BELLSOUTH TELECOMMUNICATIONS, INC.

REBUTTAL TESTIMONY OF RONALD M. PATE

BEFORE THE SOUTH CAROLINA PUBLIC SERVICE COMMISSION

DOCKET NO. 2003-326-C

March 12, 2004

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. ARE YOU THE SAME RONALD M. PATE WHO PREVIOUSLY FILED TESTIMONY IN THIS DOCKET?

A. Yes.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. The purpose of my testimony is to respond to certain issues raised in the testimony of Mark David Van de Water of AT&T Communications of the Southern States, LLC (“AT&T”) and Sherry Lichtenberg of MCI WorldCom and MCI Metro (“MCI”). The

issues I will respond to are related to the ordering of batch migrations, flow-through, the LFACS database, local number portability, and CLEC-to-CLEC migrations.

Throughout this testimony, I will use the terms “batch” and “bulk” interchangeably when referring to the process of migrating UNE-P to UNE-L in batches.

Q. ALL PARTIES HAVE DIRECTED THIS COMMISSION TO VARIOUS PORTIONS OF THE TRO AND THE RULES IN SUPPORT OF THEIR POSITIONS IN THEIR DIRECT TESTIMONY. WHAT IS THE IMPACT OF THE D.C. CIRCUIT COURT OF APPEALS ORDER ON THE TRO IN THIS PROCEEDING?

A. Currently the impact of the DC Circuit Court's opinion is unclear. At the time of filing this testimony, the DC Court had vacated large portions of the rules promulgated as a result of the TRO, but stayed the effective date of the opinion for at least sixty days. Therefore my understanding is that the TRO remains intact for now, but its content, and the rules adopted thereto, must be suspect in light of the court's harsh condemnation of large portions of the order. Accordingly, I will reserve judgment, and the right to supplement my testimony as circumstances dictate, with regard to the ultimate impact of the DC Court’s order on this case.

<u>ORDERING UNE-TO-UNE BATCH MIGRATIONS</u>

Q. AT&T’S MR. VAN DE WATER, ON PAGE 22 OF HIS TESTIMONY, CLAIMS THAT BELLSOUTH’S IMPLEMENTATION OF ITS BULK ORDERING PROCESS “DID NOT MEET AT&T'S NEEDS AS DESCRIBED IN THE CHANGE REQUEST.” IS HE RIGHT?

A. No. In my direct testimony on pages 3-5, I described in detail the development and implementation of AT&T's change request CR0215 through BellSouth's Change Control Process and I included a copy of the entire change request as Exhibit RMP-1. That discussion included an overview of the requirements meetings held by BellSouth and the CLECs – including AT&T – to review the parameters of the change request. Neither the wording of the change request, nor that of the requirements document for the change request, would lead any reasonable reader to conclude that the change request comprised anything other than a bulk ordering process with project-managed provisioning. Notably, Mr. Van de Water does not cite to any specific way in which the change request fails to meet AT&T's needs.

As part of its request, AT&T did suggest an *option* for the provisioning of the cuts: "an option for doing the migration…is that BellSouth and AT&T would schedule the cuts…to take place over a weekend. Our experience with this process has been a very low number of customer outages." When it was implementing CR0215, BellSouth determined that the practice of providing either coordinated or non-coordinated hot cuts for the CLECs' UNE-to-UNE batch migrations was more flexible than limiting cutovers to just the weekends. Nevertheless, on February 18, 2004, BellSouth implemented Saturday cutovers as part of the batch hot cut process, as described in Mr. Ainsworth's testimony. Thus, Mr. Van de Water's complaint is moot.

Q. ON PAGES 50-51 OF HER TESTIMONY, MCI'S MS. LICHTENBERG CITES TO A CCP E-MAIL AS EVIDENCE THAT BELLSOUTH IS NOT WILLING TO IMPROVE ITS HOT-CUT PROCESS. PLEASE ADDRESS THIS ALLEGATION.

A. As Ms. Lichtenberg's own cited exhibit SL-5 demonstrates, BellSouth simply replied to a CCP action item request from another party (NeuStar) in the November 19, 2003 meeting that BellSouth "has no [current] plans to establish a Bulk Migration collaborative at this time." For Ms. Lichtenberg to infer from that response that there is unwillingness on BellSouth's part to improve its hot-cut process is a very large leap. BellSouth responded to NeuStar that there currently is "an effective, seamless Bulk Migration process in place," which indeed is the case.

Furthermore, the CLECs' demand for a collaborative on improvements to the manual hot cut processes is disingenuous. Under ordinary circumstances, BellSouth fully supports collaborative discussions. In this instance, however, the CLECs have been very clear in their position that they are allegedly "impaired" by a manual hot cut process, regardless of what improvements are made to that process. Considering this position, there is not a great deal of incentive for BellSouth to establish a collaborative at this juncture. BellSouth also notes that the CLECs' requests for collaboration did not occur until after the commencement of the state TRO impairment cases.

That being said, BellSouth welcomes specific proposals for changes and improvements to this or any other process that would benefit the CLECs and BellSouth. Consequently, although BellSouth has declined to hold a collaborative, it has not refused to collaborate with the CLECs. During the December 10, 2003 meeting of the CCP, the CLECs stated that they were primarily interested in a process to improve the provisioning aspect of the hot-cut process, which is manual, rather than the currently established ordering process. On December 15, 2003, ITC^DeltaCom, on behalf of the CLECs, provided a written

request and some materials that it asked BellSouth to consider. BellSouth responded directly to ITC^DeltaCom on January 7, 2004, and forwarded its response to all the CLECs participants in the CCP on January 8, 2004. In this response, BellSouth stated, "CCP will review recommended process changes for the Bulk migration process. Please submit specific process changes within the scope of CCP via change request(s)." During the week of February 23, 2004 (the week of the first state TRO hearing) the CLECs submitted their first change requests related to the UNE-to-UNE batch migration process to the CCP.[1]

Consequently, BellSouth's actions contradict Ms. Lichtenberg's allegations. Despite the fact that the CLECs did not submit any specific changes to the batch hot cut process through CCP until late February 2004, BellSouth has been listening to the CLEC criticisms raised in the hot cut workshops around its region and, BellSouth has agreed to incorporate many of those changes into its process, as I will discuss below.

Q. DID THE CLECS HAVE THE OPPORTUNITY TO COLLABORATE ON THE DEVELOPMENT OF BELLSOUTH'S UNE-TO-UNE BATCH MIGRATION PROCESS?

A. Yes. CLECs had the opportunity to collaborate on the development of the batch ordering component of the batch hot cut process when BellSouth developed the process in response to change request CR0215. Very few CLECs attended the user requirements meetings in 2002. MCI (including WorldCom) did not. No CLEC used the escalation or dispute process of the CCP for any questions or problems that it had with the

[1] The CLECs have submitted seven (7) change requests. As of March 3, 2004, BellSouth is still reviewing these change requests for acceptance per the CCP process.

development of the process. As I stated above, no CLEC has submitted a change request to alter the process established by CR 0215 or a change request for a different batch migration process.

Q. DID BELLSOUTH PROVIDE THE CLECS WITH THE DOCUMENTATION NECESSARY FOR THEM TO USE THE BATCH ORDERING PROCESS?

A. Yes. As I described in my direct testimony, on page 6, BellSouth has provided CLECs with user requirements, business rules (contained in the *Local Ordering Handbook* or "LOH"), and the *UNE-Port/Loop Combination (UNE-P) to UNE-Loop (UNE-L) Bulk Migration CLEC Information Package* ("CLEC information package"). The original version of the CLEC information package was attached to my direct testimony as Exhibit RMP-2. On February 18, 2004, BellSouth enhanced this process and issued a revise revised version of the CLEC information package, which is attached as Exhibit RMP-4 to this testimony.

Q. PLEASE DESCRIBE THE ENHANCEMENTS THAT BELLSOUTH MADE TO ITS ALREADY SEAMLESS AND EFFECTIVE BATCH PROCESS.

A. As I mentioned above, despite the fact that the CLECs did not submit any changes requests related to the batch migration process until late February 2004, BellSouth has been listened to and acted on the CLECs' criticisms raised during the hot cut workshops held in its region. Here is a summary of the changes that BellSouth made to its already seamless and effective UNE-to-UNE batch migration process on February 18, 2004:

- After Hours/Weekend Migrations

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

BellSouth also reduced the interval for the project manager to return the bulk notification form to four business days (from seven) for 2 to 99 telephone numbers and to six business days (from 10) for 100-200 telephone numbers. Most of these enhancements are to the provisioning side of the process, which is under Mr. Ainsworth's purview. This process is also described in the CLEC information package (Exhibit RMP-4).

Q. PLEASE DESCRIBE HOW CLECS MAY USE THE ENHANCED UNE-TO-UNE BATCH MIGRATION PROCESS TO SUBMIT CLEC-TO-CLEC BATCH MIGRATIONS.

A. The CLEC-to-CLEC batch migration process allows a "winning" CLEC B to migrate in batches the end user customers of a "losing" CLEC A. In other words, CLEC A to CLEC B Migration of UNE-P to UNE-L is defined as a facility-based CLEC B that is migrating the UNE-P's, previously held by another CLEC A, to UNE-L's.

The winning CLEC must follow the steps that I described on pages 7-8 of my direct testimony, including preparing the same notification form using the requirements as specified in the CLEC information package. In addition, the winning CLEC must have an end-user letter of authorization (LOA) on file (it must be available if requested). This

process is also detailed in the new version of the CLEC information package (Exhibit RMP-4).

FLOW-THROUGH

Q. IN THEIR DIRECT TESTIMONY, THE CLECS' WITNESSES VAN DE WATER AND LICHTENBERG CLAIM THAT BELLSOUTH'S FLOW-THROUGH PERFORMANCE IS DEFICIENT. DID THE FCC FIND BELLSOUTH'S FLOW-THOROUGH PERFORMANCE TO BE SATISFACTORY?

A. Yes. In its three Orders approving BellSouth's provision of long-distance service, the FCC specifically concluded that "BellSouth's OSS are capable of flowing through UNE and resale orders in a manner that affords competing carriers a meaningful opportunity to compete."[2]

Q. DID BELLSOUTH MEET ESTABLISHED FLOW-THROUGH BENCHMARKS FOR *ALL* SEGMENTS AT THE TIME OF ITS LAST 271 APPLICATION?

A. No. The FCC recognized in its *Florida/Tennessee Order* that BellSouth had missed the flow-through benchmark for residence and business resale orders, but nonetheless found BellSouth to be compliant with the checklist.[3]

BellSouth's application provided PMAP flow-through results for May through July 2002, which were as follows:

[2] *Order No. 02-331 (BellSouth Florida/Tennessee Order)* in FCC WC Docket 02-307, dated December 20, 2002, at paragraph 93 (footnote omitted).
[3] *Id*.

Month	Residence Resale	Business Resale	UNE	LNP
May 2002	86.74%	69.54%	82.57%	89.75%
June 2002	88.58%	73.74%	83.84%	83.63%
July 2002	87.70%	73.23%	88.50%	88.50%
Benchmark	95%	90%	85%	85%

Q. HOW DOES BELLSOUTH'S CURRENT FLOW-THROUGH PERFORMANCE COMPARE TO ITS PERFORMANCE AT THE TIME OF ITS LAST 271 APPLICATION?

A. As it has over time, BellSouth's performance continues to improve, and current results show strong overall flow-through improvement since the FCC's *Florida/Tennessee Order*.[4] Using the same August 2003 timeframe that Mr. Van de Water cites (pages 13 and 42 and his chart on page 18), BellSouth's SQM Flow-through Report showed the following results:[5]

Segment	Result	Benchmark
Residence Resale	97.31%	95%
Business Resale	88.67%	90%
UNE Loops	86.19%	85%
UNE-P	96.40%	90%
LNP	84.64%	85%

[4] In its *Order*, at paragraph 93, the FCC recognized that "BellSouth's flow-through performance has improved since the BellSouth Georgia/Louisiana and Multistate applications."

[5] It is worthwhile to note that BellSouth began reporting in March 2003, at the direction of the Florida, Georgia, and North Carolina Commissions, further disaggregation of the UNE segment to the UNE-P and UNE-L level. As a truer comparison to the numbers reported by BellSouth in its Florida/Tennessee application, the combined UNE segment for August 2003 was 96.13% - well above the previous combined UNE benchmark of 85% existing at the time of BellSouth's application.

Q. ACCORDING TO THE TABLE ABOVE, BELLSOUTH'S BEST FLOW-THROUGH PERFORMANCE OCCURRED IN THE RESIDENCE RESALE AND UNE-P SEGMENTS. PLEASE COMMENT.

A. That is due to BellSouth's conscious efforts to improve flow-through performance in the segments in which the CLECs submitted the vast majority of their LSRs. As an example, the following chart – also from the August 2003 Flow-through Report – supports my point, and is similar to activity for a number of months previous to, and since, August 2003.

Segment	Total Mech LSRs	% of Total Electronic LSRs
Residence Resale	129,682	16.4%
Business Resale	8,744	1.1%
UNE Loops	17,943	2.3%
UNE-P	621,101	78.6%
LNP	12,622	1.6%
Total	790,092	100.0%

As the chart demonstrates, the combined Residence and UNE-P segments account for 95% of all CLEC electronic LSR submissions. Based upon current market direction – as dictated by the CLECs' business activities – it is appropriate and logical that BellSouth has concentrated its efforts to date as it has.

Q. DOES THAT MEAN THAT BELLSOUTH HAS NOT DEVOTED RESOURCES FOR FLOW-THROUGH IMPROVEMENTS TO THE OTHER SEGMENTS?

A. Absolutely not. In fact, BellSouth has initiatives underway to improve flow-through such that all segments consistently meet the flow-through benchmarks. A quarterly flow-

through improvement report is filed with the Florida Public Service Commission that details those efforts, and provides projections as to when BellSouth will achieve the benchmarks in the segments currently not doing so. BellSouth's most recent Quarterly Report (filed December 12, 2003) is attached as Rebuttal Exhibit RMP-3.

Q. WHEN WILL BELLSOUTH MEET THE FLOW-THROUGH BENCHMARK FOR LNP?

A. As indicated in Rebuttal Exhibit RMP-3, BellSouth expected to meet the benchmark in April 2004, after the March implementation of Release 15.0 containing some LNP flow-through improvement items. However, as I will now discuss, BellSouth has exceeded that expectation.

Q. IS BELLSOUTH ALREADY SEEING IMPROVEMENT TO THE FLOW-THROUGH RATE FOR LNP?

A. Yes. Recent data show excellent flow-through rates for UNE-P to UNE-L migrations, which include UNE-L with LNP. In December 2003 and January 2004, using the LENS interface, one Florida-based CLEC submitted electronically via the LENS interface 8,740 LSRs and 5,662 LSRs respectively to migrate its embedded base of UNE-P to UNE-L with LNP. Data reflects a 99.1% flow-through rate for those LSRs for both months, and this rate greatly contributed to an improvement in the overall LNP flow-through rate. This CLEC’s submissions accounted for approximately 45% of all electronic LNP submissions in December and 31% for January. As a consequence of this CLEC’s

results, the overall LNP flow-through rate was 93.4% for December and 93.3% for January.

Now, I do note that a portion of the electronic LSR submissions did fall out by design for manual processing. During these two months, a total of 2,267 of the submissions fell out by design for manual processing by BellSouth's center personnel. What is interesting is why these LSRs fell out by design. From an analysis of the 2,267 LSRs that fell out, it was determined that the vast majority, 2,160 LSRs or 98%, fell out due to pending service orders. In other words, this CLEC had pending service orders in process for its own accounts that had not cleared before the CLEC submitted LSRs to migrate the accounts to UNE-L. If the CLEC only had checked its systems for pending service orders, which it should do in the normal course of its operations, these migration requests likely would have flowed through BellSouth's systems as well.

Q. ON PAGE 42 OF HIS TESTIMONY, MR. VAN DE WATER ALLEGES THAT THE FLOW-THROUGH OF UNE LOOP ORDERS IS A CONSTRAINT ON BELLSOUTH'S CAPACITY TO HANDLE UNE-L ORDERS. MCI'S MS. LICHTENBERG ALLUDES TO THE SAME ON PAGE 24 OF HER TESTIMONY. IS THERE ANY MERIT TO THEIR CLAIMS?

A. Not at all, and it is incorrect for Mr. Van de Water and Ms. Lichtenberg to suggest that the flow-through rate of the UNE-L segment itself, or as compared to that of another ordering segment (UNE-P), should be the sole basis for the Commission to determine a finding of impairment. In the first place, flow-through for UNE-L has been thoroughly evaluated in the Florida, Georgia, and North Carolina performance measurement dockets,

and these commissions decided that UNE-L orders warrant a lower benchmark than that for UNE-P. In the second place, and as I demonstrated earlier, BellSouth currently is meeting the regional disaggregated benchmark for UNE-L.

Further, other factors in addition to flow-through indicate that CLECs are not now impaired (and will not be in the future) in their ability to order UNE loops. This Commission (as did the FCC) should also consider Firm Order Confirmation (FOC) and Reject Timeliness, the accuracy of manual service order processing and the scalability of associated manual processes. I refer the Commission to the testimonies of BellSouth's witnesses Varner and Ainsworth for more in-depth discussions on these other factors.

Q. CAN BELLSOUTH'S ELECTRONIC OSS HANDLE CONTEMPLATED ORDERING VOLUMES IF THERE IS A SHIFT FROM PREDOMINANTLY UNE-P ORDERING TO THAT OF UNE-L AS A RESULT OF STATE COMMISSION ORDERS ELIMINATING BELLSOUTH'S UNE-P OBLIGATIONS?

A. Yes. Commercial volume demonstrates that BellSouth has scaled its electronic ordering OSS to meet projected demands. As noted earlier, there were 790,092 electronic LSRs submitted in August 2003. That same month, 26,762 LSRs were submitted manually, resulting in a total submission volume of 816,854 LSRs. Electronic submissions comprised 96.7%.

It is interesting to note how the electronic LSR volume has grown. For August 2002, the number of electronic submissions was 607,211. The total for August 2003 represents a 30.1% increase in just one year. Going back to the total electronic submissions for

August 2001 (397,640), current volumes represent a 98.7% increase in two years. This clearly demonstrates BellSouth's ability to scale its electronic ordering OSS to meet demands, and BellSouth will continue to do so.[6]

Q. ON PAGE 13 OF HIS TESTIMONY AND IN HIS CHART ON PAGE 18, AT&T'S MR. VAN DE WATER STATES THAT BELLSOUTH HAD A 17.2% FLOW-THROUGH RATE FOR MIGRATIONS TO UNE-L IN SOUTH CAROLINA IN AUGUST 2003, AND A 89.3% FLOW-THROUGH RATE FOR MIGRATIONS TO UNE-P FOR THE SAME PERIOD, BASED ON BELLSOUTH'S RESPONSE TO AT&T DISCOVERY. IS HE CORRECT?

A. No. Mr. Van de Water has mischaracterized the data provided by BellSouth in those responses. The numbers he cited were correct, but those numbers do not represent flow-through percentages, nor did BellSouth purport that those numbers represented flow-through percentages.

BellSouth's responses to AT&T's Interrogatories 28 and 32 were responses to AT&T's requests to provide the percent of migration orders (Local Service Requests, or LSRs, converting service to UNE-L and UNE-P) that were fully mechanized as compared to the total number of LSRs submitted – including both electronic and manual submissions. AT&T did not ask for flow-through percentages, and BellSouth was very clear in its responses as to what the numbers did and did not represent.

[6] This comports with the FCC's findings in its *BellSouth Florida/Tennessee Order*. The FCC stated, at paragraph 93, "Further, we find, as we have in previous BellSouth 271 orders, that BellSouth scales its system as volumes increase, and has demonstrated its ability to continue to do so…"

Q. HOW DID BELLSOUTH DERIVE THE PERCENTAGES THAT WERE PROVIDED TO AT&T?

A. The percentages provided by BellSouth in response to AT&T Interrogatories 28 and 32 were developed using disaggregated data that is the underlying data used to develop the BellSouth flow-through SQM metric. Added to that was data related to manually submitted LSRs, which is not part of the SQM flow-through calculation.

BellSouth went to great lengths to develop the information requested by AT&T, as there was no existing report to provide it in a manner that was responsive to the interrogatories. BellSouth simply does not retain data in its Performance Measurement and Analysis Platform (PMAP) at that level of disaggregation.[7] BellSouth was able to derive from the total number of submitted LSRs a subset of those LSRs submitted only for migration to either UNE-P or UNE-L, and then developed the percentages requested by AT&T.

Q. REGARDLESS OF AT&T'S CONFUSION ABOUT THESE PERCENTAGES, DID BELLSOUTH'S UNE FLOW-THROUGH PERFORMANCE FOR SOUTH CAROLINA EXCEED THE COMMISSION'S BENCHMARKS FOR THE PERIOD IN QUESTION?

A. BellSouth's August 2003 flow-through rate for UNEs in South Carolina was 96.13% versus the 85% benchmark. Further, BellSouth's disaggregated regional flow-through

[7] The flow-through SQM is a regional measure. The Florida, Georgia, and North Carolina Commissions developed benchmarks that require BellSouth to track flow-through for the following segments: Residence Resale, Business Resale, UNE-P, UNE-Loops and Local Number Portability (LNP). The flow-through SQM for each of the segments includes performance of all electronic LSRs submitted for *all* activity types within the segment for the given month, not just the subsets of activity types responsive to AT&T's interrogatories.

rate for UNE-P (96.40% vs. 90% benchmark) and UNE-L (86.19% vs. 85% benchmark) both exceeded the benchmarks of the Florida, Georgia, and North Carolina Commissions for the same timeframe.

THE LOOP FACILITIES ASSIGNMENT AND CONTROL SYSTEM ("LFACS") DATABASE

Q. ON PAGE 34 OF HER TESTIMONY, MS. LICHTENBERG OF MCI SPECULATES ABOUT THE ACCURACY OF THE DATA IN THE LFACS DATABASE AND SUGGESTS THAT "CHURN" MAY CAUSE THE QUALITY OF THE DATABASE TO DEGRADE. PLEASE COMMENT.

A. CLECs have repeatedly complained of inaccuracies in BellSouth's Loop Facilities Assignment and Control System ("LFACS") database, and such complaints have been repeatedly rejected. This issue was raised in all three of the BellSouth 271 filings (Georgia/Louisiana, Five-State, and Florida/Tennessee) and all three times, the FCC rejected this complaint on the grounds that BellSouth provides CLECs with the same information it provides to itself. BellSouth offers CLECs access to loop makeup data in LFACS via LENS, EDI, and TAG. LFACS is the same database that is used by BellSouth's retail operations. The FCC has recognized that both competing carriers and the incumbent LEC use the LFACS system. Thus, any inaccuracies in the ILEC's database are not discriminatory, because they affect the ILEC in the same fashion as competing carriers. *See Kansas/Oklahoma Order ¶ 126.*

Nonetheless, BellSouth disagrees with any allegations of widespread inaccurate data in BellSouth's loop makeup databases. Although BellSouth's LFACS database is not perfect, it is very accurate.

LFACS is the live, real-time database, the primary source of BellSouth's loop data, and contains certain minimum information about each pair, including assignment data (cable and pair assignments and the serving terminal information), as well as whether the loop is served by copper or digital loop carrier ("DLC") and whether the loop contains load coils. This information is updated in a real-time basis each and every time any change is made to the loop assignments for any given service. This information is generally very accurate. Churn, whether it is caused by BellSouth's own customers connecting or disconnecting service or by migrations between BellSouth and CLECs or between CLECs, impacts the database in identical fashion, and the LFACS database is updated, real-time, as changes occur.

The inaccuracies referred to by the CLECs are typically associated with detailed loop makeup data (cable makeup and/or loading discrepancies), not assignment data (cable and pair and transmission medium information).

Q. ON PAGE 35 OF HER TESTIMONY, MS. LICHTENBERG SUGGESTS THAT "LFACS SHOULD BE AUDITED FOR ACCURACY AND THAT A PROCESS [SHOULD] BE DEVELOPED TO ENSURE THAT IT IS ACCURATELY MAINTAINED IN REAL TIME WHEN THE ILEC ALTERS OR CHANGES ITS LOOP PLANT." IS THIS NECESSARY?

A. Absolutely not. Ms. Lichtenberg mistakenly believes that BellSouth does not have a process to maintain the data in its LFACS database. This is not true. As I said before, the information in LFACS is updated in a real-time basis each and every time any change is made to the loop assignments for any given service. Additionally, in the summer of 2001, BellSouth made modifications to its systems that compiled all relevant LMU data in the Corporate Facilities Database ("CFD"), by wire center, on a bulk basis for automatic update to the LFACS database. All LMU data that could be mechanically generated in the CFD was automatically populated in LFACS at that time.

Further, in September 2001, BellSouth implemented an enhancement to its mechanized loop makeup process that provides for an electronic query from LFACS to the CFD for loop qualification information. As a result of this enhancement, when a CLEC sends an electronic query to LFACS for loop qualification information and all of the necessary information is not resident in LFACS, an electronic query is automatically launched to the CFD to generate the required additional information. This additional loop qualification information resulting from the queried CFD is automatically combined with the LFACS information and provided to the CLEC. Also, the information obtained from the query to the CFD is populated in the LFACS database and thus, is available going forward for future electronic loop qualification information queries.

BellSouth is continuously updating and/or populating LMU data in LFACS as Engineering Work Orders are issued. Additionally, each time the manual Loop Makeup service inquiry process is used, BellSouth loads the resulting LMU information into LFACS for future queries. Thus, the LFACS database improves on a daily basis, and will continue to do so.

An "accuracy audit" is unnecessary. While BellSouth's LFACS database is not perfect, it is not discriminatory in any way, as any inaccuracies negatively affect BellSouth just as they negatively impact CLECs. It is in BellSouth's best interest to ensure that LFACS remains very accurate, and BellSouth already does this, as I have described above.

Q. DOES BELLSOUTH ALLOW CLECS TO RESERVE SPARE LOOPS, AS IMPLIED BY MS. LICHTENBERG'S COMMENTS REGARDING IDLC ON PAGE 35 OF HER TESTIMONY?

A. Yes, BellSouth already offers this functionality. Using the manual or mechanized loop makeup process, CLECs may perform a query for spare pairs at a customer's location. CLECs have the option to search for loops without reserving them or to search for loops and simultaneously reserve the facilities, if available. This functionality has been available since 2000. In the mechanized loop makeup functionality, the CLEC also has the option of specifying the spare pair selection criteria during the search. For example, the CLEC may specify the order that LFACS search for spare pairs, such as first for copper facilities, then universal DLC, then finally integrated DLC. CLECs may reserve pairs for 96 hours, or four days. A facility reservation number ("FRN") is returned during the loop makeup transaction. When the FRN is placed on the LSR in the Reservation Identifier ("RESID") field and the LSR is issued within 96 hours of making the reservation, the subsequent service order is issued with the FRN on the order and the reserved facilities are used for the order (when compatible). Thus, CLECs are able to determine not only that spare facilities exist, but that spare *qualified* facilities exist, prior to issuing the LSR. And, they may reserve these pairs for up to four days.

Currently, reserved pairs may be specified on firm order requests for xDSL (ADSL, HDSL, UCL, UCL-ND), Shared Loop (Line Sharing and Line Splitting), and SL-1 loops. If additional products need to allow reservations, the CLEC may request this enhancement by submitting a change request via the Change Control Process ("CCP"). As of March 9, 2003, there are no outstanding requests to allow reservations on any other product types.

LOCAL NUMBER PORTABILITY ISSUES

Q. ON PAGE 42 OF HER TESTIMONY, MCI'S MS. LICHTENBERG SPECULATES, WITHOUT PROVIDING ANY EVIDENCE, THAT "IT IS UNCLEAR WHETHER NPAC WILL BE ABLE TO HANDLE THE VOLUMES OF TRANSACTIONS THAT WOULD OCCUR IN A DYNAMIC UNE-L MARKET." DOES THAT MAKE SENSE?

A. No, it does not. Similarly, Ms. Lichtenberg states on page 7 of her testimony that "outside systems such as the NPAC have not had to deal with mass markets customer migrations," and, therefore, she suggests that an "untested and potentially unready" NPAC will not be able to respond under the new UNE-L environment.

Although NeuStar (not BellSouth) is the NPAC administrator, BellSouth's positive experience with NeuStar renders Ms. Lichtenberg's speculative concerns on both points unfounded. First and foremost, NeuStar is obligated by its contracts with service providers to handle industry-wide portability volumes regardless of the product (in this case, UNE-L). Second, BellSouth, among other service providers in the Southeast

region, supports NeuStar by providing forecast information (via the NPAC Forecasting Group, or NFG) that NPAC uses for capacity planning and implementation. All local, long-distance, and wireless carriers in the region have the same opportunity to provide forecasts through NFG to assist NeuStar in developing an optimally efficient process. It is unknown whether MCI provides such forecasts.

To illustrate the NPAC's volume-handling capability, consider that total transactions[8] between service providers and the NPAC jumped from 480,831 in November 2002 to 1,219,923 in November 2003 - a significant increase of 154% in a year's time. The NPAC has successfully met the increased transaction demand from BellSouth - as well as that from other service providers in the region - because of due diligence in capacity planning with its regional forecasting partners. There is simply no reasonable basis to believe that NPAC will be unable to handle the number of the types of transactions envisioned by Ms. Lichtenberg.

CLEC-TO-CLEC MIGRATIONS

Q. STARTING ON PAGE 51 OF HIS TESTIMONY, MR. VAN DE WATER OF AT&T, AND STARTING ON PAGE 25 OF HER TESTIMONY, MS. LICHTENBERG OF MCI, RAISE ISSUES RELATED TO CLEC-TO-CLEC MIGRATIONS. PLEASE COMMENT.

A. BellSouth does perform CLEC-to-CLEC conversions of unbundled loops. BellSouth's CLEC-to-CLEC conversion product is described in the *CLEC to CLEC Conversion for*

[8] The numbers of transactions cited represent only those that are 'billable' by NPAC to the service providers; specifically modifies, deletes and activates. These are the only transactions for which there are accurate counts. When added to other 'non-billable' transactions (e.g., create and concur), the true transaction total handled by NPAC is significantly higher.

Unbundled Loops document, which is located at the Interconnection web site.[9] As Mr. Ainsworth has testified, CLEC-to-CLEC loop conversions may be ordered individually or as a project. Also, as I discussed above, on February, 18, 2004, BellSouth enhanced its already seamless and effective batch migration ordering process to include CLEC-to-CLEC UNE-P to UNE-L. Further, BellSouth is also working to include UNE-L to UNE-L migrations in the batch hot cut process.

The issues described by Mr. Van de Water and Ms. Lichtenberg, however, have nothing to do with BellSouth's already seamless and effective hot cut process. Instead, the issues about which the CLECs complain having nothing to do with BellSouth. Rather, they are issues related to the CLECs' transactions with each other, and their apparent inability to cooperate with each other. Hence, these issues are not relevant to the question of whether BellSouth's process impairs the CLECs without access to unbundled local switching. I would, however, like to discuss the collaborative process that is currently underway to develop the rules to govern the migration of UNE loops among the CLECs.

Q. PLEASE DESCRIBE THIS COLLABORATIVE PROCESS AND ITS ACTIONS.

A. The end user migration collaborative is part of the Telecommunications Competitive Interests Forum, which is under the auspices of the Florida Commission. The purpose of the collaborative is to develop the rules for the migration of UNE loops or UNE-L among the CLECs, first for voice grade circuits, and then for data circuits. Some of the participants are: AT&T, Sprint, MCI, Allegiance, Verizon, and BellSouth.

[9] http://www.interconnection.bellsouth.com/guides/unedocs/c2c.pdf

The collaborative has submitted a draft of the migration rules for voice grade circuits to the Florida Commission. The Commission requested comments from the participants, which were due on September 29, 2003. The participants updated their comments by November 13, 2003. On November 20, 2003, at a regularly-scheduled meeting of the Telecommunications Competitive Interests Forum, the parties and the Florida Commission discussed four unresolved issues related to the draft migration rules. During the meeting, the parties were able to resolve two of the four issues. During the next meeting on December 15, 2003, the parties were able to resolve one of the two remaining issues.

Q. WHAT IS THE ONE REMAINING UNRESOLVED ISSUE?

A. This table below shows the issue and BellSouth's position on it. This issue is still open primarily because of issues related to Customer Proprietary Network Information ("CPNI").

	Issue	BellSouth Position
1	Should the ILEC (as DSP and/or NSP) be required to provide CSR and Transition information for CLECs' customers? DSP=Digital Service Provider NSP=Network Service Provider CSR=Customer Service Provider	No, for both CSR and Transition data the old Local Service Provider (LSP) has the most current, complete, and accurate end user information that will be available to the new LSP. Only the minimum data required to support the LSP care of their end user service is retained by the ILEC. The ILEC is required to notify the current LSP when ILEC initiated changes are made to the content of the end user's CSR, Directory Listings, or Transition information. There is no requirement for the current LSP to notify the ILEC for LSP or end user initiated changes to these records. Further for Transition information, there is no requirement or reliable method for the ILEC to associate an end user's telephone number or data service to the old LSP circuit identification.

	Issue	BellSouth Position
		Concerning CSR data, for UNE-P or Resale end-user accounts, BellSouth responded to a CCP request (July 2003) that provided a method where CLECs may view the customer service records maintained by BellSouth for an end-user currently served by another CLEC. With this mechanized process, CLECs may authorize other CLEC to view their end-user's records maintained by BellSouth. CLECs that have not provided permission to another CLEC for viewing their end-user records maintained by BellSouth must request this information directly from the incumbent CLEC. BellSouth CSR content for end-users that have migrated to facility-based providers contain only a record that the end-user has ported out their telephone number.

Q. WILL THE END USER MIGRATION RULES BE USED REGIONALLY?

A. After the Florida collaborative establishes the end user migration rules for voice grade circuits, the participants plan to use the rules as guidelines for establishing rules in the other states in BellSouth's region. The participants plan to use the end user migration rules for data circuits in the same manner, once those rules have been established.

Q. ON PAGE 52 OF HIS TESTIMONY, MR. VAN DE WATER COMPLAINS THAT CLEC-TO-CLEC MIGRATIONS OF UNE-L MUST BE PERFORMED MANUALLY. PLEASE COMMENT.

A. BellSouth recognizes that it must be involved in the transfer of loops between CLECs. Consequently, it accepts LSRs from CLECs that are migrating UNE-L. CLECs currently submit these LSRs manually, because the volume of LSRs has not been sufficient to justify the cost to mechanize the flow-through of LSRs for CLEC-to-CLEC migrations of

UNE-L. For January through November 2003, the CLECs requested the migration of only 47 loops. BellSouth notes that no CLEC has submitted a change request to the CCP to mechanize the LSR for CLEC-to-CLEC migrations of UNE-L.

Q. ON PAGES 32-34, MS. LICHTENBERG PROPOSES THE ESTABLISHMENT OF A "DISTRIBUTED CSR DATABASE" TO BE SHARED AND MAINTAINED BY THE CLECS AND ILECS. WHAT IS YOUR RESPONSE?

A. If the CLECs are having problems obtaining CSR information for CLEC-to-CLEC UNE-L migrations, it is because they apparently are not able to cooperate with each other and share CSRs information. Although BellSouth certainly agrees that the CLECs need this information from each other, as Ms. Lichtenberg describes, in order to migrate UNE-Ls from one CLEC to another, BellSouth does not agree with is Ms. Lichtenberg's approach to facilitating the transfer of this information.

Q. MS. LICHTENBERG, ON PAGE 31 OF HER TESTIMONY, SPECIFICALLY DISCUSSES THE AVAILABILITY OF CIRCUIT IDS FOR CLEC-TO-CLEC MIGRATIONS. DO CLECS NEED CIRCUIT IDS TO MIGRATE UNE-P TO UNE-L?

A. No. CLECs do not need circuit IDs to migrate UNE-P to UNE-L, either individually or in bulk, because UNE-P is on BellSouth's switch. CLECs may need circuit IDs when they are performing CLEC-to-CLEC migrations of UNE-L. The CLEC that is gaining the end user should obtain the circuit ID information from the CLEC that is losing the end user. The issue of circuit IDs related to CLEC-to-CLEC migrations is being handled

by the parties participating in the end user migration collaborative under the Florida Commission's Telecommunications Competitive Interests Forum.

Q. PLEASE EXPLAIN WHY BELLSOUTH DOES NOT HAVE INFORMATION, SUCH AS THE CSR AND CIRCUIT ID?

A. After a CLEC has established service to an end user with UNE-L, BellSouth does not know what kind of services the CLEC is providing to the end user. The CLEC maintains its own records, including customer service information and circuit IDs, for its UNE-L end users. Consequently, the CLECs should be sharing such information with each other (rather than BellSouth serving as a central depository) because they have the information on their customers served by loops, and BellSouth does not. Additionally, this issue is not relevant to the question of whether BellSouth's process impairs the CLECs without access to unbundled local switching.

Q. HOW DOES BELLSOUTH BELIEVE THAT THIS MATTER SHOULD BE APPROACHED?

A. First, BellSouth believes that it and the CLECs should continue to deal with the matters surrounding the sharing of CSR information and other data among the CLECs as part of the Telecommunications Competitive Interests Forum under the Florida Commission.

Second, there is another, more sensible, approach to sharing information, than that proposed by Ms. Lichtenberg. Just as BellSouth has opened its OSS to the CLECs, so the CLECs could be required to maintain their own records and to provide fully-integratable,

machine-to-machine electronic interfaces with each other at the CLECs' cost. Various measurements and penalties could also be established to ensure that the CLECs cooperate with each other and provide the necessary information with each other in a timely manner. This is a more direct resolution to the problem than imposing additional unwarranted obligations on BellSouth, which is a third party in CLEC-to-CLEC transactions.

Q. HAVE ANY INDUSTRY STANDARDS BEEN DEVELOPED FOR CLEC-TO-CLEC MIGRATIONS?

A. No, not yet. The industry standards organization, the Ordering and Billing Forum ("OBF"), however, has begun to consider the issue of multi-provider migrations, including CLEC-to-CLEC migrations. AT&T is one of the sponsors of this issue at the OBF, along with the Alliance for Telecommunications Industry Solutions ("ATIS") and Cap Gemini Ernst & Young.

Q. IS IT FAIR TO SAY THAT THE ISSUE OF CLEC-TO-CLEC MIGRATIONS IS BEING ADDRESSED?

A. Absolutely. The appropriate fora for other CLEC-to-CLEC migration matters are the Florida Commission's Telecommunications Competitive Interests Forum and the industry standards organization. To reiterate, the CLEC-to-CLEC migration issues raised by the CLECs are not relevant to the question of whether BellSouth's current process impairs the CLECs without access to unbundled local switching, particularly given that BellSouth

has agreed to include CLEC-to-CLEC migrations in the batch hot cut process, as discussed in this testimony and in Mr. Ainsworth's rebuttal testimony.

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes.

Exhibit No. RMP-3

BELLSOUTH

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Maryrose Sirianni
Manager
Regulatory Relations

December 12, 2003

Lisa Harvey
Florida Public Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32302

RE: Flow through Report

Dear Lisa,

Attached is a copy of BellSouth's flow – Through improvement plan progress report. If you have any further questions, please do not hesitate to call me.

Sincerely,

MaryRose Sirianni

BEFORE THE

FLORIDA PUBLIC SERVICE COMMISSION

Investigation into the establishment Of Operations Support Systems Permanent Performance Measures for Incumbent Local Exchange Telecommunications Companies	)))))	Docket No. 000121-TP Filed: December 12, 2003

BELLSOUTH'S FLOW-THROUGH IMPROVEMENT PLAN PROGRESS REPORT

OVERVIEW

In its Performance Metrics Order, the Florida Public Service Commission ("Commission") ordered BellSouth to file a Flow-Through improvement plan by July 30, 2002 describing how it intends to achieve the Service Quality Measure Flow-Through benchmarks and show significant improvement in 2002. The Commission opened Docket No. 000121-TP to develop permanent performance metrics for the ongoing evaluation of Operations Support Systems ("OSS") provided for Competitive Local Exchange Carriers' ("CLECs") use by Incumbent Local Exchange Carriers ("ILECs"). Associated with the performance metrics is a monitoring and enforcement program to ensure that CLECs receive nondiscriminatory access to the ILEC's OSS.

BellSouth filed its first status update to the Commission on October 30, 2002. In response to the Commission's request dated August 18, 2003, BellSouth provided to the Commission in a September 11, 2003 filing performance updates in the categories outlined in its original plan report (actual and projected results), as well as the status of the implementation of flow-through improvement items.

At the time of that filing, BellSouth proposed – and the Commission agreed – that subsequent quarterly progress reports (beginning with this one) would focus solely upon segments that do not meet the benchmark for at least 2 out of 3 months within the subject quarter. The Commission further requested that the reports include updates for segments

that failed to meet the benchmark in any two consecutive months in order to capture segments that failed only the last month of the previous quarter and only the first month of the succeeding quarter.

Pursuant to that agreement, BellSouth presents its first such report. The Commission will find that two (2) segments – Business Resale and LNP – fell within this category for the August-October 2003 timeframe. Additionally, BellSouth provides an updated Flow-Through Improvement Projection chart.

Business Resale

As reported in September 2003, BellSouth expects to continue to make progress toward meeting the Percent Flow-Through Business benchmark of 90%. BellSouth reaffirms its assessment that attaining and maintaining a 90% benchmark in this segment will be a challenge. To reiterate, this segment's complexity – coupled with its low volume – makes it difficult to realize significant flow-through improvement beyond about 85%. The business segment comprises only 1.25% of total mechanized LSR volume for October 2003.

Results for August 2003 were consistent with those reported for this segment for July 2003. September 2003 results declined due to a defect introduced with the implementation of a flow-through improvement item in Release 13.2 on September 13, 2003. BST-caused errors increased significantly during the week following the release, impacting flow-through. The defect was corrected on September 20, 2003. Results for October 2003 returned to levels consistent with those of July and August.

In its September 2003 report, BellSouth indicated that it expected some Local Exchange Service Order Generator (LESOG) flow-through improvement items to be implemented in Release 14.0 on November 23, 2003. Due to the complexity of the release, which included an industry-directed software map change (ELMS6) and the FCC-mandated Wireless Local Number Portability (WLNP) implementation, BellSouth was not able to introduce additional flow-through improvements as originally planned. Those items have been deferred until the implementation of Release 15.0 in March 2004. BellSouth has, therefore, revised its projections for this segment. Based upon current

performance and planned improvements, BellSouth expects to reach the 90% benchmark for this segment in June 2004.

Local Number Portability (LNP)

BellSouth implemented the facility-check-before-FOC (Firm Order Confirmation) functionality for North Carolina on August 1, 2003. As anticipated, the LNP results for August reflected a similar degradation of performance as experienced with the implementation of this functionality previously in Florida and Tennessee. That carried forward for a portion of the drop in the September and October LNP flow-through results.

September and October results were further skewed downward due to a defect that inhibited fully mechanized FOCs from being sent for certain types of LNP requests in the three (3) states where a facility check before FOC is required. Importantly, service orders for those requests were mechanically generated according to process despite the defect. There was no adverse impact to the actual provisioning process.

Upon discovery of the defect, BellSouth implemented a manual process that allowed its Local Carrier Service Center (LCSC) representatives to trigger the return of mechanized FOCs for the affected types of LNP requests. On November 30, 2003, BellSouth implemented interim mechanized functionality to electronically trigger the return of mechanized FOCs. On December 7, 2003, BellSouth implemented a final code change to fix the defect. Although November 2003 LNP performance will also be negatively impacted by the defect, BellSouth expects that December 2003 LNP performance will return to the August 2003 pre-defect levels.

Approximately 1,200 LSRs were impacted by this defect in October, representing 56% of the total LNP LSRs with BellSouth errors (2,131 BST-Caused Fallout). The low volume of total mechanized LNP requests (13,166) – coupled with the relative high number of LNP requests affected by this defect – created a significant impact on segment performance. The LNP segment, however, represents only 1.56% of total mechanized LSR volume for all segments in October. Based upon current performance and planned improvements, BellSouth expects to reach the 85% benchmark with April 2004 data,

following the March 2004 implementation of Release 15.0 containing LNP flow-through improvement items.

Conclusion

The Flow-Through Improvement (FTI) project continues to identify items to improve the Business Resale and LNP segments. Flow-through improvement items will be implemented throughout 2004 to improve performance in these two segments that comprise less than 3% of the total mechanized LSR volume.

The following chart provides BellSouth's projected timelines for each flow-through segment, showing current performance and expected improvements.

FLOW-THROUGH IMPROVEMENT PROJECTION

Category	Residence Resale		Business Resale		UNE		LNP	
Benchmark	**95%**		**90%**		**85%**		**85%**	
Actual/ Projected Performance	Actual	Projected	Actual	Projected	Actual	Projected	Actual	Projected
Jul 02	87.70		73.23		89.13		88.50	
Aug 02	89.52		76.17		87.94		88.09	
Sep 02	90.20		77.80		89.81		88.81	
Oct 02	92.25		80.65		92.71		86.53	
Nov 02	94.52		78.62		93.98		85.46	
Dec 02	93.55		81.40		92.21		82.81	
Jan 03	87.61		82.08		92.26		82.48	
Feb 03	86.95		82.34		95.57		76.45	
Mar 03	95.64		83.50		96.33		76.99	
Apr 03	97.95		87.11		96.11		79.82	
May 03	97.82		87.43		96.90		76.65	
Jun 03	97.43		86.15		95.88		83.05	
Jul 03	97.25		88.82		95.38		86.41	
Aug 03	97.31		88.67		96.13		84.64	
Sep 03	97.49		85.79		95.64		78.89	
Oct 03	97.38		86.33		96.63		74.00	
Nov 03		97.38		86.33		96.63		69.15
Dec 03		97.38		86.33		96.63		83.05
Jan 04		97.38		86.33		96.63		84.05
Feb 04		97.38		86.33		96.63		84.05
Mar 04		97.64		87.73		97.54		84.78
Apr 04		97.72		88.19		97.84		85.02
May 04		97.72		88.19		97.84		85.02
June 04		98.12		90.05		98.15		86.44

BELLSOUTH

UNE-Port/Loop Combination (UNE-P) to UNE-Loop (UNE-L) Bulk Migration

CLEC Information Package

Version 2
February 18, 2004

BELLSOUTH

UNE-P to UNE-L Bulk Migration

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BELLSOUTH

UNE-P to UNE-L Bulk Migration

1. Introduction & Scope

This Product Information Package is intended to provide CLECs general ordering information specific to the **UNE-P** to **UNE-L** Bulk Migration process described herein.

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

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

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UNE-P to UNE-L Bulk Migration

2. Revisions

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

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

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

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

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UNE-P to UNE-L Bulk Migration

3. Service Description

The Unbundled Network Element – Port/Loop Combination (UNE-P) to Unbundled Network Element – Loop (UNE-L) Bulk Migration process may be used by a CLEC when migrating existing multiple non-complex UNE-P Services to a UNE-L offering.

All Bulk Migration orders will be project managed by a BellSouth Project Manager. Initially, the CLEC will submit required information to a BellSouth Customer Care Project Manager (CCPM) who after reviewing the bulk migration work effort with the field organizations will provide due dates back to the CLEC. Once the CLEC receives the due date information from the BellSouth Project Manager, the CLEC will electronically submit a Bulk Request for service order processing and provisioning. This allows migration of multiple UNE-P end-users to a UNE-L offering without submitting individual Local Service Requests.

UNE-P and UNE-L are defined below:

3.1 UNE-P

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

3.2 UNE-L

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

UNE-P to UNE-L Bulk Migration

4. Bulk Migration Requirements

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

- Bulk Migration is available for migrating existing **non-complex** Port/Loop Combination services to Unbundled Loops with Local Number Portability (LNP).
- A UNE Loop will be provided for each ported telephone number formerly associated with the UNE-P Service.
- Complex UNE-P accounts are prohibited on Bulk Requests. Examples of Complex UNE-P are 2 Wire ISDN/BRI Digital Loop & Port UNE Combination, 4 Wire ISDN/PRI Digital Loop & Port UNE Combination, UNE-P Centrex, Digital Direct Integration Termination Service (DDITS), etc.
- The UNE-Ps that can be migrated are listed in the **UNE-P USOC** section.
- UNE-Ps can be migrated to the UNE-Ls listed in the **UNE-L USOC** section. These UNE-L types must be in the CLEC's Interconnection Agreement.
- Bulk Requests that require a change in existing loop facilities to a type of facility that is not available, resulting in a Pending Facility (PF) status on Due Date –7 days, must be cancelled by the CLEC and removed from the Bulk Request.
- All Existing Account Telephone Numbers (EATNs) on the Bulk Request must use the existing Regional Street Address Guide (RSAG) valid end-user address.
- All EATNs must be served from the same BellSouth Serving Wire Center (SWC).
- All UNE-Ps on a Bulk Request must be migrated to a single UNE-L type.
- No end-user moves or changes of address will be allowed on the Bulk Request.
- Non-Recurring rates for the specific loop type being requested will be charged.
- Service order charges for mechanized orders (SOMEC) will be charged based on the current rules for individual Local Service Requests (LSRs) created per EATN of a Bulk Request.
- A BellSouth Customer Care Project Manager (CCPM) will project manage the Bulk Request.
- CLEC must submit a **BellSouth UNE-P to UNE-L Bulk Migration Project Notification**, herein known as **Project Notification,** to the BellSouth CCPM prior to the CLEC's placing the mechanized Bulk Request.
- CLEC may specify Desired Due Dates (DDD) for each EATN. The BellSouth CCPM will negotiate due dates with Network Operations. Every effort will be made to accommodate the CLEC DDDs where force and load permits and minimum intervals are met.
- A minimum of two (2) EATNs and up to a maximum of ninety-nine (99) EATNs can be placed on a single Bulk Request.
- A maximum of twenty-five (25) end-user telephone numbers per EATN can be placed on a Bulk Request.
- No additional EATNs or end-user telephone numbers may be added to the ***BellSouth UNE-P to UNE-L Bulk Migration Project Notification*** form once it has been submitted to the BellSouth

CCPM.

Requirements (continued)

- Order Coordination-Time Specific option is not applicable for a Bulk Request.
- UNE-Ls that require a Service Inquiry and/or Unbundled Loop Modification are excluded from the Bulk Request process.
- A Reservation Identification (RESID) (also referred to as a Facility Reservation Number (FRN)) is required on the Bulk Request for Unbundled ADSL Compatible Loops, HDSL Compatible Loops and Unbundled Copper Loop - Designed (UCL-D). Refer to the **Unbundled ADSL and Unbundled HDSL Compatible Loop, UCL-Designed CLEC Information Packages** and **Loop Make-Up CLEC Information Package** for RESID/FRN requirements.
- When a Mechanized Loop Make Up with Facility Reservation Number (FRN) is requested, the CLEC must submit the Bulk Request with the FRN to BellSouth within 24 hours of receiving FRN.
- Firm Order Confirmation (FOC) will be sent on individual LSRs generated from the Bulk Request.
- Upon receipt of a Reject, CLEC must re-submit a corrected Bulk Request or submit a cancellation of the Bulk Request.

5. Bulk Migration Options

5.1 Order Coordination (Coordinated Hot Cut)

- Order Coordination (OC) is available in situations where there is a reuse of existing facilities for the UNE-L.
- OC is included with the UVL-SL2, 2 Wire ADSL and 2/4 Wire HDSL Loops at no additional charge.
- OC is available as a chargeable option for conversions to UVL-SL1, UCL-Non Designed and UCL-Designed Loops. OC must be requested at the EATN level on the Project Notification form. An OC charge will be applied to each loop on the EATN for which OC has been requested.

UNE-P to UNE-L Bulk Migration

Bulk Migration Options (continued)

5.2 After Hours/Weekend Migrations

- Migrations will typically be completed during normal working hours of 8 a.m. – 5 p.m. However, for CLECs that have customers who need cutovers completed outside of normal business hours, after hours/weekend migrations are available at the CLECs request.
- The Project Notification Form includes a column titled "Special Handling". The CLEC provides its desired "Day" and "After Hours/Weekend" time window for the selected accounts at the EATN level in the Special Handling column according to the table below:

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

[1] **Extended Basic Hours**
[2] **Extended Overtime Hours**
[3] **Interconnection Agreement**

5.3 Two (2) hour Go Ahead Notification *(for Non-Coordinated Bulk Migrations)*

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

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

UNE-P to UNE-L Bulk Migration

Bulk Migration Options (continued)

5.4 Time Windows for Coordinated Conversions

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

- There are two (2) time window options:
  - *8 a.m. – 12 p.m.*
  - *1 p.m. – 5 p.m.*
- CLEC will submit the Project Notification form and indicate the time window desired, at the EATN level, in the Special Handling column.
- Prior to the due date, the BellSouth CCPM will coordinate with Customer Wholesale Interconnection Network Services (CWINS) to ensure that CWINS and Network forces are scheduled and loaded to perform the migration in the designated 4-hour time window.
- On the due date, the coordinated cutover will take place using current provisioning processes.

5.5 Pre and Post Order Completion Restoral Process (or Throwback Process)

- The restoral process (also referred to as a throwback process) is available at the CLEC's request due to out-of-service issues and when the CLEC requires a restoral/throwback back to the UNE-P service.
- ***The restoral/throwback process can only occur within a twenty-four (24) hour window of the UNE-L order Due Date.***
- The CLEC will use follow the requirements in 5.5.1 or 5.5.2 or 5.5.3 below depending on whether the order is (1)coordinated/non-coordinated *completed* UNE-L order; (2)coordinated *not* completed UNE-L order; (3)non-coordinated *not* completed order:

UNE-P to UNE-L Bulk Migration

Bulk Migration Options (continued)

5.5.1 Coordinated or Non-Coordinated '*Completed*' UNE-L order

- CLEC submits Expedited LSR to the Local Carrier Service Center (LCSC) using one of the following fax numbers:
  - Birmingham Fax Server – 888-792-6271
  - Atlanta Fax Server – 888-581-6038
- The LSR Package requesting a throwback to UNE-P must contain the following information:

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

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

5.5.2 Coordinated '*Not Completed'* UNE-L Order

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

Bulk Migration Options (continued)

5.5.3 Non-Coordinated '*Not Completed*' UNE-L order

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

5.6 Same-day End-user Account Migrations

Same day End-user Account Migrations are available upon CLEC request. Same day end-user account migration means that all lines associated with an end-user from the same Serving Wire Center will be assigned the same due date.

- CLEC will group the same end-user accounts together on the Project Notification form.
- CLEC will submit the Project Notification form and indicate the same Due Date desired, at the EATN level, in the Special Handling column.
- The BellSouth CCPM will coordinate with the appropriate internal groups to ensure that all end-user account migration activity is performed on the same due date.

5.7 CLEC to CLEC Migration of UNE-P to UNE-L

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

- CLEC (CLEC A) to CLEC (CLEC B) Migration of UNE-P to UNE-L is defined as a facility based CLEC (CLEC B) that is migrating the UNE-Ps, previously held by another CLEC (CLEC A), to UNE-Ls.
- CLEC B will prepare the Project Notification form using the same Bulk Migration requirements as specified within this document.
- The Project Notification form must contain all the necessary UNE-P and UNE-L information according to the requirements of the form.
- CLEC B must have an end-user letter of authorization (LOA) on file (it must be available if requested).

UNE-P to UNE-L Bulk Migration

6. Bulk Migration Submission/Flow Process

The Bulk Request Submission Process will consist of two main work activities. The CLEC will first submit a Project Notification. Once the Project Notification has been processed and returned to the CLEC, the CLEC will then prepare and input the mechanized Bulk Request. The Bulk Request must be submitted according to the guidelines contained in the **Local Ordering Handbook.** Below are the steps in the process :

Step #	Action
1	BellSouth CCPM receives Project Notification form from CLEC and negotiates/assigns Bulk Order Package Identifier (BOPI) and validates information (i.e., USOCs, Same Wire Center, etc.).
2	If pertinent information is missing on the Project Notification package, the form is returned to CLEC along with a reason(s) for return. BellSouth CCPM receives corrected Project Notification from the CLEC and continues the negotiation process.
3	BellSouth CCPM contacts BellSouth's Network organization and negotiates Due Date (DD) for all related Purchase Order Numbers (PONs) in the Bulk package and returns Bulk Notification Form including negotiated DD to the CLEC.
4	Upon receipt of the Bulk Notification Form that includes negotiated DD from BellSouth CCPM, CLEC submits Bulk Request package with negotiated dates for each EATN/PON via electronic ordering interface.
5	If the CLEC wants to supplement (SUP) (01,02,03) an individual PON, the request must be sent through the same electronic ordering system as the original Bulk Request.
6	At this point, the Bulk Request package will be processed for 1st level validation and any rejects will be mechanically generated to the CLEC.
7	The electronic ordering systems will accept the Bulk Request package, break the individual PONs into separate LSRs and populate the remaining required LSR fields from Operation Support System (OSS) systems prior to sending the individual LSRs downstream to the Local Number Portability (LNP) Gateway.
8	The LNP Gateway will perform 2nd level validations and provide any fallouts, per "business as usual" processes. The Local Carrier Service Center (LCSC) will handle all fallouts as normal. Any of the individual PONs that must be clarified will be sent back to the CLEC, business as usual.
9	After LNP Gateway issues the service orders, the LCSC will handle all manual service order fallouts as normal. The BellSouth Service Representative will send any PF and Missed Appointments (MA) to the CLEC via a jeopardy notice.
10	LNP Gateway will send an FOC on each individual PON associated with the Bulk Request package, to the CLEC.
11	The Project Manager will monitor PON, Service Order and Porting Statuses associated with the Bulk Request package. BellSouth's Service Representative and Project Manager will monitor the LNP gateway for the "Number Ported" messages and the Service Representative will handle manual port out order processing if required.

7. BellSouth UNE-P to UNE-L Bulk Migration Project Notification Process

Following is the Project Notification process:

- Complete the **BellSouth UNE-P to UNE-L Bulk Migration Project Notification** form according to the instructions.
- Electronically submit the ***Project Notification*** to the email address of the CLEC's assigned BellSouth Customer Care Project Manager (CCPM). For help with identifying a BellSouth CCPM , the CLEC should contact its BellSouth Customer Support Manager.
- The BellSouth CCPM will review the information submitted by the CLEC and will assign a Bulk Order Package Identifier (BOPI) that the CLEC will later use on the electronic Bulk Request.
- The BellSouth CCPM will coordinate with BellSouth's field forces to schedule the migration Due Dates.
- Once the review with the field forces is complete, the BellSouth CCPM will include the Due Dates on the ***Project Notification*** and return it to the CLEC.
- No additional EATNs or end-user telephone numbers may be added to the ***Project Notification*** form once it has been submitted to the BellSouth CCPM.

UNE-P to UNE-L Bulk Migration

8. UNE-P USOCs

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

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

9. UNE-L USOCs

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

Loop USOC	Description
UEAL2	2 Wire Unbundled Voice Loop – SL1
UEAL2, UEAR2	2 Wire Unbundled Voice Loop – SL2
UCLPW	2 Wire Unbundled Copper Loop/Short– Designed without manual Service Inquiry
UCL2W	2 Wire Unbundled Copper Loop/Long - Designed without manual Service Inquiry
UCL4W	4 Wire Unbundled Copper Loop/Short – Designed without manual Service Inquiry
UCL4O	4 wire Unbundled Copper Loop/Long – Designed without manual Service Inquiry
UEQ2X	2 Wire Unbundled Copper Loop – Non-Designed
UAL2W	2 Wire Unbundled ADSL Loop without manual Service Inquiry
UHL2W	2 Wire Unbundled HDSL Loop without manual Service Inquiry
UHL4W	4 Wire Unbundled HDSL Loop without manual Service Inquiry

UNE-P to UNE-L Bulk Migration

10 Intervals

10.1 Bulk Migration Project Notification Interval

- The "CC*PM Targeted Response Interval*" column in the table below represents the targeted number of business days in which the BellSouth CCPM will respond back to the CLEC.
- CLEC must submit the **Project Notification** in advance of the earliest CLEC's requested Desired Due Date (DDD) according to the "*Minimum # of days in advance to submit Project Notification*" column in the table below. This column represents the number of days that the Project Notification must be submitted in advance of the earliest DDD.
- *"Minimum # of days*" includes the interval for the BellSouth Customer Care Project Manager to negotiate the Due Dates. It also allows three (3) days for the CLEC to correct, process and submit mechanized Bulk Request and it includes 14 days in order to meet the 14-business day submission requirement for the Bulk Request.
- The BellSouth CCPM will attempt, where possible, to assign the work such that migrations occur on the requested DDD.

# of end-user Tel. Numbers	CCPM Targeted Response Interval	CLEC days after receipt from Proj Mgr	Bulk Request Submission Requirement	Minimum # of days in advance to submit Project Notification
Maximum of 99	4 business days	3 business days	14 business days	21 business days
100-200	6 business days	3 business days	14 business days	23 business days
201 +	To be determined	3 business days	14 business days	Contact CCPM

10.2 Bulk Request Service Order Intervals

- The BellSouth CCPM will negotiate the Bulk Request due dates with BellSouth's provisioning personnel and will communicate the due date to the CLEC.
- The CLEC must submit the Bulk Request and it must be accepted by the mechanized system at least 14 business days in advance of the earliest Due Date for any end-user telephone number to be migrated.

10.3 Example of Intervals

An example of Intervals follows:

- March 1, 2004 - CLEC submits Project Notification with 87 end-user telephone numbers to the BellSouth CCPM
- March 5, 2004 (4 business days) – the BellSouth CCPM sends the Project Notification with firm Due Dates to the CLEC
- March 8 – March 10 (3 business days) – CLEC will prepare and submit mechanized Bulk Request via the electronic interface.
    - March 30, 2004 (14 business days) – the earliest assigned Due Date on the Project Notification returned to the CLEC.

11. Acronyms

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