1　　　　　　　　　　BELLSOUTH TELECOMMUNICATIONS, INC.

2　　　　　SURREBUTTAL TESTIMONY OF MILTON MCELROY JR.

3　　　　　BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

4　　　　　　　　　　DOCKET NO. 030851-TP

5　　　　　　　　　　　January 28, 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 Milton McElroy Jr. My title is Director – Interconnection Services.

11　　　My business address is 675 West Peachtree Street, Atlanta, Georgia 30375.

12

13　Q.　ARE YOU THE SAME MILTON MCELROY JR. WHO PREVIOUSLY FILED

14　　　REBUTTAL TESTIMONY IN THIS DOCKET?

15

16　A.　Yes.

17

18　Q.　WHAT IS THE PURPOSE OF YOUR TESTIMONY?

19

20　A.　The purpose of my testimony is to respond to certain issues raised in the

21　　　testimony of Mark David Van de Water of AT&T Communications of the Southern

22　　　States, LLC ("AT&T"), Sherry Lichtenberg of MCI WorldCom Communications,

23　　　Inc. and MCIMetro Access Transmission Services, Inc. ("MCI"), and Michael

24　　　Gallagher on behalf of Florida Digital Network ("FDN"). The issues to which I will

25　　　respond are related to batch migrations. My testimony is divided into two

1   sections. In the first section of my testimony, I will respond to issues associated

2   with testing of the batch migration process. In the second section, I will discuss

3   BellSouth's Mass Migration process. Throughout this testimony, I will use the

4   terms "batch" and "bulk" interchangeably when referring to the process of

5   migrating Unbundled Network Element Platform ("UNE-P") service to Unbundled

6   Loop ("UNE-L") service in batches.

7

8   I.   **Testing of the Batch Migration Process**

9

10 Q. ON PAGE 9 OF HER TESTIMONY, MS. LICHTENBERG CRITICIZES THE

11   ENTIRE BATCH ORDERING PROCESS AND CLAIMS "THIS PROCESS DID

12   NOT EXIST AND THEREFORE WAS NOT TESTED DURING THE 271

13   PROCEEDINGS AND BELLSOUTH HAS NOT PROVIDED DOCUMENTATION

14   ON HOW THE PROCESS WILL WORK." PLEASE ADDRESS.

15

16 A. BellSouth's Batch migration process was not tested during the 271 proceedings

17   because it did not exist. Since that time, however, BellSouth engaged PwC, an

18   independent auditor, to test BellSouth's process. I provided the successful

19   results of the audit with my Rebuttal Testimony.

20

21   With respect to documentation, Ms. Lichtenberg is incorrect when she states that

22   BellSouth has not provided documentation on how the process will work. In fact,

23   the UNE-P to UNE-L Bulk Migration CLEC Information package was introduced

24   to the Competitive Local Exchange Carrier ("CLEC") community on March 26,

25   2003. This document can be found on-line at

1   http://www.interconnection.bellsouth.com/guides/unedocs/BulkManpkg.pdf.

2   The document provides the requirements, options, submission/flow process,

3   notification process and intervals associated with the batch process. If Ms.

4   Lichtenberg is not familiar with that documentation, it is because she has never

5   looked at the documentation.

6

7 Q. ON PAGES 18-19 OF HIS TESTIMONY, MR. VAN DE WATER ARGUES THAT

8   PRE- AND POST-IMPLEMENTATION TESTING OF BELLSOUTH'S BATCH

9   PROCESS IS NECESSARY. DO YOU AGREE?

10

11 A. To the extent that AT&T advocates pre-implementation testing, the time for that

12   has passed as BellSouth implemented this process in March 2003. Since its

13   implementation, however, BellSouth has tested the process by engaging PwC to

14   conduct an independent audit of the process. PwC's work was twofold: first,

15   PwC observed a test of the Bulk Migration Process using a pseudo CLEC; and

16   second, PwC observed a number of live UNE-L migrations or hot cuts in several

17   states. A full recount of the test, the test results and an affidavit by Mr. Paul

18   Gaynor of PwC can be seen in my earlier testimony in this proceeding.

19

20   Moreover, BellSouth has a proven record of its ability to successfully migrate end

21   user customers from a BellSouth switch to a CLEC switch. This is evidenced by

22   the extent of the commercial activity of hot cuts across the BellSouth region as

23   described in Mr. Ainsworth's testimony.

24

25

3

II. BellSouth's Mass Migration Process

1

2

3 Q. CERTAIN CLECS (GALLAGHER, AT 3-4 R; VAN DE WATER, AT 2 R, 8-9 R)

4 CRITICIZE BELLSOUTH'S BATCH HOT CUT PROCESS FOR BEING ONLY A

5 BATCH ORDERING PROCESS AND FOR NOT SUFFICIENTLY REDUCING

6 THE NON-RECURRING COSTS. PLEASE RESPOND.

7

8 A. As described in the testimony of Ken Ainsworth, BellSouth's Batch Hot Cut

9 Process complies with the requirements of the *Triennial Review Order* and allows

10 for the seamless and efficient migration of UNE-P service to UNE-L service such

11 that CLECs are not impaired without access to unbundled switching.

12

13 That being said, BellSouth will adopt a third hot cut process to address alleged

14 CLEC concerns about batch provisioning and non-recurring costs at such time as

15 it receives unbundled switching relief in UNE Zones cut by Component Economic

16 Areas. The third process is known as the Mass Migration Conversion Process.

17

18 With the advent of the Mass Migration Conversion Process, BellSouth will offer

19 three migration options to CLECs:

20

21 1. Individual Conversions

22 2. Batch Migration Process as described in the testimony of Mr. Ken

23 Ainsworth

24 3. Mass Migration Conversions.

25

1		Exhibit MM-3, attached hereto, provides process overview and flows for the
2		Mass Migration Conversion Process.
3		
4	Q.	PLEASE GENERALLY DESCRIBE THE MASS MIGRATION CONVERSION
5		PROCESS.
6		
7	A.	While BellSouth disagrees with the CLEC criticism that it's Batch Process is not a
8		batch provisioning process, BellSouth, in a further effort to meet CLEC needs,
9		has developed the Mass Migration Conversion Process. Generally, the Mass
10		Migration Conversion Process allows a CLEC to submit a spreadsheet of
11		telephone numbers and some other minimal information to BellSouth for
12		conversion. Once the CLEC submits the spreadsheet, BellSouth performs all the
13		other tasks associated with the cut including order submission and number
14		porting. BellSouth gains efficiencies through this process by eliminating the
15		coordination between BellSouth and the CLEC and by batching the provisioning
16		orders and eliminating duplicative dispatches.
17		
18		The gains in efficiencies result in lower costs to the CLECs. Not only do the
19		CLECs avoid the costs associated with the hot cuts from their side of the
20		network, but they pay a reduced non-recurring charge for the cuts themselves.
21		In addition, BellSouth will provide the CLEC with the UNE-L rate when the
22		conversion process begins with the service order creation. The immediate
23		access to the lower rate should make the CLEC indifferent as to when the end-
24		user's loop is actually cut from BellSouth's switch to the CLEC's switch.
25		

1   Q.   CAN YOU PROVIDE MORE SPECIFICITY ABOUT THE PROCESS?

2

3   A.   Certainly. A Mass Migration request allows a CLEC to submit a spreadsheet for

4   the purpose of migrating large numbers of non-complex UNE-P service to UNE-L

5   with LNP (Local Number Portability). Approximately 70% of the embedded base

6   of UNE-P service within the BellSouth region is residential class of service.   The

7   majority of the remaining embedded base of business class of service is non-

8   complex. The Mass Migration process has been established for simple large

9   scale residential and small business embedded base mass conversions. The

10   intent is for this process to provide the flexibility by applying the "80% rule" (i.e.,

11   the simple UNE-P conversions). In keeping with this principle, the following

12   "simple" UNE-L services will be eligible for Mass Migrations:

13

14   o   2 Wire Unbundled Voice Loop – Service Level 1 ("SL1")

15   o   2 Wire Unbundled Voice Loop – Service Level 2 ("SL2")

16   o   2 Wire Unbundled Copper Loop – Non-Designed (UCL-ND)

17

18   To utilize this process, a planning phase will be conducted with the CLEC prior to

19   the submission of its first mass migration spreadsheet. The purpose of the

20   planning meeting is to ensure that the CLEC switch is operational and ready for

21   the Telephone Numbers ("TNs") to be translated. Additionally, this phase will

22   allow for negotiations of dates based on the volume level of conversions for the

23   mass migration batch conversions and to confirm that the CLEC is aware of the

24   information that is required on the spreadsheet.

25

1   Next, the CLEC submits a spreadsheet with pertinent information for the

2   telephone numbers that the CLEC wants to migrate. BellSouth then internally

3   project manages and completes all migration activities for preordering, ordering

4   and provisioning including all Local Number Porting ("LNP") activity. From a

5   CLEC perspective, the Mass Migration Process will allow for seamless pre-

6   ordering, ordering and provisioning batch migrations. In contrast to the Batch

7   Process, the Mass Migration Process shifts the "control" of the conversion

8   activities back to BellSouth. This "control" allows for even greater efficiencies

9   that can be passed along to CLECs with even higher Non-Recurring Charge

10   ("NRC") discounts.

11

12   Again, the intent of the Mass Migration Conversion Process is to provide an

13   option for a CLEC to provide minimal information to BellSouth and for BellSouth

14   to handle all conversion activities. This will allow BellSouth to have more

15   autonomy with the timing of conversions so as to balance its workforce with the

16   workload.

17

18   Q. ON PAGE 14 OF HIS TESTIMONY, MR. GALLAGHER INDICATES THAT

19   WHILE FDN DOES NOT SUPPORT BELLSOUTH'S PROPOSED 10%

20   DISCOUNT TO CERTAIN NRCs FOR ITS BATCH PROCESS, FDN BELIEVES

21   THAT VERIZON'S "BATCH PRICING STRUCTURE IS A FIRST STEP IN THE

22   RIGHT DIRECTION." PLEASE COMMENT.

23

1   A. Due to the efficiencies in force and load balancing that BellSouth will gain in the

2   Mass Migration Process, this process will be offered to CLECs at higher level of

3   discount for the NRC. The discount structure can be seen in the following table.

4

5

Number of TNs to Migrate	Geographic Area	Targeted Migration Time Period	Pricing Targeted UNE-L NRC Reductions
500 to 2000	UNE Zones cut by Component Economic Areas	Negotiated period based on actual migration volume, but not expected to exceed 60 Days	15%
> 2000	UNE Zones cut by Component Economic Areas	Negotiated period based on actual migration volume, but not expected to exceed 180 Days	25%

6

7   To address concerns that CLECs may have with the timing of mass migration

8   conversions, BellSouth will offer to bill the CLEC at the UNE-L recurring charge

9   price instead of the UNE-P price during the mass migration conversion period.

10   Said another way, once a CLEC submits to BellSouth a list of telephone numbers

11   which triggers initiation of service orders, the CLEC will enjoy the UNE-L

12   recurring rate rather than the UNE-P recurring rate. BellSouth will also initiate

13   the non-recurring rate for each TN conversion (minus the discount) on the same

14   date as the UNE-P to UNE-L recurring charge change. Normally, BellSouth's

15   billing systems are constructed to bill on the actual conversion dates when

16   service orders are completed.   In the case of the Mass Migration process,

17   however, the pricing changes previously described will be effected through billing

1   adjustments and credits once the individual telephone numbers are migrated to

2   the CLEC's switch and the service orders are completed.

3

4   To summarize, BellSouth has developed yet another efficient batch process

5   option to speed the conversion from UNE-P to UNE-L as required by the TRO.

6   The Mass Migration Conversion Process has been developed with a specific

7   purpose – to convert large numbers of CLEC UNE-P facilities to CLEC switching

8   with minimal CLEC involvement in the individual cutovers.   To that end, the

9   Mass Migration process is designed for UNE Zones cut by Component Economic

10   Areas where relief from UNE-P is granted.

11

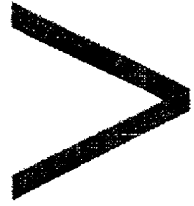12 Q.   DOES THIS CONCLUDE YOUR SURREBUTTAL TESTIMONY?
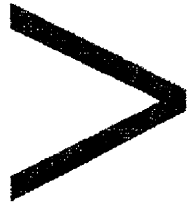
13

14 A.   Yes.

15

17

Mass Migration Conversion Process

>> *Listening > > Answering*

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Content—Mass Migration Conversion Process

- Process Overview

- Process Flow

- Day-by-Day Process Flow

- Glossary

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Mass Migration Conversion

Offerings

•Available for non-complex embedded base UNE-P customers migrating to UVL SL1 and SL2 UNE-Loop, and UCL-ND (>80% of embedded base

•Spreadsheet in lieu of individual LSRs or Bulk LSRs

•May include multiple COs

•No volume limitations

•Discount rates

•BLS performs ordering, porting and provisioning activities

•Joint planning phase conducted to negotiate up-front activities and migration period

Advantages

•CLEC to submit large quantities of non-complex UNE-P lines to be migrated via a single request

•The CLEC will not be required to track individual orders or migrations

•CLECs do not have to submit LSRs or coordinate any porting activity

•CLEC experiences seamless pre-ordering, ordering and provisioning batch migrations.

•Reduced cost to CLEC

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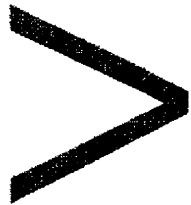
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Mass Migration Conversion

Process Overview

- Mass Migration request are defined by UNE Zones cut by Component Economic Area (CEA)

- BellSouth will implement this Mass Migration Conversion option for CLEC at such time as it receives unbundled switching relief in UNE Zones cut by Component Economic Areas

- Mass Migration is available for migrating existing non-complex residential and business Port/Loop Combination services to Unbundled Loops with LNP

- Eligible UNE-L services:

    - 2 Wire Unbundled Voice Loop – Service Level 1 (SL1)

    - 2 Wire Unbundled Voice Loop – Service Level 2 (SL2)

    - 2 Wire Unbundled Copper Loop – Non-Designed (UCL-ND)

- Minimum of 500 lines per Mass Migration request

- Mass Migrations of 500 – 2000 lines will be completed within a negotiated period based on actual volume, but not expected to exceed to 60 days

- Mass Migrations exceeding 2000 lines will be completed within a negotiated period based on actual volume, but not expected to exceed to 180 days

- BellSouth will internally perform all of the project management, pre-ordering, ordering, provisioning, testing, and porting operations and completion notification necessary to update CLEC records and complete the project in the specified time frame on behalf of the CLEC

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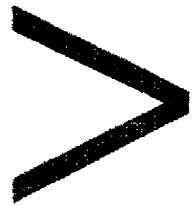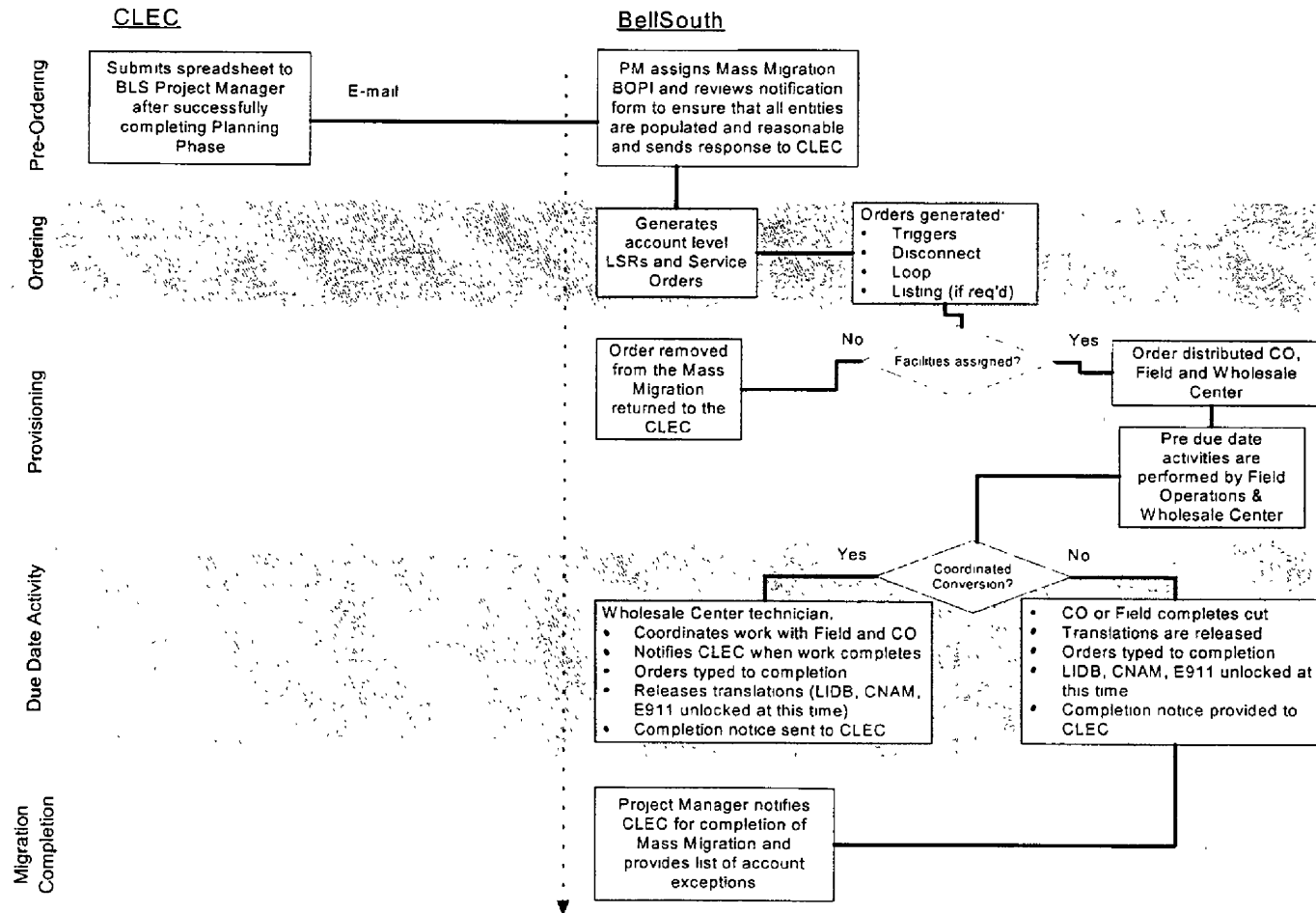
Mass Migration Conversion

Process Overview

- A Planning Phase will be conducted with each CLEC prior to the submission of the mass migration spreadsheet. The purpose of the planning meeting is to ensure that the CLEC switch is operational. Additionally, this phase will allow for negotiations of dates based on the volume level of conversions and to confirm spreadsheet requirements

- CLEC would submit spreadsheet including information for TNs to be migrated after a Planning Phase between the CLEC and the BellSouth Project Manager

- Directory listings will remain the same during the migration process

- CLEC EATN's will be considered frozen during the migration period. If an end-user customer changes carriers during the migration period, the CLEC must contact the BellSouth PM to have the TN removed from the mass migration batch conversion project.

- CLECs must establish dial tone for each TN on their switch by the day of spreadsheet submission for mass migrations involving 500 to 2000 TNs, and within a negotiated time period for mass conversions of greater then 2000 TNs.

- Monthly recurring rate will be reduced to the UNE-L rate when conversion service orders are activated

- NRC rate deductions of 15% for 500-2000 conversions and 25% for >2000 conversions will be applied at same time

- Service order charges for mechanized orders (SOMEC) will be charged based on the current rules for individual Local Service Requests (LSRs) created per EATN of a Bulk Request

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Mass Migration Conversion

Day-by-Day Process Flow

Pre-Order	•CLEC contacts BellSouth Project Manager to initiate planning phase •CLEC e-mails Mass Migration spreadsheet to BLS Project Manager after completion of planning phase •BLS Project Manager will respond to CLEC spreadsheet within the following time: 500 to 2000 TNs—3 business days; >2000 TNs—6 business days
Day 1 to X within the negotiated conversion period	•Orders are issued •Order is assigned and distributed to network organizations •BLS does required NPAC activities •Order is screened •Pre due date activities are performed by Field Operations & Wholesale Center •Conversion is completed and telephone number ported •Orders are completed •Releases translations •LIDB, CNAM, E911 unlocked at this time •Completion notices are sent to CLEC after each individual end-user conversion
Migration completion	Project Manager notifies CLEC for completion of Mass Migration and provides list of account exceptions

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Mass Migration Conversion Process Flow

CLEC | BellSouth

Pre-Ordering

Submits spreadsheet to BLS Project Manager after successfully completing Planning Phase

E-mail

PM assigns Mass Migration BOPI and reviews notification form to ensure that all entities are populated and reasonable and sends response to CLEC

Ordering

Generates account level LSRs and Service Orders

Orders generated:
- Triggers
- Disconnect
- Loop
- Listing (if req'd)

Provisioning

Order removed from the Mass Migration returned to the CLEC

No — Facilities assigned? — Yes

Order distributed CO, Field and Wholesale Center

Pre due date activities are performed by Field Operations & Wholesale Center

Due Date Activity

Yes — Coordinated Conversion? — No

Wholesale Center technician.
- Coordinates work with Field and CO
- Notifies CLEC when work completes
- Orders typed to completion
- Releases translations (LIDB, CNAM, E911 unlocked at this time)
- Completion notice sent to CLEC

- CO or Field completes cut
- Translations are released
- Orders typed to completion
- LIDB, CNAM, E911 unlocked at this time
- Completion notice provided to CLEC

Migration Completion

Project Manager notifies CLEC for completion of Mass Migration and provides list of account exceptions

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Glossary

Acronyms

BLS	BellSouth Telecommunications
BOPI	Bulk Order Package Identifier
CHC	Coordinated Hot Cut
CEA	Component Economic Area
CLEC	Competitive Local Exchange Carrier
CNAM	Calling Name Delivery
CSOTS	CLEC Service Order Tracking System
CWINS	Customer Wholesale Interconnection Network Services
DD	Due Date
EATN	Existing Account Telephone Number
EnDI	Enhanced Delivery Initiative
LCSC	Local Carrier Service Center
LIDB	Line Information Database

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Glossary

Acronyms

LNP	Local Number Portability
LSR	Local Service Request
NPAC	Number Portability Administration Center
PM	Project Manager
PN	Project Notification
PON	Purchase Order Number
SL	Service Level
TN	Telephone Number
UCL-D	Unbundled Cooper Loop – Designed
UCL-ND	Unbundled Cooper Loop – Non-Designed
UNE-P	Unbundled Network Element-Port/Loop Combination
UNE-L	Unbundled Network Element Loop
UVL	Unbundled Voice Loop

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