**ALABAMA PUBLIC SERVICE COMMISSION**

COUNTY OF Fulton
STATE OF Georgia

BEFORE ME, the undersigned authority, duly commissioned and qualified in and for the State and County aforesaid, personally came and appeared Ronald M. Pate, who being by me first duly sworn deposed and said that he/she is appearing as a witness on behalf of BellSouth Telecommunications, Inc. before the Alabama Public Service Commission in Docket No. 29054, IN RE: Implementation of the Federal Communications Commission's Triennial Review Order (Phase II – Local Switching for Mass Market Customers), and if present before the Commission and duly sworn, his/her statements would be set forth in the annexed direct testimony consisting of 13 pages and 2 exhibits.

Ronald M. Pate

SWORN TO AND SUBSCRIBED BEFORE ME
THIS 14th DAY OF JANUARY, 2004

Linda M. Hobbs
Notary Public

LINDA M. HOBBS NOTARY PUBLIC GWINNETT COUNTY, GA

Notary Public, Gwinnett County, Georgia
My Commission Expires March 17, 2007

BELLSOUTH TELECOMMUNICATIONS, INC.

DIRECT TESTIMONY OF RONALD M. PATE

BEFORE THE ALABAMA PUBLIC SERVICE COMMISSION

DOCKET NO. 29054, PHASE II

January 20, 2004

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

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

Q. PLEASE SUMMARIZE YOUR BACKGROUND AND EXPERIENCE.

A. I graduated from the Georgia Institute of Technology in 1973, with a Bachelor of Science degree. In 1984, I received a Masters of Business Administration degree from Georgia State University. My professional career spans over 30 years of general management experience in operations, logistics management, human resources, sales, and marketing. I joined BellSouth in 1987, and have held various positions of increasing responsibility since that time.

Q. HAVE YOU TESTIFIED PREVIOUSLY?

A. Yes. I have testified before the Public Service Commissions in Alabama, Florida, Georgia, Louisiana, South Carolina and Kentucky, the Tennessee Regulatory Authority, and the North Carolina Utilities Commission.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. The purpose of my testimony is to describe BellSouth's ordering process used when a Competitive Local Exchange Carrier ("CLEC") migrates existing multiple non-complex Unbundled Network Element – Port/Loop Combinations (UNE-P) Services to an Unbundled Network Element – Loop (UNE-L) batch migration offering, including UNE-L plus local number portability (LNP). BellSouth's "UNE-to-UNE bulk migration ordering process," as it has been labeled by BellSouth, is the ordering mechanism for the batch hot cut process that is discussed at length in the testimony of BellSouth's witness, Mr. Ken Ainsworth. Throughout this testimony, I will use the terms "batch" and "bulk" interchangeably when referring to the process of migrating UNE-P to UNE-L in batches.

I also will discuss the scalability of BellSouth's OSS.

ORDERING UNE-TO-UNE BATCH MIGRATIONS

Q. PLEASE DESCRIBE THE ORDERING PROCESS FOR BELLSOUTH'S BATCH MIGRATION PROCESS.

A. The ordering mechanism for the batch migration process is the UNE-to-UNE batch migration request. The purpose of this ordering mechanism is to allow CLECs to submit

multiple UNE-P to UNE-L conversion requests in a streamlined and efficient manner. In other words, the UNE-to-UNE batch migration ordering process allows a CLEC to migrate multiple UNE-P end-users to a UNE-L offering without submitting multiple, individual local service requests ("LSRs").

Q. WHAT ARE SOME OF THE BENEFITS OF THE UNE-TO-UNE BATCH MIGRATION PROCESS?

A. With this electronic process, a CLEC can migrate two to 99 UNE-P accounts to UNE-L on a single submission. Depending on the conditions, CLECs may submit UNE-to-UNE batch migration orders for up to 2,475 end users. I will discuss this in more detail below.

Q. WHEN DID BELLSOUTH IMPLEMENT ELECTRONIC ORDERING OF UNE-TO-UNE BATCH MIGRATION?

A. BellSouth implemented a fully-mechanized, electronic UNE-to-UNE batch migration ordering process on March 29, 2003 with Release 12.0, as a result of change request CR0215.

Before implementation of the electronic process, BellSouth implemented a manual batch ordering process on December 4, 2002.

