

ALABAMA PUBLIC SERVICE COMMISSION

COUNTY OF Lulton
STATE OF Georgia

BEFORE ME, the undersigned authority, duly commissioned and qualified in and for the State and County aforesaid, personally came and appeared KEN AINSWORTH; 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 Rebuttal testimony consisting of 26 pages and 5 exhibits.

Ken R. Ainsworth

SWORN TO AND SUBSCRIBED BEFORE ME
THIS 3rd DAY OF MARCH, 2004

Micheale F. Bixler Notary Public

MICHEALE F. BIXLER
Notary Public, Douglas County, Georgia
My Commission Expires November 8, 2005

1 BELL SOUTH TELECOMMUNICATIONS, INC.
2 REBUTTAL TESTIMONY OF KENNETH L. AINSWORTH
3 BEFORE THE ALABAMA PUBLIC SERVICE COMMISSION
4 DOCKET NO. 29054 (PHASE II)
5 MARCH 5, 2004
6

7 Q. PLEASE STATE YOUR NAME, YOUR BUSINESS ADDRESS, AND YOUR
8 POSITION WITH BELL SOUTH TELECOMMUNICATIONS, INC.
9 ("BELL SOUTH").
10

11 A. My name is Ken L. Ainsworth. My business address is 675 West Peachtree
12 Street, Atlanta, Georgia 30375. My title is Director – Interconnection Operations
13 for BellSouth.
14

15 Q. ARE YOU THE SAME KEN L. AINSWORTH WHO EARLIER FILED DIRECT
16 TESTIMONY IN THIS DOCKET?
17

18 A. Yes.
19

20 Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY BEING FILED
21 TODAY?
22

23 A. I respond to portions of the direct testimonies of Mr. James D. Webber and Ms.
24 Sherry Lichtenberg on behalf of MCI, and Mr. Mark David Van de Water on
25 behalf of AT&T with regard to BellSouth's hot cut processes.

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Q. ALL PARTIES HAVE DIRECTED THIS COMMISSION TO VARIOUS PORTIONS OF THE TRO AND THE RULES IN SUPPORT OF THEIR POSITIONS IN THEIR DIRECT TESTIMONY. WHAT IS THE IMPACT OF THE D.C. CIRCUIT COURT OF APPEALS ORDER ON THE TRO IN THIS PROCEEDING?

A. Currently the impact of the DC Circuit Court's opinion is unclear. At the time of filing this testimony, the DC Court had vacated large portions of the rules promulgated as a result of the TRO, but stayed the effective date of the opinion for at least sixty days. Therefore my understanding is that the TRO remains intact for now, but its content, and the rules adopted thereto, must be suspect in light of the court's harsh condemnation of large portions of the order. Accordingly, we will reserve judgment, and the right to supplement our testimony as circumstances dictate, with regard to the ultimate impact of the DC Court's order on this case.

Q. BEFORE TURNING TO SPECIFICS, CAN YOU ADDRESS GENERALLY WHAT IS MISSING FROM THE COMPETITIVE LOCAL EXCHANGE CARRIERS' ("CLECS") DIRECT TESTIMONY?

A. Certainly. What is notably missing from the CLECs' testimony in this docket are alternative batch hot cut processes. The CLECs criticize BellSouth's process and speculate (without corroboration) about hypothetical things that could go

1 wrong, but not one CLEC proposes any concrete alternative. AT&T purports to
2 propose some “characteristics” of a process, but characteristics hardly constitute
3 an operational process. This Commission is charged with adopting and
4 implementing a batch hot cut process within 9 months of the effective date of this
5 order. See ¶ 460 (“state commissions must, within nine months from the
6 effective date of this Order, approve and implement a batch cut process...”).
7 BellSouth is the only participant in this proceeding that has complied with the
8 purpose of this docket and the directives of the FCC and presented this
9 Commission with a compliant batch hot cut process.

