

1 BELL SOUTH TELECOMMUNICATIONS, INC.  
2 SURREBUTTAL TESTIMONY OF RONALD M. PATE  
3 BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION  
4 DOCKET NO. 960786-TL  
5 AUGUST 20, 2001  
6

7 Q. PLEASE STATE YOUR NAME, YOUR POSITION WITH BELL SOUTH  
8 TELECOMMUNICATIONS, INC. AND YOUR BUSINESS ADDRESS.  
9

10 A. My name is Ronald M. Pate. I am employed by BellSouth  
11 Telecommunications, Inc. ("BellSouth") as a Director, Interconnection  
12 Services. In this position, I handle certain issues related to local  
13 interconnection matters, primarily operations support systems ("OSS").  
14 My business address is 675 West Peachtree Street, Atlanta, Georgia  
15 30375.  
16

17 Q. PLEASE SUMMARIZE YOUR BACKGROUND AND EXPERIENCE.  
18

19 A. I graduated from Georgia Institute of Technology in Atlanta, Georgia, in  
20 1973, with a Bachelor of Science Degree. In 1984, I received a Masters of  
21 Business Administration from Georgia State University. My professional  
22 career spans over twenty-five years of general management experience in  
23 operations, logistics management, human resources, sales and marketing.  
24 I joined BellSouth in 1987, and have held various positions of increasing  
25 responsibility since that time.

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Q. HAVE YOU TESTIFIED PREVIOUSLY?

A. Yes. I have testified before the Public Service Commissions in Alabama, Florida, Georgia, Louisiana, South Carolina, Kentucky, 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 rebut the testimony filed on July 20, 2001, by Denise Berger of AT&T, Bernadette Seigler of AT&T, Steven Turner of AT&T, Judy Wheeler of AT&T, Mark G. Felton of Sprint, and Collette Davis of Covad.

Q. IN WHAT CONTEXT SHOULD YOUR TESTIMONY BE READ?

A. My testimony should be read in conjunction with other surrebuttal testimony supporting BellSouth's 271 application. Additionally, I will refer to the affidavit of William N. Stacy, filed May 31, 2001 ("Stacy Affidavit filed May 31, 2001") in this proceeding as notification of BellSouth's intent to file such affidavit before the Federal Communications Commission.

Further, for the convenience of this Commission, a list of acronyms has been provided in Exhibit OSS-1 to the Stacy Affidavit filed on May 31, 2001.

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Q. DO YOU HAVE PRELIMINARY COMMENTS?

A. Yes. In this testimony, I will address the issues that have been raised by the Alternative Local Exchange Carriers (“ALECs”) by topic and category within those topics. Many of the issues raised in this proceeding are currently being handled collaboratively by BellSouth and the ALECs through the regional Change Control Process (“CCP”), or otherwise dealt with by this Commission.

**SUPPORT FOR ALECs**

Q. DOES BELLSOUTH PROVIDE COMPLETE DOCUMENTATION TO THE ALECS IN COMPLIANCE WITH THE FCC’S REQUIREMENTS?

A Ms. Seigler, on page 15 of her affidavit, complains that BellSouth’s Business Rules are inconsistent and incomplete. BellSouth disagrees. As stated in the Stacy Affidavit filed May 31, 2001, beginning on page 25 and detailed in Exhibits OSS-3 through OSS-38, BellSouth provides extensive support to the ALECS through documentation and training for the electronic interfaces and its OSS. Specifically, BellSouth ALEC Training Course Offerings are posted to the Web at the Interconnection Web site. (<http://www.interconnection.bellsouth.com/training/html/info.html>). BellSouth strives to make such training and documentation complete, accurate, and up-to-date in order to meet the ALECs business needs.

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Q. DOES MS. SEIGLER PROVIDE ANY EXAMPLES TO SUPPORT HER CLAIMS REGARDING BELL SOUTH'S BUSINESS RULES?

A. Yes, but her claims associated with those example are questionable at best. BellSouth has made correct information available to ALECs, and it is incumbent upon the ALECs to take advantage of that information.

Ms. Seigler's first example pertains to the use of the "business rules" for ordering UNE-P via the LENS interface. It is not clear from her testimony exactly what document AT&T uses as a guide for ordering UNE-P via LENS, but her constant reference to the "business rules" is a possible indication that AT&T's representatives are not using the appropriate guide. The LENS User Guide (located on the BellSouth Interconnection Website <http://www.interconnection.bellsouth.com/guides/html>) is the appropriate document to be used because it is designed specifically for submission of requests via LENS, and has extensive information regarding the conversion of an end user to UNE-P, which is the main type of request about which AT&T is complaining. The BellSouth Business Rules for Local Ordering ("BBR-LO"), located at the same Website, is an appropriate guide for preparing manual and electronic requests, but the LENS User Guide is more specific, and, therefore, more user-friendly, for the use of the LENS interface. LENS is programmed to comply with the Business Rules, and it is just a matter of populating the correct data in the request fields in order to produce a clean and correct local service request

1 (“LSR”). LENS has edits that help the user progress to such an LSR, and  
2 BellSouth is confident that the use of the LENS User Guide will enhance  
3 the usability of the interface.

4  
5 Next, Ms. Seigler complains that the “business rules regarding Universal  
6 Service Order Codes [USOCs] have contributed to this problem” of  
7 rejected requests for conversions to UNE-P. That is wrong. As I stated  
8 above, the LENS User Guide provides assistance with ordering, and that  
9 includes USOCs. Further, BellSouth made available to the ALECs via the  
10 Change Control Process (“CCP”) an ALEC Information Package which  
11 goes beyond the information contained in the LENS User Guide by  
12 providing the different possible entries for input on a UNE-P conversion  
13 request, and the different circumstances under which particular USOCs  
14 are used (including the type-of-service (TOS) field and the UEPLX coding  
15 issues mentioned on page 17 by Ms. Seigler). BellSouth could not have  
16 made it any simpler for the ALECs. That Information Package, currently in  
17 Version 5 (dated July 13, 2001), is entitled ‘2-Wire Voice Grade UNE  
18 Loop/Port Switched Combination (Business, Residential and Line Side  
19 PBX Service).

20  
21 Q. DO ALECS HAVE ANY RECOURSE IF THEY DETECT THAT THERE  
22 MAY BE A PROBLEM WITH BELL SOUTH’S DOCUMENTATION?

23  
24 A. Certainly. When ALECs detect problems associated with BellSouth’s  
25 documentation, they should submit a Change Request via the CCP, which

1 is the appropriate forum in which to address this type of issue. And,  
2 indeed, ALECs are using the CCP to address issues with documentation,  
3 as BellSouth has corrected errors in documentation that have been raised  
4 by several ALECs through the CCP.

