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January 10, 2002

**VIA HAND DELIVERY**

Blanca S. Bayo, Director  
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Betty Easley Conference Center  
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Re: Docket No.: 960786-B-TL

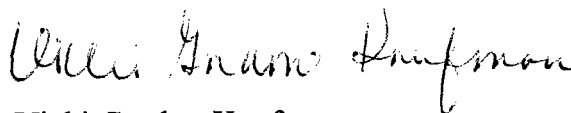
Dear Ms. Bayo:

On behalf of DIECA Communications, Inc. d/b/a Covad Communications, Inc. (Covad), enclosed for filing and distribution are the original and 15 copies of the following:

- ▶ Comments of Covad Communications Company Regarding Problems with BellSouth's Local Customer Service Center ("LCSC").

Please acknowledge receipt of the above on the extra copy of each and return the stamped copies to me. Thank you for your assistance.

Sincerely,



Vicki Gordon Kaufman

VGK/bae  
Enclosure

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**BEFORE THE  
FLORIDA PUBLIC SERVICE COMMISSION**

In Re: Consideration of BellSouth  
Telecommunication, Inc.'s Entry into  
InterLATA Services Pursuant to Section  
271 of the Federal Telecommunications  
Act of 1996

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Docket No. 960786-B-TL (Third Party Test)

**COMMENTS OF COVAD COMMUNICATIONS COMPANY  
REGARDING PROBLEMS WITH  
BELLSOUTH'S LOCAL CUSTOMER SERVICE CENTER ("LCSC")**

January 10, 2002

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COMES NOW, DIECA Communications, Inc. d/b/a Covad Communications Company ("Covad") and files these comments to emphasize the systemic problems that Covad experiences with regard to BellSouth Telecommunications, Inc.'s ("BellSouth") Local Carrier Service Center ("LCSC"). The crux of Covad's problems with the LCSC is its lack of a unified approach to customer service. Covad's ability to service our customers is directly dependent on the support we receive from the LCSC and from BellSouth Interconnection Services. Simply stated, CLECs do not receive the same customer service support, as do BellSouth's retail customers. Because BellSouth Interconnection Services lacks the proper organizational procedures and support personnel infrastructure, Covad's customers suffer accordingly and also experience the effects of these systemic problems.

Covad's established point of contact for orders is BellSouth's Birmingham LCSC. Each day Covad representatives submit numerous Local Service Requests ("LSRs") to the Birmingham LCSC via manual and/or mechanized gateways. If an LSR encounters any type of problem during this process, it has been Covad's experience that the LCSC appears unable to respond to Covad with the same knowledge, expertise and accountability that BellSouth shows its retail customers. For example, if Covad submits an LSR via a mechanized gateway and it falls out for auto-clarification, the LCSC should have the knowledge and ability to answer Covad's questions and get the problem resolved quickly. Instead, when Covad inquires about why this order has fallen out of the mechanized system, the standard BellSouth LCSC response is, "We don't handle mechanized ordering. You will have to contact your Customer Service Manager ("CSM") or the EC Support Group." BellSouth repeatedly tells Covad that the LCSC acts as a "clerical center" not a "call center". Covad is forced to escalate even clerical issues to a BellSouth team leader rather than being passed around to different individuals and departments within BellSouth. This "passing the buck" method of customer support is highly inefficient and adds unnecessary complication to an already complicated process when we do contact the CSM only to be told that the CSM is a management level individual and not available to handle front line customer calls. Consequently, the

burden of resolving any issues is shifted solely to Covad resulting in costly delays to Covad's customers. This is not evidence of the parity service that CLECs are entitled to under the 1996 Telecommunications Act. In fact, this type of customer service is substandard. If Covad treated its customers in the same manner, we would have been out of business long ago.

In sharp contrast to Covad's experience, when a BellSouth retail customer encounters a problem, the customer service experience is vastly different. A record of that customer's call is noted in BellSouth's computer system which: (1) captures the work item; (2) captures the customer request; (3) captures the action taken by the BellSouth's representative; and (4) tags the request for follow-up to contact the customer, if necessary, at a later date. This is clearly not the case for CLEC customers because BellSouth does not currently provide a system wherein a CLECs information is integrated into BellSouth Interconnection Service's computer system. This causes Covad's representative to have to recount the problem to each new representative that they are passed to within BellSouth resulting in unnecessary frustration and inefficiency to both parties. Moreover, repeated calls on the same issue illustrate that BellSouth does not flag our concerns for follow-up like BellSouth does for its retail customers.

To effectively support a customer the BellSouth CSM and LCSC need to have the ability to access CLEC specific information when issues arise such that the CSM and the LCSC can respond with the proper knowledge, expertise and accountability that is necessary to resolve the problem quickly and efficiently. For instance, a CSM should be able to retrieve: (1) the ordering gateways the CLEC uses; (2) the products and services ordered; (3) any open questions or issues concerning that CLEC; and (4) the BellSouth representative that was last in contact with that CLEC. This information can be parsed to different groups within BellSouth from the field and central office technicians through the service representatives and their supervisors, up to and including the account teams and executives resulting in a "unified" and "efficient" approach to managing CLEC customers.

Since this type of environment does not exist, Covad must interact with BellSouth representatives in their work group and department who are not able to provide the proper service, thereby resulting in delayed service installations, dissatisfied customers, and a lower volume of orders. Examples of these affects are highlighted below.

When Covad implemented the LENS GUI, we were not notified that BellSouth's system contained significant defects. The only feedback we received from BellSouth's account team was that most of the CLECs were using LENS with no problem, therefore Covad should not have problems. While it may have been true that other CLECs used LENS to order other network elements, Covad's experience shows that BellSouth had not properly developed the xDSL ordering functionality or the documentation that supposedly tells CLECs how to use it. Covad discovered several serious flaws that resulted in the following: (1) a large number of failed lineshare orders; (2) the inability to place disconnect orders; and (3) the inability to supplement orders if the initial order was placed via LENS. In fact, no resolution to the LENS issues were reached until Covad brought them to a public forum. This process delays Covad's customers from receiving service in a timely manner making it appear as if Covad is the problem, when in fact it is BellSouth's inability to provide adequate support to its CLEC customers that is the real problem.

A more recent example of the ongoing problem with Covad's customer service experience relates to the implementation of the Non-Designed Unbundled Copper Loop or the UCL-ND. When BellSouth implements a new product or service, the CLEC must revert to manual ordering gateways rather than the more efficient means of mechanized ordering. This is due to the fact that BellSouth does not provide mechanized ordering gateways unless it is specifically requested to do so by the CLEC via Change Management or unless it is a regulated directive. This also contrasts with BellSouth's treatment of its retail customers. For retail services, BellSouth develops mechanized ordering systems before it even allows the products to be sold. Covad ordered a controlled test group of a small number of UCL-ND loops in October 2001. During the test phase, a Covad employee worked full-time for over a month tracking these loops from the initial order through the provisioning of the loop. Covad encountered significant problems

with this test group of orders, which were communicated to BellSouth by Colette Davis, Covad's Director of ILEC Relations. Some of the problems Covad experienced were: (1) the LCSC incorrectly issuing orders by omitting the Test USOC that Covad included on each LSR; (2) field technicians calling Covad for testing and acceptance of the loop when the central office (CO) work was not complete (a practice that BellSouth continues to maintain as they refuse to coordinate the inside CO work orders with the outside plant customer work orders); (3) field technicians arguing and refusing to test with Covad because the order submitted by the LCSC did not request testing; (4) CO wiring problems resulting in missed firm order completion (FOC) dates and delayed service for Covad's customers; and (5) an overall lack of training of the LCSC and the field and CO technicians on loop ordering and delivery of the UCL-ND. The fact is that the LCSC never accepted responsibility for omitting the Test USOC code from these orders. Even the documentation from the CSM is worded such that some mysterious anomaly occurred which resulted in the field technicians not getting the proper Test USOC code. No one from the LCSC attempted to call Covad to discover the true cause of the problem. Covad's calls were ignored and we were referred to the CSM. These problems with the UCL-ND loop still have yet to be resolved by BellSouth to Covad's satisfaction.

Finally, in December 2001 Ms. Davis was contacted by Covad's Service Delivery manager and advised that the escalation process within BellSouth had changed and Covad was required to call yet another person with BellSouth to get our issues resolved. After numerous e-mails and phone calls, Covad learned that the LCSC made internal/functional changes to the problem escalation process but did not bother to issue any sort of formal notice to Covad. Covad wasted "management" time attempting to obtain the proper escalation procedures that are critical to Covad since we escalate ordering issues on a daily basis only to find out that the LCSC advised us incorrectly. The LCSC continues to mislead CLECs, refuses to be accountable for their mistakes, and sends Covad representatives to the CSM or EC Support for resolution to issues that a properly trained service representative should be capable of handling.

Covad appreciates the opportunity to share this information with KPMG and the Commission. These comments are intended to provide information about ongoing problems that KPMG should investigate. As with the other issues that Covad has raised in this docket, if these problems are ignored they will have a significant impact on Covad's ability to compete effectively in the telecommunications arena and to continue to provide the high quality of service that Covad's customers expect.

Thank you for your consideration of these important issues.

Catherine F. Boone / nfb  
Catherine F. Boone

## **CERTIFICATE OF SERVICE**

I **HEREBY CERTIFY** that a true and correct copy of the foregoing the Comments of Covad Communications Company Requesting Problems with BellSouth's Local Customer Service Center ("LCSC") has been furnished by (\*) hand delivery or by U. S. Mail on this 10th day of January, 2002, to the following:

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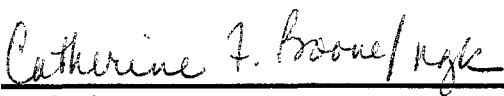
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