Q. DID A CLEC SUBMIT CHANGE REQUEST CR0215?

A. Yes, on November 11, 2000, AT&T submitted CR0215 to the Change Control Process ("CCP"). This change request asked BellSouth to develop a process for migrating customers from UNE-P to UNE-L in batches. Below is an excerpt from AT&T's change request:

> AT&T would like BellSouth to implement the ability to migrate UNE to UNE orders in bulk. *For example, AT&T is providing service to customers with port/loop combinations (UNE-P) and wants to migrate a group of customers from UNE-P to UNE-L (BellSouth UNE loop/LNP with AT&T switch).* AT&T would then send a spreadsheet/bulk migration order to BellSouth containing pertinent customer specific information. (Emphasis added.)

Attached as Exhibit RMP-1 is the change request. The change request is also posted at BellSouth's Interconnection web site.[1]

Q. WAS CHANGE REQUEST CR0215 IMPLEMENTED ACCORDING TO THE PROCEDURES OF THE CHANGE CONTROL PROCESS ("CCP")?

A. Yes. Change request CR0215 was handled by the CCP from its inception through its implementation in March 2003. Let me provide a chronology of the events leading to the implementation of CR0215.

| | |
|---|---|
| November 8, 2000 | AT&T submitted CR0215. |
| December 18, 2000 | The CCP placed CR0215 in pending status. |
| January 31, 2001 | The CLECs prioritized CR0215 as 7th of 14 pre-ordering and ordering change requests. |
| April 25, 2001 | The CLECs re-prioritized CR0215 as 8th of 36 pre- |

[1] http://www.interconnection.bellsouth.com/markets/lec/ccp_live/docs/statuses/change_requests/cr0215.pdf

| | |
|---|---|
| | ordering and ordering change requests. |
| February 27, 2002 | CR0215 was scheduled for Release 11.0. |
| March 15, 2002 | BellSouth distributed draft user requirements to the CLECs. |
| April 10, 2002 | BellSouth distributed updated draft user requirements to the CLECs. |
| April 23, 2002 | BellSouth and the CLECs held a meeting to discuss the user requirements. |
| June 20, 2002 | BellSouth distributed updated user requirements to the CLECs. |
| July 9, 2002 | BellSouth and the CLECs held a meeting to discuss the user requirements. |
| October 10, 2002 | BellSouth and AT&T discussed BellSouth's ability to support 99 LSRs per bulk order rather than 100. |
| October 24, 2002 | BellSouth distributed updated user requirements. |
| November 7, 2002 | CR0215 was moved to Release 12.0 |
| March 29, 2003 | CR0215 was implemented with Release 12.0 |
| | |

Q. WHICH COMPANIES PARTICIPATED IN THE USER REQUIREMENTS MEETINGS?

A. At the user requirements meeting that occurred on April 23, 2002, representatives of Network Telephone, BTI, Telcordia, AT&T, and Accenture participated, in addition to representatives of BellSouth.

At the meeting on July 9, 2002, representatives of BellSouth, Allegiance, Network Telephone, AT&T, and Nuvox were in attendance. Every CLEC had the opportunity to participate in the development of this electronic ordering process and AT&T, in particular, was actively involved.

Q. DOES BELLSOUTH PROVIDE INFORMATION FOR CLECS THAT ARE INTERESTED IN LEARNING ABOUT AND IMPLEMENTING THE ELECTRONIC ORDERING OF UNE-TO-UNE BATCH MIGRATIONS?

A. Certainly. The business rules for ordering UNE-to-UNE batch migrations are contained in the *Local Ordering Handbook* ("LOH"), which is available at BellSouth's interconnection web site.[2] BellSouth has also provided CLECs with the *UNE-Port/Loop Combination (UNE-P) to UNE-Loop (UNE-L) Bulk Migration CLEC Information Package* ('CLEC information package"). This document is attached as Exhibit RMP-2, and also is available at the interconnection web site.[3] The CLEC information package is intended to provide CLECs with general ordering information specific to the UNE-to-UNE batch migration process. In addition, the Local Exchange Navigation System Guide ("LENS Guide") contains ordering instructions for those CLECs that use the LENS ordering interface. The LENS Guide is posted at the Interconnection web site.[4]

Q. WHAT ARE THE CRITERIA THAT CLECS SHOULD CONSIDER WHEN USING THE UNE-TO-UNE BATCH MIGRATION PROCESS?

A. The batch migration ordering process must meet the same requirements as the batch hot cut process as a whole. These requirements are described in full in the LOH and summarized in the CLEC information package. Some of the requirements are: the batch migration request must be project managed; the batch migration request must contain a minimum of two LSRs; the batch migration request may contain up to and including 99

[2] http://www.interconnection.bellsouth.com/guides/html/leo.html
[3] http://www.interconnection.bellsouth.com/guides/html/unes.html
[4] http://www.interconnection.bellsouth.com/guides/html/lens_tafi.html