5  
6 In summary, BellSouth provides ALECs with thorough and complete  
7 documentation that is readily available, and a process exists within the  
8 CCP to correct documentation defects, should they occur.

9  
10 Q. WHAT OTHER TYPES OF SUPPORT DOES BELL SOUTH PROVIDE  
11 FOR ALECS?

12  
13 A. BellSouth held an ALEC Inforum on July 15-17, 2001 (Inforums are an  
14 annual event). This Inforum provided ALECs with information on  
15 operational efficiency improvements, sales and marketing initiatives,  
16 educational sessions and workshops with information about the latest  
17 BellSouth products. ALECS were also provided with the opportunity to  
18 talk one-on-one with Subject Matter Experts in several areas such as the  
19 complex resale support group (CRSG), product management, and ALEC  
20 training.

21  
22 For example, the loop makeup ("LMU") user group session specifically  
23 provided ALECS with information on the LMU product, including: manual  
24 versus mechanized submissions (how-to-do and common mistakes);  
25 technical information related to interpreting LMU responses to qualify a

1 loop; how LMU relates to the firm order and shared proposed  
2 enhancements, and contract language necessary for using LMU.  
3 BellSouth also offered the ALECs an opportunity to provide their input for  
4 product improvement.

5  
6 BellSouth has established a number of other user groups in support of the  
7 ALECs such as: Resale, Facility-Based, UNE-P, Collocation, Notification,  
8 EDI, and RoboTAG™. A description of some of these user groups and  
9 information pertaining to some of the user groups can be found on the  
10 BellSouth Interconnection Website.<sup>1</sup>

11  
12 **PRE-ORDERING**

13  
14 **Loop Makeup**

15  
16 Q. DOES BELLSOUTH PROVIDE NONDISCRIMINATORY ACCESS TO  
17 LOOP MAKEUP INFORMATION IN FLORIDA?

18  
19 A. Yes. The FCC's Interconnection Rules (at 51.319(g)) state that “[a]n  
20 incumbent LEC, as part of its duty to provide access to the pre-ordering  
21 function, must provide the requesting carrier with nondiscriminatory  
22 access to the same detailed information about the loop that is available to  
23 the incumbent LEC.” BellSouth provides ALECs with the same detailed  
24 information about the loop that is available to BellSouth. (See Stacy

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<sup>1</sup>([http://www.interconnection.bellsouth.com/help/html/ic\\_search.html](http://www.interconnection.bellsouth.com/help/html/ic_search.html) . Type “user groups” into the search query box.

1 Affidavit filed May 31, 2001, ¶¶166-175 for a complete description of the  
2 loop makeup information provided by BellSouth.)

3  
4 To reiterate briefly, since November 18, 2000, ALECs have had  
5 nondiscriminatory electronic access to loop makeup information that is  
6 contained in the LFACS database. This functionality is provided via the  
7 Telecommunications Access Gateway ("TAG"), RoboTAG™, and the  
8 Local Exchange Navigation System ("LENS") electronic interfaces. If an  
9 ALEC determines that it needs additional information that is not available  
10 electronically, the ALEC can submit a manual loop makeup request.

11 Personnel in BellSouth's Outside Plant Engineering department must then  
12 retrieve the data from the plats whether the request relates to a BellSouth  
13 customer or to an ALEC customer.

14  
15 BellSouth's timely provision of nondiscriminatory access to loop makeup  
16 information is well supported by the significant commercial usage  
17 throughout the region and in Florida. The numbers of loop makeup  
18 inquiries for April 2001 through June 2001 are:

19

Month	# Submitted Regionally	% Within 5 Minutes	% Within 1 Minute	# Submitted in FL	% Within 1 Minute in FL
April 2001	4565	100%	96.3%	1609	97.4%
May 2001	3685	100%	98.7%	1752	98.9%
June 2001	5005	100%	99.2%	1842	99.0%

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In Florida, ALECs sent 394 fully mechanized local service requests (“LSRs”) for xDSL loops in March, 455 fully mechanized LSRs for xDSL loops in April, and 418 fully mechanized LSRs for xDSL loops in May of 2001.

Q. SPRINT CLAIMS THAT THE LFACS DATABASE IS CURRENTLY INADEQUATE BECAUSE ALL BELLSOUTH LOCATIONS ARE NOT COMPLETELY LOADED INTO THE DATABASE. PLEASE COMMENT.

A. While 100% of BellSouth’s loops are populated in LFACS with certain basic information, not all will have the detailed loop makeup information necessary to qualify a loop. It is estimated that as much as 85% of loops with detailed loop makeup information are populated in LFACS in some major metropolitan areas. As of July 2001, Loop Makeup data is populated in LFACS on approximately 46% of the total network feeder or distribution cable pairs region-wide. In Florida, Loop Makeup data is populated in LFACS on 52% of the total cable pairs. This number is even greater in the 72 Florida wire centers where Sprint is collocated: Loop Makeup data is populated on approximately 57% of the total cable pairs in LFACS.

These numbers continue to grow on a daily basis. In fact, Mr. Felton’s assertion that BellSouth’s early year percentage was only 41% of the total cable pairs in LFACS is correct. To put BellSouth’s progress in this area

1 into perspective, it should be noted, that in order for BellSouth to improve  
2 from 41% to 46% in this short time, loop makeup information was  
3 populated on over 8.1 million cable pairs in LFACS. BellSouth is  
4 continuously updating and/or populating LMU data in LFACS as  
5 Engineering Work Orders are issued, and as manual LMU Service  
6 Inquiries are requested. Other mechanized efforts are underway to  
7 increase the percentage of loops with LMU data populated in LFACS,  
8 which I will describe below in my testimony.

9  
10 In its UNE Remand Order, ¶427: the FCC required that an ILEC provide  
11 the requesting carrier with nondiscriminatory access to the same detailed  
12 information about the loop that is available to the incumbent.

13 Nondiscriminatory access does not require that detailed information about  
14 loops must be available electronically and involve no manual processes.  
15 For BellSouth to serve its own customers, BellSouth must perform manual  
16 service inquiries for information when there is no electronic access for the  
17 requested retail service/product. If an ALEC determines that it needs  
18 additional information that is not available electronically, the ALEC can  
19 submit a manual loop makeup request. Therefore, BellSouth is presently  
20 providing ALECs nondiscriminatory access to the same detailed  
21 information that it provides itself through both electronic and manual  
22 means. Thus, these processes are in compliance with FCC requirements.

23  
24 Finally, as a rule in the past, BellSouth has populated detailed loop  
25 makeup in LFACS based upon anticipated requests for its designed

1 services that require special engineering and provisioning, and that are  
2 often served by more than one central office or wire center. On the other  
3 hand, because there was previously no need for detailed loop makeup  
4 information on non-designed services that required no special provisioning  
5 and that were served by one central office, BellSouth had not populated  
6 LFACS with detailed loop makeup information for these loops. BellSouth  
7 and the ALECs have access to the same information for designed and  
8 non-designed loops.