10
11 **A. The Hot Cut Process**

12
13 **Q. WHILE YOU CAN ADDRESS EACH OF THE CLECS’ TESTIMONIES
14 SPECIFICALLY LATER IN YOUR REBUTTAL, PLEASE ADDRESS
15 GENERALLY THE MAIN CLEC ALLEGATIONS REGARDING BELLSOUTH’S
16 HOT CUT PROCESS.**

17
18 **A. Certainly. The CLECs generally complain about six (6) aspects of the process,
19 each of which BellSouth has addressed:**

20
21 (1) Go Ahead Notifications – BellSouth will provide the CLEC with notification via
22 telephone (coordinated cuts) after each cut, or via email or fax (non-coordinated
23 cuts) to allow the CLEC to port the number. For coordinated cuts, BellSouth’s
24 data shows that it provides the go-ahead notification, on average, in less than

1 two (2) minutes. For non-coordinated cuts, BellSouth will notify the CLEC of hot
2 cut completions within 2 hours.

3
4 (2) Database impacts – BellSouth’s hot cut process will not adversely impact
5 database updates. With respect to E911, the end user’s address will remain the
6 same regardless of the end user’s local service provider. Consequently, even if
7 for some reason there was delay in updating the local service provider in the
8 E911 database, it would not impact the ability of emergency personnel to find the
9 end user.

10
11 (3) After hours cuts – BellSouth’s batch process does allow for after hours and
12 Saturday cuts. BellSouth will not dispatch personnel late in the evening for
13 safety reasons – thus, after hours cuts that require dispatch may not be possible.

14
15 (4) Provision of all end user lines on same day – BellSouth’s batch process will
16 guarantee that an end user’s account will all be cut on the same day.

17
18 (5) Exclusion of certain loop types – BellSouth designed the batch hot cut
19 process to convert UNE-P arrangements to UNE-L arrangements given the
20 predominance of UNE-P and the Federal Communications Commission’s
21 (“FCC’s”) Order focused on UNE-P conversions. Specifically, ¶ 489 of the TRO
22 provides that “state commissions should adopt a batch cut over ‘increment’ for
23 migrating customers served by unbundled loops combined with unbundled local
24 switching to unbundled stand-alone loops.” This sentence means UNE-P to
25 UNE-L.

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(6) CLEC-to-CLEC migrations – BellSouth will perform hot cuts for CLEC-to-CLEC migrations in the batch process. The issues about which the CLECs complain are issues regarding the CLECs’ inability to exchange information amongst themselves. The reliability of the CLECs’ information is not a flaw in BellSouth’s process.

Go-Ahead Notifications

Q. PLEASE EXPLAIN BELLSOUTH’S “GO AHEAD” NOTIFICATION PROCESS TO CLECs.

A. BellSouth developed the process for “Go Ahead” notifications with the needs of the CLEC in mind. When a CLEC wishes to have real time notification of hot cut completions, BellSouth offers coordinated hot cuts, which include a call to the CLEC upon completion of the hot cut. As I stated in my direct testimony, for the last year, BellSouth has made these notifications on average in less than two (2) minutes after the hot cut is complete.

For CLECs who do not wish to order coordinated hot cuts, BellSouth provides “Go Ahead” notifications either by e-mail or fax. The CLEC determines the method of delivery. BellSouth delivers these notifications at an account level, which means that for each account being converted, a notification is sent. These notifications are driven by the closure of the work steps by the Central Office (“CO”) and/or Field Technicians involved in the hot cut. For batch orders, the

1 technicians close out their work steps within two (2) hours of the actual hot cut.
2 Once the work steps are completed, an automated program is activated to send
3 either the fax or e-mail notification.

4
5 BellSouth is currently developing a web-based notification tool that will be used
6 to provide CLECs with another alternative for receiving "Go-Ahead" notifications
7 for non-coordinated conversions. This is currently scheduled to be available to
8 the CLECs in June 2004. Exhibit KLA-4 outlines specific details and provides
9 sample screen prints of the information to be contained in the web-based
10 notification tool.