LSRs; the batch migration request must be for the same loop type; the existing UNE-P combinations must be non-complex; and, the loops must all be in the same wire center.[5]

Q. PLEASE DESCRIBE HOW THE CLEC USES THE UNE-TO-UNE BATCH MIGRATION PROCESS.

A. As explained by Mr. Ainsworth, BellSouth's process is as follows:

1. A Bulk Notification form is sent from the CLEC to the BellSouth Project Manager (PM) to identify those UNE-P accounts to be converted to a UNE-Loop.
2. The PM reviews the form to determine if the accounts qualify for handling by the Bulk migration process and if the form entries are complete and appear accurate.
3. The PM sends the form to the Network Single Point of Contact (SPOC) to determine load variations, personnel availability, and due date schedule to be applied to each of the Earning Account Telephone Numbers (EATN) accounts. The PM will return the Bulk Notification form to the CLEC within the following time period based on the number of telephone number (TN) requests: 7 business days to return to the CLEC a form with up to 99 TNs and 10 business days to return a form with between 100 to 199 TNs. The Project Manager will negotiate the return interval for requests of 200+ TNs.
4. The Bulk Notification form that has now been updated to include due dates for each of the accounts will be returned to the CLEC via the PM.

[5] 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).

5. The CLEC has three (3) business days to submit an accurate Mechanized Bulk Local Service Request (LSR) containing the accounts and due dates to BellSouth's Local Carrier Service Center (LCSC). The mechanized system will create individual service orders for each of the accounts that will be provisioned and completed.
6. The BellSouth Customer Wholesale Interconnection Network Services (CWINS) Center will advise the PM of any service orders that will not be completed on the due date.
7. The PM will advise the CLEC on current order status.

Q. IN STEP 5 ABOVE, YOU MENTIONED THAT THE CLEC MUST SUBMIT A BATCH MIGRATION REQUEST CONTAINING THE ACCOUNTS AND DUE DATES. COULD YOU DISCUSS THIS PROCESS IN MORE DETAIL?

A. Yes. CLECs can use either the EDI, TAG, or LENS ordering interfaces to place a batch migration request. The CLEC first completes information for the entire batch migration package. The LOH refers to this as the "global level."[6] This information includes the Bulk Order Package Identifier ("BOPI") and information about the wire center. The CLEC also completes information about the CLEC initiator and the implementation contact person. If the migration involves designed loops, the CLEC must include contact information, including an address, for the design contact person.[7] The CLEC only enters this global level information once for the entire package.

[6] The LENS Guide refers to this level as the "Package Level."
[7] Designed loops require BellSouth to perform design engineering activities.

Next, the CLEC completes the information needed for each account of the two to 99 accounts that will be migrated. The LOH refers to this as "account level" and "line level" activity. When writing the user requirements, BellSouth developed this functionality so that the CLECs would only fill out a minimum number of fields. Some of the fields that the CLECs are required to complete include the purchase order number ("PON"), the end user's name, the billing account number ("BAN1"), the Earning Account Telephone Number ("EATN"), and the line number ("LNUM"). The complete list of fields is described in the LOH.[8]

Q. MUST THE CLECS PROVIDE AN ADDRESS FOR EACH ACCOUNT THAT THEY ARE MIGRATING?

A. No, CLECs do not include an address for each account. Only if the migration involves designed loops must the CLEC include address information for the design contact person, and only at the "global level" of the batch migration request.

BellSouth has simplified the number of fields that the CLECs must complete at the "account level" and "line level" for each end user on the batch migration request. BellSouth was able to reduce the required information to the minimal amount necessary for conversions from UNE-P to UNE-L. To create the individual LSRs for UNE-L, BellSouth needs information that the CLEC has, such as the cable and pair information, the cable ID, and, when necessary, the reservation number for the facility (the Facility Reservation Number or "FRN"). BellSouth could not reduce the number of required fields for UNE-P to UNE-L migration to the number used when the CLECs submit a "TN

[8] The LENS Guide also contains similar information for users of the LENS interfaces. The "account level" and "line level" fields are referred to as the "PON level" in the LENS Guide.

migration" or "Telephone Migration" LSR. When the CLEC converts a retail or resale or UNE-P end user to its UNE-P, the CLEC can submit an LSR with just the end user's telephone number (in addition to information about the gaining CLEC), hence the name "TN migration."

Q. PLEASE DESCRIBE WHAT HAPPENS WHEN THE CLEC SUBMITS THE BATCH MIGRATION REQUEST VIA THE EDI, TAG, OR LENS ORDERING INTERFACES.