9  
10 Q. ON PAGE 6 OF HIS TESTIMONY, MR. FELTON OF SPRINT CLAIMS  
11 THAT BELLSOUTH SHOULD BE ORDERED TO PROVIDE ACCESS TO  
12 THE CORPORATE FACILITIES DATABASE ("CFD"). PLEASE  
13 COMMENT.

14  
15 A. First, the additional customer-specific information in the Corporate  
16 Facilities Database ("CFD") to which Mr. Felton refers, is not required for  
17 loop qualification. The assignment information that is required for loop  
18 qualification is located in LFACS, and is not located in the CFD. Thus, a  
19 loop cannot be qualified through the CFD, making direct access to the  
20 CFD unnecessary in the provision of nondiscriminatory access to loop  
21 makeup information.

22  
23 Second, the CFD contains BellSouth's proprietary network information as  
24 well as certain information regarding BellSouth's end user customers. For  
25 example, the CFD provides detailed information on the exact location of

1 cables serving military installations and financial institutions as well as  
2 police, fire, disaster recovery, and FAA locations, among others. Thus,  
3 the release of this information raises concerns not only about customer  
4 proprietary data, but also sensitive state and national security information.  
5 So, as explained herein, the information required for loop qualification is  
6 currently provided to the ALECs, as it is to BellSouth for its use, on a non-  
7 discriminatory basis without jeopardizing the integrity of BellSouth's  
8 proprietary data. Therefore, direct access to the CFD is unnecessary to  
9 accomplish such nondiscriminatory access.

10  
11 Further, as discussed above, and in the Stacy Affidavit, ¶¶ 166-175,  
12 BellSouth has gone to great lengths to provide ALECs with  
13 nondiscriminatory access to loop makeup information. If an ALEC  
14 determines that it needs additional information that is not available  
15 electronically, the ALEC can submit a manual loop make-up request. This  
16 request is processed in substantially the same time and manner as would  
17 be a similar request (service inquiry) for a BellSouth customer as part of  
18 the order and provisioning process – the data would be retrieved from the  
19 CFD by personnel in BellSouth's Outside Plant Engineering department  
20 whether the request relates to a BellSouth customer or to an ALEC  
21 customer. Thus, ALECs are not at a disadvantage when compared to  
22 BellSouth's retail operations.

23  
24 BellSouth has recently made modifications to its systems that will compile  
25 relevant loop makeup data contained in the CFD, by wire center, on a bulk

1 basis for automatic update to the LFACS database. This process was  
2 completed for all collocation wire centers on July 18, 2001 (this process  
3 was also completed for all other wire centers on August 13, 2001). All  
4 loop makeup data that can be mechanically generated in the CFD was  
5 automatically populated in LFACS at that time. Therefore, all relevant  
6 loop makeup data that an ALEC would need to access from the CFD that  
7 can be mechanically generated is now contained in LFACS, and ALEC  
8 access to the CFD by an ALEC is unnecessary.

9  
10 Further, in September 2001, BellSouth will make available a planned  
11 enhancement for an electronic query from LFACS to the CFD for loop  
12 qualification information. As a result of this enhancement, when an ALEC  
13 sends an electronic query to LFACS for loop qualification information, and  
14 all of the necessary information is not resident in LFACS, an electronic  
15 query will be automatically launched to the CFD to retrieve the required  
16 additional information. This additional loop qualification information  
17 resulting from the queried CFD will automatically be combined with the  
18 LFACS information and provided to the ALEC. This entire process will be  
19 automated, and will occur as a result of the ALEC's initial electronic query  
20 to LFACS. Also, the information obtained from the query to the CFD will  
21 be populated in the LFACS database and, thus, will be available going  
22 forward for future electronic loop qualification information queries. In  
23 summary, BellSouth is providing the ALECs with the same detailed  
24 information about the loop that is available to BellSouth, as required by the  
25 FCC's Interconnection Rules (at 51.319(g)), and the enhancements

1 described above emphasize BellSouth's commitment to continue to  
2 improve the processes by which that information is provided.

3  
4 Finally, Mr. Felton relies on the North Carolina Utilities Commission  
5 Recommended Order Concerning All Phase I and Phase II Issues  
6 Excluding Geographic Deaveraging Issued June 7, 2001, at page 10  
7 ("NCUC UNE Order"), to assert that BellSouth does not provide  
8 nondiscriminatory access to loop qualification information. BellSouth  
9 disagrees with the NCUC UNE Order that directed BellSouth to permit  
10 [ALECs] to access directly BellSouth's Corporate Facilities Database  
11 ("CFD"), and has submitted Exceptions to the NCUC, requesting this  
12 conclusion be modified. Based upon the explanation provided herein,  
13 BellSouth believes that the NCUC will agree with its reasonable  
14 modification to the NCUC UNE Order to allow BellSouth to make "LFACS  
15 and LQS – or a functionally equivalent electronic system – available to  
16 CLPs on a permanent basis." (BellSouth's Exceptions to Recommended  
17 Order filed July 6, 2001, Docket No. P-100, Sub 133d, at p. 7). This  
18 modification will allow BellSouth the flexibility to upgrade, update or even  
19 replace, its electronic systems and platforms as it recognizes changes in  
20 requirements or technology.

21  
22 **Pre-Ordering through LENS**

23  
24 Q. ON PAGES 8-9 OF HER TESTIMONY, MS. WHEELER OF AT&T  
25 COMPLAINS THAT BELL SOUTH DOES NOT PROVIDE THE ABILITY

1 TO ELECTRONICALLY TRANSFER CUSTOMER INFORMATION FROM  
2 A PRE-ORDERING INTERFACE TO AN ORDERING INTERFACE  
3 WITHOUT MANUAL PROCESSING. PLEASE COMMENT.  
4

5 A. BellSouth does not understand why AT&T says it is a problem to transfer  
6 customer service record information, when AT&T's Mr. Bradbury has  
7 confirmed in another 271 proceeding that parts of AT&T have integrated  
8 TAG pre-ordering with an EDI ordering interface. (See June 28, 2001  
9 proceedings before the Alabama Public Service Commission, Docket  
10 25835, Cross-Examination of Jay M. Bradbury, at 2998 ("I do know that  
11 we have integrated in the past TAG with the EDI interface and I know that  
12 work has been done there and I would assume it's still going on.")).  
13

14 Also, ITC DeltaCom confirms that it has integrated its TAG and EDI  
15 interfaces. (See June 29, 2001 proceedings before the Alabama Public  
16 Service Commission, Docket 25835, Cross-Examination of Mary  
17 Conquest, at 3636-3637).  
18

19 MCI/WorldCom has also integrated TAG pre-ordering and EDI ordering, at  
20 least to the extent that end-user address information from the pre-ordering  
21 transaction is automatically populated on the local service request ("LSR").  
22 (See June 31, 2001 proceedings before the Alabama Public Service  
23 Commission, Docket 25835, Cross-Examination of Sherry Lichtenberg, at  
24 4635-4636).  
25

1 Evidently, AT&T and other ALECs are using the machine-to-machine  
2 integrateable TAG and EDI interfaces. However, if AT&T Broadband has  
3 made the business decision to use the human-to-machine interface  
4 (LENS) for pre-ordering, then it must accept that the integrateable  
5 machine-to-machine functionality is not available.