11
12 *Database Updates*

13
14 Q. ON PAGE 26 OF HER TESTIMONY, MS. LICHTENBERG SUGGESTS THAT IT
15 REQUIRES MANUAL COORDINATION BETWEEN THE ILEC AND THE CLEC
16 "TO CREATE AND ISSUE THE E911, AND LNP TRANSACTIONS" INVOLVED
17 IN A HOT CUT. DO YOU AGREE?

18
19 A. As far as E911 and LNP are concerned, there is no need for any manual
20 coordination. Routing to the number, if it is ported, is a direct result of the
21 download of information from the Number Portability Administration Center
22 ("NPAC"), which is a mechanized process that occurs everyday as numbers port.
23 It is the responsibility of the port-to carrier to notify NPAC that the port has
24 completed. Then, NPAC downloads the information and the routing is changed
25 and no manual activity occurs.

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Q. MS. LICHTENBERG ALLEGES, ON PAGES 37-38 OF HER TESTIMONY, THAT THE HOT CUT PROCESS WILL CAUSE ERRORS IN THE E911 DATABASE. IS THIS TRUE?

A. No. Updates to the E911 database are triggered by a disconnect order. BellSouth has procedures in place that ensure timely issuance and completion of the disconnect order that unlocks the E911 database records. BellSouth’s disconnect service order to unlock the E911 database records has the same due date as the CLEC’s request to port the number thereby minimizing errors in the E911 database. In the rare event that the completion of the service order is delayed, there will be no impairment to the end user’s ability to effectively contact E911 in that the end user’s address remains the same – it is only the identity of the service provider that changes. Thus, emergency personnel can obtain the address, regardless of the change in local service providers.

Q. ON PAGE 46 OF HER TESTIMONY, MS. LICHTENBERG COMPLAINS ABOUT BELLSOUTH’S POLICY OF ONLY ALLOWING “AS IS” DIRECTORY LISTING CHANGES FOR THE FIRST MIGRATION IN A BATCH HOT CUT. ARE HER COMPLAINTS VALID?

A. No. BellSouth does allow migration of directory listings “as is” on subsequent requests, when appropriate. All characteristics of the directory listing to be migrated “as is” must remain unchanged. For example, record type (“RTY”), listing type (“LTY”), alpha listing identifier code (“ALI”), listing telephone number,

1 etc. Any change in the way the listing is set up on the existing customer service
2 record does not qualify for an “as is” migration.

3
4 *After-Hours Cuts*

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6 Q. MR. VAN DE WATER ALLEGES, ON PAGE 22 OF HIS TESTIMONY, THAT
7 BELLSOUTH'S BATCH HOT CUT PROCESS IS FLAWED BECAUSE IT DOES
8 “NOT ALLOW FOR AFTER-BUSINESS-HOURS HOT CUTS.” IS THIS
9 CORRECT?

10
11 A. No. BellSouth will include after hours and Saturday cuts in the batch process.

12
13 *End-user lines*

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15 Q. MR. VAN DE WATER ALLEGES, ON PAGE 22 OF HIS TESTIMONY, THAT
16 BELLSOUTH'S BATCH HOT CUT PROCESS IS FLAWED BECAUSE IT DOES
17 NOT ENSURE THAT ALL END USERS' LINES WOULD BE PROVISIONED ON
18 THE SAME DAY. PLEASE COMMENT.

19
20 A. All lines for an individual end user on a single Customer Service Record (“CSR”)
21 will be provisioned on the same day. If an end user has multiple accounts,
22 BellSouth will guarantee that all the lines in an end user's accounts will be cut on
23 the same day. This should alleviate Mr. Van de Water's concern.

24
25 Q. ON PAGE 29 OF HIS TESTIMONY, MR. VAN DE WATER CRITICIZES

1 BELL SOUTH'S ALLEGED "FAILURE" TO IDENTIFY THE QUANTITY OF
2 LOOPS THAT CAN BE PROVISIONED TOGETHER IN THE BATCH
3 PROCESS. PLEASE ADDRESS THIS CONCERN.
4

5 A. First of all, it is important to note that to the extent BellSouth has "failed", AT&T
6 has also failed in that it does not specify what it believes to be the appropriate
7 volume. Moreover, it is not that BellSouth has failed by providing a limit; rather,
8 BellSouth has no predetermined limit on the number of loops that can be
9 provisioned together in its batch hot cut process. Many variables would have to
10 be assumed in order to set such a limitation including whether multiple CLECs
11 submit batch orders at the same time for the same central office and the size of
12 the central office involved. The use of the Customer Care Project Manager
13 ("CCPM") and the Network Single Point Of Contact ("SPOC") allows the flexibility
14 necessary to set due dates based on these and other variables. BellSouth, in the
15 past, has told one (1) CLEC that a good rule of thumb to use would be 125 lines
16 per central office per day. However, this is not a hard and fast rule for the
17 reasons stated above. BellSouth has already proven that it can perform hot cuts
18 at a much higher rate than this in some central offices as I stated in my direct
19 testimony.

20 That being said, BellSouth is currently developing a web-based scheduling tool
21 for batch ordering that will allow the CLECs to reserve the due dates for their
22 orders before they are submitted so they will know how many lines can be cut on
23 a particular day. BellSouth is targeting the release of this functionality for
24 October 2004. When the scheduler is implemented, a batch hot cut limit will, by
25 necessity, be imposed. BellSouth is considering a limit of 200 batch hot cuts per

1 central office per day. Exhibit KLA-5 outlines specific details of this web-based
2 scheduling tool.

3
4 Q. DO REQUESTS FOR LOOPS COMPRISED OF HIGHER LINE COUNTS
5 REQUIRE "SIGNIFICANT NEGOTIATION" AND DEPARTURE FROM
6 EXISTING PROVISIONING AND PERFORMANCE INTERVALS AS ALLEGED
7 BY MR. WEBBER ON PAGE 16 OF HIS TESTIMONY?

8
9 A. No. BellSouth's individual and project hot cut processes do not require any
10 negotiation and/or departure from existing provisioning and performance intervals
11 unless there are 15 or more lines on the same end user account. Due to the
12 nature of the batch hot cut process, there is negotiation that takes place within
13 BellSouth to establish due dates for the hot cuts. BellSouth has proposed,
14 however, performance measurements that will monitor the period of time
15 between receipt and return of the initial spreadsheet from the CLEC. These
16 procedures are discussed in my direct testimony.

17
18 Further, BellSouth is currently developing a web-based scheduler that will
19 provide the CLECs the ability to schedule due dates prior to submitting their
20 batch request. This will remove the need for any negotiation from the batch
21 process.

22
23 *Exclusion of Loop Types*

1 Q. MR. WEBBER, ON PAGES 22-23 OF HIS TESTIMONY, COMPLAINS
2 BECAUSE CERTAIN (UNSPECIFIED) LOOP TYPES ARE "EXCLUDED" FROM
3 THE HOT CUT PROCESS. PLEASE COMMENT.
4

5 A. BellSouth's batch hot cut process includes conversions to both voice and data
6 loops. Both designed and non-designed voice loops are included as well as both
7 designed and non-designed xDSL type loops. The xDSL loops include
8 Asymmetrical Digital Subscriber Line ("ADSL"), High-bit-rate Digital Subscriber
9 Line ("HDSL"), and unbundled copper loops. All non-complex UNE-P services
10 are available for conversions to these loops through the batch hot cut process.
11 This includes the vast majority of the existing UNE-P accounts that are in place
12 today. BellSouth's records indicate that for the 12-month period December 2002
13 through November 2003, 99.93% of the UNE-P lines that have been installed are
14 eligible for conversions to UNE-Loops through BellSouth's batch hot cut process.
15 The small percentage, 0.07%, of services or loop types that are not included in
16 the batch hot cut process can be converted through BellSouth's individual or
17 project hot cut processes.
18

19 Q. WHY DOES BELLSOUTH LIMIT THE BATCH HOT CUT PROCESS TO UNE-P
20 TO UNE-L CONVERSIONS?

21 A. First, and most importantly, because that is what the TRO requires. In ¶ 489, the
22 FCC directs "state commissions [to] adopt a batch cut over 'increment' for
23 migrating customers served by unbundled loops combined with unbundled local
24 circuit switching to unbundled stand-alone loops." Unbundled loops combined
25 with unbundled local switching means UNE-P.

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Second, BellSouth developed its batch hot cut (bulk migration) process with input from the CLEC community through the Change Control Process (“CCP”) process. To my knowledge, the CLECs did not request that any other loop types be included in the process.

Q. IS LIMITING THE BATCH PROCESS TO CONVERSIONS FROM UNE-P TO UNE-L “MITIGATING THE POTENTIAL BENEFITS OF IMPROVED HOT CUT PROCESSES” AS MR. WEBBER ALLEGES ON PAGE 22 OF HIS TESTIMONY?

A. No. As I stated above, the service or loop types that are not included in the batch hot cut process constitute a very small percentage of the existing UNE-P accounts. Moreover, even if such limits exist, they are limits imposed by the FCC because the FCC directed this Commission to adopt a batch process “for migrating customers served by unbundled loops combined with unbundled local circuit switching to unbundled stand-alone loops.” See ¶ 489.

Q. ON PAGE 16 OF HIS TESTIMONY, MR. WEBBER COMPLAINS BECAUSE BELL SOUTH’S HOT CUT PROCESS IS NOT AVAILABLE FOR ENHANCED EXTENDED LINKS (“EELS”). PLEASE COMMENT.

A. In response to this criticism, 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. Exhibit KLA-6 is a draft of the Market Service

1 Description for this process. As discussed above, however, such migrations are
2 not required in the batch process as defined by the FCC. See ¶ 489 (state
3 commissions must adopt and implement a batch process for migrating UNE-P to
4 “unbundled stand-alone loops.”)
5

6 *CLEC-to-CLEC Migrations*
7

8 Q. MR. WEBBER ARGUES, ON PAGE 15 OF HIS TESTIMONY, THAT
9 BELLSOUTH’S HOT CUT PROCESS IS NOT “AVAILABLE” BECAUSE IT
10 DOES NOT INCLUDE CLEC-TO-CLEC MIGRATIONS. PLEASE COMMENT.
11

12 A. Mr. Webber is incorrect. BellSouth will perform CLEC-to-CLEC conversions.
13 BellSouth's CLEC-to-CLEC conversion product is described in the **CLEC to**
14 **CLEC Conversion for Unbundled Loops** document located on the CLEC
15 Guides web site at:
16 <http://www.interconnection.bellsouth.com/guides/html/usoc.html>. CLEC-to-CLEC
17 loop conversions may be ordered individually or as a project. Further, in
18 response to CLEC concerns, BellSouth has agreed to CLEC-to-CLEC migrations
19 (UNE-P to UNE-L) to the Batch Hot Cut Process, as well as CLEC-to-CLEC
20 migrations (UNE-L to UNE-L) as soon as necessary systems changes can be
21 made.
22

23 Q. WITNESS LICHTENBERG ALLEGES, ON PAGES 29-30 OF HER TESTIMONY,
24 THAT THE EXCHANGE OF INFORMATION FOR CLEC-TO-CLEC
25 MIGRATIONS HAS NOT BEEN ESTABLISHED. PLEASE COMMENT.

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A. As I have testified, BellSouth will perform CLEC-to-CLEC migrations. The issues, about which the CLECs complain, however, are not BellSouth's problems. Rather, CLECs complain about the inability to obtain cooperation or accurate information from one another. Problems presented are related to obtaining accurate end-user information from other CLECs' CSRs; difficulty obtaining CSRs from CLECs; and difficulties in obtaining circuit ID information from other CLECs as preparation to migrating an end-user between CLECs. The CLECs need to fix those problems, not BellSouth. That being said, BellSouth is currently participating with other ILECs and CLECs in a Florida End User Migration collaborative to identify and propose resolutions for CLEC-to-CLEC end-user migration issues.

Q. IS IT PRACTICAL TO ALLOW A "MIGRATE AS IS" FUNCTIONALITY FOR DIRECTORY LISTINGS FOR CLEC-TO-CLEC MIGRATIONS AS MS. LICHTENBERG ADVOCATES ON PAGE 46 OF HER TESTIMONY?

A. No, it is not practical to allow a "migrate as is" functionality for directory listings for CLEC-to-CLEC migrations. In case of standalone directory listings, migrating from one CLEC to another, BellSouth has a manual process, which allows the submission of one Local Service Request ("LSR"); however, the CLEC does have to provide complete directory listing information. In support of this manual process, Change Control 1108 was submitted, accepted, and prioritized by the CLEC community to mechanize BellSouth's manual process. To my knowledge,

1 no request was received from any CLEC to include "migrate as is" functionality in
2 this process.

3
4 *Other Issues*

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6 Q. MR. VAN DE WATER CONTENDS, ON PAGE 22 OF HIS TESTIMONY, THAT
7 BELLSOUTH LACKS A PROCESS FOR TIMELY RESTORAL OF CUSTOMER
8 SERVICE IN THE EVENT OF A PROBLEM WITH THE HOT CUT. DO YOU
9 AGREE?

10
11 A. No. In the rare event that there is a problem encountered during a hot cut,
12 BellSouth will work to resolve the problem if it is in the BellSouth portion of the
13 network. If the problem is in the CLEC portion of the network, the CLEC has an
14 opportunity to either correct its problem or request that BellSouth delay the hot
15 cut as long as the CLEC has not performed number porting activity and the
16 BellSouth service orders have not been completed. If the conversion orders
17 have already been completed, the CLEC may input a trouble ticket on the
18 unbundled loop. If the trouble is reported within 24 hours of the completed date,
19 an expedite procedure is in place to throwback to the original UNEP service at
20 the CLECs request. BellSouth has updated its UNE-P to UNE-L Bulk Migration
21 Process to document the restoral process for both coordinated and non-
22 coordinated orders. This should address Mr. Van de Water's concern.

23
24 Q. ARE BELLSOUTH'S BATCH CUT INTERVALS REFLECTIVE OF
25 BELLSOUTH'S CAPABILITY OF CUTTING OVER COMMERCIAL VOLUMES

1 OF CUSTOMERS?

2
3 A. Absolutely. The intervals in the batch hot cut process are designed to allow the
4 project manager the opportunity to schedule the cuts so that they will occur in the
5 most efficient manner possible. It is important to remember that the batch
6 process applies to conversion of an embedded base – it is not applicable to daily
7 load. (See ¶ 489). Thus, there is ample time to schedule the cuts assuming
8 proper planning and scheduling by the CLEC.

9
10 Moreover, as BellSouth witness Milton McElroy discusses in his rebuttal
11 testimony, BellSouth's third party test of its batch hot cut process shows its
12 capability to move large quantities of customers from BellSouth's switches to a
13 CLEC's switches in a single day.

14
15 Finally, over the last four months, BellSouth has successfully migrated over
16 15,000 UNE-P arrangements to UNE-L for a single CLEC in Florida. While the
17 CLEC did not choose to use the batch process, the fact that BellSouth could
18 migrate that many loops using its less efficient individual process demonstrates
19 the high degree of accuracy and skill in BellSouth's processes and network
20 operations staff.

21
22 Q. WHAT IS THE HIGHEST SINGLE DAY / SINGLE OFFICE VOLUME OF HOT
23 CUTS THAT BELL SOUTH HAS PERFORMED FOR ONE CLEC?