A. After BellSouth's systems receive the batch migration request, the first level edits are applied in order to check the request for errors. If there are no first level errors in the batch migration request, BellSouth's systems will accept the batch migration request and break the accounts into individual parts. BellSouth's systems then generate the individual LSRs, using the information provided by the CLEC at the account and line levels of the batch migration. For example, the systems take the telephone number that the CLEC provided for an individual PON and retrieve an address from the address database (the Regional Street Address Guide or RSAG). The individual LSRs are checked against the second and third level edits to determine if the data on the LSR is correct. Accurate and complete LSRs flow-through BellSouth's OSS to the service order generator (Service Order Communications System or "SOCS"), where a service order is generated from each LSR. BellSouth then sends a firm order confirmation ("FOC") to the CLEC for each LSR. The service orders then move downstream for provisioning, including updating E911 databases and directory listing information, just as they would for service orders created from LSRs submitted individually.

Q. WHAT HAPPENS WHEN A BATCH MIGRATION REQUEST CONTAINS AN ERROR?

A. After BellSouth's systems receive the batch migration request, they check the request for errors. BellSouth's systems perform these checks by applying first level edits to the batch migration request. The first level edits are straightforward and basic – they are related to field length, allowable characters, required, optional, and "not allowed" fields, and the relationships between fields. BellSouth checks the entire batch migration request for these types of errors before returning it to the CLECs. If a batch migration request contains a first level error or errors, BellSouth returns it to the CLEC. The CLEC may then correct the error or errors and submit a supplemental batch migration request to BellSouth.

Q. WHY DOES BELLSOUTH RETURN THE ENTIRE BATCH REQUEST TO THE CLEC?

A. The first level edits simply determine if the CLEC provided enough information so that BellSouth's systems can create the individual LSRs. If the CLEC has not provided the correct information in those fields, then BellSouth cannot generate the individual LSRs. Also consider that, if the CLEC makes an error or errors in the "global" section of the request, all the potential LSRs in the request would be affected. At this stage of the process, returning the incorrect batch migration request to the CLEC is equivalent to rejecting and returning an incorrect LSR that a CLEC has submitted individually.

Q. AFTER BELLSOUTH'S SYSTEMS HAVE CREATED INDIVIDUAL LSRS FROM THE BATCH MIGRATION REQUEST, WHAT HAPPENS IF AN ERROR IS DETECTED IN AN INDIVIDUAL LSR?

A. After BellSouth's systems have created the individual LSRs from the batch migration request and information in BellSouth's systems, BellSouth will clarify any mistakes that are found in the individual LSRs on an individual basis. Thus, if one LSR out of 99 has an error, the 98 error-free LSRs will continue to process. BellSouth finds these errors when its systems apply the second and third level edits. Level 2 data edits verify that the fields in the LSR contain the correct information, such as whether the telephone number supplied by the CLEC is known by BellSouth's systems. Third level edits continue the evaluation of the data in the fields of the LSR, such as comparing a given Universal Service Order Code ("USOC") and any associated Field Identifiers ("FIDs") in a service order to ensure that the FIDs are allowed and in the proper order.

Therefore, if any data errors are found in any of the LSRs, BellSouth then clarifies the LSR individually with the CLEC, just as it would with any LSR submitted individually.

Q. EARLIER YOU STATED THAT A CLEC MAY REQUEST A MAXIMUM OF 99 ACCOUNTS IN A BATCH MIGRATION. PLEASE PROVIDE MORE DETAIL.

A. Each UNE-to-UNE batch migration request may contain a maximum of 99 accounts, each identified by a PON and an Earning Account Telephone Number ("EATN"). A CLEC can, however, include a maximum of 25 end-user telephone numbers per EATN. If a CLEC has accounts of this nature in the same wire center, the CLEC could

conceivably migrate as many as 2,475 end users (99 EATN X 25 TN) per batch migration.

OSS SCALABILITY

Q. ARE BELLSOUTH'S OSS SCALABLE?

A. Yes, BellSouth's existing ordering OSS are scalable, and are designed to accommodate both current and projected volumes of LSRs.

The Florida KPMG Third Party Test, at Section TVV2, provided confirmation that BellSouth's ordering OSS responded effectively to normal, peak and stress volume testing. "Normal" volume was defined as 100% of projected LSR submissions, and "peak" and "stress" volumes were defined as 150% and 250% of "normal," respectively. BellSouth passed all of these test criteria.

BellSouth's commercial usage further confirms the ability of BellSouth's OSS to handle high volumes. For the three month period August through October, 2003, an average of 798,558 LSRs were submitted via the electronic ordering OSS applications. Moreover, it is important to remember, even if all UNE-P orders changed to UNE-L, that does not change the total ordering volume that BellSouth is handling very capably today.

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes.