

1 BELLSOUTH TELECOMMUNICATIONS, INC.
2 REBUTTAL TESTIMONY OF RONALD M. PATE
3 BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION
4 DOCKET NO. 030851-TP
5 January 7, 2004
6

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

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

16 Q. ARE YOU THE SAME RONALD M. PATE WHO PREVIOUSLY FILED
17 TESTIMONY IN THIS DOCKET?
18

19 A. Yes.
20

21 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?
22

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

1 MCI Metro ("MCI"), and David E. Stahly of Supra Telecommunications and
2 Information Systems, Inc. ("Supra"). The issues I will respond to are related to
3 the ordering of batch migrations, flow-through, the LFACS database, local
4 number portability, and CLEC-to-CLEC migrations.

5
6 Throughout this testimony, I will use the terms "batch" and "bulk"
7 interchangeably when referring to the process of migrating UNE-P to UNE-L in
8 batches.

9
10 ORDERING UNE-TO-UNE BATCH MIGRATIONS

11 Q. SUPRA'S MR. STAHLY, ON PAGES 19-20 OF HIS TESTIMONY,
12 DISPARAGES "BELLSOUTH'S BATCH ORDER" PROCESS, AND CLAIMS
13 IT IS NOTHING MORE THAN A "BATCH PRE-ORDERING PROCESS."
14 PLEASE RESPOND.

15
16 A. Mr. Stahly is incorrect in both his characterization of the process and in his
17 explanation of how it works. BellSouth's Mr. Ainsworth has responded in his
18 rebuttal testimony to Mr. Stahly's unsubstantiated discussion of the provisioning
19 aspects of this process.

20
21 In my direct testimony on pages 3-13, I provided extensive information regarding
22 the operation and benefits of BellSouth's batch (or bulk) ordering process. I
23 reiterate that BellSouth's process *is*, in fact, an ordering process that allows
24 CLECs to submit the equivalent of multiple LSRs in a single transaction. As I
25 explained in my direct testimony, and despite Mr. Stahly's claim to the contrary,

1 the process benefits the CLEC by reducing – by far – the amount of required
2 CLEC data inputs, thus saving personnel and processing time, and allowing both
3 the CLECs and BellSouth to reap the benefits of better planning.

4
5 Further, Mr. Stahly's claim that "we [Supra] still have to enter all the LSRs and
6 process them for conversion as if they were individual orders" is incorrect.
7 BellSouth streamlined the inputs to reduce the amount of information that the
8 CLECs must provide. Obviously, the CLECs need to provide certain information
9 about each individual account in the batch so that BellSouth knows what to do on
10 each account, and whom to bill. It would be impossible to process the orders if
11 the CLEC were relieved of that obligation.

12
13 Q. AT&T'S MR. VAN DE WATER, ON PAGE 21 OF HIS TESTIMONY,
14 CLAIMS THAT BELL SOUTH'S IMPLEMENTATION OF ITS BULK
15 ORDERING PROCESS "DID NOT MEET AT&T'S NEEDS AS DESCRIBED
16 IN THE CHANGE REQUEST." IS HE RIGHT?

17
18 A. No. In my direct testimony on pages 3-6, I described in detail the development
19 and implementation of AT&T's change request CR0215 through BellSouth's
20 Change Control Process. That discussion included an overview of the
21 requirements meetings held by BellSouth and the CLECs – including AT&T – to
22 review the parameters of the change request. Neither the wording of the change
23 request, nor that of the requirements document for the change request, would lead
24 any reasonable reader to conclude that the change request comprised anything
25 other than a bulk ordering process with project-managed provisioning. Notably,

1 Mr. Van de Water does not cite to any specific way in which the change request
2 fails to meet AT&T's needs.

3

4 Q. ON PAGE 49 OF HER TESTIMONY, MCI'S MS. LICHTENBERG CITES TO
5 A CCP E-MAIL AS EVIDENCE THAT BELL SOUTH IS NOT WILLING TO
6 IMPROVE ITS HOT-CUT PROCESS. PLEASE ADDRESS THIS
7 ALLEGATION.

8

9 A. As Ms. Lichtenberg's own exhibit demonstrates, BellSouth simply replied to a
10 CCP action item request from another party (NeuStar) in the November 19, 2003
11 meeting that BellSouth "has no [current] plans to establish a Bulk Migration
12 collaborative at this time." For Ms. Lichtenberg to infer from that response that
13 there is an unwillingness on BellSouth's part to improve its hot-cut process is a
14 very large leap.

15

16 BellSouth also responded to NeuStar that there currently is "an effective, seamless
17 Bulk Migration process in place." During the December 10, 2003 meeting of the
18 CCP, BellSouth attempted to close the action item based upon the response
19 previously provided to NeuStar. There was further clarification from the CLECs
20 that the subject of the request was related to improvement of the provisioning
21 aspect of the hot-cut process more so than improvement of the currently
22 established ordering process. BellSouth has an effective, seamless bulk
23 provisioning process in place.

24

1 It is also important to note that given the CLECs' position in this case, their
2 demands that BellSouth collaborate on improvements to the manual processes are
3 a red herring and an attempt by the CLECs to divert BellSouth's resources from
4 this case. The CLECs have been very clear that they will never support any
5 manual hot cut process, and that they will be impaired without unbundled local
6 switching so long as BellSouth refuses to implement an 8 billion dollar retrofit of
7 its network for electronic loop provisioning. Given their position, there is not a
8 great deal of incentive for BellSouth to collaborate.

9
10 That being said, specific proposals for changes and improvements to this or any
11 other process that benefit the CLECs and BellSouth are certainly welcome, and
12 can be entertained via the CCP. BellSouth agreed to keep the action item open for
13 a further clarification of its response.

14
15 FLOW-THROUGH

16 Q. DID THE FCC FIND BELL SOUTH'S FLOW-THROUGH PERFORMANCE
17 TO BE SATISFACTORY?

18
19 A. Yes. In its *Order* approving BellSouth's long-distance application for Florida and
20 Tennessee, the FCC concluded that "BellSouth's OSS are capable of flowing
21 through UNE and resale orders in a manner that affords competing carriers a
22 meaningful opportunity to compete."¹

23

¹ *Order No. 02-331 (BellSouth Florida/Tennessee Order)* in FCC WC Docket 02-307, dated December 20, 2002, at paragraph 93 (footnote omitted).

1 Q. DID BELLSOUTH MEET ESTABLISHED FLOW-THROUGH
2 BENCHMARKS FOR *ALL* SEGMENTS AT THE TIME OF ITS
3 FLORIDA/TENNESSEE APPLICATION?
4

5 A. No. The FCC recognized in its *Order* that BellSouth had missed the flow-through
6 benchmark for residence and business resale orders, but nonetheless found
7 BellSouth to be compliant with the checklist.²
8

9 BellSouth's application provided PMAP flow-through results for May through
10 July 2002, which were as follows:
11

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%

12
13 Q. HOW DOES BELLSOUTH'S CURRENT FLOW-THROUGH
14 PERFORMANCE COMPARE TO ITS PERFORMANCE AT THE TIME OF
15 ITS FLORIDA/TENNESSEE APPLICATION?
16

17 A. As it has over time, BellSouth's performance continues to improve, and current
18 results show strong overall flow-through improvement since the FCC's

² *Id.*

1 *Florida/Tennessee Order*.³ Using the same August 2003 timeframe that Mr. Van
2 de Water cites, BellSouth's SQM Flow-through Report showed the following
3 results⁴:

4

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%

5
6 Q. ACCORDING TO THE TABLE ABOVE, BELL SOUTH'S BEST FLOW-
7 THROUGH PERFORMANCE OCCURRED IN THE RESIDENCE RESALE
8 AND UNE-P SEGMENTS. PLEASE COMMENT.

9
10 A. That is due to BellSouth's conscious efforts to improve flow-through performance
11 in the segments in which the CLECs submitted the vast majority of their LSRs.
12 As an example, the following chart – also from the August 2003 Flow-through
13 Report – supports my point, and is similar to activity for a number of months
14 previous to, and since, August 2003.

15

³ 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.”

⁴ It is worthwhile to note that BellSouth began reporting in January 2003, at the direction of this Commission, 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.

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%
<i>Total</i>	790,092	100.0%

1

2

3

4

5

6

7

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

10

11

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 this 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 Exhibit RMP-3.

17

1 Q. WHEN WILL BELL SOUTH MEET THE FLOW-THROUGH BENCHMARK
2 FOR LNP?

3
4 A. As indicated in its most recent flow-through improvement report to this
5 Commission, BellSouth expects to meet the benchmark in April 2004, after the
6 March implementation of Release 15.0 containing some LNP flow-through
7 improvement items.

8
9 Q. ON PAGE 44 OF HIS TESTIMONY, MR. VAN DE WATER ALLEGES THAT
10 THE FLOW-THROUGH OF UNE LOOP ORDERS IS A CONSTRAINT ON
11 BELL SOUTH'S CAPACITY TO HANDLE UNE-L ORDERS. MCI'S MS.
12 LICHTENBERG ALLUDES TO THE SAME ON PAGE 25 OF HER
13 TESTIMONY. IS THERE ANY MERIT TO THEIR CLAIMS?

14
15 A. Not at all, and it is incorrect for them to suggest that the flow-through rate of the
16 UNE-L segment itself, or as compared to that of another ordering segment (UNE-
17 P), should be the sole basis for the Commission to determine a finding of
18 impairment. In the first place, flow-through for UNE-L has been thoroughly
19 evaluated in a performance measurement docket, and this Commission has
20 recognized that the complexity of UNE-L orders justified a lower benchmark than
21 that for UNE-P. In the second place, and as I demonstrated earlier, BellSouth
22 currently is meeting the benchmark for UNE-L.

23
24 Further, other factors combine with flow-through to suggest that BellSouth does
25 not now (nor will it in the future) impair CLECs in their ability to order UNE

1 loops. This Commission (as did the FCC) should also consider Firm Order
2 Confirmation (FOC) and Reject Timeliness, the accuracy of manual service order
3 processing and the scalability of associated manual processes. I refer the
4 Commission to the testimonies of BellSouth's witnesses Varner and Ainsworth for
5 more in-depth discussions on these other factors.

6
7 Q. CAN BELLSOUTH'S ELECTRONIC OSS SUPPORT CONTEMPLATED
8 ORDERING VOLUMES IF THERE IS A SHIFT FROM PREDOMINANTLY
9 UNE-P ORDERING TO THAT OF UNE-L AS A RESULT OF STATE
10 COMMISSION ORDERS ELIMINATING BELLSOUTH'S UNE-P
11 OBLIGATIONS?

12
13 A. Yes. Commercial volume demonstrates that BellSouth has scaled its electronic
14 ordering OSS to meet projected demands. As noted earlier, there were 790,092
15 electronic LSRs submitted in August 2003. That same month, 26,762 LSRs were
16 submitted manually, resulting in a total submission volume of 816,854 LSRs.
17 Electronic submissions comprised 96.7%.

18
19 It is interesting to note how the electronic LSR volume has grown. For August
20 2002, the number of electronic submissions was 607,211. The total for August
21 2003 represents a 30.1% increase in just one year. Going back to the total
22 electronic submissions for August 2001 (397,640), current volumes represent a
23 98.7% increase in two years. This clearly demonstrates BellSouth's ability to

1 scale its electronic ordering OSS to meet demands, and BellSouth will continue to
2 do so.⁵

3

4 Q. ON PAGE 11 OF HIS TESTIMONY AND IN HIS CHART ON PAGE 17,
5 AT&T'S MR. VAN DE WATER STATES THAT BELL SOUTH HAD A 23.7%
6 FLOW-THROUGH RATE FOR MIGRATIONS TO UNE-L IN FLORIDA IN
7 AUGUST 2003, AND A 84.4% FLOW-THROUGH RATE FOR MIGRATIONS
8 TO UNE-P FOR THE SAME PERIOD, BASED ON BELL SOUTH'S
9 RESPONSE TO AT&T DISCOVERY. IS HE CORRECT?

10

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

15

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

23

⁵ 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..."

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

3
4 A. The percentages provided by BellSouth in response to AT&T Interrogatories 28
5 and 32 were developed using disaggregated data that is the underlying data used
6 to develop the BellSouth flow-through SQM metric. Added to that was data
7 related to manually submitted LSRs, which is not part of the SQM flow-through
8 calculation.

9
10 BellSouth went to great lengths to develop this information, as there was no
11 existing report to provide it in a manner that was responsive to the interrogatories.
12 BellSouth simply does not retain data in its Performance Measurement and
13 Analysis Platform (PMAP) at that level of disaggregation.⁶ BellSouth was able to
14 derive from the total number of submitted LSRs a subset of those LSRs submitted
15 only for migration to either UNE-P or UNE-L, and then developed the
16 percentages requested by AT&T.

17
18 THE LFACS DATABASE

19 Q. ON PAGE 36 OF HIS TESTIMONY, MR. STAHLY STATES “BELLSOUTH’S
20 PLANT RECORDS ARE FULL OF ERRORS.” LIKEWISE, ON PAGE 34 OF

21

⁶ The flow-through SQM is a regional measure. The Florida Commission developed benchmarks that require BellSouth to track flow-through for the following segments: Residence Resale, Business Resale, UNE-P, UNE-L 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.

1 HER TESTIMONY, MS. LICHTENBERG CLAIMS THAT “LFACS DOES
2 NOT CONTAIN ACCURATE DATA.” DO YOU AGREE?

3

4 A. No. CLECs have repeatedly complained of inaccuracies in BellSouth’s Loop
5 Facilities Assignment and Control System (“LFACS”) database, and such
6 complaints have been repeatedly rejected. This issue was raised in all three of the
7 BellSouth 271 filings (Georgia/Louisiana, Five-State, and Florida/Tennessee) and
8 all three times, the FCC rejected this complaint on the grounds that BellSouth
9 provides CLECs with the same information it provides to itself. BellSouth offers
10 CLECs access to loop makeup data in LFACS via LENS, EDI, and TAG.
11 LFACS is the same database that is used by BellSouth’s retail operations. The
12 FCC and this commission have recognized that both competing carriers and the
13 incumbent LEC use the LFACS system. Thus, any inaccuracies in the ILEC’s
14 database are not discriminatory, because they affect the ILEC in the same fashion
15 as competing carriers. *See Kansas/Oklahoma Order ¶ 126*. BellSouth disagrees
16 with Mr. Stahly’s allegations of widespread inaccurate data in BellSouth’s loop
17 makeup databases. Although BellSouth’s LFACS database is not perfect, it is
18 very accurate.

19

20 LFACS is the primary source of BellSouth’s loop data, and contains certain
21 minimum information about each pair, including assignment data (cable and pair
22 assignments and the serving terminal information), as well as whether the loop is
23 served by copper or digital loop carrier (“DLC”) and whether the loop contains
24 load coils. This information is rarely inaccurate. The inaccuracies referred to by
25 the CLECs are typically associated with detailed loop makeup data (cable makeup

1 and/or loading discrepancies), not assignment data (cable and pair and
2 transmission medium information).

3

4 Q. MS. LICHTENBERG SUGGESTS THAT "LFACS SHOULD BE AUDITED
5 FOR ACCURACY AND THAT A PROCESS [SHOULD] BE DEVELOPED TO
6 ENSURE THAT IT IS ACCURATELY MAINTAINED IN REAL TIME WHEN
7 THE ILEC ALTERS OR CHANGES ITS LOOP PLANT." IS THIS
8 NECESSARY?

9

10 A. Absolutely not. Ms. Lichtenberg mistakenly believes that BellSouth does not have
11 a process to maintain the data in its LFACS database. This is not true. In the
12 summer of 2001, BellSouth made modifications to its systems that compiled all
13 relevant LMU data in the Corporate Facilities Database ("CFD"), by wire center,
14 on a bulk basis for automatic update to the LFACS database. All LMU data that
15 could be mechanically generated in the CFD was automatically populated in
16 LFACS at that time.

17

18 Further, in September 2001, BellSouth implemented an enhancement to its
19 mechanized loop makeup process that provides for an electronic query from
20 LFACS to the CFD for loop qualification information. As a result of this
21 enhancement, when a CLEC sends an electronic query to LFACS for loop
22 qualification information and all of the necessary information is not resident in
23 LFACS, an electronic query is automatically launched to the CFD to generate the
24 required additional information. This additional loop qualification information
25 resulting from the queried CFD is automatically combined with the LFACS

1 information and provided to the CLEC. Also, the information obtained from the
2 query to the CFD is populated in the LFACS database and thus, is available going
3 forward for future electronic loop qualification information queries.

4
5 BellSouth is continuously updating and/or populating LMU data in LFACS as
6 Engineering Work Orders are issued. Additionally, each time the manual Loop
7 Makeup service inquiry process is used, BellSouth loads the resulting LMU
8 information into LFACS for future queries. Thus, the LFACS database improves
9 on a daily basis, and will continue to do so.

10
11 An "accuracy audit" is unnecessary. BellSouth admits that its LFACS database is
12 not perfect, but disagrees that it is discriminatory in any way, as inaccuracies
13 negatively affect BellSouth just as they negatively impact CLECs. It is in
14 BellSouth's best interest to ensure that LFACS remains very accurate, and
15 BellSouth already does this, as I have described above.

16
17 Q. ON PAGE 34 OF HER TESTIMONY, MS. LICHTENBERG STATES "CLECS
18 MUST BE ABLE TO 'RESERVE' A SPARE COPPER FACILITY WHEN A
19 CUSTOMER IS MIGRATING TO ENSURE THAT THAT MIGRATION CAN
20 TAKE PLACE." DO YOU AGREE?

21
22 A. Yes, and, in fact, BellSouth already offers this functionality. Using the manual or
23 mechanized loop makeup process, CLECs may perform a query for spare pairs at
24 a customer's location. CLECs have the option to search for loops without
25 reserving them or to search for loops and simultaneously reserve the facilities, if

1 available. This functionality has been available since 2000. In the mechanized
2 loop makeup functionality, the CLEC also has the option of specifying the spare
3 pair selection criteria during the search. For example, the CLEC may specify the
4 order that LFACS search for spare pairs, such as first for copper facilities, then
5 universal DLC, then finally integrated DLC. CLECs may reserve pairs for 96
6 hours, or four days. A facility reservation number ("FRN") is returned during the
7 loop makeup transaction. When the FRN is placed on the LSR in the Reservation
8 Identifier ("RESID") field and the LSR is issued within 96 hours of making the
9 reservation, the subsequent service order is issued with the FRN on the order and
10 the reserved facilities are used for the order (when compatible). Thus, CLECs are
11 able to determine not only that spare facilities exist, but that spare **qualified**
12 facilities exist, prior to issuing the LSR. And, they may reserve these pairs for up
13 to four days.

14
15 Currently, reserved pairs may be specified on firm order requests for xDSL
16 (ADSL, HDSL, UCL, UCL-ND), Shared Loop (Line Sharing and Line Splitting),
17 and SL-1 loops. If additional products need to allow reservations, the CLEC may
18 request this enhancement by submitting a change request via the Change Control
19 Process ("CCP"). As of December 2003, there are no outstanding requests to
20 allow reservations on any other product types.

21
22 Q. ON PAGE 36 OF HIS TESTIMONY, MR. STAHLY RETURNS TO THE
23 TOPIC OF IDLC AND STATES "IDEALLY, BELLSOUTH SHOULD TELL
24 CLECS AHEAD OF TIME WHICH CUSTOMERS ARE SERVED VIA IDLC.
25 IF SUPRA RECEIVED THIS INFORMATION, IT MIGHT BE REASONABLE

1 AND FINANCIALLY POSSIBLE TO USE A COORDINATED CONVERSION
2 TO MAKE SURE THE CUT IS SUCCESSFUL.” IS THE INFORMATION MR.
3 STAHLY SEEKS (THAT IS, WHETHER A GIVEN CUSTOMER IS SERVED
4 VIA IDLC) AVAILABLE TO SUPRA AND OTHER CLECs?

5
6 A. Yes. CLECs, including Supra, have been able to access this information
7 electronically since the summer of 2000.⁷ Supra can simply go online and
8 perform a loop makeup and readily determine whether working or spare pairs at a
9 customer address are served via IDLC. 100% of BellSouth’s loops are populated
10 in LFACS with certain basic information, although not all will have the detailed
11 loop makeup information necessary to qualify a loop. The “basic information”
12 includes the cable and pair, serving terminal, resistance zone, and transmission
13 media. The transmission media (the TRMED field in the LFACS response)
14 identifies whether the loop is served by copper facilities or DLC and reflects the
15 system type (including whether it is an integrated system or a universal system).
16 This field is always populated and is rarely inaccurate. This information is
17 explained in detail in the *D/CLEC Pre-Ordering and Ordering Guide for*
18 *Electronic Loop Makeup (LMU)* and may be obtained on the Interconnection
19 website at <http://www.interconnection.bellsouth.com/guides/html/bpobr.html>.
20 Thus, the capability Supra says it needs has been available to Supra and the other
21 CLECs for over three years.

22
23
24

⁷ Electronic LMU has been available in LENS and TAG since the summer of 2000; since June 2003, this functionality has also been available via EDI.

1 LOCAL NUMBER PORTABILITY ISSUES

2 Q. ON PAGE 41 OF HER TESTIMONY, MCI'S MS. LICHTENBERG
3 SPECULATES, WITHOUT PROVIDING ANY EVIDENCE, THAT "IT IS
4 UNCLEAR WHETHER NPAC WILL BE ABLE TO HANDLE THE
5 VOLUMES OF TRANSACTIONS THAT WOULD OCCUR IN A UNE-L
6 ENVIRONMENT." DOES THAT MAKE SENSE?

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

13
14 Although NeuStar (not BellSouth) is the NPAC administrator, BellSouth's
15 positive experience with NeuStar renders Ms. Lichtenberg's speculative concerns
16 on both points unfounded. First and foremost, NeuStar is obligated by its
17 contracts with service providers to handle industry-wide portability volumes
18 regardless of the product (in this case, UNE-L). Second, BellSouth, among other
19 service providers in the Southeast region, supports NeuStar by providing forecast
20 information (via the NPAC Forecasting Group, or NFG) that NPAC uses for
21 capacity planning and implementation. All local, long-distance, and wireless
22 carriers in the region have the same opportunity to provide forecasts through NFG
23 to assist NeuStar in developing an optimally efficient process. It is unknown
24 whether MCI provides such forecasts.

25

1 To illustrate the NPAC's volume-handling capability, consider that total
2 transactions between BellSouth and the NPAC jumped from 480,831 in
3 November 2002 to 1,219,923 in November 2003 - a significant increase of 154%
4 in a year's time. The NPAC has successfully met the increased transaction
5 demand from BellSouth - as well as that from other service providers in the region
6 - because of due diligence in capacity planning with its regional forecasting
7 partners. There is no rationale for suggesting the same would not be true of
8 NPAC's ability to handle any number of the types of transactions envisioned by
9 Ms. Lichtenberg.

10

11 Q. SUPRA'S MR. STAHLY, IN HIS TESTIMONY ON PAGE 23, COMPLAINS
12 THAT "THE NPAC SYSTEM BECOMES CONGESTED AND ADDS TO THE
13 DELAY" OF PORTING ACTIVITY. IS THAT TRULY A PROBLEM?

14

15 A. No. Short-duration congestion has occasionally occurred in the past, but it is not
16 the pervasive problem that Mr. Stahly would have the Commission believe, nor
17 should it be a problem in the future. Although any past congestion issues were
18 part of the NPAC's system, BellSouth nonetheless has a vested interest in the
19 overall performance of the LNP process. To that end, BellSouth in 2003 has
20 worked more closely with the NPAC to evaluate and improve the efficiency of
21 NPAC traffic flow to eliminate as much as possible the likelihood of future
22 congestion problems.

23

24 In 2003, the NPAC implemented several modifications to its server/router
25 configurations to combat congestion, and since then there has been virtually no

1 congestion. Additionally, BellSouth will implement the following improvements
2 in early 2004:

- 3 • A feature (TN Range) that will allow multiple telephone numbers to be
4 processed as a range of numbers on a single transaction instead of
5 requiring a transaction per individual number, thus fewer total
6 transactions. (Release 14.1, January 14)
- 7 • Implementation of Dual Service Provider Identification (SPID) numbers to
8 separate different types of port transaction traffic between two NPAC
9 routers instead of the current one router, allowing NeuStar to monitor and
10 spread the transaction traffic load more efficiently. (Release 15.0, March
11 14)

12
13 CLEC-TO-CLEC MIGRATIONS

14 Q. STARTING ON PAGE 53 OF HIS TESTIMONY, MR. VAN DE WATER OF
15 AT&T, AND STARTING ON PAGE 26 OF HER TESTIMONY, MS.
16 LICHTENBERG OF MCI, RAISE ISSUES RELATED TO CLEC-TO-CLEC
17 MIGRATIONS. SHOULD THE ISSUE OF CLEC-TO-CLEC MIGRATION BE
18 PART OF THIS DOCKET?

19
20 A. No. CLEC-to-CLEC migrations are extraneous to this docket. That being said,
21 BellSouth will accept and process orders for CLEC-to-CLEC migrations. The
22 issues about which the CLECs complain are not BellSouth's issues. Rather, they
23 are issues related to the CLEC's transactions with each other. Hence, they are not
24 relevant to the question of whether BellSouth's process impairs the CLECs
25 without access to unbundled local switching. I would like, however, to discuss

1 the collaborative process that is currently underway to develop the rules to govern
2 the migration of UNE loops among the CLECs.

3

4 Q. PLEASE DESCRIBE THE END USER MIGRATION COLLABORATIVE
5 AND ITS ACTIONS.

6

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

13

14 The collaborative has submitted a draft of the migration rules for voice grade
15 circuits to the Florida Commission. The Commission requested comments from
16 the participants, which were due on September 29, 2003. The participants
17 updated their comments by November 13, 2003. On November 20, 2003, at a
18 regularly-scheduled meeting of the Telecommunications Competitive Interests
19 Forum, the parties and the Florida Commission discussed four unresolved issues
20 related to the draft migration rules. During the meeting, the parties were able to
21 resolve two of the four issues. During the next meeting on December 15, 2003,
22 the parties were able to resolve one of the two remaining issues. The next
23 meeting of the collaborative is scheduled for late January 2004.

24

25

1 Q. WHAT IS THE ONE REMAINING UNRESOLVED ISSUE?

2

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

6

	Issue	BellSouth Position
1	Should the ILEC (as DSP and/or NSP) be required to provide CSR and Transition information for CLEC's 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. Concerning CSR data, for UNE-P or Resale end-user

	Issue	BellSouth Position
		<p>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.</p> <p>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.</p>

1

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

3

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

9

1 Q. ON PAGE 53 OF HIS TESTIMONY, MR. VAN DE WATER COMPLAINS
2 THAT CLEC-TO-CLEC MIGRATIONS OF UNE-L MUST BE PERFORMED
3 MANUALLY. PLEASE COMMENT.

4
5 A. BellSouth recognizes that it must be involved in the transfer of loops between
6 CLECs. Consequently, it accepts LSRs from CLECs that are migrating UNE-L.
7 CLECs currently submit these LSRs manually, because the volume of LSRs has
8 not been sufficient to justify the cost to mechanize the flow-through of LSRs for
9 CLEC-to-CLEC migrations of UNE-L. For January through November 2003, the
10 CLECs have requested the migration of only 47 loops. BellSouth notes that no
11 CLEC has submitted a change request to the CCP to mechanize the LSR for
12 CLEC-to-CLEC migrations of UNE-L.

13
14 Q. ON PAGES 31-33, MS. LICHTENBERG PROPOSES THE ESTABLISHMENT
15 OF A "DISTRIBUTED CSR DATABASE" TO BE SHARED AND
16 MAINTAINED BY THE CLECS AND ILECS. SHE STATES THAT THIS A
17 REQUIREMENT FOR CLEC-TO-CLEC UNE-L MIGRATIONS. WHAT IS
18 YOUR RESPONSE?

19
20 A. BellSouth agrees that the CLECs need the information from each other that Ms.
21 Lichtenberg describes in order to migrate UNE-Ls from one CLEC to another.
22 What BellSouth does not agree with is Ms. Lichtenberg's approach to facilitating
23 the transfer of this information.

24

1 Q. WHY DOES BELL SOUTH BELIEVE THAT THE CLECS SHOULD SHARE
2 INFORMATION WITH EACH OTHER?

3
4 A. The CLECs should be sharing information with each other (rather than BellSouth
5 servicing as a central depository) because they have the information on their
6 customers served by loops, and BellSouth does not. After a CLEC has
7 established an end user with UNE-L, BellSouth does not know what kind of
8 services the CLEC is providing to the end user. The CLEC maintains its own
9 records, including customer service information, for its UNE-L end users.

10
11 Q. HOW DOES BELL SOUTH BELIEVE THAT THIS MATTER SHOULD BE
12 APPROACHED?

13
14 A. BellSouth believes that it and the CLECs should continue to deal with the matters
15 surrounding the sharing of CSR information and other data among the CLECs as
16 part of the as part of the Telecommunications Competitive Interests Forum under
17 the Florida Commission.

18
19 However, there is another, more sensible, approach to this matter, than that
20 proposed by Ms. Lichtenberg. Just as BellSouth has opened its OSS to the
21 CLECs, so the CLECs could be required to maintain their own records and to
22 provide fully-integratable, machine-to-machine electronic interfaces with each
23 other at the CLECs' cost. Various measurements and penalties could also be
24 established to ensure that the CLECs cooperate with each other and provide the
25 necessary information with each other in a timely manner. This is a more direct

1 resolution to the problem than imposing additional unwarranted obligations on
2 BellSouth.

3

4 Q. MS. LICHTENBERG, ON PAGES 30-31 OF HER TESTIMONY,
5 SPECIFICALLY DISCUSSES THE AVAILABILITY OF CIRCUIT IDS FOR
6 CLEC-TO-CLEC MIGRATIONS. DO CLECS NEED CIRCUIT IDS TO
7 MIGRATE UNE-P TO UNE-L?

8

9 A. No. CLECs do not need circuit IDs to migrate UNE-P to UNE-L, either
10 individually or in bulk, because UNE-P is on BellSouth's switch. CLECs may
11 need circuit IDs when they are performing CLEC-to-CLEC migrations of UNE-L.
12 The CLEC that is gaining the end user should obtain the circuit ID information
13 from the CLEC that is losing the end user. The issue of circuit IDs related to
14 CLEC-to-CLEC migrations is being handled by the parties participating in the
15 end user migration collaborative under the Commission's Telecommunications
16 Competitive Interests Forum.

17

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

20

21 A. Absolutely. The Commission does not need to look at that process here. To
22 reiterate, CLEC-to-CLEC migration matters are not relevant to the question of
23 whether BellSouth's process impairs the CLECs without access to unbundled
24 local switching. The appropriate forum for CLEC-to-CLEC migration matters is
25 the Commission's Telecommunications Competitive Interests Forum.

1 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

2

3 A. Yes.

4

5



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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,

A handwritten signature in cursive script that reads "MaryRose Sirianni".

MaryRose Sirianni

2003 DEC 15 11:11:10
COMMUNICATIONS

**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

Investigation into the establishment)	Docket No. 000121-TP
Of Operations Support Systems Permanent)	
Performance Measures for Incumbent)	
Local Exchange Telecommunications Companies)	
<hr/>		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