Issue 9-G of the business rule changes released?

A I'm not sure.

Q It was well after August, wasn't it?

A I'm not sure.

Q Now, if I understand your testimony, one of the reasons that you object to this Commission making a determination about AT&T's request for changes to the change control process is that only AT&T and BellSouth are involved in the docket, correct?

A Only in this docket as an arbitration, that's correct.

Q Okay. So you believe it would be more appropriate for this Commission to make these issues part of its ongoing

OSS docket?

A No, I really don't. What I thank would be more appropriate is for the Commission to send the guidance back to the body itself, a forum -- industry forum to work through these issues. And if they cannot actually resolve -- once you fine tune to those few issues that we just can't see eye to eye, there's a process built in there for internal escalation within BellSouth, and if that's not sufficient, then to take it in the form of an issue to the appropriate commission.

VICE CHAIRMAN BURGESS: Let me ask a question. One of the concerns -- I just have a general concern about making changes to the process documented in the arbitration cases. I read this document during the day, and one of the things that I noticed in the section regarding changes of processes, it doesn't include anything about arbitration being a vehicle to make changes or not make changes. So I guess in my mind, one of the concerns I would have is, if another party filed arbitration -- say the Commission adopted this agreement, there's nothing in this agreement that I see that would prohibit another party from seeking to arbitrate the same issue, saying we've got some problems with the process, the change management process, and coming back here and making those changes in the context of an arbitration case. I guess one of the questions is, if the

Commission were to adopt these changes, should there be some verbiage in this document that would provide one method to change of process is arbitration? I ask you that question, Mr. Pate, just hypothetically, if the Commission were to adopt this document, would it be necessary to include as a vehicle for prospective change future arbitrations?

THE WITNESS: Well that's absolutely the question, Commissioner. To me, from my personal view, arbitration is still not the appropriate forum, because arbitration really exists between BellSouth and one particular individual CLEC. And as much as CLECs work jointly in some areas, I don't think any of them are going to give proxy to another CLEC in arbitration to state their issues around something that impacts them all. However, nothing prevents them from joining in terms of trying to ask the Commission to give a general docket or a complaint, things of that nature, if they agree to whatever they're filing. And to me, that's what we're trying to say in the process, that you can take it to the Commission through a formal proceeding, not an arbitration proceeding. It could be a complaint filed or whatever if they have an issue in dispute we cannot resolve among ourselves.

BY MS. RULE:

Q Mr. Pate, do you agree that this Commission does have authority to order changes in the change control

process?

A This Commission has the authority to order anything that it thinks is appropriate. That's for this Commission to decide.

Q Turning to Issue 42. Do you understand that AT&T is asking in this case for the ability to submit electronic orders for all services and elements?

A Yes.

Q And you would agree, wouldn't you, that electronic ordering is cheaper and faster, generally speaking, than manual ordering?

A Generally speaking. There's only a couple exceptions. One would be where you just don't have the volume for that particular transaction. If you did one or two of something a year, it's not going to be cheaper to go through the process of the dollars associated with developing that code and maintaining that code. In that case, because there's so few, you probably really are cheaper to have someone manually do it.

Q Okay. So generally you agree with me with that exception?

A Yes.

Q And generally speaking again, electronic ordering and processing is less prone to error, isn't it?

A Yes and no. I mean, you're still prone to the

errors of entry, but then all the mechanization takes place after that and obviously it's less prone.

Q BellSouth has already gone ahead and automated some ordering and processing for CLECs, hasn't it?

A Yes, most definitely.

Q For example, CLECs can order residential POTS resale electronically and it will be processed electronically, correct?

A Yes. I mean, to state it clearly, 82 percent, based on last month's order volume, was submitted electronically -- BellSouth. Eighty-two percent of all the electronic -- excuse me, all the LSR submissions.

Q And most of those were for resale, weren't they?

A Certainly. I mean, that's your highest volume, in resale, certainly.

Q Now, if I understand your testimony correctly -- in your written testimony, you say that electronic processing of most other services -- for which electronic ordering and processing isn't available for CLECs right now. You're saying it's also not available to BellSouth, is that correct?

A I'm not quite following you. I apologize. Do you have a particular place to refer me or just restate the question for me.

Q Sure. Let's take a look at page 110 of your

testimony, beginning on line 3.

A 110, line 3?

Q There's a sentence that begins on line 3. It starts out because.

A Yes, I've read that.

Q Could you read that, please?

A Do you want me to read the sentence? I'm sorry.

Q Yes.

A Okay. The sentence that starts on line 3 of 110 of my testimony reads, "Because the same manual processes are in place for both CLEC and BellSouth retail orders, the processes are competitively neutral, which is exactly what both the Act and FCC require".

Q Okay. Now you also explain in your testimony that MultiServe is an example of a service that you say BellSouth has not automated for itself, correct?

A Yes.

Q And while you've got your testimony, could you turn to your Exhibits 15 and 16, please.

Commissioners, I have copies of those exhibits for you, so you don't have to flip through your documents.

CHAIRMAN DURDEN: Okay, fine.

BY MS. RULE:

Q Now Exhibit 15, which is not -- unfortunately is not indicated on this document, is labeled CLP, Complex

Services, Multiserve, correct?

A Yes.

Q And that means CLP, and that's a North Carolina designation for competitive local provider, correct?

A That's correct.

Q And the next document, which is your exhibit 16, is labeled BST Retail: Complex Services, MultiServe, correct?

A That's correct.

Q And in these two documents, you say that you compare the multiserve ordering process for BellSouth retail and for the CLECs, correct?

A Yes.

Q And we talked about these same documents in North Carolina, didn't we?

A Yes, we did.

Q Let's take a look at the diagram for BellSouth retail first. There's a notation at the bottom of the page that says shade indicates manual processing.

A Yes.

Q So all these boxes that are shaded means that there are manual steps involved and they are not electronic for BellSouth, correct?

A That's correct.

Q Over on the right-hand side of the page there are

two boxes that are unshaded. Could you tell me what the top of that two boxes represent?

A Are you referring to the box that reads CSA-order entry into ROS?

Q Yes, sir.

A ROS is the regional ordering system. That's the BellSouth system where we submit our service orders for our business transactions. The CSA is the customer service assistant that actually enters the order. Then you can see the line is indicating it's going to the service order communication systems, SOCS. That's where that order, once entered in the SOCS-compatible format, is transmitted there for further provisioning by the down-stream systems.

Q And those aren't shaded, so that means that's an electronic process on this schedule, correct?

A That means it's an electronic transmission of a SOCS-compatible formatted service order to SOCS.

Q Okay. Could you turn to Exhibit 15, the CLEC complex service order.

A I'm there.

Q Okay. And the two unshaded boxes are more in the middle of the page here. What do those indicate?

A The one in the middle, the first one, reads CSA - order entry into DOE. So there's still a customer service assistant entering into the direct order entry, which is the

system we used in the local carrier service center for entering the orders that are submitted to us that we get manually. You can see the line indicating to the same system, which is the common point, the service order communications system, SOCS, for once again, further downstream provisioning processing.

Q Okay. But in each case, it's a BellSouth customer service representative who is doing the ordering into the system, is that correct?

A That is correct. It's designed that way.

Q Okay. Now when the customer service representative enters the order into ROS on the BellSouth chart, it has an electronic record of the order, correct?

A I'm not quite clear what you mean by electronic record.

Q Well, I guess one way to put it would be that -- or to ask you whether the order entry into ROS by the BellSouth customer service representative creates any information in any other BellSouth back-end system.

A What it creates is a service order that's transmitted to the SOCS for further provisioning.

Q Well, let's say -- does it also update the customer service information records?

A That order itself that's created in ROS does not. That's part of the provisioning process.

Q Does the customer service representative have to enter it separately into the customer service information records, or is that record created as part of the same order/entry process?

A The information that you're updating into the customer service record is a result of the provisioning process. It is a result of when that order is submitted and when it's provisioned by the various further downstream systems when the order is actually completed. That gets it updated into the customer records information.

Q Well if you'll give me a moment, Mr. Pate, I'm going to look in to North Carolina transcript, because I believe you agreed with me that there was an order/entry -- one-time order/entry that updated some other data bases. So, I guess the question I would ask you is, have you changed your answer?

A No, I haven't changed any answer from North Carolina, so I'm obviously not hearing the question the same.

Q I'll let Mr. Bradbury look that up.

Okay, let's look at the CLP, complex services chart, again. Again, this is a BellSouth customer service representative entering information into DOE, correct?

A That's correct.

Q Does that electronic entry create any billing

record entries for the CLEC?

A It only creates the billing record when we bill the CLEC. The CLECs, if you're referring to how they bill they bill their customers, no that would be a part of their systems.

Q And the CLEC's customer service information records aren't updated either by the act of that order-entry, are they?

A Definitely not. That's not how it's designed nor a requirement that I'm aware of.

Q Okay. On the other hand, BellSouth gets to order -- or enter the order information once into the ROS system and that information is then accessible in other parts of BellSouth's back-end systems, isn't it?

A That information is actually placed in whatever appropriate systems is a result of that provisioning of BellSouth, if that's what you mean by it's available, yes.

Q Okay. As a result of that one order entry process?

A As a result of a representative from BellSouth entering a service order, like it's always been, then the system is going to process that and update whatever appropriate systems are for us to serve that customer. That's our system's design, what we refer to as the Legacy systems.

Q So as a result of BellSouth's system design and the way BellSouth has chosen to set up the systems for CLECs, if the CLEC wants to have the same information in its back-end systems, it'll have to go through a separate order-entry or information-entry process, won't it?

A Only for that that's manually submitted is it going to have to do so. You know, a big issue with the FCC is being able to give you orders that are integratable, and that you can get some information back and integrate your system. But you're responsible for that part of your system that's going to do that integration.

Q Well, I would rather not get into the FCC orders. Do you understand that what AT&T is asking for is basically to be able to have its customer service representative type the information into a system that will allow electronic ordering, just as BellSouth has, and allow its internal or back-end systems to be populated just as BellSouth does?

A No, actually I don't understand it that way. Based on what your request was, was the ability to submit all of your orders electronically. I've never read anything into this at all about you being able to get any information back to update your systems. It's being able to get it -- input it and get it to flow through is the two issues -- sub-issues that you've discussed there. So I have not interpreted it that way.

COMMISSIONER BAKER: Mr. Pate, what are the drawbacks, technically or financially, to complying with the request AT&T has made? I mean, as for cost, just give me your best educated guess.

THE WITNESS: Certainly. Well they have two issues. Now the first issue is to be able to submit everything electronically, and their concern, as I understand it is, that we actually had the opportunity to do such since our systems are designed that way under SOC-compatible format. For a CLEC to do that, though, we're dealing with a local service request format, an industry standard national format. That we have to take that and actually convert it. You have to develop coding to convert that LSR format to a SOCs format so our systems can process it. That is rather challenging for the very complex orders to do so. We haven't been able to develop that code, how to do that, make that translation in all of these cases. That's the issue from just the ability to submit it electronically.

One way they could do it, if they had our exact same system, which there are many reasons probably why they would not want to. One, it's not an industry standard. It would only work for BellSouth's region. I haven't found anybody frankly that's made the offer that's willing to go through that investment as a CLEC, to train their personnel

to use a system just for that purpose. Plus, some of these systems won't do -- like a -- may not do all the transactions that they would have a need for in terms -- they would have to have -- my sinuses are kicking in here -- to try to explain this. They may have to have more than one system to be able to do residential versus business the way it's designed. For example, if they used our R&S system, that's only designed to do residential.

And to get to the other issue is the flowing through of everything. I've really kind of touched on it already in that translations piece. That's the main component associated with that and we haven't been able to develop that coding. We have -- I'm not saying that you can't do it for everything, but the ones where we're down to now are extremely complex orders. We haven't figured out how to do it and some of those are of a volume nature that I discussed earlier. You may not want to do it. You don't enough of them.

COMMISSIONER BAKER: But just to give me an idea, it sounds like this is an expensive, complicated process, is that right?

THE WITNESS: Oh, most definitely. I mean, it's going to be very expensive just to figure out the coding, much less put it all in place and then maintain it on and on-going basis as things may change here. I mean, these are

things that you're talking about developing without any type of industry standards to assist in that process. Those may still evolve. Not that we wait on industry standards, sometimes we try to be the leader of those. This is not an easy effort. I know this Commission has looked at through the performance docket, to try to put a team out there to assess, to improve these things. And if that's what this Commission orders in that, you know, we're going to be obviously leading that effort trying to do that. But we're already trying to do that now and it's a challenge.

COMMISSIONER BAKER: Well would -- just hypothetically, what if a CLEC, or a group of CLECs said we will make the financial commitment to go hire, I don't know, a computer consultant, a software consultant to make this work? I mean, if Bell -- if they were willing to do that, spend their own money to develop the system, BellSouth checked it out, it works, it's not going to crash your system, something like that might be acceptable?

THE WITNESS: I would be definitely willing to entertain that. No one has come forth, obviously, with that type of offer, but we definitely would be receptive to sitting down and viewing what they would like to do in that respect.

COMMISSIONER BAKER: Well what about if you just said well, we estimate the cost will be X and we'll divide

it out among all the CLECs and this is your proportionate share, would you do it?

THE WITNESS: Well, I think actually that kind of happens in OSS recovery, but I'm not the cost expert when you think of it from that standpoint.

BY MS. RULE:

Q A follow-up question, Mr. Pate. For every business service that BellSouth offers its retail customers, a customer service representative will sit down and enter an order into ROS, correct?

A Yes, that's correct.

Q And then that order is electronically sent to SOCS where a service order is produced, correct?

A Well, yes, but let me make sure I clarify that point. I mean, these things don't happen by osmosis. You've got to enter this stuff somewhere. My technical term stuff, this service order -- the systems that we've designed is to enter it in that SOCS-compatible format. The issue we're talking about here is taking an LSR format and making that translations, which could end up in several SOCS orders. That's complex. That's not easy to do. It's that translation, the coding and the impact of that that's at issue.

Q And that's exactly what AT&T wants, isn't it?

A Yes. I can understand why you would want it. I'm

just telling you that that's not something simple to do. We haven't been able to figure out how to do it, even though if you look at our results from the amount of orders that was submitted a year ago, this same time frame electronically was 49 percent. As I've already said, today it is 82 percent. I think we've made some pretty durned good progress in a year's time.

Q And that 80-some percent referred to resale orders, did it not?

A No, no, it refers to all orders --

Q The bulk of which --

A -- of which the bulk are resale. If you take a look at the numbers and look particularly at the unbundled network elements, it has grown significantly this year as a result of our efforts.

Q Okay. Turning your attention to maintenance and repair. TAFI can't he used for maintenance and repair of all types of services, can it?

A No, it's for basically POTS services.

Q Okay. So that leaves out unbundled loops and switching and transport among other things?

A Yes.

Q Okay. And EFTA doesn't allow CLEC customers to -- or customer service representatives to correct all the service problems that they could correct if they were using

TAFI, does it?

A I don't quite follow your question. Try me again. I apologize.

MS. RULE: Well there might be an easier way to do this. In order to avoid asking you any questions about the FCC's order, what I would like to do, Commissioners, is mark as an exhibit an excerpt of the FCC's Louisiana 2 order, ask you to take official notice of the order and just let the order speak for itself and then I'm done.

CHAIRMAN DURDEN: That is a marvelous idea.

(Laughter.)

CHAIRMAN DURDEN: We will take administrative notice of it and allow you to introduce it.

MS. RULE: And I believe that would be Exhibit Number 66.

CHAIRMAN DURDEN: Is there any objection to that? I can't imagine that there would be.

MR. LACKEY: No, sir.

CHAIRMAN DURDEN: And I'm correct. So it's admitted without objection.

(The document referred to was marked for identification aas AT&T Exhibit Number 66 and received in evidence.)

MS. RULE: I'm content to let the FCC's order on

TAFI and EFTA speak for itself and I have no more questions.

CHAIRMAN DURDEN: Okay. And, of course, I'll remind you that if you want to make any commentary about it or any argument based on it, just put it in the brief.

BY MS. RULE:

Q Mr. Lackey has a request which I'm happy to fulfil, and that is about your North Carolina testimony. Unfortunately, I have only one copy of it.

MR. LACKEY: Show it to him.

BY MS. RULE:

Q On page 205 of the North Carolina transcript, let me direct your attention to -- beginning on page -- or line 18 through the next page.

(The witness reviews the document.)

A Okay, I've read it.

Q And do you recall now agreeing with me that once the CSA enters the order into ROS, BellSouth has an electronic record of the order?

A Yeah, it seems to be the same way you asked the question. My brain is not working as good I can tell you. But from the standpoint that it's electronically created and transmitted from a transmission to SOCS, and then SOCS does further provisioning, I think that's the framework that we're talking about in North Carolina, and I still agree with that.

Q And you answered yes, correct?

A Yes.

Q And you agreed that the electronic record could then populate various databases such as billing records?

A As part of the overall provisioning process, all of that gets populated. It's electronically done. It's a mechanized process unless something falls out as part of the provisioning process, then someone may have manual intervention. They correct, do whatever it is. Then much of it is done electronically going forward.

Q And you agree that it can populate customer service information records and maintenance and repair databases?

A Oh, yes, certainly. Yeah, that's part of the process.

MS. RULE: Thank you.

MR. LACKEY: No redirect. I would like to move Exhibits 23 through 39.

CHAIRMAN DURDEN: Any objection?

(No response.)

CHAIRMAN DURDEN: They're admitted without objection.

(The documents heretofore marked as BellSouth Exhibits 23 through 39, were received in evidence.)

MS. RULE: And AT&T would move 66.

CHAIRMAN DURDEN: The witness is excused.

(Witness excused.)

CHAIRMAN DURDEN: Any objection?

(No response.)

CHAIRMAN DURDEN: It's admitted without objection.

(The document heretofore marked as AT&T Exhibit Number 66 was received in evidence.)

Do we have any other housekeeping matters?

(No response.)

CHAIRMAN DURDEN: I believe the procedural and scheduling order sets forth -- does it not set forth a briefing schedule?

MS. OCKLEBERRY: The problem, Mr. Chairman, would be, we moved direct testimony out several times, so I don't think it actually comports with the time period because we've moved the hearing. That was changed also.

CHAIRMAN DURDEN: Okay. Well we need to set a -- will five days be long enough?

MS. OCKLEBERRY: No, Commissioner.

MR. LACKEY: Mr. Ross is writing the brief. If you would like it tomorrow it's okay with me.

(Laughter.)

CHAIRMAN DURDEN: Well, how long will it take you

to get a brief done?

MS. OCKLEBERRY: We don't even have the transcript yet.

CHAIRMAN DURDEN: Well they'll get you the transcript PDQ.

MS. OCKLEBERRY: If we could have 10 days?

CHAIRMAN DURDEN: I'll give you 10 days, 10 calendar days from today.

MS. OCKLEBERRY: Can we negotiate 10 business days?

CHAIRMAN DURDEN: Let the record reflect that Mr. Lackey is showing facial expressions indicating great consternation. I thought you said your brief was ready to be filed?

MR. LACKEY: No, I said Mr. Ross had to write it and it could be tomorrow.

CHAIRMAN DURDEN: Okay. He doesn't need a transcript to do his. I'm sorry, I'm --

MR. LACKEY: We're tired.

CHAIRMAN DURDEN: Yeah, we're all tired. Let the record reflect that I'm -- these pitiful attempts at levity are mine.

How long, two weeks? Do we have a deadline that we're going to run up against? I don't want to run up against a deadline.

STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

IN THE MATTER OF THE INTERCONNECTION AGREEMENT NEGOTIATIONS BETWEEN AT&T COMMUNICATIONS OF THE SOUTHERN STATES, INC., TCG OF THE CAROLINAS, INC., and BELLSOUTH TELECOMMUNICATIONS, INC., Pursuant to 47 U.S.C. Section 252

Docket No. P-140, Sub 73
Docket No. P-646, Sub 7

DEPOSITION OF
DOUGLAS W. McDOUGAL

July 28, 2000

11:00 a.m.

1200 Peachtree Street, N.E.
Atlanta, Georgia

Wanda L. Robinson, CRR, CCR No. B-1973

Docket No. 2000-465
JMB-R24
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1 would be something that's actually
2 impacting operational performance, causing us
3 to not be able to process an order as
4 quickly as we should, as accurately as we
5 should.
6 Anything that impedes them doing
7 their job is essentially a Severity 1.
8 Q. Do you know if there is a time
9 frame, a target time frame for solving
10 Severity 1 problems?
11 A. Generally I think the target time
12 frame is 24 hours.
13 Q. At the end of that 24 hours, if
14 it all works as planned, what should happen?
15 A. The software would be updated in
16 the next maintenance period, which hopefully
17 would be after midnight the next day. They
18 wouldn't upgrade software during production
19 environment.
20 Q. Would you repeat the last part?
21 A. They would not upgrade software
22 during the day, during production. They
23 would upgrade software at night, put it
24 through a test process on test platforms and
25 ensure they didn't create another anomaly

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1 within the software before putting it on the
2 production boxes.
3 Q. You mentioned the next maintenance
4 period. How often do maintenance periods
5 occur?
6 A. Every night.
7 Q. What happens during maintenance?
8 A. Tables are updated, bug fixes are
9 tested and implemented.
10 Q. That's Severity 1. What are the
11 other severity levels?
12 A. I can't give you the definitions,
13 but there obviously are less severe
14 situations than SEV 2, SEV 3. I can't
15 define them for you.
16 Q. Do you know who could?
17 A. Sure. Our IT organization can
18 define those.
19 Q. Possible name? Do you have a
20 name for me?
21 A. I can't tell you the best name on
22 the systems, I'll be honest. I've only been
23 on the job for a week. I can give you
24 some names but I'm not sure I would --
25 MR. EDENFIELD: Let's not guess.

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1 If you can answer, you can. If you can't,
2 don't.
3 Q. (By Ms. Rule) Do you know who
4 the head of the IT organization is?
5 A. From the perspective of local
6 systems or the head of BellSouth Corporate
7 IT?
8 Q. Local systems.
9 A. You're looking for an officer
10 level name or non-officer level name?
11 Q. Not necessarily officer level.
12 Somebody who could define for me what the
13 various severity levels are.
14 THE WITNESS: Can we give a name?
15 MR. EDENFIELD: If you know
16 someone who can give the severity levels.
17 A. My key interface into the IT
18 organization is Susan Baughman,
19 B-A-U-G-H-M-A-N.
20 Q. I imagine from your job
21 description, you're very familiar with the
22 operation of the LCSC?
23 A. Fairly familiar.
24 Q. You've described some processes
25 where an LCSC service rep will lease an

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1 order to a downstream system. One of the
2 things we're very interested in, obviously,
3 is flowthrough. Do you have a flowthrough
4 definition that's used to describe service
5 orders that come into the LCSC and go out of
6 them, what constitutes flowthrough for you?
7 A. A couple of different definitions
8 of flowthrough. I'm not sure there's a
9 definition. But generally flowthrough
10 describes an order that flows through our
11 systems through the Service Order Control
12 System, or SOCS, without being touched by a
13 service rep. In other words, it came in
14 electronically generally and flows through
15 those systems.
16 However, we also have flowthrough
17 on orders that come in by fax and paper
18 because we get tremendous numbers of fax and
19 paper orders, particularly from smaller CLECs.
20 So we attribute flowthrough to once the
21 service rep builds the order and releases the
22 order to the downstream systems, it flows
23 without erroring out. So there are different
24 definitions.
25 Q. So basically, though, it sounds

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like the difference in the definition is where you start it off?
A. That's right.
Q. So if we're starting off an electronic order, the point at which you begin to judge whether it flows through is before it even comes to the LCSC, correct?
MS. RULE: Strike that.
Q. The point at which you begin to determine flowthrough is when it leaves the CLEC hands, correct?
A. No. I wouldn't agree with that.
Q. If You could correct me.
A. I would say that when it hits our mainframe. If it doesn't fatally reject, because fields are missing, then it could flowthrough. But the order can come in from your EDI system into our EDI receiver, and it could be rejected due to fields being missing. Obviously it wouldn't flow through. We would never see that. That would be a system-to-system interface. We wouldn't attribute it leaving your system; we would attribute it beginning at the receiver of our systems.

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Q. You mentioned that for flowthrough, for orders received via fax or on paper, that the service rep builds the order and releases it to downstream systems, correct?
A. That's right.
Q. Can you define for me what you mean by the service rep building an order?
A. A local service request comes in, an LSR, local service request. That order can be faxed in or be delivered by overnight mail. The service rep's responsibility is to turn that into a true service order that meets the BellSouth definitions of service order. Field sizes, number of fields, what has to be populated, what's option, et cetera. They would use a service order generated program to build that order.
If it's an LNP order, they would use the LNP gateway. If it's not an LNP orders, they would use one of two systems: DOE, Direct Order Entry System, or SONGS. I don't know what that stands for. Service Order Negotiation System, I think.
They would use one of those to

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assist us. So one of those three systems would be built. Those are service order generators. That's the purpose of those systems.
Q. So when would you say the order has been built?
A. At completion of that activity.
Q. What happens after the order has been built on the service order generator?
A. It's handed off to the Service Order Control System, SOCS. More edits are applied to it, and SOCS is a conduit to multiple other downstream systems, particularly network provisioning systems, in order to get the order actually provisioned in the network, and it's a front end to our billing systems. Front end to provisioning systems, various provisioning systems, and front end to billing systems. Those are the next steps.
Q. So if I understand you correctly, paper comes in, LCSC service rep builds order on the service order generator, whichever one is applicable to that particular order, releases the order to SOCS, more edits are

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applied. If it passes those edits, it's then released to downstream provisioning systems?
A. Correct.
Q. When does the order become assignable? When does it achieve assignable status?
A. I'm not sure what you mean by assignable.
Q. Are you familiar with BellSouth's processes for building orders for its own customers, it's own retail customers?
A. No.
From SOCS down, it's the same process, but I'm not really familiar to talk to you about routine process, if those are the same systems.
Q. When the order leaves the service order generator, does anything happen to it between the time it leaves the service order generator and the time it leaves SOCS except those edits you described to me?
A. Hopefully not. The objective is that it's perfect.
Q. Can you tell me how flowthrough

ORDERING

Report/Measurement:

O-3. Flow-Through Error Analysis

Definition:

An analysis of each error type (by error code) that was experienced by the LSRs that did not flow through and reach a status for a FOC to be issued.

Exclusions:

Each Error Analysis is error code specific; therefore exclusions are not applicable.

Business Rules:

The CLEC mechanized ordering process includes all LSRs, including supplements (subsequent versions) which are submitted through one of the three gateway interfaces (TAG, EDI, and LENS), that flow through and reach a status for a FOC to be issued. The CLEC mechanized ordering process does not include LSRs, which are, submitted manually (e.g., fax, and courier).

Calculation:

Σ Of errors by type

Report Structure:

- Provides an analysis of each error type (by error code). The report is in descending order by count of each error code and provides the following:
  - Error Type (by error code)
  - Count of each error type
  - Percent of each error type
  - Cumulative percent
  - Error Description
  - CLEC Caused Count of each error code
  - Percent of aggregate by CLEC caused count
  - Percent of CLEC by CLEC caused count
  - BST Caused Count of each error code
  - Percent of aggregate by BST caused count
  - Percent of BST by BST caused count

Level of Disaggregation:

Region

Data Retained Relating to CLEC Experience	Data Retained Relating to BST Experience
• Report month • Total number of LSRs received • Total number of errors by type (by error code) ➢ CLEC caused error	• Report month • Total number of errors by type (by error code) ➢ BST system error

Retail Analog/Benchmark:

Not Applicable

Revision Date: 02/22/00 (tm)

LSR Flow-Through Matrix

PRODUCT	F/T	COMPLEX SERVICE	COMPLEX ORDER	PLANNED FALLOUT FOR MANUAL HANDLING [1]	EDI	TAG [2]	LENS 99 [4]	LENS [3]	COMMENTS
2 wire analog DID trunk port	No [5]	UNE	Yes	Yes	N	N	N	N	
2 wire analog port	Yes	UNE	No	No	Y	Y	N	N	
2 wire ISDN digital line side port	No	UNE	Yes	Yes	N	N	N	N	
2 wire ISDN digital loop	No	UNE	Yes	NA	Y	Y	N	N	
3 Way Calling	Yes	No	No	NA	Y	Y	Y	Y	
4 wire analog voice grade loop	Yes	UNE	Yes	NA	Y	Y	N	N	
4 wire DS0 & PRI digital loop	No	UNE	Yes	Yes	N	N	N	N	
4 wire DS1 & PRI digital loop	No	UNE	Yes	Yes	N	N	N	N	
4 wire ISDN DSI digital trunk ports	No	UNE	Yes	Yes	N	N	N	N	
Accupulse	No	Yes	Yes	NA	N	N	N	N	
ADSL	No	UNE	Yes	Yes	N	N	N	N	
Area Plus	Yes	No	No	No	Y	Y	Y	Y	
Basic Rate ISDN	No	Yes	Yes	Yes	Y	Y	N	N	
Call Block	Yes	No	No	No	Y	Y	Y	Y	
Call Forwarding-Variable	Yes	No	No	No	Y	Y	Y	Y	
Call Return	Yes	No	No	No	Y	Y	Y	Y	
Call Selector	Yes	No	No	No	Y	Y	Y	Y	
Call Tracing	Yes	No	No	No	Y	Y	Y	Y	
Call Waiting	Yes	No	No	No	Y	Y	Y	Y	
Call Waiting Deluxe	Yes	No	No	No	Y	Y	Y	Y	
Caller ID	Yes	No	No	No	Y	Y	Y	Y	
CENTREX	No	Yes	Yes	NA	N	N	N	N	
DID WITH PBX ACT W	No	Yes	Yes	Yes	Y	N	Y	N	
DID ACT W	No	Yes	Yes	Yes	Y	N	Y	N	
Digital Data Transport	No	UNE	Yes	NA	N	N	N	N	
Directory Listing Indentions	No	No	No	Yes	Y	Y	Y	Y	
Directory Listings Captions	No	No	Yes	Yes	Y	Y	Y	N	
Directory Listings (simple)	Yes	No	No	No	Y	Y	Y	Y	

DS3	No	UNE	Yes	NA	N	N	N	N	
DS1 Loop	Yes	UNE	Yes	Yes	Y	Y	N	N	
DSO Loop	Yes	UNE	Yes	Yes	Y	Y	N	N	
Enhanced Caller ID	Yes	No	No	No	Y	Y	Y	Y	
ESSX	No	Yes	Yes	NA	N	N	N	N	
Flat Rate/Business	Yes	No	No	No	Y	Y	Y	Y	
Flat Rate/Residence	Yes	No	No	No	Y	Y	Y	Y	
FLEXSERV	No	Yes	Yes	NA	N	N	N	N	
Frame Relay	No	Yes	Yes	NA	N	N	N	N	
FX	No	Yes	Yes	NA	N	N	N	N	
Ga. Community Calling	Yes	No	No	No	Y	Y	Y	Y	
HDSL	No	UNE	Yes	NA	N	N	N	N	
Hunting MLH	No	C/S [6]	C/S	Yes	Y	Y	N	N	
Hunting Series Completion DM10	No	C/S	C/S	Yes	Y	Y	Y	Y	
Hunting Series Completion	No	C/S	C/S	Yes	Y	Y	Y	Y	
INP RECTYPE B	Yes	UNE	No	No	Y	Y	N	N	
INP RECTYPE C	Yes	UNE	No	No	Y	Y	N	N	
LightGate	No	Yes	Yes	NA	N	N	N	N	
Local Number Portability	Yes	UNE	Yes	No	Y	Y	N	N	Yes - LENS, April 2000
LNP with Complex Listing	No	UNE	Yes	Yes	Y	Y	N	N	
LNP with Partial Migration	No	UNE	Yes	Yes	Y	Y	N	N	
LNP with Complex Services	No	UNE	Yes	Yes	Y	Y	N	N	
INP to LNP Conversions	No	UNE	Yes	Yes	Y	Y	N	N	
Measured Rate/Bus.	Yes	No	No	No	Y	Y	Y	Y	
Measured Rate/Res.	Yes	No	No	No	Y	Y	Y	Y	
Megalink	No	Yes	Yes	NA	N	N	N	N	
Megalink-T1	No	Yes	Yes	NA	N	N	N	N	
Memory Call	Yes	No	No	No	Y	Y	Y	Y	
Memory Call Ans. Svc.	Yes	No	No	No	Y	Y	Y	Y	
Multiserv	No	Yes	Yes	NA	N	N	N	N	
Native Mode LAN Interconnection (NMLI)	No	Yes	Yes	NA	N	N	N	N	
Off-Prem Stations	No	Yes	Yes	NA	N	N	N	N	
Optional Calling Plan	Yes	No	No	No	Y	Y	Y	Y	
Package/Complete Choice and area plus	Yes	No	No	No	Y	Y	Y	Y	

Pathlink Primary Rate ISDN	No	Yes	Yes	NA	N	N	N	N	
Pay Phone Provider	No	No	No	NA	N	N	N	N	
PBX Standalone ACT A,C, D	No	Yes	Yes	Yes	Y	Y	Y	N	
PBX Trunks	No	Yes	Yes	Yes	Y	Y	Y	N	
Port/Loop Combo	Yes	UNE	No	N	Y	Y	N	N	Yes - LENS, April 2000
Port/Loop PBX	No	No	No	Yes	Y	Y	N	N	
Preferred Call Forward	Yes	No	No	No	Y	Y	Y	Y	
RCF Basic	Yes	No	No	NA	N	N	N	N	
Remote Access to CF	Yes	No	No	No	Y	Y	Y	Y	
Repeat Dialing	Yes	No	No	No	Y	Y	Y	Y	
Ringmaster	Yes	No	No	No	Y	Y	Y	N	
Smartpath	No	Yes	Yes	NA	N	N	N	N	
SmartRING	No	Yes	Yes	NA	N	N	N	N	
Speed Calling	Yes	No	No	No	Y	Y	Y	Y	
Synchronet	No	Yes	Yes	NA	Y	Y	N	N	
Tie Lines	No	Yes	Yes	NA	N	N	N	N	
Touchtone	Yes	No	No	No	Y	Y	Y	Y	
Unbundled Loop-Analog 2W, SL1, SL2	Yes	UNE	No	No	Y	Y	N	N	Yes - LENS, April 2000
WATS	No	Yes	Yes	NA	N	N	N	N	
XDSL Extended LOOP	No	UNE	Yes	NA	N	N	N	N	

Note [1]: Planned Fallout for Manual Handling denotes those services that are electronically submitted and are not intended to flow through due to the complexity of the service.

Note [2]: The TAG column includes those LSR submitted via RoboTAG.

Note [3]: The LENS column denotes the ordering status of services prior to OSS 99.

Note [4]: The LENS 99 column denotes the ordering status of services post OSS 99.

Note [5]: For all services that indicate 'No' for flow-through, the following reasons, in addition to errors or complex services, also prompt manual handling: Expedites from CLECs, special pricing plans, for denials – restore and conversion or disconnect and conversion both required, partial migrations (although conversions-as-is flow through), class of service invalid in certain states with some TOS – e.g. gov't, or cannot be changed when changing main TN on C activity, low volume – e.g. activity type T=move, pending order review required, more than 25 business lines, restore or suspend for UNE combos, transfer of calls option for CLEC end user— new TN not yet posted to BOCRIS. All but the last one are unique to the CLEC environment.									
Note [6]: Services with C/S in the Complex Service and/or the Complex Order columns can be either complex or simple									

STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

IN THE MATTER OF THE INTERCONNECTION AGREEMENT NEGOTIATIONS BETWEEN AT&T COMMUNICATIONS OF THE SOUTHERN STATES, INC., TCG OF THE CAROLINAS, INC., and BELLSOUTH TELECOMMUNICATIONS, INC., Pursuant to 47 U.S.C. Section 252

Docket No. P-140, Sub 73
Docket No. P-646, Sub 7

DEPOSITION OF
RONALD PATE

July 20, 2000

9:06 a.m.

1200 Peachtree Street, N.E.
Atlanta, Georgia

Arne' B. Davis, CCR-B-1475

Docket No. 2000-465
JMB-R26
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designate by various interfaces whether it can be submitted using that electronic interface.
Q. So, as a CLP, I should be able to look at this table and determine which types of the services and products that I want to order for my customers, can only be ordered manually. Correct?
A. As well as electronically, yes.
Q. So if I look in the fifth column headed, Planned Fallout for Manual Handling, and I compare that information with the various EDI, TAG, LENS '99 and LENS columns, I can tell whether I can order a product electronically, but it will encounter design manual fallout?
A. Yes.
Q. This document also shows me what products and services that I might order that would encounter manual fallout for reasons other than by design?
A. I guess I'm trying to understand the question. Manual fallout is supposed to be only by design. So I'm confused by the question.

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Q. Does fallout for manual handling mean they have errors in them, too?
A. Yes.
Q. Are there any areas that an order might fall out for manual handing, even though it could be submitted electronically?
A. None come to mind. It's either planned fallout flow through or there's an error that results in that falling out. If there's some other situation, I don't recall.
(Whereupon a discussion ensued off the record.)
Q. (By Ms. Rule) The second column is headed F/T. Is that supposed to be a list that describes whether or not items will flow through?
A. Yes.
Q. If you look at footnote 5, which is under the first entry in that column, what does -- can you explain to me what footnote 5 means?
A. Let me read this, please.
Q. Sure.
A. Footnote 5 is identifying some situations where orders could manually fall

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out. Does trigger a couple throughout where ones designed to flow through could actually fall out as in footnote 5. For example, let me find here for clarification purposes -- well, you go by the first one, expedite from a CLEC, so an order that they have expedited request -- that's been designed for flow through by the nature they expedited it -- it's going to have to fall out. So we can manually process it in order to try to meet their request. So you understand exactly from what I was saying earlier, there are situations such as foot note 5.
Q. Seems to me, looking at footnote 5, and that flow through column, that footnote 5 is actually complying to all the yeses in that column, inside of that first no. Do you agree? I'm wondering if it's a typo.
A. I see from your approach, the person who authored this, I see from the way you're looking at it now, the confusion it could create. To see if there might be a better way -- more likely, it would be up there, besides the FT itself.

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Q. So it appears to say to you, also, footnote 5, general application, that first entry under the flow through column?
A. Yes. The other footnotes appear across the top in the columns. So I'm thinking, maybe, as you indicated, it's just a typo, but I will be dealing with that and finding out.
Q. So if I understand you correctly, though, footnote 5 is a list of conditions that will result in design manual fallout, even though an item is ordered electronically and was otherwise eligible for flow through; correct?
A. Let me go back and refresh my memory.
Q. Okay.
A. I think that's the intent, because it starts off, Also, this may be better for all services to indicate yes.
Q. So if I'm understanding this correctly, go back to the flow through column, everything that says "yes" should be yes, unless one of the conditions listed in this footnote 5 apply, in which case they

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will fall out for manual handling?
A. As a result of this discussion, I'm having the same inclination. I would like to reserve the right to talk to the author of this report. I understand what they're intending to say. I've seen the report many times and looked at this document many times. It's never hit me the way it's hitting me now.
Q. Just to walk through an example, the second product, entry two, wire analog port, said, yes, it should flow through?
A. Correct.
Q. But if I understand footnote 5 correctly, it should flow through, unless one of these 12 or 13 things listed in footnote 5 are present, in which case it will fall out?
A. That is the way I interpret it, too.
Q. There's another question we had about footnote 5. It says -- the very last sentence says, All but the last one are unique to CLEC. What does that mean?
A. Well, I need to talk to the

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author on that as well. They were trying to categorize these as unique; and, frankly, they're not all unique, but most are unique. I think that's an area where we can go back and look, but the majority of these are unique to CLEC environment.
Q. Now, do you mean they don't occur in BellSouth retail orders?
A. The way they're trying to describe it here.
Q. Are BellSouth retail orders ever expedited?
A. Yes.
Q. That one wouldn't be unique?
A. No. The way they labeled it here, the author may have been trying to categorize that about -- there's something unique about that.
Q. Special pricing plans; does BellSouth have special pricing plans?
A. Yes, but this is trying to deal with a CLEC is taking over from a conversion standpoint. That has a special pricing plan. So that's unique from that standpoint. You have to deal it with: Are you going to

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assume that special pricing plan? Are you going to pay? There's things that have to be dealt with. That's what's unique about it.
Of course, it's difficult to get every little thing down here, when we're using our best effort to explain it without having a voluminous document.
Q. Are you familiar with the BellSouth's flow through matrix for OSS199? The first page is an E-mail. Do you see that?
A. Yes.
Q. Ms. Williamson is an AT&T employee?
A. That's correct.
Q. Look down on the original transmittal where it was sent to Ms. Williamson.
A. Starts with -- Original message from Beverly Shelton Williams.
Q. Who is she?
A. A member of the account team that serves AT&T.
Q. She was a BellSouth employee?

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A. Yes.
Q. So it appears from this e-mail that Beverly Shelton Williams forwarded a copy of the document to Jill Williamson, an AT&T employee; correct?
A. That's correct.
Q. Take a look at that document and tell me if you know what it is.
MR. EDENFIELD: Are you representing this is the document attached to the e-mail?
MS. RULE: Yes, I am.
THE WITNESS: I don't know who developed the document at BellSouth, but it's talking about the requisition type, and activations is the first page that defines the issue 9 version, part of OSS99, which refers to a release that was made in, actually, December or January past year time frame, final production in January. Has attached to it the combinations of the cables that you can use with flow through purposes as well as a series of pages that have comments.
Q. (By Ms. Rule) Would you please

BEFORE THE

KENTUCKY PUBLIC SERVICE COMMISSION

PREFILED REBUTTAL TESTIMONY OF

GREGORY R. FOLLENSBEE

ON BEHALF OF

AT&T COMMUNICATIONS OF THE SOUTH CENTRAL STATES, INC.

AND TCG OHIO

DOCKET NO. 2000-465

FEBRUARY 20, 2001

Q. PLEASE STATE YOUR NAME, ADDRESS AND EMPLOYMENT.

A. My name is Gregory R. Follensbee. I am employed by AT&T Corp. ("AT&T") as a Director in its Law & Government Affairs organization, providing support for AT&T's regulatory and legislative advocacy in the nine states that make up AT&T's Southern Region. My office is at 1200 Peachtree Street, Suite 8100, Atlanta, Georgia 30309.

Q. DID YOU PREFILE DIRECT TESTIMONY ON FEBRUARY 6, 2001 IN THIS PROCEEDING?

A. Yes, I did.

Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?

A. I will be rebutting the testimony of Mr. Ruscilli for Issues 1, 4, 5, 6, 7, 9, 13, and 21.

ISSUE 1: SHOULD CALLS TO INTERNET SERVICE PROVIDERS BE TREATED AS LOCAL TRAFFIC FOR PURPOSES OF RECIPROCAL COMPENSATION?

Q. ON PAGES 12 AND 13, BELLSOUTH ACKNOWLEDGES THAT THE COMMISSION HAS PREVIOUSLY ORDERED ISP-BOUND TRAFFIC BE TREATED AS LOCAL FOR PURPOSES OF RECIPROCAL COMPENSATION, WHICH SUPPORTS AT&T'S POSITION, BUT REQUESTS THAT SUCH TRAFFIC BE SUBJECT TO RETROACTIVE TRUE-UP FOR RECIPROCAL COMPENSATION WHEN THE FCC

ESTABLISHES ITS MECHANISM FOR COMPENSATION OF SUCH TRAFFIC. DO YOU AGREE WITH THIS REQUEST?

A. No. There is no reason to make this an interim solution, subject to true-up on a retroactive basis once the FCC renders a decision on how this traffic will be treated. Calls made by either BellSouth or AT&T end users, that are ISP-bound, should be treated as local, and reciprocal compensation should be paid for such calls, until the Commission is pre-empted by the FCC from treating the calls in this manner. No true-up or retroactive application of any FCC rule is appropriate or warranted.

Q. WHY IS AT&T OPPOSED TO TRACK AND TRUE- UP?

A. Under the terms of AT&T's agreement that ended on August 13, 2000 but which is continuing in use until replaced by this renewal agreement, the rates, terms and conditions of the renewal agreement are retroactive to the day after the previous agreement expired. If AT&T is subject to a track and true-up provision on ISP-bound traffic, it will have to go back to August 14, 2000 and try to find records that can be used to determine what amount, if any, of the local traffic it both received and sent to BellSouth may have been ISP-bound traffic. Additionally, AT&T and BellSouth would have to reach agreement on how much of this traffic, and future traffic, was subject to tracking. AT&T has had experience with such a process with BellSouth, and has found that the parties cannot agree on how much of the total local traffic is ISP-bound. Thus, AT&T believes the more appropriate solution is to treat the traffic as local and only change that designation once the FCC asserts jurisdiction over how the traffic will be compensated. According to all information AT&T has available, the FCC does not intend to apply any future

decision in a retroactive manner. AT&T would recommend this Commission also adopt any retroactive treatment as well.

ISSUE 4: WHAT DOES "CURRENTLY COMBINES" MEAN AS THAT PHRASE IS USED IN 47 C.F.R § 51.315(B)?

ISSUE 5: SHOULD BELLSOUTH BE PERMITTED TO CHARGE AT&T A "GLUE CHARGE" WHEN BELLSOUTH COMBINES NETWORK ELEMENTS?