6  
7 **ORDERING**

8  
9 **Ordering of Line Splitting**

10  
11 Q. ON PAGE 23, MR. TURNER OF AT&T STATES THAT ALECS ARE  
12 "FORCED TO SIT ON THE SIDELINES" BECAUSE BELLSOUTH DOES  
13 NOT PROVIDE ELECTRONIC OSS FOR ALEC LINE SPLITTING  
14 ORDERS, HE ALSO INDICATES CONCERN REGARDING THE  
15 PROCESSING OF MANUALLY SUBMITTED ORDERS. PLEASE  
16 COMMENT

17  
18 A. As Mr. Turner is aware, BellSouth's Line Splitting service became  
19 available on June 19, 2001. To date, BellSouth has received no firm  
20 orders for Line Splitting. AT&T and other ALECs participated in the  
21 BellSouth Line Splitting Collaborative and AT&T has been one of the test  
22 partners for the manual ordering and maintenance processes developed  
23 by the team. Further, nondiscriminatory access to mechanized OSS  
24 providing pre-ordering, provisioning, maintenance and repair, and billing  
25 for loops used in Line Splitting arrangements is currently in place, and has

1           been available since June 19, 2001.

2  
3           BellSouth has also been working with AT&T as part of the Line Splitting  
4           Collaborative, to develop the electronic ordering processes. A fully  
5           mechanized ordering capability is currently underway, and will allow  
6           ALECs to mechanically order Line Splitting services via existing electronic  
7           OSS, including TAG, EDI, LENS, and RoboTAG™. BellSouth anticipates  
8           having it completed in time to meet the Georgia PSC xDSL UNE Order  
9           dated June 11, 2001 that requires BellSouth to complete development of  
10          its mechanized ordering process by December 11, 2001. ALECs will be  
11          notified via a Carrier Notification Letter when the mechanized functionality  
12          will be available.

13  
14          Mr. Turner's concern regarding the processing of manual orders is also  
15          without merit. According to the processes which AT&T helped develop,  
16          manually submitted requests for Line Splitting will be worked in the same  
17          intervals as Line Sharing requests (currently 3 business days for 1-4  
18          telephone numbers ("TNs"), 5 business days for 5-9 TNs, individual case  
19          basis for 10 or more TNs), and will be processed in an accurate, timely  
20          manner by BellSouth's trained Local Carrier Service Center ("LCSC")  
21          representatives. Manually submitted LSRs today utilize the same ordering  
22          systems that will be utilized with the electronic interface.

23  
24          Accordingly, AT&T is not "forced" to sit on the sidelines; they have simply  
25          chosen not to submit manual orders for Line Splitting in the interim period

1 until the mechanized process is implemented.

2  
3 **CLEC [ALEC] Service Order Tracking System (“CSOTS”)**

4  
5 Q. COVAD COMPLAINS THAT CSOTS AND CPSS (“CIRCUIT  
6 PROVISIONING STATUS SYSTEM”) CONTAIN CONFLICTING  
7 INFORMATION, AND INFERS THAT THIS MEANS THAT BELLSOUTH  
8 PROVIDES DATA THAT IS NOT RELIABLE, COMPLETE AND  
9 ACCURATE. PLEASE COMMENT.

10  
11 A. On pages 4-5 of her testimony, Ms. Davis of Covad complains that  
12 BellSouth “does not have a single source of accurate data for ALEC  
13 orders.” Ms. Davis is mistaken. First, BellSouth offers CSOTS, which  
14 allows an ALEC to track the status of its manually and mechanically  
15 submitted requests. To accommodate the needs of the ALEC community,  
16 BellSouth modified CSOTS for the recently introduced Line Sharing UNE  
17 requests to enable the ALECs to view their end users’ service order  
18 status. The permanent CSOTS completion notification process went into  
19 production April 28, 2001. ALECs no longer have to go to multiple  
20 databases to obtain order status or completion notifications.

21  
22 As an interim solution, while the CSOTS modification was being  
23 developed and implemented, Covad was advised to use the COSMOS or  
24 SWITCH CFA (Connecting Facility Assignment) Report (depending upon  
25 the state location) to confirm the order status as either “working” or

1 “pending”. A status of “working” shown in the CFA Report is a reliable  
2 indication that the Line Sharing UNE order has been provisioned. This  
3 interim process required some additional manual effort by the ALEC but  
4 provided accurate information to the participants. The extra effort was  
5 eliminated with the permanent modification to CSOTS described above.  
6 Second, LENS provides the capability to request information on a specific  
7 PON, all information for orders placed on a specific date, or all information  
8 regarding orders placed within a date range.

9  
10 Finally, the COSMOS/SWITCH CFA report Ms. Davis mentions on page 5  
11 is not a Completion Notification (“CN”) report. It was not designed for that  
12 purpose and is not being supported as a CN system. As I mentioned  
13 above, it was simply offered as an interim solution until the CSOTS  
14 modifications were completed. The COSMOS/SWITCH CFA report  
15 continues to be made available to ALECs as a separate informational tool.  
16 Covad has not provided evidence that the existing standard CN process is  
17 not providing accurate CN information, nor has it provided evidence that  
18 the systems and reports to status orders, PON status reports, CSOTS,  
19 and CPSS contain conflicting information.

20  
21 Q. ON PAGE 8 LINES 17-19, MS. DAVIS OF COVAD SAYS THAT IN  
22 ORDER “TO GET ACCURATE AND COMPLETE ORDER STATUS  
23 INFORMATION, COVAD MUST CHECK THE COSMOS/SWITCH  
24 REPORT, WHICH WAS ONLY UPDATED 3 TIMES A WEEK UNTIL  
25 VERY RECENTLY.” PLEASE COMMENT.

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A. As discussed above, effective April 28, 2001, the completion status for both the billing and the provisioning Line Sharing UNE orders may be obtained via CSOTS. The COSMOS/SWITCH CFA report continues to be made available to ALECs as a separate informational tool. Ms. Davis is correct that the COSMOS/SWITCH report is now updated daily, rather than three times per week. This change was made available during the week of July 16, 2001, in direct response to Covad's informal request made through the Line Sharing collaborative.

Q. MS. DAVIS MENTIONS THAT BELLSOUTH HAS PUT A MANUAL PROCESS INTO PLACE TO INSURE THAT AUTO-COMPLETIONS DO NOT GENERATE INCORRECT SERVICE COMPLETION NOTICES FROM BELLSOUTH. PLEASE DISCUSS THIS PROCESS.

A. Upon receiving an LSR for UNE Line Sharing, BellSouth produces two orders internally. A provisioning order is issued through BellSouth's Customer Record Information System ("CRIS") for the end user's line in order to have the physical work performed in BellSouth's central office. A second billing order establishes the Line Sharing UNE in the ALEC's name and results in billing for the UNE through BellSouth's Carrier Access Billing System ("CABS"). The provisioning and billing orders are issued with the same due date. As Ms. Davis correctly stated, BellSouth has taken steps to ensure that the provisioning and billing orders remain in sync.

1 On April 13, 2001, BellSouth implemented a change on manually  
2 submitted Line Sharing requests that added a unique indicator, the  
3 Frame Ready Date ("FRD"), on the provisioning order. The FRD is three  
4 business days before the due date specified on the order, and indicates  
5 the date by which verification of the cable and pair information and  
6 splitter assignment information (commonly referred to as connecting  
7 facility assignment ("CFA")) must be performed. The presence of the  
8 FRD mechanically drops a work request to a BellSouth technician,  
9 alerting him to verify that the cable and pair and/or splitter information  
10 specified by the ALEC on the LSR is indeed available for use. The  
11 manual process implemented on April 13, 2001 was subsequently  
12 upgraded on June 14, 2001, adding up-front edit validations (that is, edits  
13 were put in place that require the Service Representative to populate the  
14 FRD on manually submitted orders). This change has eliminated the  
15 possibility of a Service Representative "forgetting" to populate the FRD  
16 on the service order. Additionally, on July 28, 2001, BellSouth  
17 implemented enhancements to the mechanized Line Sharing ordering  
18 process so that the FRD is now automatically generated and populated  
19 on all mechanically generated Line Sharing service orders.

20  
21 When the CFA assignments provided by the ALEC are correct on the  
22 original request, the BellSouth technician completes the work on  
23 schedule. If, during the verification on the FRD, it is determined that the  
24 cable pair(s) or splitter assignments are not available for use<sup>2</sup>, the

---

<sup>2</sup> The cable pair(s) or splitter assignments may not be available because of defective facilities or because the pair(s)/splitter port is already in use.

1 technician places the order in a jeopardy condition that informs the  
2 LCSC. The LCSC then informs the ALEC that it must investigate and  
3 resolve its incorrect assignments. When this occurs, the LCSC cancels  
4 both the billing and provisioning orders. When the ALEC corrects the  
5 CFA error and issues a Supplemental LSR, the LCSC reissues the billing  
6 and the provisioning orders, with new common due dates. This process  
7 ensures that the billing order will not auto-complete prior to the  
8 provisioning order being worked.

9  
10 Initial results from the CFA validation process indicate that this new  
11 process is working and billing orders are not being completed before the  
12 associated provisioning order. But, as Ms. Davis pointed out in her  
13 testimony, the process is dependent upon BellSouth personnel  
14 performing their work properly and on the appropriate date. As  
15 explained, BellSouth is taking the necessary steps to ensure that the  
16 work is performed correctly.

17  
18 In summary, there is a necessity for two orders when establishing Line  
19 Sharing UNE service to establish 1) the Line Sharing service on the end  
20 user's line; and, 2) the billing order to establish an account record and bill  
21 the ALEC. Both orders are carefully coordinated to complete on the same  
22 date. The CFA information is validated on the provisioning order three  
23 days prior to the due date, allowing ample time for discrepancies to be  
24 referred back to the ALEC and the billing order to be suspended.  
25 BellSouth has every reason to believe that this new process will address

1 this issue.

2  
3 Q. COVAD CLAIMS THAT THE BELLSOUTH'S ORDERING GATEWAYS  
4 ARE PLAGUED WITH DEFECTIVE FUNCTIONALITY WHICH INHIBITS  
5 FLOW-THROUGH. PLEASE COMMENT.

6  
7 A. Ms. Davis states on pages 18 and 19 that Covad has implemented LENS  
8 for xDSL and Line Sharing ordering, but that the documented functionality  
9 does not work. She says this impacts Covad's ability to pass flow-through  
10 orders. She does not, however, provide any specific examples of  
11 functionality problems or documentation errors. Neither has Covad  
12 submitted any change requests to BellSouth's CCP identifying specific  
13 defects in coding or documentation. Consequently, BellSouth is unable to  
14 address Ms. Davis' claims. However, BellSouth's commercial volumes  
15 indicate a different reality than that of Ms. Davis' allegations. Region-  
16 wide, ALECs submitted 7813 xDSL orders mechanically between January  
17 and May of 2001, and, in Florida alone, ALECs have submitted 2278  
18 orders mechanically for xDSL service.

19  
20 Q. ON PAGE 9, MS. DAVIS SAID THAT BELLSOUTH HAS REFUSED TO  
21 PROVIDE COVAD WITH A LIST OF LINE SHARING ORDERS  
22 COMPLETED THE DAY BEFORE. PLEASE COMMENT.

23  
24 A. This issue has been resolved between BellSouth and Covad in previous  
25 arbitrations (Florida PSC Docket No. 001797-TP, Tennessee Regulatory

1 Authority Docket No. 00-001130, and Georgia PSC Docket No. 13346-U),  
2 and Covad has agreed with BellSouth's contention that this report is not  
3 necessary.

4  
5 **Access to Loop Facility Assignment Control System ("LFACS")**

6  
7 Q. AT&T ASSERTS THAT BELLSOUTH SHOULD CHECK ALECS' CFAS,  
8 AND FURTHER, BELLSOUTH SHOULD BE REQUIRED TO PROVIDE  
9 DIRECT ACCESS TO ITS LFACS. PLEASE COMMENT.

10  
11 A. Ms. Berger, on page 15-17 of her testimony, states that "another source of  
12 unreasonable delay...occurs when BellSouth returns a FOC without first  
13 checking the availability of its connecting facility assignments". BellSouth  
14 submitted on August 7, 2001 a change request (CR0461) to the CCP to  
15 alter its processes for electronically available facility checks to address  
16 this issue through the addition of a post-FOC unsolicited response sent  
17 from BellSouth to the ALEC when the order reaches Pending Dispatch  
18 ("PD") status and after an electronic facility check has been completed.  
19 Additionally an optional field would be added to designate the "new" FOC  
20 response for only selected LSRs.

21  
22 Nevertheless, ALECs are responsible for submitting complete and  
23 accurate LSRs with accurate assignments to BellSouth for CFA cable and  
24 pair assignments, and for maintaining their own records so that they may  
25 perform accurate assignments of their cables. The CFA assignments that

1 Ms. Berger says BellSouth should check are the AT&T assignments, not  
2 the BellSouth assignments. Although BellSouth submitted the CR  
3 described above to address this issue, this function is clearly AT&T's  
4 responsibility.

5  
6 Bellsouth disagrees with Ms. Berger's claim on page 17 of her testimony  
7 that BellSouth agreed to give AT&T access to LFACS, but that access has  
8 not yet been granted. As explained in the Stacy Affidavit of May 31, 2001,  
9 in ¶167, BellSouth already provides ALECs access to the LFACS  
10 database through the LMU process which provides ALECs with the loop  
11 makeup information needed to qualify loops for high speed services,  
12 including ADSL and HDSL

13  
14 BellSouth continues to properly work through the CCP to address AT&T's  
15 request for access to the CFA cable and pair data that resides in  
16 BellSouth's LFACS database. AT&T submitted Change Request 0368,  
17 requesting that ALECs be provided new pre-ordering functionality so that  
18 they could validate the CFA cable ID and channel pair prior to submitting  
19 the LSR. They also requested that, if it is determined that the cable ID  
20 and channel pair are working, the circuit identification would be provided.

21  
22 During the April 25, 2001 CCP Monthly Status meeting, ALECs re-  
23 prioritized change requests, and CR0368 moved up in the ranking to  
24 number 9. Once the ALEC community jointly designated this CR as a  
25 higher priority, BellSouth immediately took steps to implement this

1 change. BellSouth has subsequently completed User Requirements for  
2 this effort. The User Requirements are scheduled to be delivered to the  
3 ALECs the first week of September. The scope of releases for the  
4 remainder of 2001 has not yet been finalized, but BellSouth is targeting  
5 this request to be loaded into CAVE for testing on December 8, 2001, and  
6 for full production on January 5, 2002. Once the release scope is  
7 finalized, this information will be communicated to the ALECs through  
8 normal CCP communication channels.

9  
10 When this new feature is implemented, BellSouth will update the  
11 documentation available on the Interconnection Services Website and will  
12 include information on how to use the new functionality. Additionally,  
13 BellSouth will evaluate training requirements and will provide ALECs the  
14 necessary training, whether it is a formal training class or a simple job aid.  
15 ALECs will be notified of available documentation and training via a  
16 Customer Notification Letter.

17  
18 **STABILITY AND AVAILABILITY OF BELLSOUTH'S INTERFACES FOR**  
19 **ALECS**

20  
21 **System Outages**

22  
23 Q. DO YOU AGREE THAT BELLSOUTH HAS FAILED TO NOTIFY AT&T  
24 WHEN SYSTEM OUTAGES OCCUR?

1 A. No, I do not agree. BellSouth acknowledges that it incurred EDI system  
2 outages during the transition to a new EDI translator. The EDI outage Ms.  
3 Wheeler mentioned followed the normal outage notification process as  
4 described in CCP Document Version 2.5. Whenever there is a system  
5 outage that is not resolved within 20 minutes, a notification is provided via  
6 e-mail and posted to the Change Control Website at:  
7 ([http://www.interconnection.bellsouth.com/markets/lec/ccp/ccp\\_so\\_edi.ht](http://www.interconnection.bellsouth.com/markets/lec/ccp/ccp_so_edi.html)  
8 [ml](http://www.interconnection.bellsouth.com/markets/lec/ccp/ccp_so_edi.html)) within 15 minutes of the outage verification. An e-mail notification was  
9 provided to our customers on May 21, 2001, and was also clearly noted  
10 on the BellSouth Change Control Website as well. BellSouth restored  
11 service on May 21<sup>st</sup>, and normal processing resumed and the backlog of  
12 previously unprocessed messages appeared to have been cleared.  
13 However, on May 29, 2001, BellSouth did learn that some inbound and  
14 outbound files for some customers had not cleared or processed as  
15 previously believed on May 21<sup>st</sup>. BellSouth immediately began to work  
16 with those affected customers to remedy the situation and all outstanding  
17 files from May 21<sup>st</sup> were then processed.

18  
19 Ms. Wheeler is correct that AT&T did not receive FOCs on LSRs  
20 submitted for ported orders on June 4<sup>th</sup>, 5<sup>th</sup> and 6<sup>th</sup>. Our investigation of  
21 this problem revealed that there was a previously announced Local  
22 Number Portability ("LNP") release on the weekend of June 2<sup>nd</sup> and 3<sup>rd</sup>.  
23 During the release implementation, there was an undetected programming  
24 glitch that was not found during the normal system testing process.  
25 BellSouth was unaware of this problem until an inquiry was made to the

1 LCSC on June the 18<sup>th</sup>. The ensuing investigation revealed the error.  
2 The programming was corrected on June 19<sup>th</sup>, and BellSouth worked with  
3 AT&T in an effort to get the approximately 1,400 missing responses AT&T  
4 as quickly as possible.

5  
6 BellSouth is continually working to monitor and enhance all of our OSS on  
7 an ongoing basis in an effort to prevent any outage situations. However,  
8 there are times when unscheduled outages or glitches suddenly occur. In  
9 the event that this type of situation does occur, BellSouth has competent  
10 and well-trained technical support in place to address the situation as  
11 quickly as possible.

12  
13 **LENS Outages**

14  
15 Q. DOES BELLSOUTH AGREE WITH THE ALECS' INTERPRETATION OF  
16 THE LENS OUTAGES REPORT?

17  
18 A. No. On page 26 of her affidavit, Ms. Seigler of AT&T, and on page 18 of  
19 her testimony, Ms. Davis of Covad, discuss the adverse impact on ALECs'  
20 ability to serve UNE-P customers due to LENS outages. BellSouth  
21 acknowledges that there have been LENS outages, and, further, that all  
22 interfaces incur outages. As Ms. Seigler said, this information is tracked  
23 at the BellSouth Interconnection Website under Change Control Process,  
24 Type 1 System Outages.<sup>3</sup> If the System Outage is not resolved within 20  
25 minutes, a notification will be provided via e-mail and posted to the Web

---

<sup>3</sup> [http://www.interconnection.bellsouth.com/markets/lec/ccp\\_live/ccp\\_so.html](http://www.interconnection.bellsouth.com/markets/lec/ccp_live/ccp_so.html)

1 within 15 minutes of the outage verification. Either BellSouth or an ALEC  
2 may initiate a change request to address the problem. Type 1 System  
3 Outages will be processed and corrected on an expedited basis. Attached  
4 is a chart (Exhibit OSS-69) that summarizes the LENS outages for the  
5 months of March through June 2001.

6  
7 Exhibit OSS-69 also details the results of BellSouth's review of LENS  
8 Type 1 outages posted to the CCP Website. The information used was  
9 based upon the final resolution found for each of the outages, with each  
10 outage being classified into one of the four categories described below. A  
11 comparison was made between the actual time the outage lasted and the  
12 total time of the LENS posted system availability. From that comparison,  
13 a percentage was derived comparing outage time against total time of  
14 LENS posted system availability to illustrate the actual availability of the  
15 LENS interface.

16  
17 The supporting details of the assessment are also noted in the matrix in  
18 Exhibit OSS-69. A conservative baseline of 548 hours per month was  
19 used to define system availability. This was based on a 7-day, 4-week  
20 month as opposed to the actual hours available for a full calendar month  
21 using 21 hours of system availability for Monday - Friday, 18 hours for  
22 Saturday, and 14 hours for Sunday.

23  
24 The first category of outage is a 'No (N) Outage' condition that may occur  
25 for several reasons. First, the investigation may determine that no

1 problem actually exists. Second, the problem may be determined to have  
2 occurred on the ALEC side. Third, the investigation may be unable to  
3 confirm that an outage actually occurred. And finally, the reported outage  
4 may have actually occurred during a previously announced scheduled  
5 downtime.

6  
7 Next is a 'Degraded (D) Outage'. A Degraded (D) Outage means that an  
8 application is processing less than normal capacity or is providing slow  
9 responses. This degraded condition may also impact one or more  
10 customers. Then, there is 'Loss of Functionality (LOF)'. Loss of  
11 Functionality (LOF) is incurred when a function normally provided by an  
12 application is unavailable to any customer. This may also impact one or  
13 more customers. And, finally, there is a 'Full (F) Outage'. A Full (F)  
14 Outage occurs when an application is down or is totally inoperative to one  
15 or more ALECs.

16  
17 In the month of March 2001, there was a total of fifteen (15) outages.  
18 Four (4) were determined to have been No (N) Outage and, thus, had no  
19 time associated with them. Four (4) were Degraded (D) or slow outages  
20 which lasted a total of 4.85 hours (or 0.89% of the total LENS posted  
21 system availability). Three outages (3) fell into the Loss of Functionality  
22 (LOF) category for a total of 6.83 hours (1.25%). And, four (4) were  
23 determined to have fallen into the Full (F) category and lasted a total of  
24 3.28 hours (0.60%).

1 In April 2001, there was a total of ten (10) outages posted on the Website.  
2 Four (4) were found to be No (N) Outage situations, two (2) for Loss of  
3 Functionality (LOF) lasting a total of 2.01 hours (0.37% of the total LENS  
4 posted system availability), and four (4) were for Full (F) Outages which  
5 lasted a total of 7.86 hours (1.43%).

6  
7 In May 2001, there was a total of twelve (12) outages posted. Four (4)  
8 were for No (N) Outages, three (3) for Degraded (D) Outages lasting a  
9 total of 3.33 hours (0.61% of the total LENS posted system availability).  
10 Three (3) Loss of Functionality (LOF) outages lasted 33.51 hours (6.11%),  
11 and were due mainly to one order type. LENS was having a problem  
12 returning notifications on xDSL orders, and investigation revealed that the  
13 cause was a configuration problem. A temporary fix was immediately put  
14 into place, and the permanent solution was implemented on June 2, 2001.  
15 Three (3) were Full (F) outages lasting a total of 2.76 hours (0.50%). You  
16 will note that there is a total of 13 outage types recorded in May but with a  
17 total of 12 outages reported. This is because one outage was recorded as  
18 both a Degraded (D) and a Full (F) outage.

19  
20 In June 2001, there was a total of fifteen (15) outages posted. Three (3)  
21 were for No (N) Outage. Five (5) were for Degraded (D) or slow outages  
22 that lasted a total of 5.53 hours (1.10% of total LENS posted availability  
23 time). Four (4) were for Loss of Functionality (LOF) and lasted a total of  
24 10.08 hours (1.84%). Finally, there were 4 Full (F) outages lasting 3.86  
25 hours (0.70%). You will again note that there was a total of 16 outage

1 types recorded for the 15 outages in June. Again, one outage was  
2 recorded as both a Degraded (D) and a Full (F) outage.

3  
4 As the matrix reflects from the Outage data, the LENS system has been  
5 available as follows for the months from March through June:

- 6
- 7 • March 97.27%
- 8 • April 98.2%
- 9 • May 92.77%
- 10 • June 96.45%

11  
12 It is important to note that even though an outage is posted to the  
13 Website, in many cases it may only impact some of our ALECs. As  
14 outlined in the Glossary provided as a part of Exhibit OSS-69, even a Full  
15 Outage may impact only one customer. However, the posting of the  
16 outages to the Web serves as a useful tool. It allows BellSouth to alert all  
17 ALECs that a problem has been reported, and that each of those  
18 problems is actively under investigation by BellSouth.

19  
20 **CONCLUSION**

21  
22 Q. PLEASE SUMMARIZE YOUR TESTIMONY.

23  
24 A. BellSouth's interfaces, processes, and procedures provide ALECs with  
25 access to the required OSS information and functions in substantially the

1 same time and manner as BellSouth's access for its retail customers, and,  
2 therefore, conform to the FCC's definition of nondiscriminatory access.  
3 BellSouth has demonstrated the effectiveness of this access through the  
4 sheer numbers reflected in the commercial volume taking place on a  
5 region-wide basis. BellSouth's OSS is designed, developed, modified,  
6 and measured for performance on a region-wide basis to operate in an  
7 indistinguishable manner whether an ALEC is in Florida, Georgia or any of  
8 the other seven states in BellSouth's region. Furthermore, BellSouth  
9 respectfully submits that this Commission can rely on the evidence of  
10 actual commercial usage to determine that BellSouth provides  
11 nondiscriminatory access to its OSS in Florida.

12  
13 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

14  
15 A. Yes.  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

## **Transmittal Cover Sheet for Pate Surrebuttal Exhibit OSS-69**

This sheet transmits the  
Detailed Analysis of LENS System Outages  
which consists of 5 pages.

## Detailed Analysis of Change Control Process (CCP) Type 1 Change Requests

### Glossary

No Outage (N) – No outage is incurred when a problem is reported and the investigation reveals one of the following conditions occurred:

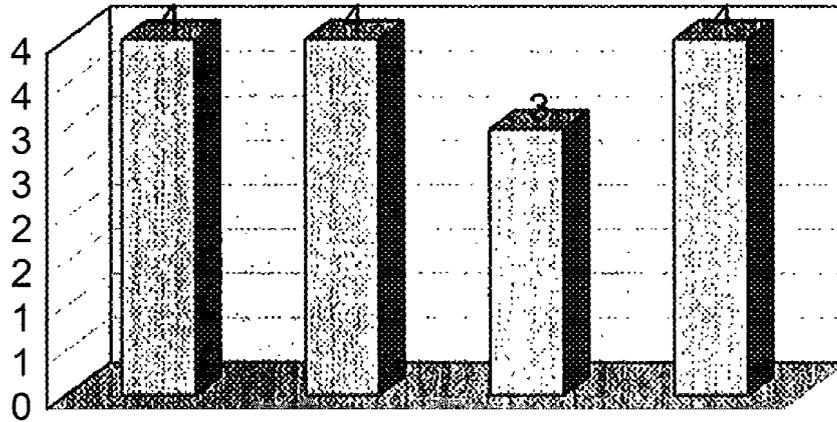
- No problem actually existed
- Problem was found to be on the customer side
- Investigation was unable to confirm that an outage occurred
- The reported outage occurred during a previously announced scheduled downtime

Degraded Outage (D) - This type of outage occurs when an application is processing below normal capacity or when users experience slow responses from the application. This degradation may impact one or more customers.

Loss of Functionality (LOF) - Loss of functionality is incurred when a function normally provided by an application is unavailable to any customer. This loss may impact one or more customers.

Full Outage (F) - This outage occurs when an application is down or totally inoperative. This outage may impact one or more customers.

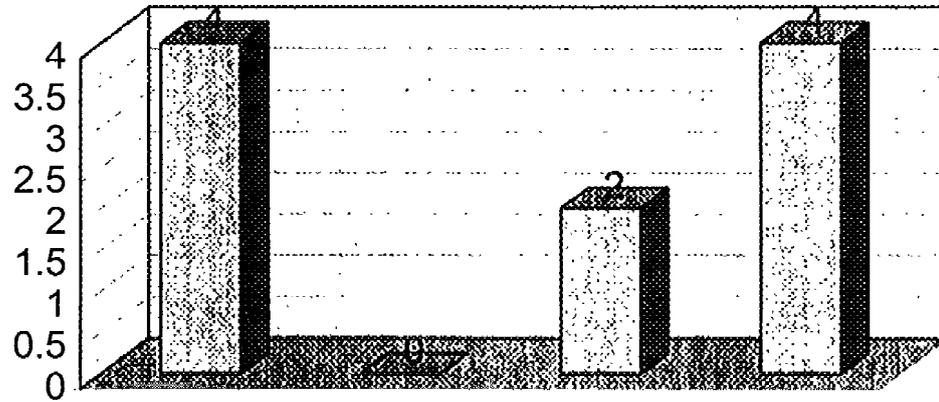
## LENS - March 2001 Outages by Type Compared to System Availability Time



■ Number of Occurrences by Type

No Outage	Degraded	LOF =	Full =
= 0.00% of	= 0.89% of	1.25% of	0.60% of
Total Sch	Total Sch	Total Sch	Total Sch
Avail Hrs	Avail Hrs	Avail Hrs	Avail Hrs

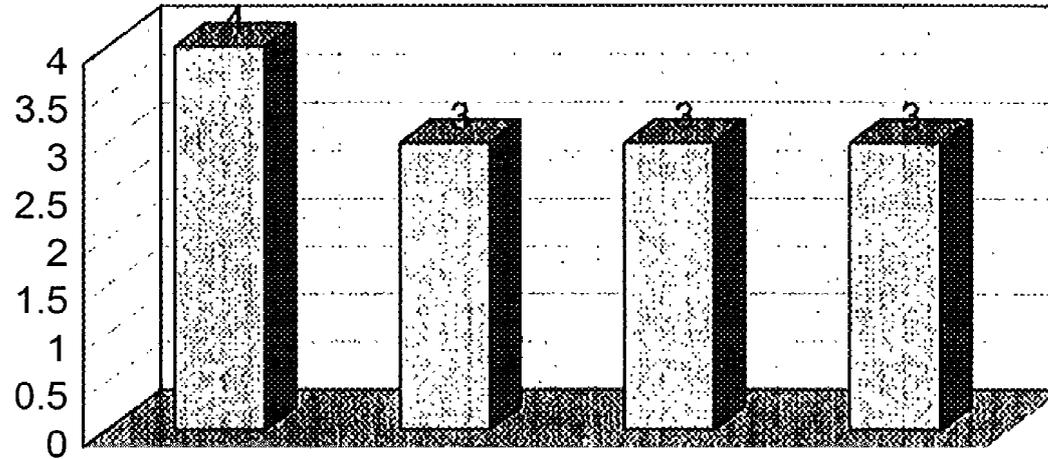
## LENS - April 2001 Outages by Type Compared to System Availability Time



□ Number of Occurences by Type

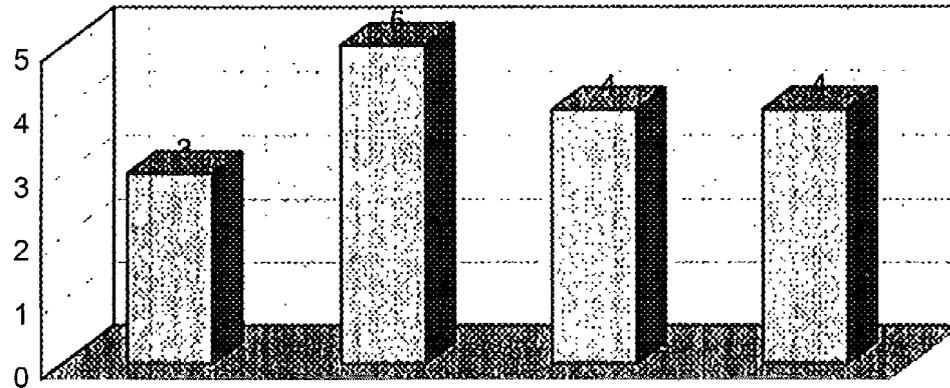
No Outage Degraded =	LOF -	Full - 1.43%
= 0.00% of	0.00 % of	0.37% of
Total Sch	Total Sch	Total Sch
Avail Hrs	Avail Hrs	Avail Hrs

## LENS - May 2001 Outages by Type Compared to System Availability Time



No Outage = Degraded = LOF - 6.11% Full - 0.50%  
0.00% of .61% of Total of Total Sch of Total Sch  
Total Sch Sch Avail Hrs Avail Hrs Avail Hrs  
Avail Hrs

**LENS - June 2001 Outages by Type Compared to System Availability Time**



□ Number occurrences by Type

No Outage =	Degraded =	LOF = 1.84%	Full = 0.70%
0.00% of Total	1.01% of Total	of Total Sch	Total Sch Avail
Sch Avail Hrs	Sch Avail Hrs	Avail Hrs	Hrs