Nancy B. White
General Counsel-Florida

BellSouth Telecommunications, Inc.
150 South Monroe Street
Room 400
Tallahassee, Florida 32301
305 347-5558

February 20, 2004

Mrs. Blanca S. Bayó
Division of the Commission Clerk and
Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 030851-TP

Dear Ms. Bayó:

Enclosed are an original and fifteen copies of BellSouth Telecommunications, Inc.'s Late-filed Deposition Exhibits Nos. 1-5 for Kenneth Ainsworth; Exhibit Nos. 1 and 3 for Pamela A. Tipton; and public versions of Exhibit Nos. 1, 2, 3, 4 and 9 for James Stegeman, which we ask that you file in the above-captioned docket. Mr. Stegeman's Exhibit Nos. 1 and 2 are also provided as Late-Filed Deposition Exhibits to the deposition of Dr. Debra J. Aron.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,

Nancy B. White

Nancy B. White (KK)

Enclosure
cc: Parties of Record
Marshall M. Criser III
R. Douglas Lackey
Meredith Mays

AUS
CAF
CMP
COM 5
CTR
ECR 1
GCL 1
OPC
MMS 1
SEC 1
OTH

528186

CERTIFICATE OF SERVICE
Docket No. 030851-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Electronic Mail, Hand Delivery* and FedEx⊗ this 20th day of February 2004 to the following:

Jeremy Susac, Staff Counsel *
Pat Lee
Florida Public Service Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
Phone: (850) 413-6236
Fax: (850) 413-6250
jsusac@psc.state.fl.us
plee@psc.state.fl.us

Michael A. Gross
VP Reg. Affairs & Reg. Counsel
Florida Cable Telecomm. Assoc.
246 East 6th Avenue
Tallahassee, FL 32303
Tel. No. (850) 681-1990
Fax. No. (850) 681-9676
mgross@fcta.com

Joseph A. McGlothlin (+)
Vicki Gordon Kaufman (+)⊗
McWhirter, Reeves, McGlothlin,
Davidson, Kaufman & Arnold PA
117 South Gadsden Street
Tallahassee, FL 32301
Tel. No. (850) 222-2525
Fax. No. (850) 222-5606
Represents FCCA
Represents Covad ~
jmcglothlin@mac-law.com
vkaufman@mac-law.com

Charles E. Watkins (+)⊗
Covad Communications Company
1230 Peachtree Street, N.E.
19th Floor
Atlanta, Georgia 30309
Tel. No. (404) 942-3492
Fax. No. (404) 942-3495
gwatkins@covad.com
jbell@covad.com

Nanette Edwards, Esq. (+)⊗
Director – Regulatory
ITC^DeltaCom
4092 S. Memorial Parkway
Huntsville, AL 35802
Tel. No. (256) 382-3856
nedwards@itcdeltacom.com

Floyd Self, Esq. (+)
Norman H. Horton, Esq. ~
Messer Caparello & Self
215 South Monroe Street, Suite 701
Tallahassee, FL 32301
Tel. No. (850) 222-0720
Fax. No. (850) 224-4359
Represents ITC^DeltaCom,
Represents KMC
Represents MCI
Represents Xspedius~
fself@lawfla.com
nhorton@lawfla.com

De O'Roark, Esq. (+)
MCI WorldCom Communications, Inc.
6 Concourse Parkway, Suite 3200
Atlanta, GA 30328
de.oroark@mci.com

Jon Moyle, Jr.
Moyle Law Firm (Tall)
The Perkins House
118 North Gadsden Street
Tallahassee, FL 32301
Phone: (850) 681-3828
Fax: 681-8788
Email: jmoylejr@moylelaw.com

Andrew O. Isar
Miller Isar, Inc.
7901 Skansie Avenue
Suite 240
Gig Harbor, WA 98335
Tel. No. (253) 851-6700
Fax No. (253) 851-6474
aisar@millerisar.com

Jason Spinard, Esq.
Rand Currier
Geoff Cookman
Granite Telecommunications, LLC
234 Copeland Street
Quincy, MA 02169
Tel. No. 617 847-1500
Fax No. 617 847-0931
jspinard@granitenet.com
rcurrier@granitenet.com
gcookman@granitenet.com

Donna McNulty, Esq. (+)⊗
MCI WorldCom Communications, Inc.
1203 Governors Square Blvd., Suite 201
Tallahassee, FL 32301-2960
donna.mcnulty@mci.com

Tracy Hatch, Esq.
AT&T
101 North Monroe Street
Suite 700
Tallahassee, FL 32301
Tel. No. (850) 425-6360
thatch@att.com

Lisa A. Sapper (+)⊗
AT&T
1200 Peachtree Street, N.E.
Suite 8100
Atlanta, GA 30309
Tel. No. (404) 810-7812
lisariley@att.com

Jake E. Jennings (+)
NewSouth Communications Corp
Two North Main Center
Greenville, SC 29601-2719
Tel. No. 864 672-5877
Fax No. 864 672-5313
jejennings@newsouth.com

Marva Brown Johnson, Esq.
KMC Telecom III, LLC
1755 North Brown Road
Lawrenceville, GA 30034-8119
marva.johnson@kmctelecom.com

Susan S. Masterton, Esq. (+)
Sprint-Florida, Inc.
Sprint Communications Co. L.P.
1313 Blair Stone Road
P.O. Box 2214
Tallahassee, FL 32316-2214
Tel. No. (850) 599-1560
Fax. No. (850) 878-0777
susan.masterton@mail.sprint.com

Allegiance E-mail Only
charles.gerkin@algx.com

Terry Larkin
Allegiance Telecom, Inc.
700 East Butterfield Road
Lombard, IL 60148
Phone: (630) 522-6453
terry.larkin@algx.com

Jean Houck
Business Telecom, Inc.
4300 Six Forks Road
Raleigh, NC 27609
Tel. No. (919) 863-7325
jean.houck@btitelecom.net

Jonathan Audu**
Manager, Regulatory Affairs
Supra Telecommunications
1311 Executive Center Drive
Suite 220
Tallahassee, FL 32301-5027
Tel. No. (850) 402-0510
Fax. No. (850) 402-0522
jonathan.audu@stis.com

Margaret Ring, Director
Regulatory Affairs
Network Telephone Corporation
815 S. Palafox St.
Pensacola, FL 32501
850-465-1748
Margaret.Ring@networktelephone.net

Jorge Cruz-Bustillo (+)
Assistant General Counsel
Supra Telecommunications & Information Systems, Inc.
2620 S.W. 27th Avenue
Miami, FL 33133
Phone: (305) 476-4252
Fax: (305) 443-1078
jorge.cruz-bustillo@stis.com

AT&T by E-Mail only: (+)
soniadaniels@att.com

Richard Chapkis (+)
Kimberly Caswell
Verizon Florida Inc.
P.O. Box 110, FLTC0007
Tampa, FL 33601-0110
Phone: (813) 483-1256
Fax: (813) 273-9825
Email: richard.chapkis@verizon.com

Matthew Feil (+)
Scott Kassman
FDN Communications
2301 Lucien Way
Suite 200
Maitland, FL 32751
Tel. No. 407 835-0460
Fax No. 407 835-0309
mfeil@mail.fdn.com
skassman@mail.fdn.com

Thomas M. Koutsky
Vice President, Law and Public Policy
Z-Tel Communications, Inc.
1200 19th Street, N.W., Ste. 500
Washington, D.C. 20036
Tel. No. (202) 955-9653
tkoutsky@z-tel.com

Charlie Beck (+)
Deputy Public Counsel
Office of Public Counsel
111 West Madison Street, Room 812
Tallahassee, FL 32399-1400
Phone: (850) 488-9330
Fax No. (850) 488-4491
Beck.Charles@leg.state.fl.us

Nancy B. White (RBD)

(+)signed Protective Agreement
(*) via Hand Delivery
(⊗) via FedEx

Trigger Satisfied with 10 Lines or Fewer

UNE Zone	CEA
Zone 1	Jacksonville FL-GA
Zone 2	Jacksonville FL-GA
Zone 1	Orlando FL
Zone 2	Orlando FL
Zone 1	Miami FL
Zone 2	Miami FL
Zone 1	Fort Lauderdale FL
Zone2	Fort Lauderdale FL
Zone 1	West Palm Beach - Boca Raton FL
Zone 2	West Palm Beach - Boca Raton FL
Zone 2	Pensacola FL
Zone 2	Daytona Beach FL

Percentage Enterprise in Designated BellSouth Markets

Market	% Enterprise Where Enterprise Is > 3	% Enterprise Where Enterprise is ≥ DS1
Jacksonville FL-GA Zone1	62%	43%
Jacksonville FL-GA Zone2	26%	10%
Miami FL Zone1	44%	22%
Miami FL Zone2	23%	9%
Orlando FL Zone2	28%	11%

BellSouth Telecommunications, Inc.
Florida Public Service Commission
Docket No. 030851
Late Filed Deposition Exhibit 1
Zone 3 Jacksonville Passed Original
Deployment Test

REQUEST: Please explain why Zone 3, Jacksonville, Florida is included on revised Exhibit DJA-02, filed with Dr. Aron's surrebuttal testimony.

RESPONSE: Zone 3, Jacksonville was originally identified as a trigger market by Pamela A. Tipton in her direct testimony. While not separately identified on DJA-02 (because it was a trigger market), Zone 3 Jacksonville passed the potential deployment test as an unimpaired market. Please see the attached DJA Late Filed Deposition Exhibit 1 for the NPV results from the original model run. Ms. Tipton later excluded this market from her triggers analysis.

In the surrebuttal testimony and Revised Exhibit DJA-02 filed by Dr. Aron, both the triggers markets (all of which pass the BACE NPV test) and the "Additional" markets that pass the potential deployment test are identified on separate panels. As Zone 3 Jacksonville is no longer identified by Ms. Tipton in her surrebuttal testimony as a triggers market, but it continues to pass the potential deployment test, it now appears as an "Additional" market on Revised Exhibit DJA-02 as filed in Dr. Aron's surrebuttal testimony.

DJA Late-Filed Deposition Exhibit 1

Jacksonville Zone 3: Originally Filed Potential Deployment Test

NPV Total	NPV for the Mass Market

PUBLIC DISCLOSURE
DOCUMENT

BellSouth Telecommunications, Inc.
Florida Public Service Commission
Docket No. 030851
Late Filed Deposition Exhibit 2
Other Cost Witnesses

REQUEST: Who sponsors the cost inputs included in the BACE model?

RESPONSE: See BellSouth's response to Staff's Interrogatory No. 117. Additional information is also provided in the attached spreadsheet and verification.

BACE Cost Area	BACE Cost Center	BACE Cost Element	Cost Input Provided By	Notes
Cageless Collo	ALL	ALL	Bernard Shell	GA & FL rates
ColloEquipment	DSLAM	ALL	Eric Fogle	Based on Milr
ColloEquipment	MDF	ALL	Jim Lowry	
ColloEquipment	CFA	ALL	Andrea Hopkins	Used old cros
ColloEquipment	POTBAY	ALL	Andrea Hopkins	
ColloEquipment	DSXPanel	ALL	Dee Gonzalez	
ColloEquipment	DLCEquipment	ALL	Arlene Johnson	
ColloEquipment	Multiplexer	ALL	Dee Gonzalez	
CPE	Modem	DSLModem	Chet White	
CPE	Modem	DSLModemInstallationKit	Chet White	
CPE	Modem	BusinessModem	Bob McKnight	From BSTLM
CPE	ChannelBankEquip	ALL	Dee Gonzalez	
Data	ATMSwitch	ALL	Chet White/Eric Fogle reviewed	
Data	BroadbandServicesNode	ALL	Eric Fogle	
Data	CatalystSwitch	ALL	Doug Cole/Eric Fogle reviewed	
Data	IntAggregateExchangeRouter	ALL	Doug Cole/Eric Fogle reviewed	
Data	SubscriberManagementSystem	ALL	Eric Fogle	
Data	BackboneExtensionRouter	ALL	Doug Cole/Eric Fogle reviewed	
	DataTransport	IPTransitBackhaul	Eric Fogle	
Data	IPOP	AggregateExchangeRouter (ALL)	Doug Cole/Eric Fogle reviewed	
Data	IPOP	PeeringExchangeRouter (ALL)	Doug Cole/Eric Fogle reviewed	
Data	PXRToGSP	ALL	Eric Fogle	SpA rates
Data	Data	GSP Access	Eric Fogle	
Data	MultiServiceRouter	ALL	Eric Fogle	Vendor Quote
Data	MSRToGSP	ALL	Eric Fogle	SpA rates
EELs	ALL	ALL	Pam Tipton	UNEs or SpA
G&A	G&A	CapitalRelatedtoG&A	Dr. Debra Aron	ARMIS analys
Interconnection	TandemTransitTraffic	ALL	Pam Tipton	UNES
Interconnection	RecipComp	ALL	Keith Milner	traffic assume
Loop	ALL	ALL	Pam Tipton	UNEs
OSS	ALL	ALL	Dr. Debra Aron	ARMIS analys
Region	Features	CNAM (ALL)	Pam Tipton	UNE Rates
Region	Features	TollFreeQuery	George Grier	FCC Tariff #1
Region	Features	LNPQuery	George Grier	FCC Tariff #1
Region	Features	LIDB related items	George Grier	FCC Tariff #1.
Region	Signaling	ISUP	George Grier	Access Rates
Region	Signaling	TCAP	George Grier	Access Rates
Region	Signaling	SignalPointCode	George Grier	Access Rates
Region	Signaling	AlinkMonthly	George Grier	Access Rates

Region	Signaling	AlinkNRC	George Grier	Access Rates
Region	Signaling	STPPortTerm	George Grier	Access Rates
Region	DAServices	DACall	Allen Martin	Competitive A
Region	OAServices	OpCall	Allen Martin	Competitive A
Region	DAServices	ALL Announcement related elements	Allen Martin	UNE Rates
Region	DAServices	Listing related services	Allen Martin	DADS GSST.
Region	OAServices	ALL Announcement related elements	Allen Martin	UNE Rates
SpecialAccess	ALL	ALL	Ken Enman	Discount struc
SpecialAccessDA	ALL	ALL	Ken Enman/Keith Milner	SpA rates; 1 [
SpecialAccessE911	ALL	ALL	Ken Enman/Keith Milner	SpA rates; 6 [
SpecialAccessOA	ALL	ALL	Ken Enman/Keith Milner	SpA rates; 1 [
SwitchedAccess	SWACommonTransport	ALL	Ed Matejick/Pam Tipton	FCC#1 Sectio
SwitchedAccess	TandemSwitching	ALL	Ed Matejick/Pam Tipton	FCC#1 Sectio
SwitchedAccess	ALL	ALL	Ed Matejick/Pam Tipton	Access Charg
SwitchingCenter	LocalSwitching	ALL	Jim Lowry	SCIS Model n
SwitchingCenter	LocalSwitching	FeatureFunctionality		HAI Model
SwitchingCenter	DSXPanel	ALL	Dee Gonzalez	BellSouth DS:
SwitchingCenter	DLCEquipment	ALL	Arlene Johnson	BellSouth DL(
SwitchingCenter	Multiplexer	ALL	Dee Gonzalez	BellSouth Mul
UNEDedTransport	ALL	ALL	Pam Tipton	UNEs
Voice Mail	ALL	ALL	Mike Zier/Kent Davis	Vendor Quote
Wholesale	LD costs	ALL	Bill Blake	Based on BS1

BACE Assumptions/Inputs

Line to trunk ratios		Keith Milner	
Call and Feature Usage	Used for many weightings within BACE	Gerry Gardner; John Patterson	
Access Line data	Used for many weightings within BACE	Gerry Gardner	
Loop related weightings	SL1, SL2 wieghtings	Pam Tipton	Inward activity
Loop Conditioning weighting	Loop conditioning weightings	Mike Zier	Obtained infor
Costing Component Inputs	General guidance	Daonne Caldwell	Supervision o
InPlant, Loading and Plant Specific factors	BellSouth factors	Fletcher Horton	
DemandYearForBuild inputs		Keith Milner	

s are pending
ıer testimony in KY (Cinergy)

s connect study

(based on user input); UNEs based on September 2003 version of standard UNE agreement
sis; tied to revenue

ed to be in balance (weight = 0)

sis;

, page 6-178.1
, page 6-178.2
, page 19-7 (state rates identical)
(E6.8 for all states) & FCC#1
(E6.8 for all states) & FCC#1
(E6.8 for all states) & FCC#1
(E6.8 for all states) & FCC#1

; (E6.8 for all states) & FCC#1
; (E6.8 for all states) & FCC#1
\nalysis
\nalysis

A38.1

:ture approved by K. Enman
)S1 per switch (Milner)
)S1s per switch (Milner)
)S1 per switch (Milner)
)n 6.8
)n 6.8
)es from BACE Price table
uns

X Panel Investment (03_DS1_CALC.xls)
: Investments (DlcMaster00/Case Model)
tilplexer investment (03_DS1_CALC.xls), apply conc ratio of 4:1

:
T wholesale agreement with LD providers

/ and MAREVS
rmation from Lianne Griffin(?)
f some components; assistance on capacity analysis

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Implementation of requirements arising from Federal Communications Commission triennial UNE review: Local Circuit Switching for Mass Market Customers.	)))))	Docket No. 030851-TP

VERIFICATION

PERSONALLY appeared before me, Robert McKnight, who, being duly sworn, states that he currently is Director, Economic Analysis for BellSouth Telecommunications, Inc.; that he has reviewed the Late Filed Deposition Exhibit 2 to the Deposition of James W. Stegeman and affirms that the response contained therein has been made based on a reasonable search of Company records, or based on information provided by Company representatives having personal knowledge of the matter at issue, and that they are true and correct to the best of his knowledge.

SIGNATURE

DATED, this 20th day of February, 2004.

Sworn to and subscribed before me this 20th day of February, 2004.

NOTARY PUBLIC

My Commission Expires:

12/5/2005

527889

REQUEST: Please respond to the surrebuttal testimony of Sprint witness Dickerson at page 8, line 11 to page 11, line 6.

RESPONSE: At page 8, line 11, of Mr. Dickerson's surrebuttal testimony, he purports to attach Exhibits KWD-12, which he claims shows that BACE is illogical. His assertion is without merit.

Mr. Dickerson's exhibit KWD-12 shows the results of four different BACE runs, each with a negative total after-tax NPV (row 38) ranging from approximately -$33.4 million to -$120.4 million. Two of these scenarios even have a negative total pre-tax NPV (columns E and F). It appears is that in each of the runs, all but one of the user adjustable optimization toggles (all but the colo or EELs optimization) was turned off (see the rebuttal testimony of Dr. Staihr, page 17). Essentially, all of these runs represent Mr. Dickerson forcing the modeled CLEC to serve all areas (including those that are not economically profitable to serve). Therefore, he has modeled a total entity in Florida that is certainly not efficient and which is not economically profitable (i.e., it does not cover all of its costs including income taxes and the cost of equity).

Before discussing the BACE allocation of corporate income taxes, it is instructive to consider the full scope of the costs BACE considers. Unlike a standard P&L (profit and loss) statement, the BACE NPV metric of impairment includes not only the cost of the network, operations, taxes and debt interest, but also the cost of equity. Unlike the cost of debt (or other cost items), the cost of equity is not a tax-deductible expense. Therefore, if a BACE run (a hypothetical run) were to reflect a zero after-tax NPV for the state of Florida, this would imply a significant taxable income for the modeled CLEC and a significant corporate income tax liability, in order to generate after-tax profits just sufficient to compensate shareholders for the cost of equity.

There will also be a range of results in which a negative total after-tax NPV will correspond to a positive taxable income and a corporate tax liability. Indeed, even with some range of negative total pre-tax NPV, the CLEC would still generate a positive taxable income and a corporate tax liability (since the pre-tax NPV already includes the cost of equity).

Now consider how taxes are allocated within BACE. Corporate taxes represent a cost associated with the total operations of the CLEC. Corporate income tax

forms are, of course, not filed for each product offered or for each geographic area served. Since corporate income taxes are caused by taxable income (i.e., taxable measures of revenue less tax deductible measures of cost), one form of tax allocation would track some approximation of taxable income. However, taxable income excludes the cost of equity (which is not a tax deductible expense). Therefore, allocating taxes on the basis of taxable income would require that BACE carry this alternate information on taxable income at each and every dimension of the data; a daunting task to say the least. However, the NPV value of every data dimension is available. Since NPV provides an approximation of the "profitability" of a dimension over time, it was selected as a reasonable approach to allocate the corporate taxes.

BACE was designed to allow a user to model an efficient CLEC, a firm that attempts to serve customers profitability and avoids serving unprofitable customers and areas. As such, BACE's allocation of corporate income taxes on the basis of pre-tax NPV as a ratio of (total PV tax)/(total pre-tax NPV) should produce a reasonable assignment of the tax costs for an efficient CLEC. This allocation works as follows.

Consider a hypothetical example in modeling an efficient firm. Total pretax NPV is $10,000,000 and the estimated present value of the taxes is -$7,000, 000 (and total after-tax NPV is $3,000,000). (Note that since taxes are a cost, they have a negative present value, i.e., higher taxes have a greater negative effect on NPV). The tax allocation formula in BACE is (total PV taxes)/(total pre-tax NPV). In this case the tax allocator is -0.7 and each positive pre-tax NPV dollar is reduced by $0.70 to reflect its tax liability. Similarly, each negative pre-tax NPV dollar is assigned a reduction in tax liability of $0.70 (i.e., the -0.7 is multiplied times a negative pre-tax NPV to produce a positive gain to that product or area's NPV or a reduction in its negative NPV by $0.70 on the dollar). In this case, both positive and negative pretax NPV values become smaller (closer to zero) as taxes are applied.

However, in any situation where total post-tax NPV becomes negative, the allocation of taxes essentially becomes moot. That is, if a firm in total has a negative NPV, there is little to be gained by investigating the tax implications on the markets it operates within since it is unlikely the firm would be operating at all. This occurs either in the situations of negative total pre-tax NPV (columns E & F in Mr. Dickerson's KWD-12), or where pre-tax total NPV is positive but smaller than the PV of the tax liability (columns D and G of KWD-12).

Turning to the case of negative total pre-tax NPV identified in column E of KWD-12, Mr. Dickerson has turned off optimizations such that the resulting CLEC (which he forces to serve all areas) has a pre-tax NPV of approximately -$93.2 million. However, the CLEC still earns taxable income in total for some period of its existence sufficient to generate a PV of taxes of approximately -$27.1 million. In this case the resulting tax allocation ratio is approximately 0.29 (= -93.2/-27.1). Note that because of the negative NPV, the allocator has a positive sign, opposite of what one should expect, leading to counter intuitive results in the after-tax NPV calculations.

Now consider the case of a positive total pre-tax NPV in column D of KWD-12 of approximately $31.2 million. Again, since Mr. Dickerson has turned off optimization, the resulting CLEC (which he forces to serve all areas) has a PV of taxes of approximately -$64.7 million, which is greater in absolute value than the total pre-tax NPV. Here the tax allocator is -2.07. Here the sign is correct (negative) but the value is greater than one (in absolute value). Each dollar of positive pre-tax NPV is now assigned -2.07 PV in taxes, and each dollar of negative pre-tax NPV is allocated +2.07 PV in taxes (i.e., a reduction in tax liability). In this circumstance, the signs of after-tax segments or areas will tend to flip when after-tax NPV is calculated.

Certainly, these results do not "demonstrate the BACE Model NPV results to be fatally flawed and unsuitable for the conclusions asserted by BellSouth" as Mr. Dickerson claims at page 11 of his surrebuttal. BellSouth did not advance a model of inefficient CLEC behavior forcing the CLEC to serve economically unprofitable areas, leading to total negative after-tax NPV.

Nor do these results suggest that Mr. Dickerson cannot model (for whatever reason) the inefficient activities of CLEC serving all geographic areas. However, the BACE tax allocator and calculations of after-tax NPV were designed as a convenience for the user. If the user wishes to model inefficient CLEC behavior, then the user could focus on pre-tax values and ignore after-tax NPVs. While the allocation of taxes could be modified in the situation where the NPV of the CLEC is negative, such a modification would be nonsensical because it would negate the purpose of the model, which is to consider the activities of an efficient CLEC.

BellSouth Telecommunications, Inc.
Florida Public Service Commission
Docket No. 030851
Late Filed Deposition Exhibit 4
Allocation of Customers

REQUEST: Please explain the allocation of customers as referred to in Mr. Stegeman's surrebuttal testimony, page 18, line 20-21 and as referred to in Dr. Aron's direct testimony at page 22, lines 6 – 9.

RESPONSE: An errata is planned for Dr. Aron's direct testimony regarding page 22, lines 6-9. The errata is:

> further subdivided into three "terciles" by spend. In each geographic market, we then count up the number of customers that are in each segment and spend level in that geographic market. This creates a profile of the spend characteristics of that market. ~~Each geographic market (that is, UNE zones subdivided by CEAs as discussed in Dr. Pleatsikas's testimony) is then allocated the appropriate number of customers from each segment to reflect the actual economic profile of that market.~~

In response to this request, the process of counting customers by segment and spend level in each geographic market is further explained as follows:

The description of customer characteristics in each market is determined from two sources for customer counts by wire center. The first source is BellSouth's retail billing information system. For each wire center, the model counts the number of BellSouth retail customers by customer type (business and residence), that fall into each line size group for business (SOHO, SME/A, SME/B, SME/C) and spend category (quintiles 1-5 for residence or high, medium or low for business). The second source is the wholesale billing system for resale, UNE-P and UNE-L customers. The wholesale billing system provides CLEC customer counts by wire center and by customer type (business and residence). Since the wholesale billing system did not provide (and generally does not have) customer spend information, the wholesale residence customers in each wire center are identified with the customer spend groups (quintiles) in proportion to the distribution of BellSouth retail residence customers in that wire center. Similarly, the CLEC business customers served out of each wire center are allocated to the line-size and customer-spend groups in that wire center based on the distribution of BellSouth retail business customers in that wire center. The characteristics of each geographic market are simply the aggregate of the characteristics of each wire center in that market.

BellSouth Telecommunications, Inc.
Florida Public Service Commission
Docket No. 030851
Late Filed Deposition Exhibit 9
Scenarios 1 and 2

REQUEST: Please provide a printout of the results of scenarios 1 and 2.

RESPONSE: See attached documents. These documents are confidential and are provided pursuant to the terms of the protective order and protective agreements in this proceeding.

Proprietary and Confidential

Saved Report Name:	NPV-CEA UneZone
Scenario:	Scenario1
Data Source:	Revenue and Cost
Date/Time:	02/16/2004 12:43
User:	tro_user

State	UNE Zone	CEA	Net Present Value	NPV for Mass Market	NPV for Enterprise

Scenario1

PUBLIC DISCLOSURE
DOCUMENT

Proprietary and Confidential

Saved Report Name:	NPV-CEA UneZone
Scenario:	Scenario2
Data Source:	Revenue and Cost
Date/Time:	02/16/2004 12:44
User:	tro_user

State	UNE Zone	CEA	Net Present Value	NPV for Mass Market	NPV for Enterprise

Scenario2

PUBLIC DISCLOSURE
DOCUMENT

Difference from Scenario1 to Scenario2

Net Present Value	NPV for Mass Market	NPV for Enterprise
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-

Summary Bulk Migration Orders

Bulk Order	Due Date	EATNs	Lines	Rmk.
SF7011061201BULK	6/18/2003	2	2	
SF7011061202BULK	6/18/2003	1	1	1 EATN canc.
FL1118306AS3BULK	11/19/2003	57	57	
FL1120206AS4BULK	11/20/2003	22	22	

ACNA	ORDER	DDCOMP	ZLOC	PON	COS	PRN	ITEMS
[redacted]	NQ3353L8	6/18/2003	MIAMFLRR	UNELRRBLK2	UEANL	SF7011061201BULK	1
	NQ2K3NL4	6/18/2003	MIAMFLRR	UNELRRBLK1	UEANL	SF7011061201BULK	1

ACNA	ORDER	DDCOMP	ZLOC	PON	COS	PRN	ITEMS
[redacted]	NQ7NJKY4	6/18/2003	NDADFLGG	UNELGGBLK1	UEANL	SF7011061202BULK	1

11/19/2003

	ACNA	ORDER	DDCOMP	ZLOC	PON	COS	PRN	ITEMS
1		NRG67JC1	11/19/2003	FTLDFLPL	STIPLR00453	UEANL	FL1118306AS3BULK	1
2		NRFY4M14	11/19/2003	FTLDFLPL	STIPLR00463	UEANL	FL1118306AS3BULK	1
3		NRFDN0T6	11/19/2003	FTLDFLPL	STIPLR00440	UEANL	FL1118306AS3BULK	1
4		NRFDJPB5	11/19/2003	FTLDFLPL	STIPLR00480	UEANL	FL1118306AS3BULK	1
5		NRF8YFP8	11/19/2003	FTLDFLPL	STIPLR00436	UEANL	FL1118306AS3BULK	1
6		NRDVM2P4	11/19/2003	FTLDFLPL	STIPLR00474	UEANL	FL1118306AS3BULK	1
7		NRDRY7Q7	11/19/2003	FTLDFLPL	STIPLR00487	UEANL	FL1118306AS3BULK	1
8		NRD70R45	11/19/2003	FTLDFLPL	STIPLR00429	UEANL	FL1118306AS3BULK	1
9		NRD46CC7	11/19/2003	FTLDFLPL	STIPLR00466	UEANL	FL1118306AS3BULK	1
10		NRCY0VL7	11/19/2003	FTLDFLPL	STIPLR00451	UEANL	FL1118306AS3BULK	1
11		NRCKN2W7	11/19/2003	FTLDFLPL	STIPLR00465	UEANL	FL1118306AS3BULK	1
12		NRCKG8D3	11/19/2003	FTLDFLPL	STIPLR00439	UEANL	FL1118306AS3BULK	1
13		NRCJ9FF3	11/19/2003	FTLDFLPL	STIPLR00458	UEANL	FL1118306AS3BULK	1
14		NRCHKHV2	11/19/2003	FTLDFLPL	STIPLR00469	UEANL	FL1118306AS3BULK	1
15		NRBFFQ81	11/19/2003	FTLDFLPL	STIPLR00437	UEANL	FL1118306AS3BULK	1
16		NRBDJXW4	11/19/2003	FTLDFLPL	STIPLR00459	UEANL	FL1118306AS3BULK	1
17		NRB66BG1	11/19/2003	FTLDFLPL	STIPLR00448	UEANL	FL1118306AS3BULK	1
18		NRB4X3G5	11/19/2003	FTLDFLPL	STIPLR00452	UEANL	FL1118306AS3BULK	1
19		NRB2F712	11/19/2003	FTLDFLPL	STIPLR00475	UEANL	FL1118306AS3BULK	1
20		NR9YY0K7	11/19/2003	FTLDFLPL	STIPLR00434	UEANL	FL1118306AS3BULK	1
21		NR9W7Y49	11/19/2003	FTLDFLPL	STIPLR00492	UEANL	FL1118306AS3BULK	1
22		NR9P0R33	11/19/2003	FTLDFLPL	STIPLR00435	UEANL	FL1118306AS3BULK	1
23		NR9M8XC1	11/19/2003	FTLDFLPL	STIPLR00433	UEANL	FL1118306AS3BULK	1
24		NR9B13R9	11/19/2003	FTLDFLPL	STIPLR00471	UEANL	FL1118306AS3BULK	1
25		NR90BPV2	11/19/2003	FTLDFLPL	STIPLR00442	UEANL	FL1118306AS3BULK	1
26		NR8V31D8	11/19/2003	FTLDFLPL	STIPLR00443	UEANL	FL1118306AS3BULK	1
27		NR8Q3B77	11/19/2003	FTLDFLPL	STIPLR00464	UEANL	FL1118306AS3BULK	1
28		NR8KPT98	11/19/2003	FTLDFLPL	STIPLR00472	UEANL	FL1118306AS3BULK	1
29		NR7WMXR3	11/19/2003	FTLDFLPL	STIPLR00461	UEANL	FL1118306AS3BULK	1
30		NR7TY408	11/19/2003	FTLDFLPL	STIPLR00432	UEANL	FL1118306AS3BULK	1
31		NR7KQMF7	11/19/2003	FTLDFLPL	STIPLR00441	UEANL	FL1118306AS3BULK	1
32		NR6Y1662	11/19/2003	FTLDFLPL	STIPLR00446	UEANL	FL1118306AS3BULK	1
33		NR6VLRK8	11/19/2003	FTLDFLPL	STIPLR00468	UEANL	FL1118306AS3BULK	1
34		NR6JBC33	11/19/2003	FTLDFLPL	STIPLR00481	UEANL	FL1118306AS3BULK	1
35		NR567WC8	11/19/2003	FTLDFLPL	STIPLR00483	UEANL	FL1118306AS3BULK	1
36		NR4LX617	11/19/2003	FTLDFLPL	STIPLR00490	UEANL	FL1118306AS3BULK	1
37		NR4G7RX2	11/19/2003	FTLDFLPL	STIPLR00478	UEANL	FL1118306AS3BULK	1
38		NR495GK6	11/19/2003	FTLDFLPL	STIPLR00431	UEANL	FL1118306AS3BULK	1
39		NR48JQN7	11/19/2003	FTLDFLPL	STIPLR00489	UEANL	FL1118306AS3BULK	1
40		NR3VRKB9	11/19/2003	FTLDFLPL	STIPLR00462	UEANL	FL1118306AS3BULK	1
41		NR3P0B98	11/19/2003	FTLDFLPL	STIPLR00467	UEANL	FL1118306AS3BULK	1
42		NR3L05P0	11/19/2003	FTLDFLPL	STIPLR00470	UEANL	FL1118306AS3BULK	1
43		NR33H4B0	11/19/2003	FTLDFLPL	STIPLR00449	UEANL	FL1118306AS3BULK	1
44		NR2XLLT2	11/19/2003	FTLDFLPL	STIPLR00450	UEANL	FL1118306AS3BULK	1
45		NR2PVDF2	11/19/2003	FTLDFLPL	STIPLR00476	UEANL	FL1118306AS3BULK	1
46		NR25VL07	11/19/2003	FTLDFLPL	STIPLR00488	UEANL	FL1118306AS3BULK	1
47		NR2084H6	11/19/2003	FTLDFLPL	STIPLR00477	UEANL	FL1118306AS3BULK	1
48		NR1XQVQ4	11/19/2003	FTLDFLPL	STIPLR00485	UEANL	FL1118306AS3BULK	1
49		NR1WXLX2	11/19/2003	FTLDFLPL	STIPLR00486	UEANL	FL1118306AS3BULK	1
50		NR1Q5C44	11/19/2003	FTLDFLPL	STIPLR00454	UEANL	FL1118306AS3BULK	1
51		NR169H53	11/19/2003	FTLDFLPL	STIPLR00447	UEANL	FL1118306AS3BULK	1
52		NR1206W0	11/19/2003	FTLDFLPL	STIPLR00482	UEANL	FL1118306AS3BULK	1
53		NR0XXX39	11/19/2003	FTLDFLPL	STIPLR00444	UEANL	FL1118306AS3BULK	1
54		NR0L6F51	11/19/2003	FTLDFLPL	STIPLR00456	UEANL	FL1118306AS3BULK	1
55		NR0G6NG5	11/19/2003	FTLDFLPL	STIPLR00455	UEANL	FL1118306AS3BULK	1
56		NR090JL0	11/19/2003	FTLDFLPL	STIPLR00491	UEANL	FL1118306AS3BULK	1
57		NR06MG62	11/19/2003	FTLDFLPL	STIPLR00457	UEANL	FL1118306AS3BULK	1

11/20/2003

	ACNA	ORDER	DDCOMP	ZLOC	PON	COS	PRN	ITEMS
1		NRG3BF21	11/20/2003	FTLDFLPL	STIPLR00857	UEANL	FL1120206AS4BULK	1
2		NRG2KN88	11/20/2003	FTLDFLPL	STIPLR00877	UEANL	FL1120206AS4BULK	1
3		NRFCTFT0	11/20/2003	FTLDFLPL	STIPLR00855	UEANL	FL1120206AS4BULK	1
4		NRCVNPB6	11/20/2003	FTLDFLPL	STIPLR00864	UEANL	FL1120206AS4BULK	1
5		NRCTFHR7	11/20/2003	FTLDFLPL	STIPLR00867	UEANL	FL1120206AS4BULK	1
6		NRC97169	11/20/2003	FTLDFLPL	STIPLR00862	UEANL	FL1120206AS4BULK	1
7		NRBQ6DY5	11/20/2003	FTLDFLPL	STIPLR00870	UEANL	FL1120206AS4BULK	1
8		NRBL5TL8	11/20/2003	FTLDFLPL	STIPLR00859	UEANL	FL1120206AS4BULK	1
9		NR9RTDW7	11/20/2003	FTLDFLPL	STIPLR00875	UEANL	FL1120206AS4BULK	1
10		NR7GTK29	11/20/2003	FTLDFLPL	STIPLR00861	UEANL	FL1120206AS4BULK	1
11		NR6TLCT2	11/20/2003	FTLDFLPL	STIPLR00869	UEANL	FL1120206AS4BULK	1
12		NR6R4QC1	11/20/2003	FTLDFLPL	STIPLR00878	UEANL	FL1120206AS4BULK	1
13		NR5YYG51	11/20/2003	FTLDFLPL	STIPLR00854	UEANL	FL1120206AS4BULK	1
14		NR5V3F21	11/20/2003	FTLDFLPL	STIPLR00865	UEANL	FL1120206AS4BULK	1
15		NR53K0J2	11/20/2003	FTLDFLPL	STIPLR00871	UEANL	FL1120206AS4BULK	1
16		NR4NQ7X3	11/20/2003	FTLDFLPL	STIPLR00881	UEANL	FL1120206AS4BULK	1
17		NR24WNG9	11/20/2003	FTLDFLPL	STIPLR00868	UEANL	FL1120206AS4BULK	1
18		NR1K8T63	11/20/2003	FTLDFLPL	STIPLR00872	UEANL	FL1120206AS4BULK	1
19		NR1GF9Y0	11/20/2003	FTLDFLPL	STIPLR00880	UEANL	FL1120206AS4BULK	1
20		NR1DJ9T9	11/20/2003	FTLDFLPL	STIPLR00858	UEANL	FL1120206AS4BULK	1
21		NR0L53N7	11/20/2003	FTLDFLPL	STIPLR00876	UEANL	FL1120206AS4BULK	1
22		NR0682F0	11/20/2003	FTLDFLPL	STIPLR00856	UEANL	FL1120206AS4BULK	1

UNE-Port/Loop Combination (UNE-P) to UNE-Loop (UNE-L) Bulk Migration

CLEC Information Package

Version 2
February 18, 2004

UNE-P to UNE-L Bulk Migration

Table of Contents

UNE-P to UNE-L Bulk Migration

1. Introduction & Scope

This Product Information Package is intended to provide CLECs general ordering information specific to the **UNE-P** to **UNE-L** Bulk Migration process described herein.

The information contained in this document is subject to change. BellSouth will provide notification of changes to the document through the CLEC Notification Process.

Please contact your BellSouth Local Support Manager if you have any questions about the information contained herein.

UNE-P to UNE-L Bulk Migration

2. Revisions

1) Following are the revisions in section 5 "Bulk Migration Options" that are enhancements to the Bulk Migration process as referenced in Carrier Notification Letter SN91083967.

- After Hours/Weekend Migrations
- Two-Hour Go Ahead Notifications for SL1 non-coordinated migrations
- Time Windows for coordinated conversions
- Pre and Post order completion restoral process (Throwback)
- Same-Day end-user account migration
- CLEC to CLEC migration (UNE-P to UNE-L)

2) Additional revisions include interval reductions in the table in section 10.1 "**Bulk Migration Project Notification Interval**" .

- For a "Maximum of 99" telephone numbers the CCPM interval has been reduced from 7 business days to 4 business days.
- For "100-200" telephone numbers, the CCPM interval has been reduced from 10 business days to 6 business days.

UNE-P to UNE-L Bulk Migration

3. Service Description

The Unbundled Network Element – Port/Loop Combination (UNE-P) to Unbundled Network Element – Loop (UNE-L) Bulk Migration process may be used by a CLEC when migrating existing multiple non-complex UNE-P Services to a UNE-L offering.

All Bulk Migration orders will be project managed by a BellSouth Project Manager. Initially, the CLEC will submit required information to a BellSouth Customer Care Project Manager (CCPM) who after reviewing the bulk migration work effort with the field organizations will provide due dates back to the CLEC. Once the CLEC receives the due date information from the BellSouth Project Manager, the CLEC will electronically submit a Bulk Request for service order processing and provisioning. This allows migration of multiple UNE-P end-users to a UNE-L offering without submitting individual Local Service Requests.

UNE-P and UNE-L are defined below:

3.1 UNE-P

UNE-P is a UNE Port/Loop Switched Combination that combines a UNE local switch port and UNE loop to create an end-user-to-end-user transmission path and provides local exchange service. The CLEC may also choose to use the vertical services that are available through the features and functions of the local switch.

3.2 UNE-L

UNE-L is defined as the local loop network element that is a transmission facility between the main distribution frame (MDF) in BellSouth's central office and the point of demarcation at an end-user's premises. This facility will allow for the transmission of the CLEC's telecommunications services when connected to the CLEC's switch equipment. The local loop will require cross-connects for connection to the CLEC's collocation equipment. BellSouth does not provide telecommunications services with the UNE-L.

UNE-P to UNE-L Bulk Migration

4. Bulk Migration Requirements

Major requirements for UNE-P to UNE-L Bulk Migration process are listed below. For complete requirements, refer to the **UNE to UNE Bulk Migration** section of the **Local Ordering Handbook** *(formerly named "BellSouth Business Rules for Local Ordering")*

- Bulk Migration is available for migrating existing **non-complex** Port/Loop Combination services to Unbundled Loops with Local Number Portability (LNP).
- A UNE Loop will be provided for each ported telephone number formerly associated with the UNE-P Service.
- Complex UNE-P accounts are prohibited on Bulk Requests. Examples of Complex UNE-P are 2 Wire ISDN/BRI Digital Loop & Port UNE Combination, 4 Wire ISDN/PRI Digital Loop & Port UNE Combination, UNE-P Centrex, Digital Direct Integration Termination Service (DDITS), etc.
- The UNE-Ps that can be migrated are listed in the **UNE-P USOC** section.
- UNE-Ps can be migrated to the UNE-Ls listed in the **UNE-L USOC** section. These UNE-L types must be in the CLEC's Interconnection Agreement.
- Bulk Requests that require a change in existing loop facilities to a type of facility that is not available, resulting in a Pending Facility (PF) status on Due Date –7 days, must be cancelled by the CLEC and removed from the Bulk Request.
- All Existing Account Telephone Numbers (EATNs) on the Bulk Request must use the existing Regional Street Address Guide (RSAG) valid end-user address.
- All EATNs must be served from the same BellSouth Serving Wire Center (SWC).
- All UNE-Ps on a Bulk Request must be migrated to a single UNE-L type.
- No end-user moves or changes of address will be allowed on the Bulk Request.
- Non-Recurring rates for the specific loop type being requested will be charged.
- 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.
- A BellSouth Customer Care Project Manager (CCPM) will project manage the Bulk Request.
- CLEC must submit a **BellSouth UNE-P to UNE-L Bulk Migration Project Notification**, herein known as **Project Notification,** to the BellSouth CCPM prior to the CLEC's placing the mechanized Bulk Request.
- CLEC may specify Desired Due Dates (DDD) for each EATN. The BellSouth CCPM will negotiate due dates with Network Operations. Every effort will be made to accommodate the CLEC DDDs where force and load permits and minimum intervals are met.
- A minimum of two (2) EATNs and up to a maximum of ninety-nine (99) EATNs can be placed on a single Bulk Request.
- A maximum of twenty-five (25) end-user telephone numbers per EATN can be placed on a Bulk Request.
- No additional EATNs or end-user telephone numbers may be added to the ***BellSouth UNE-P to UNE-L Bulk Migration Project Notification*** form once it has been submitted to the BellSouth CCPM.

UNE-P to UNE-L Bulk Migration

Requirements (continued)

- Order Coordination-Time Specific option is not applicable for a Bulk Request.
- UNE-Ls that require a Service Inquiry and/or Unbundled Loop Modification are excluded from the Bulk Request process.
- A Reservation Identification (RESID) (also referred to as a Facility Reservation Number (FRN)) is required on the Bulk Request for Unbundled ADSL Compatible Loops, HDSL Compatible Loops and Unbundled Copper Loop - Designed (UCL-D). Refer to the **Unbundled ADSL and Unbundled HDSL Compatible Loop, UCL-Designed CLEC Information Packages** and **Loop Make-Up CLEC Information Package** for RESID/FRN requirements.
- When a Mechanized Loop Make Up with Facility Reservation Number (FRN) is requested, the CLEC must submit the Bulk Request with the FRN to BellSouth within 24 hours of receiving FRN.
- Firm Order Confirmation (FOC) will be sent on individual LSRs generated from the Bulk Request.
- Upon receipt of a Reject, CLEC must re-submit a corrected Bulk Request or submit a cancellation of the Bulk Request.

5. Bulk Migration Options

5.1 Order Coordination (Coordinated Hot Cut)

- Order Coordination (OC) is available in situations where there is a reuse of existing facilities for the UNE-L.
- OC is included with the UVL-SL2, 2 Wire ADSL and 2/4 Wire HDSL Loops at no additional charge.
- OC is available as a chargeable option for conversions to UVL-SL1, UCL-Non Designed and UCL-Designed Loops. OC must be requested at the EATN level on the Project Notification form. An OC charge will be applied to each loop on the EATN for which OC has been requested.

UNE-P to UNE-L Bulk Migration

Bulk Migration Options (continued)

5.2 After Hours/Weekend Migrations

- Migrations will typically be completed during normal working hours of 8 a.m. – 5 p.m. However, for CLECs that have customers who need cutovers completed outside of normal business hours, after hours/weekend migrations are available at the CLECs request.
- The Project Notification Form includes a column titled "Special Handling". The CLEC provides its desired "Day" and "After Hours/Weekend" time window for the selected accounts at the EATN level in the Special Handling column according to the table below:

Days	After-hours Time-Windows	Minimum Lines	Maximum Lines	Special Considerations	Add'l charges
Mon – Fri [1]	7 a.m. – 8 a.m.	10	25	NA	Per CLEC's IA[3]
Mon – Fri [1]	5 p.m. – 7 p.m.	10	50	NA	Per CLEC's IA[3]
Saturday [1]	8 a.m. – 5 p.m.	50	100	UVL-SL1 Non-Coordinated only	Per CLEC's IA[3]
Mon-Fri [2]	7 p.m. – 12 midnight 6 a.m. – 7 a.m.	Individual Case Basis	Individual Case Basis	CO work only – no outside dispatches	Yes Overtime

[1] Extended Basic Hours
[2] Extended Overtime Hours
[3] Interconnection Agreement

5.3 Two (2) hour Go Ahead Notification *(for Non-Coordinated Bulk Migrations)*

- For ***non-coordinated*** non-designed migrations, the CLEC will be notified within a maximum of two (2) hours of the cutover.
- A Go Ahead Notification will be sent to the CLEC by facsimile* or email for UVL-SL1 and UCL-ND non-coordinated migrations.
- Once the CLEC is notified of the cutover completion, the CLEC can then complete the necessary number porting activities.

***Note**: To change from fax to email notification, the CLEC should contact its BellSouth Local Contract Manager (LCM) and provide its Alternate Exchange Carrier Number (AECN) and email address.

UNE-P to UNE-L Bulk Migration

Bulk Migration Options (continued)

5.4 Time Windows for Coordinated Conversions

Time Windows for Coordinated Conversions are available for bulk migration orders at the CLEC's request as follows:

- There are two (2) time window options:
  - *8 a.m. – 12 p.m.*
  - *1 p.m. – 5 p.m.*
- CLEC will submit the Project Notification form and indicate the time window desired, at the EATN level, in the Special Handling column.
- Prior to the due date, the BellSouth CCPM will coordinate with Customer Wholesale Interconnection Network Services (CWINS) to ensure that CWINS and Network forces are scheduled and loaded to perform the migration in the designated 4-hour time window.
- On the due date, the coordinated cutover will take place using current provisioning processes.

5.5 Pre and Post Order Completion Restoral Process (or Throwback Process)

- The restoral process (also referred to as a throwback process) is available at the CLEC's request due to out-of-service issues and when the CLEC requires a restoral/throwback back to the UNE-P service.
- ***The restoral/throwback process can only occur within a twenty-four (24) hour window of the UNE-L order Due Date.***
- The CLEC will use follow the requirements in 5.5.1 or 5.5.2 or 5.5.3 below depending on whether the order is (1)coordinated/non-coordinated *completed* UNE-L order; (2)coordinated *not* completed UNE-L order; (3)non-coordinated *not* completed order:

UNE-P to UNE-L Bulk Migration

Bulk Migration Options (continued)

5.5.1 Coordinated or Non-Coordinated '*Completed*' UNE-L order

- CLEC submits Expedited LSR to the Local Carrier Service Center (LCSC) using one of the following fax numbers:
  - Birmingham Fax Server – 888-792-6271
  - Atlanta Fax Server – 888-581-6038
- The LSR Package requesting a throwback to UNE-P must contain the following information:

LSR Fields	Field information
LSR Remarks	Restoral UNE-L to UNE-P
REQTYP	M
Local Service Request Page	ACT = V MI = C, D
Port Service Page	LNA = V, G FA=N UNE-P Telephone Number
Port Service Page - ECCKT Field	UNE-L associated Loop Circuit ID
Directory Listing	Fill out as any other ACT=V migration request
EXP	Y

- The CLEC must advise the BellSouth CCPM of the restoral/throwback request.
- UNE-P Non-Recurring, Recurring and Expedite rates will be charged if applicable.

5.5.2 Coordinated '*Not Completed*' UNE-L Order

- CLEC calls the CWINS Provisioning Group to request restoral/throwback to the UNE-P and if the number porting has been completed, the CLEC requests port-back activity.
- Refer to the **CWINS Location and Hours** web site for CWINs telephone numbers.
- Orders will be placed in Missed Appointment (MA) status.
- CLEC submits supplemental (sup) order to cancel or reschedule conversion request.
- After receipt of the sup order FOC, the CLEC will create a new Subscription Version (SV).
- The CLEC must advise the BellSouth CCPM of the restoral/throwback request.

UNE-P to UNE-L Bulk Migration

Bulk Migration Options (continued)

5.5.3 Non-Coordinated *'Not Completed'* UNE-L order

- CLEC emails CWINS Enhanced Delivery (EnDI) Group to request restoral/throwback.
- CWINS EnDI email address is cwins.lnp@bellsouth.com
- Orders will be placed in MA status.
- If the number porting has been completed, the CLEC will call the Fleming Island LCSC Call Center at 800-872-3116 to request port-back activity before the CLECs submits a sup order.
- LCSC will advise the CLEC of port-back process.
- CLEC submits sup order to cancel or reschedule conversion request.
- After receipt of the sup order FOC, the CLEC will create a new Subscription Version (SV).
- The CLEC must advise the BellSouth CCPM of the restoral/throwback request.

5.6 Same-day End-user Account Migrations

Same day End-user Account Migrations are available upon CLEC request. Same day end-user account migration means that all lines associated with an end-user from the same Serving Wire Center will be assigned the same due date.

- CLEC will group the same end-user accounts together on the Project Notification form.
- CLEC will submit the Project Notification form and indicate the same Due Date desired, at the EATN level, in the Special Handling column.
- The BellSouth CCPM will coordinate with the appropriate internal groups to ensure that all end-user account migration activity is performed on the same due date.

5.7 CLEC to CLEC Migration of UNE-P to UNE-L

This process is available with the Bulk Migration process as follows:

- CLEC (CLEC A) to CLEC (CLEC B) Migration of UNE-P to UNE-L is defined as a facility based CLEC (CLEC B) that is migrating the UNE-Ps, previously held by another CLEC (CLEC A), to UNE-Ls.
- CLEC B will prepare the Project Notification form using the same Bulk Migration requirements as specified within this document.
- The Project Notification form must contain all the necessary UNE-P and UNE-L information according to the requirements of the form.
- CLEC B must have an end-user letter of authorization (LOA) on file (it must be available if requested).

6. Bulk Migration Submission/Flow Process

The Bulk Request Submission Process will consist of two main work activities. The CLEC will first submit a Project Notification. Once the Project Notification has been processed and returned to the CLEC, the CLEC will then prepare and input the mechanized Bulk Request. The Bulk Request must be submitted according to the guidelines contained in the **Local Ordering Handbook**. Below are the steps in the process :

Step #	Action
1	BellSouth CCPM receives Project Notification form from CLEC and negotiates/assigns Bulk Order Package Identifier (BOPI) and validates information (i.e., USOCs, Same Wire Center, etc.).
2	If pertinent information is missing on the Project Notification package, the form is returned to CLEC along with a reason(s) for return. BellSouth CCPM receives corrected Project Notification from the CLEC and continues the negotiation process.
3	BellSouth CCPM contacts BellSouth's Network organization and negotiates Due Date (DD) for all related Purchase Order Numbers (PONs) in the Bulk package and returns Bulk Notification Form including negotiated DD to the CLEC.
4	Upon receipt of the Bulk Notification Form that includes negotiated DD from BellSouth CCPM, CLEC submits Bulk Request package with negotiated dates for each EATN/PON via electronic ordering interface.
5	If the CLEC wants to supplement (SUP) (01,02,03) an individual PON, the request must be sent through the same electronic ordering system as the original Bulk Request.
6	At this point, the Bulk Request package will be processed for 1st level validation and any rejects will be mechanically generated to the CLEC.
7	The electronic ordering systems will accept the Bulk Request package, break the individual PONs into separate LSRs and populate the remaining required LSR fields from Operation Support System (OSS) systems prior to sending the individual LSRs downstream to the Local Number Portability (LNP) Gateway.
8	The LNP Gateway will perform 2nd level validations and provide any fallouts, per "business as usual" processes. The Local Carrier Service Center (LCSC) will handle all fallouts as normal. Any of the individual PONs that must be clarified will be sent back to the CLEC, business as usual.
9	After LNP Gateway issues the service orders, the LCSC will handle all manual service order fallouts as normal. The BellSouth Service Representative will send any PF and Missed Appointments (MA) to the CLEC via a jeopardy notice.
10	LNP Gateway will send an FOC on each individual PON associated with the Bulk Request package, to the CLEC.
11	The Project Manager will monitor PON, Service Order and Porting Statuses associated with the Bulk Request package. BellSouth's Service Representative and Project Manager will monitor the LNP gateway for the "Number Ported" messages and the Service Representative will handle manual port out order processing if required.

7. BellSouth UNE-P to UNE-L Bulk Migration Project Notification Process

Following is the Project Notification process:

- Complete the **BellSouth UNE-P to UNE-L Bulk Migration Project Notification** form according to the instructions.
- Electronically submit the ***Project Notification*** to the email address of the CLEC's assigned BellSouth Customer Care Project Manager (CCPM). For help with identifying a BellSouth CCPM , the CLEC should contact its BellSouth Customer Support Manager.
- The BellSouth CCPM will review the information submitted by the CLEC and will assign a Bulk Order Package Identifier (BOPI) that the CLEC will later use on the electronic Bulk Request.
- The BellSouth CCPM will coordinate with BellSouth's field forces to schedule the migration Due Dates.
- Once the review with the field forces is complete, the BellSouth CCPM will include the Due Dates on the ***Project Notification*** and return it to the CLEC.
- No additional EATNs or end-user telephone numbers may be added to the ***Project Notification*** form once it has been submitted to the BellSouth CCPM.

UNE-P to UNE-L Bulk Migration

8. UNE-P USOCs

The UNE-P Services that can be migrated to UNE-L are represented by the Port USOCs listed in the table below:

Port USOC	Unbundled Port/Loop Combination Element	Description of Combinations using an Unbundled Exchange Port (UEP):
UEPBX	UEPLX	UEP, Business, 2 Wire Analog Business Line Port, UNE=P Basic Class of Service
UEPRX	UEPLX	UEP, Residence, 2 Wire Analog Residence Line Port, UNE-P Basic Class of Service
UEPCO	UEPLX	UEP, Coin Basic Class of Service UNE-P
UEPBV	UEPLX	UEP, Remote Call Forwarding, Business Basic Class of Service
UEPVR	UEPLX	UEP, Remote Call Forwarding, Residence Basic Class of Service

9. UNE-L USOCs

Below are the UNE-L types and associated USOCs to which the UNE-Ps can be migrated:

Loop USOC	Description
UEAL2	2 Wire Unbundled Voice Loop – SL1
UEAL2, UEAR2	2 Wire Unbundled Voice Loop – SL2
UCLPW	2 Wire Unbundled Copper Loop/Short– Designed without manual Service Inquiry
UCL2W	2 Wire Unbundled Copper Loop/Long - Designed without manual Service Inquiry
UCL4W	4 Wire Unbundled Copper Loop/Short – Designed without manual Service Inquiry
UCL4O	4 wire Unbundled Copper Loop/Long – Designed without manual Service Inquiry
UEQ2X	2 Wire Unbundled Copper Loop – Non-Designed
UAL2W	2 Wire Unbundled ADSL Loop without manual Service Inquiry
UHL2W	2 Wire Unbundled HDSL Loop without manual Service Inquiry
UHL4W	4 Wire Unbundled HDSL Loop without manual Service Inquiry

UNE-P to UNE-L Bulk Migration

10 Intervals

10.1 Bulk Migration Project Notification Interval

- The "CCPM *Targeted Response Interval*" column in the table below represents the targeted number of business days in which the BellSouth CCPM will respond back to the CLEC.
- CLEC must submit the **Project Notification** in advance of the earliest CLEC's requested Desired Due Date (DDD) according to the "*Minimum # of days in advance to submit Project Notification*" column in the table below. This column represents the number of days that the Project Notification must be submitted in advance of the earliest DDD.
- *"Minimum # of days*" includes the interval for the BellSouth Customer Care Project Manager to negotiate the Due Dates. It also allows three (3) days for the CLEC to correct, process and submit mechanized Bulk Request and it includes 14 days in order to meet the 14-business day submission requirement for the Bulk Request.
- The BellSouth CCPM will attempt, where possible, to assign the work such that migrations occur on the requested DDD.

# of end-user Tel. Numbers	CCPM Targeted Response Interval	CLEC days after receipt from Proj Mgr	Bulk Request Submission Requirement	Minimum # of days in advance to submit Project Notification
Maximum of 99	4 business days	3 business days	14 business days	21 business days
100-200	6 business days	3 business days	14 business days	23 business days
201 +	To be determined	3 business days	14 business days	Contact CCPM

10.2 Bulk Request Service Order Intervals

- The BellSouth CCPM will negotiate the Bulk Request due dates with BellSouth's provisioning personnel and will communicate the due date to the CLEC.
- The CLEC must submit the Bulk Request and it must be accepted by the mechanized system at least 14 business days in advance of the earliest Due Date for any end-user telephone number to be migrated.

10.3 Example of Intervals

An example of Intervals follows:

- March 1, 2004 - CLEC submits Project Notification with 87 end-user telephone numbers to the BellSouth CCPM
- March 5, 2004 (4 business days) – the BellSouth CCPM sends the Project Notification with firm Due Dates to the CLEC
- March 8 – March 10 (3 business days) – CLEC will prepare and submit mechanized Bulk Request via the electronic interface.
    - March 30, 2004 (14 business days) – the earliest assigned Due Date on the Project Notification returned to the CLEC.

11. Acronyms

AECN	Alternate Exchange Carrier Number
ADSL	Asymmetrical Digital Subscriber Line
BOPI	Bulk Order Package Identifier
CCPM	Customer Care Project Manager
CHC	Coordinated Hot Cut
CLEC	Competitive Local Exchange Carrier
CWINS	Customer Wholesale Interconnection Network Services
DDD	Desired Due Date
EATN	Existing Account Telephone Number
EnDI	Enhanced Delivery
FOC	Firm Order Confirmation
FRN	Facility Reservation Number
HDSL	High-Bit-Rate Digital Subscriber Line
LCSC	Local Carrier Service Center
LNP	Local Number Portability
LSR	Local Service Request
MDF	Main Distribution Frame
OC	Order Coordination
OSS	Operation Support System
PON	Purchase Order Number
RESID	Reservation Identification
RSAG	Regional Street Address Guide
SUP	Supplemental
SWC	Serving Wire Center
UCL-D	Unbundled Copper Loop – Designed
UCL-ND	Unbundled Copper Loop – Non-Designed
UNE-P	Unbundled Network Element-Port/Loop Combination
UNE-L	UNE Loop

Batch Due Date Scheduler

"Currently Under Development"

- ***Implementation October 2004***
- ***Replaces current spreadsheet process***
- ***Properties***
  - ***Allows CLECs the ability to select Batch migration due dates from a WEB-based application***
  - ***Provides CLEC with BOPI (Bulk Order Project ID)***
  - ***Maximum of 200 loops per day per central office***
    - ***Maximum of 125 loops per day per central office per CLEC***
    - ***Multiple CLECs can schedule in the same central office not to exceed the 200 loop limit***
  - ***Allows migration selections for dispatched and non-dispatched***
  - ***Allows special handling request for after hour scheduling***
  - ***Allows special handling for AM and PM windows on coordinated migrations***

Please refer to the Direct Testimony of Ken Ainsworth at pages 3-9 for descriptions of coordinated, coordinated time-specific and non-coordinated hot cuts.

Non-coordinated Notification Web Tool

"Under Development"

- **Provides list of non-coordinated pending orders by due date**
- **Provides list of "go ahead" notifications with time stamp**
- **Provides CLEC no dial tone notification with time stamp**
- **Attached are draft screen prints of information to be contained in system**

BELLSOUTH

(CLEC NAME)
CLEC LIST OF PENDING ORDERS
Due Date 02/22/2004
7:00AM

SVCREQID	REUSESVCORD	PON	PROJNUM	*OUTSIDE DISP* OSP REQ	*INSIDE DISP* CO REQ	CIRCUIT ID
NR111111	CQREUxxxxxx	PON123456	ABC12345	Y		80.TYNU.xxxxxx..SB
NR222222	CQREUxxxxxx	PON123457		Y		80.TYNU.xxxxxx..SB
NR333333	CQREUxxxxxx	PON123458		N	Y	80.TYNU.xxxxxx..SB
NR444444	CQREUxxxxxx	PON123459		Y		80.TYNU.xxxxxx..SB
NR555555	CQREUxxxxxx	PON123460		N	Y	80.TYNU.xxxxxx..SB
NR666666	CQREUxxxxxx	PON123461	123ABC	N	Y	80.TYNU.xxxxxx..SB

GRAND TOTAL **6**

BELLSOUTH

GO-AHEAD NOTIFICATION
January 22, 2004

CLEC: (CLEC OCN)

BellSouth SVC ORD Number	Due Date	Wire Center	Circuit Identification	Purchase Order Number	Project Number	Notification Date/Time
NR111111	1/22/04	954761	80.TYNU.xxxxxx..SB	PON123456	ABC123 45	1/22/04 10:32 am
NR222222	1/22/04	954761	80.TYNU.xxxxxx..SB	PON123457		1/22/04 10:42 am
NR333333	1/22/04	954761	80.TYNU.xxxxxx..SB	PON123458		1/22/04 10:52 am
NR444444	1/22/04	954761	80.TYNU.xxxxxx..SB	PON123459		1/22/04 10:53 am

WEB Report Updated 1/22/04 @ 11:15a

BELLSOUTH

Currently Under Development

"CLEC No Dial Tone Notification"
January 22, 2004

CLEC: (CLEC OCN)

The following order/circuit (s) have been have been placed into CLEC – No Dial Tone status.

BellSouth SVC ORD #	Due Date	Circuit Identification	Purchase Order Number	Project Number	Placed on CLEC – No Dial Tone Status
NR777777	1/23/04	80.TYNU.667xxxSB	PON123456		1/22/04 10:30 am
NR555555	1/22/04	80.TYNU.xxxxxxSB	PON123460		1/21/04 09:00 am

WEB Report Updated 1/22/04 @ 11:15a

RBOC FOOTPRINT LINE DENSITY COMPARISON			
State	**Square Miles***	**Lines****	**Density (Lines/Sq. Mile)**
Florida	11,494	6,351,244	553
New York	23,996	9,581,324	399

*From HCPM Model Results (January 20, 2000), www.fcc.gov/wcb/tapd/hcpm.
**ARMIS 2002, report 43-01.