Q. HAVE YOU REVIEWED BELLSOUTH'S TESTIMONY (RUSCILLI, PAGES 14-22) ON THESE ISSUES?

A. Yes. However, BellSouth has blurred and obscured this issue so much that it may not be obvious what its position is, or, more precisely, what limitations it proposes on the use of combinations so as to render them less useful to CLECs. BellSouth says it will provide combinations to AT&T at cost-based prices "if the elements are, in fact, combined, and providing service to a particular service to a particular customer at a particular location." What does this mean? In plain English, what I understand this to mean is that BellSouth will not provide a particular combination for a specific customer to AT&T (or any other CLEC) at UNE prices, unless the discrete elements that comprise that combination for that customer are physically combined at the time of purchase (whether or not those elements have ever been combined anywhere in BellSouth's network, including for that customer) and are being used by BellSouth to provide service to the customer. In other words, AT&T may only use combinations to provide the same service to the same customers BellSouth is currently serving today, even though

BellSouth routinely uses those same combinations throughout its network to provide service to its own customers in Kentucky. Specifically, for loops and switching, BellSouth readily agrees that it routinely combines loops and switching throughout its network and uses combinations of loops and switching to provide service to its own customers. However, BellSouth will not sell AT&T a loop-switching combination (often referred to as the UNE Platform or UNE-P) at UNE rates to serve a particular customer, unless the loop to that customer's premise is already connected to a BellSouth switch ***and*** BellSouth is currently using that loop-switching combination to provide the service to that customer that AT&T wants to provide. BellSouth's plea that the Commission "find that BellSouth is not obligated to combine UNEs that are not already physically combined," thus obscures the real goal of BellSouth on this issue, which is to severely limit the use of UNE combinations by CLECs in Kentucky and thus continue to make local entry more difficult for CLECs.

Q. HOW DOES BELLSOUTH JUSTIFY ITS POSITION ON THIS ISSUE?

A. BellSouth's testimony is a blend of legal argument and economic rationalization. The goal of its legal argument is to assert that the Commission has the legal authority to make local entry even more difficult and expensive, while its remaining testimony tries to justify why it makes sense to do so. In the rebuttal that follows, I explain that even if BellSouth's legal reasoning were correct – an issue with which I disagree, but that I fundamentally leave to the brief – there is no rational justification for making local competition harder, and therefore more costly, than it already is.

In support of its basic position that the Commission should make entry more difficult by sanctioning BellSouth's refusal to offer any combination of network elements that it currently combines for itself, BellSouth advances three basic theories:

- Forcing entrants to combine elements in inefficient ways will somehow produce efficient results;
- Combining elements for entrants will discourage BellSouth from introducing innovative new technologies; and
- Requiring BellSouth to combine elements is "...inconsistent with the Act's basic purpose, which is to introduce competition into the local market."

As I explain below, however, none of these "justifications" can be squared with basic policy goals. At issue here is a simple choice. Should BellSouth provision network element combinations in the most efficient manner (i.e., combining those elements for entrants that it routinely combines today), or should it be allowed to require additional and unnecessary work – for both itself and the entrant – to get to the same result? There is one clearly favorable outcome – i.e., that elements be combined in the most efficient manner – that can be achieved only if the Commission rejects BellSouth's proposal.

The core "combinations" issue before the Commission in this arbitration is simple, yet far-reaching. Mass-market competition depends upon *efficient* provisioning systems structured to minimize cost and accommodate volume. This same basic conclusion applies with equal force to *new* combinations as it does to *existing* arrangements. Consumers are unlikely to accept entrants that can serve an existing line, but cannot provision additional lines or serve the customer at a

new location. Consumers will not benefit from policies that make local competition more complex, more cumbersome and more expensive. If the Commission wants competition for average consumers, then it must be committed to policies that make entry more simple and cost-effective.

Q. DO YOU INTEND TO RESPOND TO BELLSOUTH'S LEGAL ARGUMENT?

A. No, not in any detail. Addressing the legal basis underlying BellSouth's position is more appropriate to post-hearing briefs than testimony. Without attempting to render a legal opinion, however, I do believe a number of points should be considered.

First, it would seem that the central legal issue concerns the limits of the Commission's discretion – that is, may the Commission evaluate BellSouth's obligation on its merits, or must the Commission sanction BellSouth's proposal, without regard for the consequences to Kentucky consumers. As I explained in my direct testimony, I believe that the Commission has the authority to judge the issue on the merits. Indeed, it already has.

For its part, BellSouth places great emphasis on a decision from the Eighth Circuit (which the FCC and a number of other parties have requested the Supreme Court review) that had the effect of leaving vacated an FCC rule that would have removed any uncertainty that BellSouth was obligated to combine elements that it routinely combined. The Eighth Circuit's decision, however, does not preclude this Commission from deciding the issue on its merits. For instance, the United States Courts of Appeals for the Fifth and Ninth Circuits have determined that it is consistent with the Telecommunications Act of 1996 and the decision of the U.S.

Supreme Court for state commissions to require ILECs to combine network elements. *US West Communications v. MFS Intelenet,* 193 F.3d 1112 (9th Cir. 1999); *Southwestern Bell Telephone Co. v. Waller Creek Communications, Inc., et. al.,* 221 F.3d 812 (5th Cir. 2000). These decisions have the practical effect that the ILEC must provide combinations to CLECs where the ILEC ordinarily combines such network elements to provide service.

Moreover, BellSouth never tries to reconcile its position with other FCC rules that prohibit restricting network elements. For instance, FCC Rule 309(a) specifically provides:

> An incumbent LEC shall not impose limitations, restrictions or requirements on requests for, or the use of unbundled network elements that would impair the ability of a requesting telecommunications carrier to offer a telecommunications service in the manner the requesting telecommunication carrier intends.

There is no apparent dispute that BellSouth cannot restrict the use of stand-alone loops (or switching or transport) to serve only customers who currently receive service from BellSouth. For instance, when an entrant orders a DS-1 loop to a customer premise, there is no requirement that the customer already be served over such a facility. BellSouth should not be allowed to restrict the use of combinations of elements in such manner. A combination of elements is just that – a combination of elements. There is no basis for BellSouth to impose restrictions on the use of such elements merely because they are provisioned in combined form.

Q. WHAT POLICY RATIONALE DOES BELLSOUTH USE TO JUSTIFY ITS REFUSAL TO COMBINE ELEMENTS FOR ENTRANTS THAT IT

CURRENTLY COMBINES FOR ITSELF (OR, IN THE ALTERNATIVE, CHARGE A GLUE CHARGE)?

A. BellSouth offers three "policy reasons" for its position. The first of these justifications is that requiring BellSouth to combine elements would (Ruscilli, page 17), according to BellSouth:

> ... not benefit consumers as a general matter, and would unnecessarily reduce the overall degree of competition in the market.

Q. DOES THIS CONCLUSION MAKE SENSE?

A. No. The *reason* that entrants want BellSouth to combine elements is precisely because that is the *most efficient* way to obtain ordinary combinations. BellSouth routinely combines elements in the network today. It is reasonable to expect that its central offices are designed so that facilities used for routine cross-connection are easily (if not electronically) accessible, with procedures employed to avoid unnecessary reconfiguration and investment.

Remarkably, rather than simply combining elements for entrants at those points in the network (such as existing cross-connect frames) that BellSouth has established for precisely this purpose, BellSouth is proposing to create new environments where entrants would do the same work. Under BellSouth's proposal, entrants would combine elements in collocation space, or use assembly "rooms" or "points" specially constructed for this purpose. These additional steps – creating the assembly room/point, and then extending requested elements via new facilities and additional cross-connections – does nothing but create increased cost and points of potential failure. With respect to UNE-P, the absurdity of BellSouth's

position is highlighted by its admission of its obligation to provide loops to CLECs at UNE prices to serve customers to which no loops are currently provisioned. BellSouth has admitted that for such customers in its serving area (e.g., customers in new subdivisions), BellSouth would have to sell AT&T a loop at UNE prices even though no such loop is in place today (and thus no Bellsouth service). Yet, even though BellSouth would sell AT&T that loop at UNE prices, BellSouth will not sell AT&T that very same loop connected to the BellSouth switch as a loop-switching combination (UNE-P), because that combination of loop and switch are not connected today and being used by BellSouth to provide service to the customer.

The central criterion of "efficiency" is the elimination of unnecessary costs, yet in the *name* of efficiency BellSouth proposes the opposite result. Importantly, BellSouth's proposal would result in *more* work and *increased* costs for both itself and new entrants. Even BellSouth would do "more combining" by cross-connecting the requested elements to the facilities necessary to extend the elements to the CLEC, not to mention the cost -- in time, money and space – to create the associated "assembly areas." Expending resources for the sole purpose of achieving a less reliable and more costly environment is a wasteful exercise that can find no support in economics, common sense or sound policy.

Q. SHOULD THE COMMISSION EXPECT *LESS* COMPETITION IF BELLSOUTH IS REQUIRED TO COMBINE ELEMENTS IT ROUTINELY COMBINES TODAY?

A. No. Before addressing this point on the merits, however, consider the following paradox: Would it really make sense for BellSouth – the incumbent monopolist –

to advocate positions that *increase* competition, while AT&T – the new entrant – promotes policies that would produce *less*? Of course not.

The more simple and cost effective it is to obtain network elements, the more customers entrants can reasonably serve. This proposition cannot be denied. BellSouth's complaint is not that entrants won't compete more extensively; its real complaint is that BellSouth does not want to "share" its network with competitors.

Q. BELLSOUTH QUOTES SUPREME COURT JUSTICE BREYER'S OBSERVATION THAT "...IS IN THE UNSHARED, NOT IN THE SHARED, PORTIONS OF THE ENTERPRISE THAT MEANINGFUL COMPETITION WOULD LIKELY EMERGE" (RUSCILLI, PAGE 17) TO SUPPORT ITS POSITION. IS BELLSOUTH'S USE OF JUSTICE BREYER'S OPINION HERE RELEVANT?

A. No. Justice Breyer was addressing the threshold question as to *what* elements should be made available, while the issue here concerns *how* they should be offered. The FCC has already addressed the issue raised by Justice Breyer by concluding that entrants would be impaired -- and that competition would therefore be less -- without access to the network elements in question.

What BellSouth seeks here is to subvert the FCC's impairment decision by imposing provisioning practices that would increase the entrants' cost to use the network elements to which it is legally entitled. There is nothing in Justice Breyer's analysis that offers support for the proposition that inefficient provisioning systems will promote competition. If an entrant is impaired without

access to an element, then the law requires that it be available in a manner that is nondiscriminatory.

Q. BELLSOUTH ALSO CLAIMS THAT COMBINING ELEMENTS FOR ENTRANTS WOULD DISCOURAGE FACILITIES-INVESTMENT BY BELLSOUTH (RUSCILLI, PAGE 18). IS THIS VIEW REASONABLE?

A. No. First, BellSouth's objection appears directed more at the TELRIC pricing standard than the requirement to combine elements (Ruscilli, page 18):

> ...requiring BellSouth to combine UNEs at cost-based prices, particularly at Total Element Long Run Incremental Cost (TELRIC)-based prices, reduces BellSouth's incentive to invest in new capabilities. TELRIC-based prices do not cover the actual cost of elements ...

As to the TELRIC pricing standard, BellSouth is simply wrong when it claims that TELRIC rates do not cover actual cost. The TELRIC standard explicitly requires that prices accurately reflect the *forward-looking* cost of network elements for the precise reason that it is an element's forward-looking cost that will guide investment decisions. Just as BellSouth's earlier argument was structured to undermine the FCC's impairment analysis, BellSouth's testimony here is nothing more than an attempt to negate the TELRIC pricing standard.

Moreover, BellSouth's again misapplies Justice Breyer's opinion for the proposition that BellSouth would not:

> ... undertake the investment necessary to produce complex technological innovations knowing that any competitive advantage deriving from those innovations will be dissipated by the sharing requirement.

It is important to appreciate, however, that there is no "complex technological innovation" at issue here. BellSouth is refusing to combine basic building blocks

– i.e., loops to ports, or digital facilities (with multiplexing) to standard interoffice transport – that are generic, not proprietary. It is because these building blocks are *routinely* combined that makes possible the efficiencies of the present system. There is nothing unique about these standardized combinations that would give rise to some "complex technological innovation." This is network engineering, not improvisation.

Q. FINALLY, BELLSOUTH ARGUES THAT REQUIRING IT TO COMBINE NETWORK ELEMENTS IS INCONSISTENT WITH THE ACT'S BASIC PURPOSE (RUSCILLI, PAGE 18). DO YOU AGREE?

A. No, not at all. BellSouth's final objection is based on its view that the Act is intended to "introduce competition" not "subsidize competitors" (Ruscilli, page 18). On this much, we agree. However, there is nothing to suggest that requiring BellSouth to combine elements for rivals that they routinely combine for themselves would result in less competition or subsidized competitors.

Consider the practical reality here. A customer moves into a new home and AT&T requests the combination (loop and port) needed to serve that customer. Under the approach recommended by AT&T, BellSouth would be required to combine these elements as they routinely do today. Once combined, even BellSouth would agree that the combination would be available to other competitors – including BellSouth – so that the customer could easily change local carriers in the future. Simple system, low cost, greater competition.

In contrast, under BellSouth's proposal, these same elements (loop and port) would be extended to a *different* location in the central office (such as AT&T's

collocation space or an "assembly room/point") where they would then be cross-connected. The result: higher costs and additional points of failure. Moreover, under BellSouth's approach, if the customer sought to change carriers, then the entire exercise of manually reconfiguring the requested combination to a different "assembly frame" would need to be repeated – at least until the customer moved to BellSouth.

Q. SHOULD BELLSOUTH BE PERMITTED TO IMPOSE A "GLUE CHARGE"?

A. No. Even BellSouth acknowledges that the term "glue charge" is synonymous with "market rate"(Ruscilli, page 20). Of course, if a functioning "market" existed, there would be no need for UNEs. The requested facilities are deemed to be "unbundled network elements" precisely because entrants would be impaired – and, therefore, competition would be harmed – if they were not available at cost-based rates.

Furthermore, the entrant is already compensating BellSouth for the elements it purchases – BellSouth's "glue charge" is no different than a demand for above-cost rates. Glue charges must ultimately be recovered in the prices charged to end-users. BellSouth's proposal is nothing more than a request to inflate its rivals' *costs* so that it may inflate its rivals' *prices*, thereby assuring that its own monopoly prices are protected from competition. The Commission should reject its proposal.

Q. WHAT IS AT&T ASKING THE COMMISSION TO DO?

A. AT&T asks that the Commission find that BellSouth must provide a combination throughout its network as long as it provides the same combination to itself anywhere in its network and that only the approved UNE rates will be applied to such combinations, with no "glue charge" added on.

ISSUE 6: UNDER WHAT RATES, TERMS, AND CONDITIONS MAY AT&T PURCHASE NETWORK ELEMENTS OR COMBINATIONS TO REPLACE SERVICES CURRENTLY PURCHASED FROM BELLSOUTH TARIFFS?

Q. ON PAGE 23 OF HIS DIRECT TESTIMONY, MR. RUSCILLI STATES THAT IF THE END USER IS CURRENTLY UNDER A CONTRACTUAL AGREEMENT WITH BELLSOUTH, THEN THE TERMS OF THE RETAIL AGREEMENT OR CONTRACT THAT ARE APPLICABLE TO EARLY TERMINATION, INCLUDING PAYMENT OF EARLY TERMINATION LIABILITIES, MUST BE SATISFIED. HE FURTHER STATES THAT IF A CONTRACT IS TERMINATED EARLY, IT IS APPROPRIATE FOR BELLSOUTH TO IMPOSE A CHARGE FOR EARLY TERMINATION. DO YOU AGREE?

A. No. In cases where AT&T is the wholesale purchaser of special access, it is not appropriate for BellSouth to apply early termination charges to AT&T.

Q. WHY IS IT INAPPROPRIATE FOR BELLSOUTH TO APPLY EARLY TERMINATION CHARGES WHEN AT&T SEEKS TO CONVERT A PURCHASE OF TARIFFED SERVICES TO A PURCHASE OF

NETWORK ELEMENTS (OR COMBINATIONS OF NETWORK ELEMENTS)?

A. First, AT&T is not a "retail user" of the tariffed services, as Mr. Ruscilli uses the term. AT&T purchases wholesale services from BellSouth. In these circumstances there should be no termination liability assessed when AT&T seeks to convert, not terminate, such tariffed services to unbundled network elements. The main reason termination liability charges should not apply is because BellSouth has not established that the termination charges are anything other than a huge penalty and an unjustified windfall. The penalty is not tied to any costs BellSouth incurs in processing the conversion. In fact, unlike when a retail end user changes providers from BellSouth to a CLEC, BellSouth is not losing AT&T as a customer. Rather, AT&T is merely seeking to change how the UNE combinations are billed.

What BellSouth seeks to do contravenes the clear intent of the FCC's Supplemental Order Clarification (Order No. FCC 00-183 released June 2, 2000 in Docket No. 96-98). If this Commission approves BellSouth's proposal, then BellSouth ultimately ends up with what it wanted all along –CLECs would not be able to use Enhanced Extended Loops (EELs) or other combinations to serve customers who are currently served through special access service. Additionally, if CLECs are required to pay termination charges, then it will have a chilling effect on competition. CLECs will not be able to pass on these additional and unwarranted costs to their customers.

Q. WHAT DOES AT&T REQUEST REGARDING THIS ISSUE?

A. AT&T asks that the Commission prohibit BellSouth from applying termination charges when AT&T converts a purchase of tariffed services to a purchase of network elements (or combinations of network elements), such as converting the purchase of special access services to EELs.

ISSUE 7: HOW SHOULD AT&T AND BELLSOUTH INTERCONNECT THEIR NETWORKS IN ORDER TO ORIGINATE AND COMPLETE CALLS TO END-USERS?

Q. MR. RUSCILLI USES THE TERMS POINT OF INTERCONNECTION ("POI") AND INTERCONNECTION POINT ("IP") IN HIS DIRECT TESTIMONY. DO BELLSOUTH AND AT&T AGREE ON THE MEANING OF THESE TWO TERMS?

A. AT&T and BellSouth agree on the meaning of the terms, but AT&T cannot agree with Mr. Ruscilli's incorrect usage of them. Mr. Ruscilli is quite clear in his explanation of the terms Point of Interconnection ("POI") and Interconnection Point ("IP"), but he is not entirely consistent in his application of these terms. Indeed, as I will describe later in this testimony, Mr. Ruscilli misapplies certain FCC rules addressing physical network interconnection as if these rules apply to the establishment of IPs (strictly a financial matter)[1]. This Commission must be careful to understand the basis and usage of these two terms throughout this proceeding.

[1] When I refer to 'POI" I am referring to the point where AT&T and BellSouth's networks physically interconnect. When I refer to "IP" I mean the point on the terminating party's network to which the originating party is obligated (*i.e.*, has financial responsibility) to provide network interconnection facilities for the delivery of its originating traffic.

Q. DOES MR. RUSCILLI ACCURATELY DESCRIBE THE DISPUTE BETWEEN THE PARTIES ON THIS ISSUE?

A. No. Mr. Ruscilli misstates AT&T's proposal in a number of respects.

First, AT&T has stated that it will establish two IPs in each LATA, unless there is a *de minimus* volume of traffic that only justifies one IP. AT&T also agrees to establish an IP for each AT&T switching center in the LATA. Accordingly, if AT&T is successful in the Kentucky marketplace, AT&T will add switching centers and will establish an additional IP for each switch it adds in a LATA.

Second, BellSouth fails to point out that AT&T proposes that the parties first attempt to come to mutual agreement as to the location of each party's IP in each LATA and that the IP be based on the terminating NPA-NXX. This is a far cry from the unilateral designation that Mr. Ruscilli asserts is required under AT&T's proposal.

Q. WHAT DO YOU UNDERSTAND BELLSOUTH'S PROPOSAL TO BE?

A. First, that AT&T should be financially responsible for transporting its originating traffic all the way to each BellSouth end office in each BellSouth basic local calling area. Second, that AT&T should be financially responsible for transporting BellSouth's own originating traffic from some point in a BellSouth basic local calling area to AT&T's switch.

Q. HOW DOES AT&T'S PROPOSAL DIFFER FROM BELLSOUTH'S PROPOSAL?

A. AT&T agrees that AT&T should be financially responsible for transporting AT&T's originating traffic to each BellSouth end office. This is consistent with applicable law and regulations. AT&T would provide the transport facilities between its switches and the BellSouth IP and AT&T would pay BellSouth a fixed, per-minute reciprocal compensation rate for the transport between the BellSouth IP and the BellSouth end office. This does not appear to be objectionable to BellSouth.

However, contrary to BellSouth's proposal, AT&T asks that BellSouth bear a reciprocal financial obligation for the transport of BellSouth's originating traffic and not arbitrarily shift the cost for such transport to AT&T. Thus, under AT&T's proposal, for BellSouth's originating traffic, BellSouth would provide the transport facilities between its switches and AT&T's IP, and BellSouth would pay AT&T a fixed, per-minute reciprocal compensation rate for the transport between the AT&T IP and the AT&T end office.

With respect to the method that will be used to establish the IP locations in each LATA, AT&T proposes that the parties first attempt to come to mutual agreement as to the location of each party's IP in each LATA and that the IP be based on the terminating NPA-NXX. BellSouth, in contrast, proposes that the originating party have a unilateral right to designate where its traffic must be "picked up", meaning the IP would be based on the originating NPA-NXX. BellSouth's position is wrong, as I explain later, in that it forces AT&T to establish numerous IPs throughout the state and become responsible for BellSouth's originating costs, in direct conflict with existing law and FCC rules.

Q. UNDER AT&T'S PROPOSAL WHAT WOULD BELLSOUTH HAVE TO DO?

A. First, BellSouth would provide the transport facilities from the BellSouth switch from which the call originates to the same relative point on AT&T's network to which AT&T delivers its originating traffic on the BellSouth network. I use the term "top of the network" to identify that comparable point on each party's network. Each party's IP should be established at the top of its network.

Second, BellSouth would pay AT&T the identical fixed, per-minute reciprocal compensation rate for the transport that AT&T provides for the termination of BellSouth traffic from AT&T's IP across AT&T's network.

Q. WHY DOES AT&T BELIEVE THIS IS FAIR?

A. As I stated in my direct testimony, AT&T's network covers a geographic area comparable to that covered by BellSouth's network. Given this geographic comparability, it is only fair that each party have comparable and equivalent interconnection. The Commission should not give BellSouth's network preferential treatment simply because it pre-existed local telephone competition or is based on a traditional hierarchical network architecture. Conversely, the Commission should not penalize AT&T because it has chosen a different network design than that used by BellSouth. The real test for equivalency should be geographic comparability that provides the two parties the means to effectively compete. AT&T's network meets this test.

Q. DO YOU AGREE WITH MR. RUSCILLI'S ASSERTION THAT BELLSOUTH DOES NOT HAVE A NETWORK, BUT "A HOST OF NETWORKS THAT ARE GENERALLY INTERCONNECTED"?

A. No. Mr. Ruscilli made numerous claims throughout his testimony that BellSouth has a "separate" network in each BellSouth basic local calling area.[2] Under scrutiny, such "Balkanization" of BellSouth's network is nothing more than a semantic effort by BellSouth to buttress its theory as to why AT&T should interconnect wherever BellSouth determines.

Q. PLEASE EXPLAIN.

A. There is no such thing as a "BellSouth local network" that can be physically separated and identified. BellSouth has not labeled each piece of switching or transmission equipment as "local-only", "toll-only" or "access-only." There is simply no business reason to do so. The assertion that a local-only network exists is contrary to the way that equipment and facilities are assigned to provide new services. BellSouth has designed a highly integrated network to provide BellSouth the flexibility to adjust to changes in traffic volumes of the various services it offers according to market conditions. In other words, a certain piece of equipment in the BellSouth network used today to provide local service may become spare and used tomorrow to provide a toll service. To do otherwise, would create a risk of stranding plant for some services and exhausting plant for other services.

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[2] For example, on page 24 Mr. Ruscilli states that "With regard to 'local networks,' BellSouth, in any given LATA, has several such local networks, interconnected by BellSouth's long distance network. Again, on page 33 Mr. Ruscilli asserts that "BellSouth may have fifteen or twenty calling areas in the LATA."

Q. HOW DOES THIS APPLY TO LOCAL SWITCHING?

A. The typical end office switch is used to originate and terminate local traffic, intraLATA toll traffic, and inter-exchange traffic from and to inter-exchange carriers. If BellSouth's claim that is has deployed a "distinct" local network were true, then BellSouth would have deployed three separate local switches, one for each type of traffic in each local calling area. BellSouth has not done so. That would be an inefficient design.

Another example of BellSouth network integration can be found in the manner in which BellSouth combines local, toll and access traffic on common trunks between its tandem switches and end office switches. BellSouth does not create separate trunk groups for each class of services. To do so would require that BellSouth install many additional trunks, since the period of peak traffic load often varies by the type of traffic. Accordingly, the call carrying capacity of a trunk group having a mix of traffic is greater than a single-use trunk group.

However, the most probative evidence that BellSouth's assertion about a basic local network in each BellSouth basic local calling area is inaccurate is BellSouth's use of local tandem switches. In Kentucky, BellSouth has more local calling areas than it has local tandems. The fact that BellSouth has fewer tandems than local calling areas means that, contrary to Mr. Ruscilli's assertions, BellSouth is routing some of its local traffic beyond the boundaries of its local calling areas for its own reasons. In fact, it would be very surprising to find that BellSouth did not subscribe to this common engineering practice. Every large local telephone company uses local tandem switches because it is the least costly

method of interconnecting many end offices until certain traffic thresholds are reached, and this method provides alternative routing during peak traffic periods. For instance, in the Louisville LATA, BellSouth has established thirty-three basic local calling areas, collectively served by a single local tandem. Using the implausible standard suggested by BellSouth, the Commission would conclude that BellSouth has thirty-three "local networks", each serving a basic local calling area. In this specific case, as well as numerous other areas across the state, BellSouth carries its local traffic beyond the basic local calling area, because that is the least costly and most efficient way to provide telephony service.

BellSouth's primary objection to AT&T's proposal is its claim that it has one network per basic local calling area, rather than one integrated network, and thus a CLEC must provide physical interconnection at every one of these "basic local networks." However, BellSouth asks this Commission to reject AT&T's proposal on an incorrect premise. BellSouth's network should not be viewed as an integration of individual networks, but rather the integrated network that it is.

Moreover, Mr. Ruscilli's claim of separate and distinct networks that require multiple connections to each one is contradicted by his company's own press statements. In one press release, BellSouth states:

> BellSouth's e-Platform provides unique "bunker-like" security and reliability against potential natural and man-made disasters because BellSouth utilizes "battle-tested," existing facilities that have weathered hurricanes like Hugo, Andrew, and Floyd. BellSouth is also building upon some three million miles of fiber optic cable, 1,650 central offices, 50 BellSouth Managed Facilities, 15,000 Sonet rings and over 500 fast-packet switches with its e-Platform initiative.[3]

[3] *BellSouth Launches 'E-Platform' for Business; New E-Biz Centers to Unleash Power of Extensive, fiber-based Network*, BellSouth News Release (Sept. 26, 2000).

In another press release, BellSouth touts itself as an "integrated communications services company" that provides customers with "integrated voice, data, video, and data services to meet their communications needs."[4] BellSouth cannot have it both ways. It cannot claim Balkanized specialized networks for competitors while touting integrated networks for its end user customers.

Q. SHOULD THE BELLSOUTH BASIC LOCAL CALLING AREAS BE THE BASIS OF NETWORK INTERCONNECTION?

A. No. BellSouth repeatedly asserts that AT&T should be required to pay for transport of BellSouth's own local calls beyond the BellSouth basic local calling areas. Contrary to these assertions, basic local calling areas should not form the basis of network interconnection. First, basic local calling areas may be subject to substantial changes as BellSouth and CLECs seek competitive advantages to their respective local service offerings. A case in point is BellSouth's Area Plus calling plan, which allows its customers to make local calls throughout a LATA on a flat-rate basis. Second, to be fair, interconnection should not be done solely on the basis of BellSouth's existing basic local calling areas. Basic local calling areas bear no relationship to the geographic scope or capability of telecommunications equipment, such as switches. To base interconnection on BellSouth's basic local calling areas would completely disregard the legitimacy of a CLEC's local calling area, would discourage CLECs from expanding local calling areas for the benefit of customers and competition, and certainly would not be reciprocal or fair.

[4] *BellSouth Third Quarter EPS Increases 10%*, BellSouth New Release (Oct. 19, 2000).

Third, using BellSouth's basic local calling areas as the basis of network interconnection substantially compromises the network efficiencies of the alternative network architectures deployed by AT&T and other CLECs in Kentucky, forcing each CLEC into a BellSouth-look-a-like interconnection arrangement. Lastly, AT&T and BellSouth have agreed that most of the traffic within each LATA will be classified as local for purposes of compensating each other for completing the other party's calls. Thus, the local calling area for purposes of reciprocal compensation is now LATA wide.

Q. MR. RUSCILLI'S TESTIMONY PROVIDES SEVERAL EXAMPLES OF HYPOTHETICAL CALLS BETWEEN BELLSOUTH AND AT&T CUSTOMERS IN THE LOUISVILLE LATA. HAS BELLSOUTH ACCURATELY REPRESENTED AT&T'S PROPOSAL IN THESE EXAMPLES?

A. No. BellSouth's hypothetical examples are inaccurate in a number of respects. First, as I have previously stated, AT&T agrees that the parties should establish at least two IPs in each LATA in which AT&T offers local exchange service, unless there is a *de minimus* volume of traffic. For instance, this means that under AT&T's proposal, in the Louisville LATA, AT&T and BellSouth would each have an IP in two locations. Second, BellSouth fails to provide examples of calls originating on AT&T's network and terminating on BellSouth's network. Such examples show the inequitable nature of BellSouth's proposal.

Q. WOULD YOU PLEASE PROVIDE ACCURATE EXAMPLES OF HYPOTHETICAL CALLS BETWEEN BELLSOUTH AND AT&T UNDER EACH PARTY'S PROPOSAL?

A. Yes. First, assume that AT&T's has designated an IP in Louisville and an IP in Shelbyville.

1. An AT&T customer in Shelbyville calls a BellSouth customer in Shelbyville.

Under AT&T's proposal, AT&T would be financially responsible for providing the transport between its switching center (regardless of how distant) and the BellSouth IP in Louisville. In addition, AT&T would pay reciprocal compensation for the transport between the BellSouth IP in Louisville and the BellSouth end office in Shelbyville. AT&T may choose to avoid tandem switching and common transport reciprocal compensation payments by purchasing dedicated transport from the BellSouth IP in Louisville to the BellSouth end office in Shelbyville.

Under BellSouth's proposal, AT&T would be financially responsible for providing the transport between its switching center and the BellSouth end office where the call is to be terminated. AT&T may elect to route the traffic on dedicated transport or on common transport.

Although these proposals differ somewhat, there is little financial difference to the parties.

2. A BellSouth customer in Shelbyville calls an AT&T customer in Shelbyville.

Under AT&T's proposal, BellSouth would be financially responsible for providing the transport between its Shelbyville end office and the AT&T

IP in Shelbyville. In addition, BellSouth would pay reciprocal compensation to AT&T for the use of AT&T's network to complete the BellSouth originated call.

Under BellSouth's proposal, BellSouth would only be financially responsible for providing the transport between its Shelbyville end office and IP located within the Shelbyville local calling area, that BellSouth designates, at its own discretion. AT&T would be financially responsible for providing the remaining transport for BellSouth's own originated calls between the BellSouth-designated IP and the AT&T switching center. BellSouth does not pay AT&T a transport component or tandem switching component as a part of reciprocal compensation, only local switching.

The biggest difference between these proposals is that under BellSouth's proposal, AT&T must provide the transport from the BellSouth-designated IP across its network (from the Shelbyville IP to the AT&T switch) without any compensation for such costs from BellSouth.

3. An AT&T customer in Shelbyville calls a BellSouth customer in Louisville.

Under AT&T's proposal, AT&T would be financially responsible for providing the transport between its switching center and the BellSouth IP in Louisville. In addition, AT&T would pay reciprocal compensation for the transport between the BellSouth IP in Louisville and the BellSouth end office. AT&T may choose to avoid tandem switching and common transport reciprocal compensation payments by purchasing dedicated transport from the BellSouth IP in Louisville to the BellSouth end office.

Under BellSouth's proposal, AT&T would be financially responsible for providing the transport between its switching center and the BellSouth Louisville end office where the call is to be terminated. AT&T may elect to route the traffic on dedicated transport or on common transport. Although these proposals differ somewhat, there is little financial difference to the parties.

4. A BellSouth customer in Shelbyville calls an AT&T customer in Louisville.

Under AT&T's proposal, BellSouth would be financially responsible for providing the transport between its Shelbyville end office and the AT&T IP in Louisville. In addition, BellSouth would pay reciprocal compensation to AT&T for the use of AT&T's network to complete the BellSouth originated call.

Under BellSouth's proposal, BellSouth would be financially responsible for providing the transport only between its Shelbyville end office and an IP located within the Shelbyville local calling area, that BellSouth designates, at its own discretion. AT&T would be financially responsible for providing the remaining transport between the BellSouth-designated Shelbyville IP and the AT&T switching center in Louisville. BellSouth does not pay AT&T a transport or tandem switching component as a part of reciprocal compensation, only local switching.

The biggest difference between these proposals is that under BellSouth's proposal, AT&T must provide the transport from the BellSouth-designated Shelbyville IP across the LATA to AT&T's network without any compensation for such costs from BellSouth.

Q. WOULD YOU SUMMARIZE THE AREAS OF AGREEMENT AND DISAGREEMENT?

A. AT&T has agreed that for its originating traffic it will be financially responsible for all the transport required to carry its traffic across the LATA to the BellSouth end office. BellSouth has not objected to this in Mr. Ruscilli's testimony. AT&T also has agreed to establish at least two IPs in each LATA in which AT&T provides local exchange services, unless the volume is too small to justify two IPs. BellSouth omitted to mention this point in Mr. Ruscilli's testimony, but seeing as that resolves many of BellSouth's concerns about transporting its traffic outside its basic local calling area, BellSouth may find this also acceptable. Given these areas of agreement, the area of disagreement relates to BellSouth's originating traffic that terminates to an AT&T customer within the LATA.

Q. HOW DO YOU RESPOND TO BELLSOUTH'S ASSERTION THAT, "AT&T'S THEORY WOULD MEAN THAT AT&T COULD HAVE A PHYSICAL POINT OF INTERCONNECTION WITH BELLSOUTH'S 'NETWORK' IN KNOXVILLE, AND BELLSOUTH WOULD BE REQUIRED TO HAUL LOCAL CALLS ORIGINATING IN SHELBYVILLE AND DESTINED TO TERMINATE IN SHELBYVILLE ALL THE WAY TO KNOXVILLE, AT NO COST TO AT&T."

A. This is simply wrong. First, there are LATA restrictions and the FCC rules and orders adopting those rules were established knowing there are LATA restrictions still in place. If LATA restrictions are removed in the future, I have no doubt that the FCC would readdress its orders and rules to revise them to comport with the

lifting of the LATA restrictions. Second, as I have stated previously, AT&T has agreed to establish at least two IPs in each LATA in which AT&T offers service, unless there is a *de minimus* volume of traffic. In any event, AT&T will have at least one IP in each LATA and BellSouth's assertion that it would be responsible for hauling local calls in one LATA into another LATA for completion has no basis in fact.

Q. HOW DO YOU RESPOND TO MR. RUSCILLI'S CLAIM THAT UNDER FCC RULES AT&T IS OBLIGATED TO PAY THE COSTS OF INTERCONNECTION?

A. Mr. Ruscilli's reliance on paragraphs 199 and 209 of the FCC's First Order and Report is misplaced. Under FCC rules, the ILEC may recover its costs to terminate the CLEC's originating traffic, and the CLEC may recover its costs to terminate the ILEC's originating traffic. Under FCC rules, the CLEC's terminating costs are presumed to be the same as the ILECs. The CLEC, however, may make a showing to the state commission that its actual costs may be higher, and the state commission may adopt those rates for the CLEC. *See* 47 C.F.R. § 51.711. The FCC never contemplated that one party or the other is to be less than fully compensated for its costs to terminate the originating party's traffic. Moreover, the FCC rule also makes clear that "one LEC may not assess charges on any other telecommunications carrier for local telecommunications traffic that originates on that LEC's network."[5] As I stated in my direct testimony, this is exactly what BellSouth is proposing.

[5] 47 CFR §51.703(b).

In its role as originating carrier, AT&T agrees to fully compensate BellSouth for transport that it provides to AT&T to complete AT&T's traffic, but does not propose to have BellSouth financially responsible for any of the cost that AT&T incurs to bring AT&T originated traffic to BellSouth's network for completion by BellSouth. BellSouth should be required to do the same.

Q. HAS THE FCC DISCUSSED THE CONCEPT OF EQUIVALENT POINTS OF INTERCONNECTION?

A. Yes, as outlined in my direct testimony, in its order on SBC's 271 application for Texas, the FCC made clear its view that under the Telecommunication Act, CLECs have the legal right to designate the most efficient point at which to exchange traffic. As the FCC explained, "New entrants may select the most efficient points at which to exchange traffic with incumbent LECs, thereby lowering the competing carriers' cost of, among other things, transport and termination."[6]

The FCC has also articulated its view in other litigation. For example, in *In re TSR Wireless, LLC, et. al., v. U.S. West*[7] decision, the FCC reiterated its position that ILECs may not impose upon other telecommunications carriers charges for the facilities used to deliver LEC originated traffic.

Most recently, the FCC addressed this very issue in its order in *Memorandum and Order,* FCC 01-29, Joint Application by SBC Communications Inc., Southwestern Bell Telephone Company, and Southwestern Bell Communications Services, Inc. d/b/a

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[6] Memorandum Report and Order, Application of SBC Communications Inc., Southwestern Bell Telephone Company and Southwestern Bell Communications Services, Inc. d/b/a Southwestern Bell Long Distance, Pursuant to Section 271 of the Telecommunications Act of 1996 To Provide In-Region InterLATA Services in Texas, CC Docket No. 00-65, ¶ 78 (June 30, 2000).

Southwestern Bell Long Distance for Provision of In-region, interLATA Services in Kansas and Oklahoma, CC Docket No. 00-217 (January 22, 2001)("SBC Kansas & Oklahoma Order") (relevant excerpts attached). The SBC Kansas and Oklahoma Order relies upon and discusses the very same legal authority I address in my testimony, and reaches the same conclusions. In short, the SBC Kansas and Oklahoma Order provides specific and unequivocal direction to the Commission that the BellSouth proposal is illegal under FCC rules and regulations.

In its Kansas and Oklahoma Order, the FCC addressed the issue of the incumbent effectively denying "a competing carrier the right to select a single point of interconnection by ***improperly*** shifting to competing carriers inflated transport and switching costs associated with such a [single point of interconnection] arrangement." *Id.* at ¶ 233. The FCC was addressing the very same issue raised by AT&T in this arbitration.[8] Although the issue was one of future compliance, the FCC nonetheless cautioned SWBT "from taking what appears to be an expansive and out of context interpretation of findings we made in our *SWBT Texas Order* concerning its obligation to deliver traffic to a competitive LEC's point of interconnection." *Id.* ¶ 235. In particular, the FCC confirmed that its decision allowing a CLEC to designate a single point of interconnection did not in any way "change an incumbent LEC's reciprocal compensation obligations under our current rules." *Id.* The FCC specifically referenced the very same rules I address in my testimony (47 C.F.R. §§ 51.703(b) and 51.709(b)),

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[7] File Nos. E-98-13, et. al., FCC 00-194 (June 21, 2000) (Appeal filed *sub nom, Qwest Corp. v. FCC*, Docket No. 00-1376 (D.C. Cir. Aug. 17, 2000).

[8] "For example, AT&T avers that, in a technical conference in Oklahoma after the adoption of the 02A, SWBT advanced several compensation arrangements relating to a competing carrier's choice of interconnection and collocation which require AT&T to pay inflated transport costs upon exercising its right to a single point of interconnection." *Id.* ¶ 233.

which "preclude an incumbent LEC from charging carriers for local traffic that originates on the incumbent LEC's network." *Id.*

The SBC Kansas & Oklahoma Order demonstrates the fundamental fallacy of the BellSouth position. By requiring AT&T to pay the cost of transporting BellSouth's own traffic from the boundaries of its basic local calling areas to the point of interconnection designated by AT&T, BellSouth would, ***in effect***, require AT&T to construct a point of interconnection in each BellSouth basic local calling area.

It is a hollow gesture to allow AT&T to designate a single point of interconnection and then require AT&T to pay the difference of the cost of that single point of interconnection and the cost of multiple points of interconnection in every BellSouth basic local calling area. Thus, aside from being illegal under 47 C.F.R. §§ 51.703(b) and 51.709(b), the BellSouth proposal would effectively eliminate AT&T's right to designate a single point of interconnection, because it would force AT&T to pay BellSouth ***as if*** AT&T were required to establish multiple points of interconnection in all of BellSouth's basic local calling areas.

Q. WHAT HAVE OTHER STATE COMMISSIONS HELD REGARDING AT&T'S PROPOSAL?

A. Other state Commissions specifically have rejected the argument BellSouth proffers here that CLECs should be required to pay the costs to receive traffic within each local calling area established by the ILEC. For example, the Kansas Commission found that TCG should be permitted to establish an interconnection point at SWBT's local and access tandems while SWBT should establish its

interconnection point at TCG's switch.[9] Similarly, The California Commission found that AT&T was not required to interconnect at each Pacific Bell end office and set default points of interconnection at AT&T's switch and Pacific Bell's tandem switch.[10] Likewise, the Texas Public Utilities Commission specifically rejected SWBT's argument that AT&T must interconnect in each local calling area.[11] According to the Texas decision, "The FCC has clearly stated that the CLEC is the one that determines at which points on the ILEC's network it wants to interconnect, unless the ILEC demonstrates that the CLEC's proposal is technically infeasible."[12] Arbitrators in Michigan, Indiana, and Wisconsin also have held that each party is financially responsible for delivering its originating interconnection traffic to the terminating party's interconnection point.[13]

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[9] Arbitrator's Order No. 5: Decision, *In the Matter of the Petition of TCG Kansas City, Inc. for Compulsory Arbitration of Unresolved Issues with Southwestern Bell Telephone Company Pursuant to Section 252 of the Telecommunications Act of 1996*, pp. 4, 10 (Aug. 7, 2000). The Kansas Corporation Commission affirmed the arbitrator's decision on this issue on September 8, 2000, making a clarification as to the cost to be imposed to convert trunks. *See* Order Addressing and Affirming Arbitrator's Decision at 9.

[10] Opinion, *Application of AT&T Communications of California, Inc. (U 5002 C), et al., for Arbitration of an Interconnection Agreement with Pacific Bell Telephone Company Pursuant to Section 252(b) of the Telecommunications Act of 1996*, Dkt. No. 00-01-022, p. 13 (CA PUC Aug. 3, 2000).

[11] Revised Arbitration Award, *Petition of Southwestern Bell Telephone Company for Arbitration with AT&T Communications of Texas, L.P., TCG Dallas and Teleport Communications, Inc. Pursuant to Section 251(B)(1) of the Federal Communications Act of 1996,* Docket No. 22315. (Texas PUC Sept. 27, 2000.).

[12] *Id.* at 9.

[13] *See* Arbitration Award, *Petition for Arbitration to Establish an Interconnection Agreement Between two AT&T subsidiaries, AT&T Communications of Wisconsin, Inc. and TCG Milwaukee and Wisconsin Bell, Inc. (d/b/a Ameritech Wisconsin)*, 05-MA-120 (Oct. 12, 2000); Decision of Arbitration Panel, *AT&T Communication's of Michigan Inc., and TCG Detroit's Petition for Arbitration*, Case No. U-12465 (Oct. 18, 2000) (The Michigan Public Service Commission affirmed this portion of the Arbitration Panel's Decision by Order dated November 20, 2000); Order, *AT&T Communications of Indiana TCG Indianapolis, Petition for Arbitration of Interconnection Rates, Terms, and Conditions and Related Arrangements with Indiana Bell Telephone Company, Incorporated d/b/a Ameritech Indiana Pursuant to Section 252(b) of the Telecommunications Act of 1996*, Cause No. 40571-INT-03 (Nov. 20, 2000). The Oklahoma Corporation Commission, as part of its 271 deliberations, originally held that SWBT should allow CLECs to interconnect at a single technically feasible point to meet CLEC needs. However, the Commission modified its decision on this issue. *See* Order No. 445340, Order Nunc Pro Tunc Regarding Order No. 445180, Corporation Commission of Oklahoma, Cause No. PUD 970000560 (Oct. 4, 2000).

Q. DOES BELLSOUTH'S PROPOSAL TO AGGREGATE ITS ORIGINATING TRAFFIC TO A SINGLE POINT OF ITS CHOOSING WITHIN THE BELLSOUTH LOCAL CALLING AREA NULLIFY AT&T'S CONCERNS ABOUT COLLOCATION SPACE EXHAUSTION AND HAVING TO GO TO EACH END OFFICE?

A. No. Under BellSouth's proposal, BellSouth may unilaterally select an end office where collocation space is limited or exhausted. In such instances, AT&T would be required to interconnect at many end offices in a LATA.

Q. HOW DO YOU RESPOND TO MR. RUSCILLI'S ASSERTION ON PAGE 36 THAT AT&T IS NOT HAMPERED IN ITS ABILITY TO COMPETE IF THE BELLSOUTH PROPOSAL IS ADOPTED?

A. BellSouth fails to recognize that BellSouth's proposal not only increases CLECs' costs to enter the market, but also requires CLECs to create networks mirroring the embedded network BellSouth has in place today. As a result, a CLEC's ability to differentiate itself in the market is severely hampered. Because AT&T and BellSouth have agreed that all calls within the LATA are local, and BellSouth continues to sell more and more LATAwide local calling plans, BellSouth's proposal will result in AT&T having to place an IP in every local calling area, contrary to BellSouth's testimony that it will not.

Q. IN HIS DIRECT TESTIMONY MR. RUSCILLI SUGGESTS THAT THE ISSUE IS ONE OF COST ALLOCATION BASED ON THE AT&T NETWORK DESIGN. IS HE CORRECT?

A. No. The question is not whether the parties' networks will be interconnected based on the network design of one party, but rather will the parties' networks be interconnected in a manner that is neutral to network design. It is only fair and equitable that an interconnection arrangement does not favor any particular design.

AT&T should not suffer a burdensome and discriminatory network interconnection arrangement because it chooses to deploy a more efficient network design than the classic hub-and-spoke telephony architecture. The Commission should be sensitive to issues which give the incumbent carrier substantial competitive advantages over competing carriers. Accordingly, the fair outcome is for both AT&T and BellSouth to be interconnected on an equitable basis.

Q. HOW DO YOU RESPOND TO THE CLAIM THAT BELLSOUTH'S LOCAL EXCHANGE RATES DO NOT COVER ADDITIONAL TRANSPORT COSTS?

A. In none of the call examples provided above, in which BellSouth is the originating party, is BellSouth required to provide transport for which it has no means to recover its costs.

With respect to a call from a BellSouth customer to an AT&T customer within the Shelbyville local calling area, where BellSouth has no toll revenue, BellSouth would have no obligation to provide transport beyond the Shelbyville local calling area, since AT&T has indicated it might place its IP in Shelbyville. With respect to a call from a BellSouth customer in Shelbyville to an AT&T customer in Louisville, BellSouth would have an obligation to provide transport to AT&T's IP

in Louisville; however this may be a toll call under BellSouth's current local calling areas, and BellSouth would have the option to collect toll revenue for these calls to cover its additional transport expenses to AT&T.

Therefore, the Commission should disregard BellSouth's baseless assertion that AT&T's proposal would impose costs on BellSouth for which it has no means to recover.

Q. IS AT&T'S PROPOSAL NOTHING MORE THAN AN ELABORATE RUSE THAT AT&T ATTEMPTS TO USE TO IMPOSE THE ADDITIONAL COSTS OF ITS NETWORK DESIGN ONTO BELLSOUTH?

A. Absolutely not. First, AT&T's solution maintains the status quo of how the financial responsibility is assigned today. AT&T's network design has been in place for several years, and AT&T's proposed solution is what is occurring today. BellSouth is currently financially responsible for bringing its originated traffic to AT&T's switch, and has not disputed any billing by AT&T that reflects this. By the same token, AT&T is financially responsible for getting its originated traffic to BellSouth's POI and has not objected to this responsibility. BellSouth's proposal is the one that will change the imposition of costs on the other party, not AT&T's. BellSouth's proposal will result in AT&T having to incur new additional costs that it does not incur today.

Second, when BellSouth states that AT&T's proposal will raise its costs that are not currently being recovered by its current basic local rates, this is simply not true. AT&T's proposed solution – the status quo of today - has been in effect for

several years, and this Commission has yet to see a filing by BellSouth asking to raise any of its rates to cover this "additional cost."

Q. WHAT IS AT&T ASKING THIS COMMISSION DO?

A. AT&T is asking that the Commission retain the status quo and find that BellSouth shall continue to be financially responsible for all of the costs of originating any of its traffic within the LATA and delivering such traffic to an AT&T switch or designated interconnection point(s) if the switch serving a LATA is located outside of that LATA.

ISSUE 9: SHOULD AT&T BE PERMITTED TO CHARGE TANDEM RATE ELEMENTS WHEN ITS SWITCH SERVES A GEOGRAPHIC AREA COMPARABLE TO THAT SERVED BY BELLSOUTH'S TANDEM SWITCH?

Q. HOW DO YOU RESPOND TO MR. RUSCILLI'S ASSERTION THAT AT&T IS NOT ENTITLED TO THE TANDEM RATE BECAUSE AT&T DID NOT SHOW THAT AT&T IS ACTUALLY PERFORMING A TANDEM FUNCTION?

A. Rule 51.711(a)(3) of the FCC's Interconnection Order provides, "Where the switch of a carrier other than an incumbent LEC serves a geographic area comparable to the area served by the incumbent LEC's tandem switch, the appropriate rate for the carrier other than an incumbent LEC is the ILEC's tandem interconnection rate." The plain language of the order is that there is no requirement that a CLEC network actually have a tandem switch or perform an

intermediate switching function to receive the tandem interconnection rate. Any other conclusion would be illogical.

Carefully analyzing Mr. Ruscilli's argument illuminates its tortured logic. If a CLEC were providing the actual local tandem switching capability, then according to Mr. Ruscilli, BellSouth would agree to pay the tandem interconnection rate to the CLEC. Therefore, to reach Mr. Ruscilli's interpretation of Rule 51.711(a)(3), the FCC actually intended to make it more difficult for a CLEC to qualify for the tandem interconnection rate than an ILEC. Under Mr. Ruscilli's interpretation, BellSouth must merely provide tandem switching, but a CLEC must pass a two part test: first, it must actually provide the identical tandem switching functionality provided by the ILEC and the CLEC switch must also serve a geographic area comparable to the area served by the incumbent LEC's tandem switch.

It is important to note that AT&T's reliance on the FCC's proxy rule for compensating CLECs for reciprocal compensation is in lieu of making an individual cost showing that AT&T's costs are in fact higher than BellSouth's rate, and thus should be compensated at a higher rate than BellSouth. (FCC Rule 711(b)). It is quite possible for such a showing to be made by a CLEC, particularly in the early stages of construction of a local network that enjoys nowhere near the ubiquity and utilization that BellSouth's network does.

Q. WHAT ABOUT THE FCC'S LOCAL COMPETITION RULE, WHICH MR. RUSCILLI CITES?

A. Clearly the FCC did not intend to hold a CLEC to a higher standard to qualify for the tandem interconnection rate than an ILEC. Indeed, the FCC's own comments

demonstrate this intent in Paragraph 1090 of the Local Competition Order, the FCC stated:

> [s]tates shall also consider whether new technologies (*e.g.*, fiber ring or wireless networks) perform functions similar to those performed by an incumbent LEC's tandem switch.... (Emphasis added.)

This is not an additional test for CLECs, but an alternative by which the CLEC may qualify for a "proxy" of the CLEC's additional costs. Thus, it is clear that actual local tandem (i.e., intermediate switching) functionality is not a requirement for a CLEC to receive the tandem interconnection rate.

Q. ON PAGE 39 OF HIS DIRECT TESTIMONY, MR. RUSCILLI STATES THAT AT&T SHOULD ONLY BE COMPENSATED FOR THE FUNCTIONS IT ACTUALLY PERFORMS. DO YOU AGREE?

A. No. This is not the issue. The issue is whether AT&T should be compensated for its costs to terminate BellSouth's originated traffic. BellSouth is attempting to frame the issue in a different manner than how the FCC framed the issue. A careful reading of the FCC's First Order and Report, paragraphs 1085 through 1091 clearly shows that nowhere does the FCC say that parties should "only be compensated for the functions it actually provides, as BellSouth asserts. Instead of forcing the states into costly and lengthy cost proceedings for CLECs, the FCC proposes several proxies for "actual costs." In paragraph 1085 of the FCC's First Order and Report, the FCC found "We also conclude that using the incumbent LEC's forward-looking costs for transport and termination of traffic as a proxy for the costs incurred by interconnecting carries satisfies section 252(d)(2) that costs be determined 'on the basis of a reasonable approximation of the additional costs

of terminating such calls'". Again in paragraph 1088, the FCC stated that "We find, however, that incumbent LEC's costs, including small incumbent LEC's costs, serve as reasonable proxies for other carrier's costs of transport and termination". And in paragraph 1090 of this same order, it says "where the interconnecting carrier's switch serves a geographic area comparable to that served by the incumbent LEC's tandem switch, the appropriate proxy for the interconnecting carrier's additional costs is the LEC tandem interconnection rate". The Commission should reject the manner in which BellSouth has attempted to frame this issue and thereby reject BellSouth's arguments. It clearly was not the intent of the FCC for the amount of reciprocal compensation to be based on the actual costs of the functions provided by interconnecting carriers. If such were the case, then the FCC would never have allowed the incumbent LEC's costs to be used as proxies for CLEC's costs.

Q. FURTHER ON PAGE 39, MR. RUSCILLI STATES THAT AT&T MUST PROVIDE THE FUNCTIONALITY OF A TANDEM SWITCH TO INCUR THE COST OR IT SHOULD NOT CHARGE BELLSOUTH THE TANDEM SWITCHING RATE. DO YOU AGREE?

A. Absolutely not. In paragraph 1090 of the FCC's First Order, the FCC says that "states shall also consider whether new technologies (e.g., fiber rings or wireless networks) perform functions *similar* to those performed by an incumbent LEC's tandem switch and thus, whether some or all calls terminating on the new entrant's network should be priced the same as the sum of transport and termination via the incumbent LEC's tandem switch". Nowhere in its order does the FCC say that the interconnecting carrier must provide the identical functions.

Why? Because to do so would be irrelevant, since the CLEC can charge and BellSouth would pay, by its own admission, for providing identical functionality. Additionally, AT&T is permitted to charge for tandem switching on every local call because AT&T incurs its costs on every call. That is the point of the FCC's proxy.

Q. ON PAGES 40 AND 41, MR. RUSCILLI STATES THAT THE FCC POSED TWO REQUIREMENTS THAT MUST BE MET BEFORE A CLEC WOULD BE ENTITLED TO COMPENSATION AT BOTH THE END OFFICE AND TANDEM SWITCHING RATES. DO YOU AGREE?

A. No. If this were the intention of the FCC, it would have clearly stated that in its adopted rules. The rule in question, C.F.R. 55.711(a)(3) was first issued on August 8, 1996, as part of the First Order and Report issued by the FCC. The FCC has had over 4 years to revise this rule to reflect a two-part test if that is what it intended. I find it hard to believe that BellSouth thinks that the FCC made a mistake and "forgot" the second test when it wrote the rule or when it wrote the sentence quoted above. The FCC did not forget the second test because it would make no sense to include the second test proposed by BellSouth, since the CLEC would be, by BellSouth's own admission, entitled to the tandem rate by satisfying the so-called second test alone.

Q. ON PAGE 41, MR. RUSCILLI STATES THAT THE BASIC NETWORK ARCHITECTURE USED BY AT&T IS THE SAME AS BELLSOUTH, AND THUS THE COMMISSION NEED NOT MAKE ANY ATTEMPT TO DETERMINE WHETHER THE NEW TECHNOLOGY DEPLOYED BY

AT&T PERFORMS SIMILAR FUNCTIONS TO TANDEM SWITCHING. DO YOU AGREE?

A. No. There has been no evidence filed by BellSouth to support this assertion. AT&T has provided ample evidence in its direct testimony that AT&T's network architecture is substantially different than BellSouth's. BellSouth would have the Commission believe that any network that provides exchange and exchange access service must have identical architectures. This simply is not the case. Thus, the Commission should attempt, as other commissions have done, to determine whether the new technology deployed by AT&T performs a function similar to BellSouth's tandem switches. Again, the key word is similar, not exactly.

Q. BEGINNING ON PAGE 42, MR. RUSCILLI BEGINS A DISCUSSION OF WHAT TANDEM FUNCTIONALITY IS AND WHETHER AT&T'S SWITCHES PERFORM THE TANDEM FUNCTIONALITY DESCRIBED BY MR. RUSCILLI. WHAT RELEVANCE DOES THIS TESTIMONY HAVE?

A. None. For instance, Mr. Ruscilli on page 39 states "To receive reciprocal compensation at the tandem rate, a carrier must be performing the function described in the FCC's definition of tandem switching". This is simply incorrect. The rule BellSouth refers to is applicable to incumbent LECs only, not CLECs. BellSouth's false assertion directly contradicts the FCC in its First Order and Report at Paragraph 1090, when it talks about similar, not exact, functions. Further on in his testimony, Mr. Ruscilli states that AT&T switches must actually be performing the tandem functions, "if for no other reason than the difference

between end office and tandem rates for reciprocal compensation is the same as the UNE rate for tandem switching". Again, what Mr. Ruscilli fails to mention is that for AT&T these incumbent LEC rates are mere proxies for AT&T costs, in lieu of AT&T having to provide its own cost studies. These proxies are meant to compensate AT&T for the costs it incurs since it has a completely different network architecture than what BellSouth has in place.

Q. DO AT&T'S SWITCHES PERFORM THE FUNCTIONS OF A TANDEM SWITCH?

A. Although AT&T does not believe it must establish such functionality under applicable FCC rules, AT&T's switches do, in fact, provide the necessary functionality. In spite of this, AT&T provided evidence in its direct testimony demonstrating that AT&T's switches perform similar functions of a tandem switch. Despite BellSouth's attempt to try to convince this Commission that AT&T is an ILEC and must meet the requirements of an ILEC, AT&T's switches do perform similar tandem switch functions. The true purpose of a tandem switch is to aggregate traffic. A tandem switch does this through an intermediate switching step. AT&T's network is performing tandem-like functions by aggregating traffic. Since AT&T's network aggregates traffic differently than BellSouth's network, BellSouth is assuming we aggregate traffic the same way it does. However, intermediate tandem switching is not the sole means to aggregate traffic.

AT&T's network does indeed aggregate traffic across a broad geographic area, often a substantially larger area than a BellSouth tandem. This is something BellSouth has not disputed. Thus, the Commission should consider not whether

AT&T's network is capable of intermediate switching, but rather whether it is capable of traffic aggregation. If so, then AT&T's network does indeed perform functions "similar to those performed by an incumbent LEC's tandem switch".

To show the level of aggregation that AT&T's network performs please review the following table. However, as I said earlier, the FCC does not require a CLEC to meet such a test. Therefore, AT&T has met a higher standard than required by FCC rules.

TRAFFIC AGGREGATION FUNCTIONS

Traffic Type	BST Tandem	AT&T Network
Traffic between end office and IXC	YES	YES
Traffic between end office and other CLECs	YES	YES
Traffic between end office and independent LECs	YES	YES
Traffic between end offices	YES	YES
Traffic between AT&T switch and BST end office	YES	YES
Traffic between end office and operator service platform	YES	YES
Traffic between end office and 911 tandem	YES	YES
Overflow traffic	YES	NO

Q. CAN YOU SUMMARIZE THE EVIDENCE THAT AT&T HAS PROVIDED REGARDING GEOGRAPHIC COMPARABILITY?

A. Yes. In my direct testimony, AT&T provided a series of maps that show separately for AT&T and BellSouth the geographic area served by its respective switches (for AT&T) and tandems (for BellSouth) for each LATA in Kentucky. Comparing the AT&T switch service area to the BellSouth tandem service area shows that AT&T meets the requirement of § 51.711(a)(3).

Q. PLEASE SUMMARIZE WHAT YOU WANT THIS COMMISSION TO DO WITH REGARD TO ISSUE 9

A. AT&T requests the Commission conclude that AT&T switches serve a comparable geographic area as that served by BellSouth's tandem switches and that AT&T is thus entitled to the tandem interconnection rate.

ISSUE 13: WHAT IS THE APPROPRIATE TREATMENT OF OUTBOUND VOICE CALLS OVER INTERNET PROTOCOL ("IP") TELEPHONY, AS IT PERTAINS TO RECIPROCAL COMPENSATION?

Q. DO YOU AGREE WITH BELLSOUTH THAT ISSUE 13 RELATES ONLY TO PHONE-TO-PHONE IP TELEPHONY CALLS?

A. No. BellSouth has provided AT&T with two different sets of language to consider regarding treatment of IP Telephony calls. The first one is found in Attachment 3, section 6.19, as attached to BellSouth's reply to AT&T's petition for arbitration as follows:

> Neither Party shall represent access services traffic (e.g., Internet Protocol Telephony, FGA, FGB, etc.) as Local Traffic for purposes of payment of reciprocal compensation. "Internet Protocol Telephony" is defined as real-time voice conversations over the Internet by converting voices into data, which is compressed and split into packets, which are sent over the Internet like any other packets and reassembled as audio output at the receiving end. (Attachment 3, section 6.19, as attached to BellSouth's reply to AT&T's petition for arbitration)

The second one was sent to AT&T by BellSouth via e-mail and is as follows:

> The origination and end point of the call shall determine the jurisdiction of the call. Unless expressly agreed to by the Parties in this Agreement, neither Party shall represent as local traffic any traffic for which access charges may be lawfully assessed. The Parties have been unable to agree as to whether a call that travels over transport protocol methods other than those being utilized by the Parties on the effective date of this Agreement and crosses LATA boundaries constitutes switched access traffic. However, because the Parties are not currently utilizing alternative transport

protocol methods on the effective date of this Agreement, the Parties will resume negotiations on this issue if and when either Parties adopts a new transport protocol method. If the parties are unable to resolve this issue, then the Parties will submit the dispute to the Kentucky Regulatory Commission or the Federal Communications Commission, whichever is appropriate, for resolution. (Language sent to AT&T in E-mail for consideration to close issue.)

Both sets of language would apply to all IP Telephony calls, not just phone-to-phone calls. Neither set makes a distinction between phone-to-phone, computer-to-phone, phone-to-computer, or computer-to-computer calls: the two sets of language would treat all forms of Voice-over Internet Protocol (VOIP) traffic as switched access traffic.

AT&T understood the use of the term "Internet" proposed by BellSouth in its reply to AT&T's petition to mean the World Wide Web. Thus, "over the Internet" referred to "over the World Wide Web". IP telephony and Internet Telephony utilize the same Internet protocol but are not the same.

Q. PLEASE EXPLAIN THE DIFFERENCE, IF ANY, BETWEEN IP TELEPHONY AND INTERNET TELEPHONY.

A. "IP Telephony" refers to traffic carried via Internet Protocol over the private network of a carrier, while "Internet Telephony" is limited to telephone calls carried over the Internet; that is, the World Wide Web. It is universally accepted that the term "Internet" references the World Wide Web, not the internal dedicated private networks of particular companies. The language proposed by BellSouth, however, shows that BellSouth intends to treat all types of calls as switched access traffic, "regardless of transport protocol" including Internet Telephony calls that travel over the World Wide Web.

The failure by BellSouth to make the distinction between IP Telephony and Internet Telephony calls is not an oversight: BellSouth indicated in negotiations with AT&T that it intends to treat both types of calls as switched access traffic. BellSouth now takes the position that computer-to-computer, computer-to-phone, phone-to-computer, and IP enabled phone-to-phone voice calls are no longer an issue to be addressed by this Commission. However, the language proposed by BellSouth does not eliminate these variations of calls from consideration.

Q. DO YOU AGREE WITH MR. RUSCILLI'S DEFINITION OF PHONE-TO-PHONE IP TELEPHONY?

A. No. Mr. Ruscilli concludes that phone-to-phone IP Telephony provided by a "local carrier" or "telephone carriers" is a basic telecommunications service rather than an "information service". He is incorrect. It is the nature of the service, not the nature of the entity providing the service that determines whether or not a local carrier or telephone carrier is eligible for the ISP exemption from payment of access charges. Although the FCC in its *Report to Congress (FCC 98-67, April 10, 1998)* recognized that IP Telephony bears the characteristics of a "telecommunications service" that provides pure transmission (rather than an "information service" that provides enhanced functionalities), today, the FCC treats IP Telephony as if it were an information service and thus exempts IP Telephony providers from paying traditional access charges. Therefore, to the extent that a local carrier or telephone carrier provides IP Telephony, it is eligible for the ISP exemption from payment of access charges, just like all other IP Telephony providers.

It's clear that Mr. Ruscilli advocates imposing access charges on all communications, both voice and data, transported via Internet Protocol regardless of whether the service may be telecommunications or information services. However, the FCC has determined that telecommunications services and information services are mutually exclusive categories. A particular service can be one or the other, but it cannot be both.

The FCC developed the distinction between "basic services" and "enhanced services" in the Second Computer Inquiry (1980) (Computer II). "Basic services" were defined by the FCC as "the common carrier offering of transmission capacity for the movement of information". A basic service transmits information generated by a customer from one point to another, without changing the content of the transmission. The "basic" service classification defines the transport transmission capacity that makes up traditional communications service, which the FCC considers to be "wholly traditional common carrier activities" (Title II of the Act).

In comparison, the FCC defined unregulated "enhanced service" as "services offered over common carrier transmission facilities...which [1] employ computer processing applications that act on the format, content, code, protocol...[2] provide the subscriber additional, different or restructured information; or [3] involve subscriber interaction with stored information." A service is generally enhanced if it meets one of the three criteria. The FCC has determined that protocol processing services that qualified as enhanced should be treated as information services under the Act (1996)(Non-Accounting Safeguards Order). Clearly IP Telephony qualifies as an information service under the Act because

the provider transforms a communication from circuit-switched transport to Internet Protocol transport and vice versa.

Q. MR. RUSCILLI QUOTES FROM THE APRIL 10, 1998 FCC REPORT TO CONGRESS. DO YOU AGREE WITH MR. RUSCILLI'S CHARACTERIZATION OF THAT REPORT?

A. Not entirely. While Mr. Ruscilli does provide accurate quotes from that report, the quotes do not answer the question. The question in his testimony was whether or not the FCC viewed calls to ISPs differently than phone-to-phone IP telephony as it relates to the applicable charges. The FCC did not address "applicable charges" for IP telephony in the Report to Congress. In fact, the FCC deferred the issue of determining the regulatory status of IP telephony, including payment of access charges:

> We do not believe, however, that is appropriate to make any definitive pronouncements in the absence of a more complete record focused on individual service offerings. ...We defer a more definitive resolution of these issues pending the development of a more fully-developed record because we recognize the need, when dealing with emerging services and technologies in environments as dynamic as today's Internet and telecommunications markets, to have as complete information and input as possible.[14]

Thus, contrary to BellSouth's statement, the FCC has not determined that IP Telephony is a telecommunications service subject to access charges.

[14] In the Matter of Federal-State Joint Board on Universal Service, FCC Report to Congress, CC Docket No. 96-45, (April 10, 1998) at ¶ 90.

Q. HAS THE FCC RECENTLY VOICED ITS POSITION ON THE ISSUE OF INTERNET TELEPHONY?

A. Yes. In a recent May 25th interview with Warren's Washington Internet Daily, Chairman Kennard stated he will not regulate Internet telephony. He stated that "it is important to recognize that legacy regulation is not necessarily appropriate to emerging network technologies, so when people start asking when are you to going to regulate IP telephony, my answer is always the same - never." Chairman Kennard said it is preferable to seek a more appropriate method of universal service funding than to apply outdated regulation to new technology. While Mr. Ruscilli mentions an FCC report dated April 10, 1998 as a basis for asserting that the FCC would find in BellSouth's favor, the May 25th statements by Chairman Kennard clearly indicate that the FCC no longer is pursuing a course of applying traditional regulatory solutions and rules to IP telephony calls. Chairman Kennard again reiterated this position in a speech in Atlanta on September 12, 2000 when he stated: " ...regulation is too often used as a shield, to protect the status quo from new competition—often in the form of smaller, hungrier competitors—and too infrequently as a sword—to cut a pathway for new competitors to compete by creating new networks and new services."

Q. HAS THE FCC GIVEN ANY OTHER INDICATION THAT IT WILL NOT AT THIS TIME APPLY TRADITIONAL ACCESS CHARGES TO IP TELEPHONY CALLS?

A. Yes. In April 1999, the FCC declined to act on a Petition U.S. West filed seeking an expedited declaratory ruling. U.S. West requested that the FCC determine that phone-to-phone IP Telephony is a telecommunications service subject to a

carrier's carrier charges (access) when the ILEC provides originating and terminating access.

Q. WHAT DOES AT&T RECOMMEND THIS COMMISSION DO WITH THIS ISSUE AS NOW CLARIFIED BY BELLSOUTH?

A. AT&T recommends that this Commission not adopt the language proposed by BellSouth, but should instead find that IP telephony calls are not subject to access charges.

Under the FCC's longstanding ESP exemption, AT&T suggests that the Commission rule that all forms of ISP Traffic, including IP telephony, should be treated as local and subject to cost based reciprocal compensation on a uniform basis with "local" voice and data traffic. Such a ruling would further support federal and state comity and facilitate the development of a uniform, nationwide, pro-competitive regulatory policy with regard to the treatment of IP telephony services.

ISSUE 21: SHOULD THE COMMISSION OR A THIRD PARTY COMMERCIAL ARBITRATOR RESOLVE DISPUTES UNDER THE INTERCONNECTION AGREEMENT?

Q. DO YOU AGREE WITH BELLSOUTH'S POSITION THAT THE USE OF THIRD PARTY ARBITRATORS TO RESOLVE DISPUTES IS IN FACT MORE COSTLY AND EXPENSIVE THAN SEEKING RESOLUTION FROM THE GOVERNING REGULATORY COMMISSION?

A. No. BellSouth and AT&T have not utilized the previous commercial arbitration clause. Therefore, the parties have no track record regarding this issue.

Q. HAS AT&T HAD DIFFERENT EXPERIENCES WITH COMMERCIAL ARBITRATION?

A. Yes. In AT&T's Pacific region, several matters have been resolved through commercial arbitration. In these proceedings, knowledgeable arbitrators were utilized to resolve disputes in a timely and cost effective manner for AT&T and Pacific Bell. Generally, the matter was heard over a one to two day period with minimal costs to the parties. The decisions were quick and allowed the parties to focus on performing pursuant to the interconnection agreement. In fact, in AT&T's recent arbitration proceeding for its second interconnection agreement with Pacific Bell, the California Commission agreed with AT&T's position. In its final order dated August 3, 2000, the Commission adopted AT&T's proposal to retain the requirement in the interconnection agreement that disputes under the agreement should go through an alternative dispute resolution process heard before third party arbitrators, not the commission. See Order in *Application by AT&T Communications of California, inc., et al, for Arbitration of an Interconnection Agreement with Pacific Bell Telephone Company Pursuant to Section 252(b) of the Telecommunications Act of 1996*; Application 00-01-022, August 3, 2000: pages 28-29. I should note that Pacific Bell also raised the issue that private arbitrators were not qualified to resolve telecommunications disputes. The California commission rejected this argument.

While AT&T is well aware of this Commission's ability to handle complaints, this Commission may not have the resources to address each and every dispute

that could arise under the interconnection agreement, or to address them as promptly as could a commercial arbitrator.

Q. WHAT IS AT&T ASKING THAT THE COMMISSION DO WITH RESPECT TO THIS ISSUE?

A. The Commission should adopt AT&T's position regarding private arbitration for disputed issues between BellSouth and AT&T. This Commission has opened numerous generic dockets regarding important policy and pricing issues that are and will be applicable to all CLECs in Kentucky. In taking the position that Interconnection Agreements are commercial agreements between sophisticated parties, and disputes arising therein should be resolved in a private commercial forum, the Commission will be able to expand its focus on industry matters rather than spend time resolving two-party disputes under a negotiated agreement.

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes.

BEFORE THE KENTUCKY PUBLIC SERVICE COMMISSION

REBUTTAL TESTIMONY OF RONALD W. MILLS

ON BEHALF OF

AT&T COMMUNICATIONS OF THE SOUTH CENTRAL STATES, INC.

AND TCG MIDSOUTH, INC.

DOCKET NO. 2000-465

FEBRUARY 20, 2001

Q. PLEASE STATE YOUR NAME AND ADDRESS.

A. My name is Ronald Mills. My business address is 1200 Peachtree Street, NE, Atlanta, Georgia 30309.

Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?

A. I am employed by AT&T Corp. ("AT&T") as a District Manager within the Law and Government Affairs organization.

Q. ARE YOU THE SAME RONALD W. MILLS THAT FILED DIRECT TESTIMONY IN THIS CASE ON FEBRUARY 6, 2001?

A. Yes, I am.

Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?

A. The purpose of my rebuttal testimony is to respond to Mr. Milner's testimony regarding Issue 16: whether the criminal background investigation requirement

that BellSouth seeks to impose on AT&T's employees and agents seeking access to collocated space in BellSouth premises is appropriate.

ISSUE 16: COLLOCATION SECURITY.

Q. MR. MILNER INDICATES THAT BACKGROUND SECURITY CHECKS ARE REASONABLE PUBLIC SAFETY REQUIREMENTS TO PROTECT THE INTEGRITY AND RELIABILITY OF BELLSOUTH'S NETWORK. DO YOU AGREE?

A. No. BellSouth's requirement is excessive. AT&T has agreed to reasonable steps to ensure the safety of BellSouth's property. AT&T has assured BellSouth that any AT&T representatives accessing collocation space will be bonded, and the parties have agreed to liability and indemnification language in Section 10 of the General Terms and Conditions that covers BellSouth in the event of any damage from activities of an AT&T employee or agent.

Q. HAS AT&T ATTEMPTED TO MEET BELLSOUTH'S DEMANDS?

A. AT&T has attempted to meet BellSouth's demands by offering to perform criminal background checks on employees who have been working for AT&T for less than two years. BellSouth rejected AT&T's offer.

Q. HAS BELLSOUTH ESTABLISHED THAT BACKGROUND SECURITY CHECKS WOULD BE EFFECTIVE IN DEALING WITH THE ALLEGED PROBLEM?

A. No. In fact, BellSouth has not even established that a problem exists. BellSouth twice repeats its bald assertion that "[a] simple reading of today's newspaper headlines" supports its demands. (Milner Direct p. 5, lines 20-21; p. 7, line 25.)

However, AT&T's review of headlines from several major newspapers in the Southeastern United States from December 1999 to December 2000 fails to disclose a single episode of intentional destruction of BellSouth facilities attributed to an employee or agent of a CLEC. AT&T believes that such an incident has never occurred. Indeed, BellSouth admitted in discovery that AT&T employees have had access to collocation space in BellSouth facilities for several years without any incident involving intentional damage to BellSouth's network. BellSouth's insistence on extreme and invasive security measures to address a phantom problem is unreasonable.

Moreover, BellSouth has provided no data to support its contention that "the criminal background check proposed by BellSouth [is] effective in limiting or restricting a worker from harming or damaging property." (Milner Direct p. 7, lines 9-15.) According to the FCC's *Advanced Services Order*, FCC 99-48 ¶ 48, reasonable security arrangements include security cameras, restricted access and other monitoring systems. The BellSouth facilities that contain collocation space to which AT&T representatives need access are already equipped with some or all of these reasonable security measures. There is no indication that requiring criminal background checks will measurably improve security. Thus, BellSouth's request is completely unjustified.

Q. ARE MR. MILNER'S ADDITIONAL REQUIREMENTS WARRANTED?

A. No. Mr. Milner would have the KPSC prohibit AT&T from knowingly assigning to BellSouth's premises any individual who is a former employee or contractor of

BellSouth and whose employment or access was terminated for a criminal offense. (Milner Direct p. 4, line 17 to p. 5, line 6.) However, as with the background security check demand, Mr. Milner invites the Commission's intervention without establishing the existence of a problem. Mr. Milner fails to describe a single adverse event associated with the conduct he advocates prohibiting. In fact, Mr. Milner does not even allege that AT&T engages in that conduct. If there is a problem related to BellSouth's former employees and contractors, BellSouth should provide data establishing its magnitude. Unless and until it does so, the KPSC should not expend resources on devising a remedy.

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes.