BELLSOUTH TELECOMMUNICATIONS, INC.
SURREBUTTAL TESTIMONY OF KENNETH L. AINSWORTH
BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION
DOCKET NO. 030851-TP
JANUARY 28, 2004

Q. PLEASE STATE YOUR NAME, YOUR BUSINESS ADDRESS, AND YOUR POSITION WITH BELLSOUTH TELECOMMUNICATIONS, INC. ("BELLSOUTH").

A. My name is Ken L. Ainsworth. My business address is 675 West Peachtree Street, Atlanta, Georgia 30375. My title is Director – Interconnection Operations for BellSouth.

Q. ARE YOU THE SAME KEN L. AINSWORTH WHO EARLIER FILED DIRECT TESTIMONY IN THIS DOCKET?

A. Yes.

Q. WHAT IS THE PURPOSE OF YOUR SURREBUTTAL TESTIMONY BEING FILED TODAY?

A. I will respond to certain hot cut issues raised in the rebuttal testimonies of Mr. Mark Neptune on behalf of Supra Telecommunications and Information Systems, Inc. ("Supra"), Mr. James D. Webber and Ms. Sherry Lichtenberg on behalf of

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MCI, Mr. Mark David Van de Water on behalf of AT&T, and Mr. Michael Gallagher on behalf of Florida Digital Network ("FDN").

The Hot Cut Process – General

Q. THE CLECS HAVE CRITICIZED BELLSOUTH FOR BEING UNWILLING TO COLLABORATE (*See* Van de Water, at 9; Lichtenberg, at 10) . IS THIS CRITICISM MERITORIOUS?

A. No. BellSouth has always stated that it was willing to consider specific process changes proposed by the CLECs. While the CLECs have chosen to make these suggestions via this docket as opposed to through operational channels, BellSouth has listened. In an effort to be responsive, BellSouth has agreed to make the following enhancements to its effective and seamless batch hot cut process:

- Batch process will be applicable to CLEC-to-CLEC migrations (UNE-P to UNE-L);
- Batch process will be applicable to CLEC-to-CLEC migrations (UNE-L to UNE-L) at such time as necessary systems changes can be made;
- Batch process will guarantee that an end user's account will all be cut on the same day;
- Batch process will include after-hours and Saturday cuts;
- Batch process will guarantee a four-hour time window for coordinated hot cuts;

- Batch process will include a timely restoral process if there is a problem with the cut;
- BellSouth will implement a web-based communication system for non-coordinated hot cuts similar to that implemented by Verizon and SBC;
- BellSouth will reduce the 14-day provisioning interval in the batch process to 8 days;
- BellSouth will implement a scheduling tool similar to Verizon's;
- Batch process will include hot cuts to DS0 EELs.

These enhancements to BellSouth's already-compliant Batch Hot Cut Process should address virtually all of the CLECs' alleged criticisms of the process.

Q. ARE THERE FACILITIES-BASED CLECS THAT SUPPORT BELLSOUTH'S HOT CUT PROCESS?

A. Yes. FDN estimates that it purchases two-thirds (2/3) of the total UNE-Loops in Florida. The Commission, therefore, should give great weight to FDN's testimony that the hot cut process works, and that FDN is not operationally impaired.

Q. MS. LICHTENBERG ALLEGES ON PAGE 10 THAT "MCI WOULD PREFER A PROCESS THAT PROVIDES STANDARD DUE DATES AND ALLOWS THE ISSUANCE OF INDIVIDUAL LSRs, BUT BELLSOUTH CONTINUES TO REFUSE TO COLLABORATE WITH CLECS TO DEVELOP A TRUE BATCH HOT CUT PROCESS." PLEASE COMMENT.

A. This testimony demonstrates that Ms. Lichtenberg does not know what she wants. On the one hand, she criticizes BellSouth for failing to develop a true "batch" process, but on the other hand argues that BellSouth must provide standard due dates with individual LSRs, exactly what the individual hot cut process provides. This type of contradiction, coupled with the fact that CLECs have stated that they would not support *any* manual hot cut process, is the reason BellSouth has declined to collaborate. The CLECs view collaboration as a means by which to delay a switching impairment decision, not as a means by which to improve the process.

However, as my testimony demonstrates, BellSouth is listening and considering all inputs from CLECs and commissions in various workshops to enhance the currently-compliant process. BellSouth is incorporating these suggestions for tools and additional processes into current processes when they are reasonable and enhance the existing process.

Q. MR. VAN DE WATER, ON PAGE 2 OF HIS TESTIMONY, ARGUES THAT BELLSOUTH HAS NOT COMPLIED WITH THE *Triennial Review Order* ("TRO") BECAUSE IT HAS NOT ADOPTED A BATCH HOT CUT PROCESS. PLEASE ADDRESS.

A. As with most of the CLEC testimony, AT&T is quick to call BellSouth's process non-compliant, but slow to provide technically feasible alternatives. BellSouth does not dispute that the provisioning portion of its Batch Hot Cut process is

identical to the individual process – the use of the provisioning process was deliberate. BellSouth took a proven, tested and approved process and overlaid a bulk ordering mechanism and project management to create a seamless, end-to-end process that will allow BellSouth to efficiently migrate thousands of UNE-P customers to UNE-L. These additions create efficiencies in the batch process and thereby it complies with the TRO.

Q. ON PAGE 14 OF HIS TESTIMONY, MR. NEPTUNE REFERS TO INCONSISTENCIES IN THE DATA PROVIDED BY BELLSOUTH WITNESSES RUSCILLI AND AINSWORTH AS TO THE NUMBER OF UNE-L LOOPS THERE ARE IN FLORIDA. PLEASE CLEAR THIS UP.

A. The numbers provided by Mr. Ruscilli were Florida specific and the numbers that I provided in my testimony were for the BellSouth region. Mr. Neptune makes an incorrect assumption that the numbers that I provided were only for Florida.

The Batch Hot Cut Process – Specifics

Hot Cuts for EELs

Q. ON PAGES 2, 6, AND 7 OF HIS TESTIMONY, MR. WEBBER INDICATES THAT "NEITHER BELLSOUTH'S INDIVIDUAL HOT CUT PROCESS NOR ITS BATCH ORDERING PROCESS PERMIT CLECS TO TRANSFER RETAIL OR UNE-P LINES TO EELs" AND THAT "THE COMMISSION SHOULD REQUIRE

BELLSOUTH TO ACCOMMODATE EELs IN ITS INDIVIDUAL HOT CUT PROCESS AND ITS BATCH PROCESS." PLEASE COMMENT.

A. Mr. Webber is partially correct. In direct testimony, I stated that BellSouth currently did not offer UNE-P transfers to EELS. However, BellSouth did support retail/resale transfers to EELS. I should clarify that the current retail/resale transfers were for DS1 service types and new UNE-P/resale DS0 service. As Mr. Weber indicated on pages 2 and 6 of his testimony, BellSouth currently does not provide migrations of existing UNE-P and DS0 retail loops to EELS. However, BellSouth has agreed to include hot cuts to DS0 EELs in its batch and individual hot cut processes. BellSouth's target implementation date is July 2004.

Q. FURTHER ON PAGE 8 OF HIS TESTIMONY, MR. WEBBER OPINES AS TO HOW BELLSOUTH'S PROCESSES AND REQUIREMENTS SHOULD BE CHANGED TO MAKE EELs USEFUL TO CLECS AND SUGGESTS THAT DURING THE PROVISIONING PROCESS, "ALL ANI TESTING SHOULD BE COMPLETED VIA THE DS0 EEL." DO YOU AGREE?

A. As I have indicated, the product team is developing the DSO EEL process. It would be premature for me to speculate on the connectivity process. However, BellSouth does agree that appropriate hot cut pre-due and due date testing would be part of the process. This would include the ANI testing at the conversion location as described by Mr. Webber on page 8 of his testimony.

CLEC-to-CLEC Migrations

Q. MS. LICHTENBERG, ON PAGE 7 OF HER TESTIMONY, IMPLIES THAT BELLSOUTH DOES NOT ADDRESS CLEC-TO-CLEC MIGRATIONS. HAS MS. LICHTENBERG IDENTIFIED ANY ISSUE IN A CLEC-TO-CLEC MIGRATION THAT IS THE RESPONSIBILITY OF BELLSOUTH?

A. Absolutely not. As I stated in my rebuttal testimony, the issues about which Ms. Lichtenberg complains are neither caused by BellSouth nor can they be resolved by BellSouth. Ms. Litchenberg seems to suggest that BellSouth should be penalized for lack of effective processes or execution between CLECs. I would submit the opposite and ask that the Commission not support this argument when Ms. Lichenberg admits that BellSouth is not directly involved in the process issues she describes.

Q. FROM A PROVISIONING PERSPECTIVE, WILL BELLSOUTH PERFORM CLEC-TO-CLEC MIGRATIONS?

A. Absolutely. BellSouth's individual hot cut process has always included CLEC-to-CLEC migrations. In response to CLEC concerns, BellSouth has agreed to CLEC-to-CLEC migrations (UNE-P to UNE-L) to the Batch Hot Cut Process, as well as CLEC-to-CLEC migrations (UNE-L to UNE-L) as soon as necessary systems changes can be made.

Web-based scheduler

Q. MS. LICHTENBERG STATES ON PAGE 8 THAT BELLSOUTH'S BATCH HOT

CUT PROCESS IS NOT ACCEPTABLE BECAUSE IT "REQUIRES ADDITIONAL STEPS (A MANUAL SPREADSHEET, NEGOTIATION FOR DUE DATES AND A NEW BULK LSR) TO THE PROCESS." ON PAGE 10, SHE RECOMMENDS THAT BELLSOUTH SHOULD IMPLEMENT "A SCHEDULING TOOL SUCH AS THE ONE VERIZON IS DISCUSSING AND THAT SBC IS PROPOSING". PLEASE RESPOND.

A. BellSouth's spreadsheet process, particularly when coupled with project management, is an effective means by which to manage large volumes of hot cuts. As demonstrated by BellSouth's third party test, BellSouth follows its process and the process works. Other than disagreeing with a manual process generally, Ms. Lichtenberg has not pointed to any specific or documented flaws in BellSouth's ordering process and, in fact, was involved in the development of the ordering portion of the batch hot cut process as Mr. Pate describes.

In an effort to be responsive to CLEC concerns, however, unfounded as they may be, BellSouth has agreed to implement a mechanized, web-based scheduler for batch ordering to further enhance the mechanized batch ordering process. BellSouth is targeting the release of this functionality for October 2004.

Same-day cuts for end user accounts

Q. ON PAGE 9 OF HER TESTIMONY, MS. LICHTENBERG CRITICIZES THE BATCH PROCESS FOR NOT GUARANTEEING AN END USER'S LINES WILL BE CUT ON THE SAME DAY. PLEASE RESPOND.

A. BellSouth will guarantee that all the lines in an end user's specific account will be cut on the same day. This should alleviate Ms. Lichtenberg's concern.

Interval Reduction

Q. MS. LICHTENBERG, ON PAGE 10 OF HER TESTIMONY, SUGGESTS THAT BELLSOUTH SHOULD REDUCE INITIAL NEGOTIATION FROM SEVEN (7) BUSINESS DAYS TO FIVE (5) BUSINESS DAYS, AS THE SEVEN (7) BUSINESS DAY INTERVAL IS TOO LONG. DO YOU AGREE?

A. If Ms. Lichtenberg is suggesting the entire processing interval for batch migrations should only require five (5) business days for processing transfers of possibly hundreds of lines, then I adamantly disagree. The planning, pre-due preparation (wiring), quality checks (ANAC), and due date work activity are functions directly related with the ability to match force to load. Handling mass volumes requires appropriate planning and appropriate intervals to effectuate a seamless migration. Five days is insufficient time to complete that process.

That being said, if Ms. Lichtenberg is referring specifically to the period of time in which BellSouth reviews the spreadsheet, BellSouth will be reducing that interval from 7 days to 4 days as part of a batch interval reduction effort.

In addition, BellSouth, in conjunction with other planned enhancements, will reduce the 14-business day provisioning interval to 8 days.

Q. ON PAGE 3 OF HIS TESTIMONY, MR. NEPTUNE CRITICIZES BELLSOUTH'S BATCH PROCESS AND SAYS IT ADDS DELAY IN THE INTERVAL AND CREATES ORDERING COMPLICATIONS. PLEASE COMMENT.

A. While there is a 14-day due date requirement, the process does not lead to conversion rejects or increased costs. The 14-day interval was established to aid in controlling appointments and workload management for mass quantities of service requests. With this due date comes the best effort assurance that all service will be completed on that due date and if there are any issues during the provisioning process, the CLEC is informed and adjustment can be made in the process. If there are no facilities to serve the requested loop, the CLEC is informed by the project manager with other possible options. A change in requested loop type could result in increased costs as with an individual loop change. There are no order complications as Mr. Neptune alleges. A tab-delimited file is created for uploading in Local Exchange Navigation System ("LENS") from the Excel formatted data. This is simply a matter of following four (4) steps listed in the LENS User Guide.

That being said, as stated above, BellSouth has agreed to shorten the provisioning interval from 14 days to 8 days.

Mechanized Communication Tool

Q. MS. LICHTENBERG COMPLAINS, ON PAGE 10 OF HER TESTIMONY, THAT BELLSOUTH NEEDS A COMMUNICATION TOOL SIMILAR TO THE VERIZON WPTS. PLEASE RESPOND.

A. BellSouth will provide a web-based notification tool for non-coordinated batch conversions. BellSouth will make this tool available to CLECs by June 2004.

Restoral Process

Q. ON PAGE 6 OF HIS TESTIMONY, MR. NEPTUNE, IN DESCRIBING THE CUTOVER PROCESSES, MENTIONS A "ROLLBACK" PROCESS IF THERE IS A PROBLEM ON EITHER SIDE. DOES SUPRA PROPOSE A "ROLLBACK" PROCESS?

A. BellSouth is updating its UNE-P to UNE-L Bulk Migration Process to document the acceptance process for coordinated orders, and the expedited restoral process for non-coordinated orders. This should address Mr. Neptune's concern.

Port In Error

Q. ON PAGES 2 AND 9 OF MR. NEPTUNE'S TESTIMONY, HE COMPLAINS THAT BELLSOUTH'S CURRENT PROCESSES DO NOT PROVIDE FOR TIMELY RESTORATION OF SERVICE IN THE CASE OF "PORT IN ERROR." PLEASE COMMENT.

A. The term "port in error" means that the CLEC incorrectly ported the number. "Port in error" occurs most frequently when the CLEC ports the end user's number prior to receiving the completion notice from Bellsouth. BellSouth will, for orders that will be missed on the due date due to CLEC or end user reasons, place a service order into Missed Appointment status. BellSouth will also, at the request of a CLEC, place an order in canceled status. These actions will prohibit the sending of the migration completion message to the CLEC. The CLEC receipt of the completion message is the signal to the CLEC that they may then test their end user's connectivity before porting the end user's telephone number. When the completion message is not received by the CLEC, the CLEC should not port the end user's telephone number. If Supra is experiencing "port in error" problems, it is the fault of Supra and not BellSouth.

Volumes in the Batch

Q. MR. NEPTUNE, ON PAGE 4 OF HIS TESTIMONY, CLAIMS THAT BELLSOUTH LIMITS SUPRA'S NUMBER OF CONVERSIONS TO 150 PER CENTRAL OFFICE, PER DAY. IS THIS CORRECT?

A. No. BellSouth has not imposed a limit on the number of conversions per central office, per day. BellSouth has offered to help Supra with the scheduling of their orders. With the exception of four (4) batch requests, to date Supra has converted all of their lines, approximateiy ** ,** through the individual hot cut process. By refusing to use the batch process, Supra has not allowed BellSouth the opportunity to help schedule and level load their orders. BellSouth

has offered the services of a Customer Care Project Manager ("CCPM") to assist with scheduling and level loading Supra's orders, even though they are not using the batch process. To date, Supra has not accepted this offer from BellSouth. As an example of Supra's inconsistency in scheduling their orders, for the week of January 5, 2004, Supra had ** ** (** ** in one Central Office) orders due on 1/5, ** ** order due on 1/6, ** ** ((** ** in one (1) Central Office and ** ** in another)) orders due on 1/7, ** ** ((** ** in one (1) Central Office)) orders due on 1/8 and ** ** ((** ** in one (1) Central Office)) orders due on 1/9. Supra's conversions for this week took place in a total of 13 Central Offices. In one (1) of the 13 offices, Supra had ** ** orders due for the week, while in three (3) of the 13 offices, Supra had ** ** or less orders due for the week. Supra's conversion ranged from ** ** orders for the week in one (1) office to ** ** orders for the week in another. BellSouth has no problems in performing the number of conversions that Supra has indicated they want to take place. However, some logic on the part of Supra is required in order for the conversions to take place without imposing undue burdens on both BellSouth and Supra.

Coordination Levels

Q. MR. NEPTUNE, ON PAGE 5 OF HIS TESTIMONY, COMMENTS ON AN "INDUSTRY" RECOMMENDATION OR STANDARD OF COORDINATION. DO YOU UNDERSTAND THIS COMMENT?

A. No. I'm not aware of an "industry" recommendation or standard that defines the

term coordination or coordinated as it relates to hot cuts. BellSouth's coordinated hot cut process was developed through negotiations with AT&T. I have previously explained BellSouth's coordinated hot cut process in my direct testimony and the explanation of coordination as it relates to a BellSouth hot cut is posted on BellSouth's website in the CLEC guides http://www.interconnection.bellsouth.com/guides/html/other_guides.html.

Q. MR. NEPTUNE, FURTHER ON PAGE 5 OF HIS TESTIMONY, CLAIMS THAT BELLSOUTH'S "COORDINATED" PROCESS DOES NOT ALLOW FOR COMMUNICATION DURING THE PROCESS. PLEASE COMMENT.

A. As I explained in my direct testimony, there are several opportunities for communication between BellSouth and a CLEC during a coordinated hot cut. The CLEC receives a call from BellSouth 24-48 hours prior to the due date. BellSouth again contacts the CLEC on the due date prior to the conversion. Finally, BellSouth contacts the CLEC immediately after the conversion. At any time during this process if any jeopardy condition occurs, the CLEC is contacted. Mr. Neptune's statement that the process "does not allow for communication" is absolutely incorrect. The only reason that communications would not take place would be due to the CLEC not having the personnel available to receive the calls.

Q. ON PAGES 6-7 OF MR. NEPTUNE'S TESTIMONY, HE ALLEGES THAT BELLSOUTH'S PROCESS DOES NOT ASSURE DIRECT NOTIFICATION OF THE CONVERSION AT CONCLUSION. PLEASE COMMENT.

A. Mr. Neptune continues to criticize BellSouth's coordinated hot cut process, which, to my knowledge, Supra has never attempted to utilize. As I explained above, there are numerous communication opportunities between BellSouth and a CLEC during the coordinated process. Also, as I stated above, the only reason that a CLEC would not receive notification at the conclusion of a conversion would be due to the CLEC not having the personnel available to receive such notification. BellSouth assures that the attempt is made to contact the CLEC. The CLEC has the responsibility to have someone available to receive the notification.

SBC's Process

Q. ON PAGE 10 OF HIS TESTIMONY, MR. VAN DE WATER DISCUSSES SBC'S PROCESS. WHAT IS YOUR ANALYSIS OF SBC'S PROCESS?

A. I have reviewed the SBC **proposed** batch processes and will address each of the bullet items in Mr. Van De Water's testimony below.

- Flexible scheduling—BellSouth has agreed to include after-hours and Saturday cuts in the batch process.
- Eliminates negotiation steps and time involved—BellSouth's current batch hot cut process involves very little negotiation with the CLEC. There is some internal negotiation that occurs to establish due dates. As stated previously, BellSouth also has agreed to implement a scheduling tool to allow CLECs to select batch migration due dates thus reducing negotiation steps and manual interface time.

- Provides defined interval to allow for CLEC resource planning – BellSouth's current batch hot cut process allows for CLEC resource planning. The CLECs have the ability to request a desired due date when they submit their batch request. If the requested due date does not represent an interval shorter than the minimum, BellSouth will honor that date as long as workload and personnel will allow. Regardless of whether the CLEC requests a due date, BellSouth supplies the due date when the project notification sheet is returned to the CLEC. This should allow the CLEC sufficient time for resource planning. As stated previously, BellSouth also is implementing a scheduling tool to allow the CLECs to select batch migration due dates prior to submitting their batch request.
- Provides CLECs an ability to reserve time—As stated above, under the current Batch process the BellSouth Customer Care Project Manger will work with the CLEC if they need a coordinated order worked within a window of time. Moreover, in an effort to be responsive, BellSouth has agreed to (1) commit to a four-hour time window for coordinated hot cuts; and (2) develop a scheduling tool to allow the CLEC to request time frames for coordinated orders.
- Wire center based to provide CLEC the ability to convert multiple central offices on the same day—BellSouth's current process also allows the ability to convert multiple offices on the same day.
- Includes requests involving IDLC cuts—BellSouth's current process includes requests involving IDLC cuts.
- Mechanized order flow—BellSouth's batch hot cut orders will flow through at the same rate as individual orders of the same type. In addition to this,

BellSouth current batch process allows for the submission of a single bulk LSR for up to 99 end user accounts where SBC's proposed process requires single LSR submissions for each account.

- Reservation tool—In BellSouth's current process, the Customer Care Project Manger performs this function for the CLEC. Again, BellSouth's scheduler tool which it has agreed to implement will allow due date reservations.
- Pre-order IDLC tool—BellSouth's current process also provides this function through the use of its Loop Makeup Tool. The CLEC can query to see what type of facility is currently on the end user's line and reserve an alternate facility, if available, if the line is on IDLC.

Window Of Time For Cuts

Q. MR. VAN DE WATER, ON PAGE 13 OF HIS TESTIMONY, SAYS THAT BELLSOUTH WILL NOT COMMIT TO TIME SPECIFIC HOT CUTS, OR EVEN A WINDOW, IN THE BATCH PROCESS. PLEASE COMMENT.

A. BellSouth will enhance the batch process to guarantee a four (4) hour time window for coordinated cuts in the batch process. This should alleviate Mr. Van de Water's concern.

After-Hours/Weekend Cuts

Q. FURTHER ON PAGE 13 OF HIS TESTIMONY, MR. VAN DE WATER STATES

THAT BELLSOUTH WILL NOT DO AFTER-HOURS HOT CUTS OR SCHEDULE HOT CUTS ON WEEKENDS TO AVOID END USER DISRUPTION. IS HE CORRECT?

A. No. BellSouth will include after hours and Saturday cuts in the batch process.

Retail-UNE-L Conversions

Q. ON PAGES 16-17 OF MR. VAN DE WATER'S TESTIMONY, AND PAGES 14-15 OF MR. GALLAGHER'S TESTIMONY, THEY CRITICIZE BELLSOUTH'S BATCH HOT CUT PROCESS BECAUSE IT DOES NOT APPLY TO RETAIL TO UNE-L CONVERSIONS. PLEASE COMMENT.

A. The purpose of the batch migration process is to move large numbers of loops from one carrier's local switch to another carrier's local switch. Thus, the process is particularly suited to the conversion of an embedded base of customers. Customer acquisition, on the other hand, does not lend itself to batch conversions. CLECs do not structure their marketing plans or their sales channels to target a single wire center per day. On the contrary, CLECs are winning customers statewide in whatever order they sign up. It would make no sense for a CLEC to forego the revenue associated with customer acquisition while it accumulated sufficient customers in a wire center to make use of the batch process meaningful. BellSouth has a Commission-approved individual hot cut process that should be utilized for customer acquisition.

Moreover, BellSouth has agreed to include CLEC-to-CLEC UNE-P to UNE-L and UNE-L to UNE-L conversions.

Scalability Of The Batch Hot Cut Process

Q. MS. LICHTENBERG, ON PAGE 3 OF HER TESTIMONY, ALLEGES THAT BELLSOUTH'S SCALABILITY ARGUMENTS ARE NO MORE THAN "FUTURE" PROMISES. DO YOU AGREE?

A. No, I do not agree. BellSouth has a proven track record of staffing its centers and network forces to accommodate changing and increasing loads. Ms. Lichtenberg has pointed to no evidence to support her claim that BellSouth's process is not scalable. The Commission, therefore, should disregard her testimony on this point.

Q. ON PAGE 6 OF HER TESTIMONY, MS. LICHTENBERG ALLEGES THAT BELLSOUTH'S FORCE MODEL "DOES NOT APPEAR TO ADDRESS" ANY INCREASED MANUAL ORDER PROCESSING. PLEASE COMMENT.

A. Ms. Lichtenberg is incorrect. BellSouth's force model does account for different fallout rates. The increased number of BellSouth Service Representatives that I included in my direct testimony included personnel to handle an increased number of manual orders.

Q. ON PAGE 18 OF HIS TESTIMONY, MR. VAN DE WATER CRITICIZES BELLSOUTH FOR "THROWING BODIES" AT THE HOT CUT PROBLEM RATHER THAN PROPOSING ANY MECHANIZATION OF THE PROCESS. PLEASE COMMENT.

A. First, BellSouth does not believe it has a hot cut "problem." Rather, it has an efficient and seamless process by which it can move loops from one carrier's switch to another carrier's switch. Second, BellSouth is not "throwing bodies" at the problem. Rather, it will staff its network forces to handle the hot cuts that arise. Whether AT&T likes it or not, it takes human beings to run a telephone company. Finally, BellSouth agrees that it has not taken steps to institute the eight (8) billion dollar retrofit of its network that AT&T advocates. Such a capital expenditure cannot be justified, particularly when BellSouth has an efficient hot cut process in place

Q. ON PAGE 19 OF HIS TESTIMONY, MR. VAN DE WATER ARGUES THAT BELLSOUTH'S CUTOVER OF OVER 200 LINES IN A SINGLE CENTRAL OFFICE IN ONE DAY DOES NOT DEMONSTRATE BELLSOUTH'S ABILITY TO PERFORM HOT CUTS AT FORESEEABLE VOLUMES. PLEASE COMMENT.

A. To the contrary, this single day shows BellSouth's ability to successfully complete high volumes of orders within a single office, both central office and IDLC, while sustaining significant volumes in several other offices. On the referenced date, BellSouth converted 98% of 440 orders scheduled for conversion. Approximately 50% of the orders on this day were IDLC conversions. On the same day, highest

single office performance was 97.5%, provisioning 201 of the 206 orders due. Through the date of this filing, BellSouth has consistently maintained a successful due date completion rate average of over 98% for UNE-P to UNE-L migrations with total UNE-P to UNE-L migration volumes as high as 1,000 per day total and in single offices of over 250 per day. Month over month, UNE-P to UNE-L volumes have risen significantly with totals of over 1900 in November 2003; over 3100 in December 2003; and over 4200 January 1 through January 23, 2004. During the months of November and December 2003, Missed Installation Appointments for the CLEC aggregate was 1.27% for November and 1.54% for December as compared to the BellSouth retail rates of 1.75% and 1.90%, respectively.

Bellsouth has maintained these high due date performance rates with virtually no advance planning. Given the fact that CLECs have the ability to use the batch migration process, which allows both the CLEC and BellSouth extended intervals for planning, it obviously follows that BellSouth's ability to perform hot cuts in large quantities would only improve, given some idea of 'foreseeable' volumes from the CLECs.

Exhibit KLA-9 sets forth BellSouth's UNE-P to UNE-L hot cut performance for October 9, 2003 – January 23, 2004.

Q. ON PAGE 20 OF HIS TESTIMONY, MR. VAN DE WATER STATES THAT BELLSOUTH'S ASSUMPTION REGARDING NON-COORDINATED HOT CUTS IN ITS FORCE MODEL IS INCORRECT. PLEASE COMMENT.

A. There is no real way to be certain which option, coordinated or non coordinated, CLECs will choose to convert their UNE-Ps. BellSouth assumed that at least half of the migrations will be non-coordinated. To date, the vast majority, if not all, migrations of UNE-P to UNE-L have been non-coordinated. BellSouth does not expect that future migrations will differ very much from this. Moreover, MCI representatives, in a hot cut workshop in Tennessee, advised that they expected to use non-coordinated conversions. Further, based on the fact that a high percentage of UNE-P end users are residential, BellSouth expects the non-coordinated option to be used based simply on economics. If BellSouth's assumptions prove to be incorrect, BellSouth's force model can, and will, be adjusted.

Q. MR. VAN DE WATER, ON PAGE 22 OF HIS TESTIMONY, IMPLIES THAT BELLSOUTH INCORRECTLY ASSUMES A BALANCED LOAD OF MIGRATIONS WHEN THE REALITY IS THAT THE CONVERSIONS MAY BE "BACKLOADED" AT THE END OF THE SCHEDULE. DO YOU AGREE?

A. No I do not agree. The schedule, as outlined by the FCC in the TRO, allows sufficient time for any reasonable CLEC to plan and implement the necessary collocation arrangements and other facilities needed to provide switching. BellSouth should not be held accountable for poor planning on the part of a CLEC who chooses to procrastinate and wait until the end of the 27-month period to convert all of their UNE-Ps.

IDLC

Q. ON PAGE 3, MR. NEPTUNE STATES THAT "IN MANY CASES THE ASSIGNMENT AND CROSS-CONNECTION OF NEW F1 LOOPS OR UDLC FACILITIES TO EXISTING F2 COPPER LOOPS ARE THE MORE COMPLEX AND PROBLEMATIC PROCESSES." PLEASE ADDRESS.

The replacement of the current F1 facility is sometimes utilized to condition the end user for cross connection to the CLEC equipment or to provide a facility that is compatible for the service being ordered. Within the Central Office usually before the due date, the new F1 facility is connected to the CLEC demark point that was provided in the CLEC Local Service Request. On the due date in the field, the F1 is tested and cross-connected to the F2 pair that is already connected to the end user location.

Q. MR. NEPTUNE, ON PAGE 7 OF HIS TESTIMONY, COMPLAINS ABOUT THE NRC FOR UNE-P TO UNE-L CONVERSION NRCs ON THE GROUNDS THAT IT IS A MELDED RATE BETWEEN DISPATCH AND NON-DISPATCH. PLEASE COMMENT.

A. The NRCs for the individual hot cut process are those adopted as TELRIC-compliant by this Commission. The issue of the blended rate was an issue for the cost docket. This is not the place for Supra to attempt to relitigate the cost docket. Moreover, Supra has raised this precise issue in a complaint at the FCC and thus is barred from having it heard here.

Q. ON PAGE 4 OF HIS TESTIMONY, MR. NEPTUNE CLAIMS THAT IN NOVEMBER 2003, SUPRA SUBMITTED FOUR (4) 99 LINE BATCHES AND 30-40 LINES IN EACH WERE RETURNED AS SL-2 CONVERSIONS REQUIRED AND 1-5 WERE CLASSIFIED AS NON-CONVERTIBLE IN ANY WAY. FURTHER, MR. NEPTUNE STATES "AS OF DECEMBER 18, 2003, NO REASON HAS BEEN FORTHCOMING FOR THESE CLASSIFICATIONS." PLEASE COMMENT.

A. As stated and exhibited in my previous testimony, BellSouth's Customer Care Project Manager notified Supra via email advising the individual telephone numbers that were currently served by IDLC that BellSouth could not move to alternate compatible facilities. Even though there were no UDLC or Copper facilities available, records indicated many of those could, however, be served as an SL2 by a side door or hairpin arrangement on the IDLC. There were minimal amounts, less than five (5), of the 99 that had no facilities available for SL1 or SL2 and would need to be removed from the bulk request. The explanations were given in the email and also noted on the project spreadsheets returned to Supra.

Q. MR. NEPTUNE, ON PAGE 8 OF HIS TESTIMONY, CLAIMS THAT SUPRA DOES NOT HAVE NONDISCRIMINATORY ACCESS TO LOOPS BECAUSE FOUR (4) OF ITS 99 ORDERS IN PEMBROKE PINES WERE CLASSIFIED AS NON-CONVERTIBLE. PLEASE ADDRESS.

A. There are no non-convertible loops. As described in my direct testimony, BellSouth will perform special construction to provide unbundled loops. If Supra does not wish to incur the special construction cost, BellSouth will continue to provide UNE-P on that loop at TELRIC prices in those areas in which and at such time as BellSouth receives unbundled switching relief.

Q. MR. NEPTUNE FURTHER STATES, ON PAGE 8 OF HIS TESTIMONY, "SUPRA SUSPECTS THAT THIS LOOP REPLACEMENT PROCESS IS CAUSING A 4-5% RATE OF NDT OCCURRENCES DURING CONVERSIONS. SUPRA TELECOM CANNOT PROVIDE ACTUAL DATA BECAUSE BST DECLINES TO IDENTIFY THESE CUSTOMERS PRIOR TO CONVERSION." PLEASE COMMENT.

A. As Mr. Neptune admits, Supra has supplied no data to support this unsubstantiated allegation. Contrary to Mr. Neptune's testimony, BellSouth provides the CLECs with a means, through its loop make-up process, to verify the type of facility that is serving a line before they place a conversion order. This process is described further in the testimony of BellSouth's witness Pate.

Q. ON PAGE 10 OF HIS TESTIMONY, MR. NEPTUNE ALLEGES THAT SUPRA EXPERIENCES A LARGE NUMBER OF NDT CONDITIONS ON OR BEFORE THE CONVERSION DATE WHICH MEANS THAT LOOPS ARE CONVERTED TO COPPER OR UDLC PRIOR TO CONVERSION AND ARE NOT TESTED FROM CUSTOMER NETWORK INTERFACE DEVICE ("NID") TO THE

CENTRAL OFFICE PRIOR TO THE JUMPER MOVE ON THE MAIN DISTRIBUTING FRAME ("MDF"). PLEASE ADDRESS THIS ALLEGATION.

A. BellSouth as a policy does not perform any conversions before the actual due date on the order. If such a conversion were to occur before the actual due date, the BellSouth migration process requires that the CLEC dial tone be present before the conversion would take place. If CLEC dial tone is not present, the cut will not occur. In addition, the loops are not converted to copper or UDLC, as Mr. Neptune alleges, prior to the due date. As I explained above, the new F1 facility is cross-connected to the existing F2 at the time of the conversion of the line. The conversion is performed on the date specified on the FOC. BellSouth does not dispatch to work a pre-cut prior to the FOC date for two (2) reasons. First, this additional cut would cause a needless service disruption for Supra's customer. Second, the nature of cut would involve extra work for BellSouth Network personnel both in the field, central office, and other downstream departments. As far as testing from the NID, previous Installation work instructions required technicians to tag and test from the NID whenever service order activity required a dispatch. These instructions were revised on September 13, 2003, in response to Supra conversion orders placed in missed appointment ("MA") status. Supra was concerned that this would be an ongoing issue on all other dispatched orders. BellSouth's SSIM/IM staff and CWINS staff determined a revision was necessary since the service order activity was not end-user initiated and Supra's customers would be unaware of any pending work. Work instructions now state that an attempt will be made to gain access to the NID, and if access is denied, the order will be completed rather than MA'd.

Q. ON PAGE 13 OF MR. NEPTUNE'S TESTIMONY, HE DESCRIBES SUPRA'S PROPOSAL FOR IDLC WHICH PROPOSED "THAT IN AREAS OF HIGH SUPRA TELECOM CUSTOMER CONCENTRATION CONJOINED WITH HIGH CONCENTRATIONS OF IDLC BELLSOUTH COULD MOVE OR GROOM ALL THE CUSTOMERS TO 1-N REMOTE TERMINALS WHICH COULD BE DEMUXED AT THE CO AND HANDED OFF TO SUPRA AT THE APPROPRIATE LEVEL." PLEASE COMMENT ON SUPRA'S PROPOSAL.

A. BellSouth's offering titled "Unbundled Sub-loop Concentration (USLC)" dedicates a 96 channel DLC to a CLEC and hands the loops off to the CLEC at the DS1 level. It allows a CLEC to order sub-loops and transport them back to its collocation space. No CLEC has ever ordered USLC. The recent FCC TRO declined to require unbundled feeder and therefore BellSouth is withdrawing USLC. The TRO determined that CLECs are not impaired by not having access to unbundled feeder. The CLEC is free to place its own DLC systems and order unbundled sub-loops to accomplish this type of interconnection. Thus, BellSouth has no obligation to provide what Supra is asking.

Hot Cut Performance

Q. MR. NEPTUNE, ON PAGE 2 OF HIS TESTIMONY, TESTIFIES THAT DURING NOVEMBER 2003, OVER 2400 CUSTOMERS CONVERTED FROM UNE-P TO UNE-L EXPERIENCED NO DIAL TONE ("NDT") ON THE CONVERSION DATE 4-5% OF THE TIME AND COULD NOT RECEIVE CALLS FOR FOUR (4)

HOURS OR MORE 47% OF THE TIME. PLEASE COMMENT.

A. This testimony is identical to Supra's direct. As I stated and demonstrated in my Rebuttal testimony, the reason the customers could not receive calls 47% of the time was directly related to Supra's delay in porting their customers timely and was no fault of BellSouth. Please see my Rebuttal testimony for additional information.

Q. FURTHER ON PAGE 2 OF MR. NEPTUNE'S TESTIMONY, HE STATES THAT "A CUSTOMER EXPERIENCING NDT UPON CUTOVER CAN TYPICALLY EXPECT A TWENTY-FOUR HOUR WINDOW FOR REPAIR." PLEASE COMMENT.

A. First, before the cut, BellSouth tests for dial tone to verify the telephone number prior to the cutover. If a "NDT- no dial tone " condition exists, BellSouth will place the service order in Missed Appointment status and will BellSouth will not cut the loop.

After the cut, in the event the end user experiences problems after the conversion, BellSouth's repair commitment to wholesale customers is listed in our Operational Understanding:

> ... CWINS will provide CLEC certain telephone services pursuant to the Interconnection Agreement; the services and facilities will be at least equal in quality to that provided by BST to itself and its end users....Our

maintenance target is to provide "a business comparison offering" for SL1 – 2 wire analog voice grade loops.

Performance data demonstrates that BellSouth meets its repair commitments. Comparable data for BellSouth Retail and BellSouth wholesale customers for non-designed loops August through December 2003 is listed on Exhibit KLA-10. As the data demonstrates, the average repair time for CLECs is better than for BellSouth Retail each of the five (5) months.

Q. MR. NEPTUNE, ON PAGE 3 OF HIS TESTIMONY, EXPLAINS THAT PORTING IS A COMPLEX PART OF THE PROCESS. PLEASE ADDRESS.

A. Porting is a simple 3-step process:

(1) When the CLEC receives a Firm Order Commitment ("FOC"), they send a "create" message to NPAC.
(2) NPAC provides a mechanized notification to BellSouth that the create message has been sent; BellSouth responds with a mechanized "concur" message.
(3) On the due date, when BellSouth completes the migration activity, the CLEC is notified so they can send an "activate" message to NPAC.

The porting process successfully occurs many times a day for every end user telephone number "porting-in" or porting-out" of a BellSouth switch.

Q. IN ADDITION TO THE ABOVE CONCERN BY MR. NEPTUNE, HE CLAIMS THAT "DELAYS CAUSED BY THIS PROCESS COULD CAUSE UP TO 12 HOURS OF AN OSS CONDITION WHILE AWAITING A RESPONSE FROM THE CLEC." PLEASE COMMENT.

A. Mr. Neptune is absolutely correct. If a CLEC waits 12 hours to advise BellSouth of a problem, there could be 12 hours of out of service time.

Q. AS TO THE CENTRAL OFFICE TECHNICIANS ENTERING COMPLETIONS INTO THEIR SYSTEMS, MR. NEPTUNE STATES, ON PAGE 6 OF HIS TESTIMONY, THAT "THE EXTENT OF THEIR COMMITMENT IS THAT THEY WILL MAKE A BEST EFFORT TO ENTER THE COMPLETIONS IN LESS THAN FOUR (4) HOURS. THIS COMMITMENT IS ENTIRELY DEPENDANT UPON THE MOOD, ATTITUDE OR WORKLOAD OF A TECHNICIAN THAT SEES THE CLEC AS THE ENEMY." PLEASE COMMENT AS TO MR. NEPTUNE'S ASSESSMENT OF FOUR (4) HOUR COMPLETIONS.

A. BellSouth's current process is compliant with the TRO. That being said, in an effort to be responsive, BellSouth is enhancing the batch process to provide that BellSouth technicians will close out their work steps for non-coordinated batch cuts at least every 2 hours. As I have stated previously, BellSouth's automated notification system provides the notification to the CLEC within 2 minutes of the closing of the work steps by the technicians. Thus, the maximum amount of time that could pass between the hot cut and the CLEC notification would be a total of 2 hours and 2 minutes.

Q. ON PAGE 7 OF HIS TESTIMONY, MR. NEPTUNE COMPLAINS ABOUT BELLSOUTH'S PERFORMANCE ON GO-AHEAD NOTICES. HE CONTENDS THAT IT CAN TAKE UP TO FOUR HOURS FOR SUPRA TO RECEIVE THEM. PLEASE COMMENT.

A. In the absence of any willingness on the part of Supra to either use the batch process or work with a project manager to set conversion volumes and dates, BellSouth's Florida Network personnel have put forth their best efforts to handle Supra's large and inconsistent volume of orders with little or no planning. Technicians, both central office and field, have sometimes worked beyond their normally scheduled tours to complete the scheduled due dates. However, it would be a rare occasion that Supra would receive "go-aheads" as late as 9:00pm. Moreover, notably, Supra provides no evidence or specific examples to support its allegation. Previously provided testimony stated that Enhanced Delivery Initiative ("EnDI") mechanically sends an e-mail "go-ahead" notification to the CLEC within two (2) minutes of a completed –central office work step or ---- field technician completion message.

During the month of December 2003, Supra converted over ** ** orders. 98.5% of the "go-aheads" were sent between 7am and 6 pm. Mr. Neptune also references the notification process as being the most troublesome part of the conversion process since "go-ahead" notices are sent to the CLEC on an individual number basis. The individual e-mail notifications, however, were put into place at Supra's request.

As stated above, BellSouth has agreed to implement a web-based tool for posting the CLEC "go-ahead" notification. This application is expected to be deployed June 2004.

Q. FURTHER ON PAGE 9 OF HIS TESTIMONY, MR. NEPTUNE CLAIMS THAT THE CLEC PERFORMS LNP PORTING UPON RECEIPT OF THE BELLSOUTH COMPLETION NOTIFICATION, NOT ONCE THE CONVERSION IS COMPLETE AS BELLSOUTH WITNESS AINSWORTH IMPLIED IN HIS TESTIMONY. MR. NEPTUNE GOES ON TO SAY "THIS NOTIFICATION CAN BE AND OFTEN IS HOURS AFTER THE CONVERSION IS COMPLETED." PLEASE COMMENT.

A. For coordinated conversions, the CLEC is immediately notified by the CWINS that the conversion is complete. For non- coordinated conversions, the CLEC is notified after the technician has closed his work step. For individual orders, the work steps are closed after each order. However, for large volumes conversion such as bulk, it is more efficient for the technician to physically move jumpers for several orders before returning to his workstation to close out the work steps. For this efficiency reason, a central office technician working bulk volumes will close out his work within two (2) hours of the physical cut which would notify the CLEC that the conversion is complete and ready to port.

Q. ON PAGE 11 OF HIS TESTIMONY, MR. NEPTUNE WANTS BELLSOUTH TO IDENTIFY THE CLEC INVOLVED IN THE 600 CONVERSIONS BELLSOUTH CLAIMS TO HAVE PERFORMED SUCH THAT IT CAN BE DETERMINED HOW

MANY CUSTOMERS LOST DIAL TONE, ETC. PLEASE COMMENT.

A. The CLEC involved in the 600 conversions is ** **. The date of the 600 conversions was December 22, 2003. ** ** submitted ** ** orders involving eight (8) different central offices. ** ** of the ** ** were successfully completed. Five (5) of these orders could not be completed due to CLEC reasons (2-No access; one (1) No CLEC DT; one (1) Defective CLEC cable pair; one (1) CLEC other reason). There were two (2) orders that could not be completed due to lack of facilities; however, they could have been resubmitted as SL2.

BellSouth investigated those ** ** completed conversions on December 22, 2003, and found that only ** ** of the ** ** had a BellSouth problem after the conversion. ** ** trouble percentage for BellSouth issues, NDT, etc. for this day was 1.57%. This percentage is significantly lower that BellSouth's own retail rate for troubles following order activity. More orders were missed on this day due to ** ** reasons than for BellSouth reasons.

Mr. Neptune indicates a potential problem in porting and he is correct. However, once again, Supra fails to give valid reason for port problems. On December 22, 2003, ** ** orders were converted and ** ** "go-ahead" notifications were sent to ** ** by BellSouth. However, on this date, ** ** ported less than ** ** of the ** ** conversions. ** ** continued to port these customers on later dates, as evidenced by the fact that over ** ** numbers were ported on December 23, 2003, when ** ** only had one (1) order due

and only received one (1) "go- ahead" notification. The customer's incoming calls would have been negatively impacted, but this is clearly not the fault of BellSouth but is instead, caused by CLEC delay.

Q. FURTHER ON PAGE 11 OF HIS TESTIMONY, MR. NEPTUNE STATES THAT BELLSOUTH'S PROJECT MANAGER THAT WORKS WITH SUPRA DOES NOT KNOW HOW TO USE THE BULK MIGRATION REQUEST SYSTEM AND THAT SUPRA HAS NEVER BEEN MADE AWARE OF HOW IT WORKS OR TRAINED IN ITS USE. IS THIS CORRECT?

A. No. The project manager knows how to use the bulk migration process as explained in Ainsworth's testimony. The project manager's role begins in the pre-order issuance/ notification and follows through to the provisioning phase of this process. During the pre-ordering issuance/ notification process, the CLEC submits a Notification Form to BellSouth's CCPM for UNE-P accounts to be converted to UNE-L within a single wire center. The CCPM reviews the Notification Form for errors and assigns a Bulk Order Project Identifier ("BOPI") and forwards the Notification Form to the Network Single Point of Contact ("SPOC") who assigns due dates to accounts and returns the Notification Form to the CCPM, who then returns the Notification Form to the CLEC. Additionally, the project manager acts in a liaison capacity or single point of contact between the CLEC and network operations. The project manager coordinates with network to assign due dates, advise CLEC of potential delays or problems, and advise of completion of the project. In the batch hot cut provisioning process, the

BellSouth CCPM provides CWINS and the network operations group with notification of planned bulk activity, monitors status of the order(s), interfaces with the CLEC and Bellsouth groups during the process, and tracks orders and the project until it is complete. The project manager is the party responsible in the first instance for ensuring successful completion of the process.

Q. DOES THIS CONCLUDE YOUR SURREBUTTAL TESTIMONY?

A. Yes.

UNE-P to UNE-L Order Summary
October 9, 2003 - January 23, 2004

	Date	Volume	% DD Complete
October	10/9/2003	61	100.0%
199	10/10/2003	91	100.0%
	10/16/2003	31	100.0%
	10/17/2003	2	100.0%
	10/21/2003	11	100.0%
	10/28/2003	2	100.0%
	10/29/2003	1	100.0%
November	11/4/2003	1	0.0%
1977	11/5/2003	1	100.0%
	11/6/2003	85	98.8%
	11/7/2003	90	98.9%
	11/10/2003	70	100.0%
	11/11/2003	62	100.0%
	11/12/2003	62	100.0%
	11/13/2003	69	98.6%
	11/14/2003	16	100.0%
	11/17/2003	98	99.0%
	11/18/2003	136	98.5%
	11/19/2003	99	100.0%
	11/20/2003	375	99.7%
	11/21/2003	167	98.8%
	11/24/2003	434	99.3%
	11/25/2003	202	100.0%
	11/26/2003	11	100.0%
December	12/1/2003	140	100.0%
3136	12/2/2003	319	99.4%
	12/3/2003	238	99.6%
	12/4/2003	114	98.2%
	12/5/2003	7	85.7%
	12/8/2003	23	95.7%
	12/10/2003	393	98.0%
	12/12/2003	85	100.0%
	12/15/2003	285	99.6%
	12/16/2003	3	66.7%
	12/17/2003	154	96.1%
	12/18/2003	9	100.0%
	12/19/2003	297	98.3%
	12/22/2003	642	98.9%
	12/23/2003	1	100.0%
	12/24/2003	415	98.6%
	12/26/2003	3	100.0%
	12/29/2003	8	100.0%

January	1/2/2004	44	95.5%
5047	1/5/2004	671	98.8%
	1/6/2004	4	100.0%
	1/7/2004	1022	95.6%
	1/8/2004	900	99.9%
	1/9/2004	516	98.3%
	1/12/2004	298	99.7%
	1/13/2004	0	
	1/14/2004	195	99.0%
	1/15/2004	239	97.5%
	1/16/2004	20	95.0%
	1/19/2004	186	98.4%
	1/21/2004	211	100.0%
	1/22/2004	343	98.0%
	1/23/2004	398	99.0%

Mean Time to Repair

State	FL Maintenance and Repair Products	Metrics	August 2003 Total	September 2003 Total	October 2003 Total	November 2003 Total	December 2003 Total
BST	Retail Residence and Business (POTS)	Avg Dur	21.95	19.58	18.35	21.52	17.49
All CLECs	2W Analog Loop Non-Design	Avg Dur	14.91	15.46	15.67	20.19	15.25