1 A. On February 26, 2004, BellSouth performed over 320 hot cuts in one (1) central
2 office.

3

4 **B. BellSouth's Hot Cut Performance**

5

6 Q. PLEASE COMMENT GENERALLY ON THE CLECS' ALLEGATIONS
7 REGARDING BELLSOUTH'S PERFORMANCE OF ITS HOT CUT PROCESS.

8

9 A. Certainly. What is most noteworthy about the CLECs' comments as a whole is
10 their lack of credible evidence to support their allegations. This Commission
11 should not make the same mistake made by the FCC in the Triennial Review
12 proceeding and rely on uncorroborated anecdotal evidence. Rather, this
13 Commission should look at the facts, all of which support BellSouth's high level
14 of performance.

15

16 Q. DO CUSTOMERS EXPERIENCE LESS THAN THREE (3) MINUTES OF
17 SERVICE DISRUPTION DURING CONVERSION?

18

19 A. Yes. BellSouth's performance measures for coordinated hot cuts performed for
20 CLECs from November 2002 through October 2003 reveals that the average
21 interval when the loop was detached from BellSouth's switch, but not yet
22 attached to a CLEC's switch, was 2:54 minutes, which falls within three (3)
23 minutes. While BellSouth might, through the hot cut process, cause service
24 disruption, the CLEC has significant responsibility to ensure minimal service
25 disruption. For example, the CLEC must provision its own switch port and

1 assure dial tone is present and that all required switch-based features are
2 translated in its switch at the time of cutover. Once the cutover of the loop from
3 BellSouth's switch to the CLEC's switch is effectuated, the CLEC must launch
4 messages to begin the porting of calls bound for that telephone number to the
5 CLEC's switch. Obviously, BellSouth is not and cannot be responsible for a
6 CLEC's actions or inactions regarding the hot cut process.

7
8 Q. CAN BELLSOUTH HOT CUT CLECS' CUSTOMERS TO THE CLECS'
9 SWITCHES IN A TIMELY MANNER?

10
11 A. Yes. As I showed in my direct testimony in this proceeding (as did BellSouth's
12 witness Al Heartley), BellSouth can scale its operations and personnel to
13 accommodate even a "worst case" scenario. To calculate load, I used the
14 highest level of inward UNE-P movement that BellSouth has encountered at any
15 time in the last 33 months (at the time I filed my direct testimony in this
16 proceeding) and assumed that that level of inward movement would be repeated
17 every single month going forward. The bottom line is that, even assuming that
18 volume as well as making other upward adjustments to the load volume,
19 BellSouth can accommodate those projected volumes.

20
21 Q. MS. LICHTENBERG ALLEGES, ON PAGE 17 OF HER TESTIMONY, THAT A
22 UNE-L MIGRATION "TAKES AT LEAST FIVE DAYS." IS SHE CORRECT?

23 A. No. BellSouth's intervals for individual hot cuts range from 3-4 days depending
24 on whether or not the loops are designed or non-designed and if non-designed,
25 whether they are coordinated or non-coordinated.

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Q. MS. LICHTENBERG ALLEGES, ON PAGE 24 OF HER TESTIMONY, THAT BECAUSE BELL SOUTH'S HOT CUT PROCESS IS MANUAL, IT "OFTEN RESULT[S] IN ERRORS AND DELAYS." DOES THE DATA CONFIRM HER POSITION?

A. Absolutely not. Ms. Lichtenberg makes several unfounded allegations without any data to support her erroneous claims. As the FCC and nine state commissions have found, the mere absence of a mechanized process does not indicate that an ILEC is non-compliant or that CLECs are impaired. Please see the testimony of Alphonso Varner for details relating to BellSouth's hot cut performance.

C. **Scalability**

Q. WHAT WOULD HAPPEN TO THE EMBEDDED BASE OF UNE-P CUSTOMERS WERE THIS COMMISSION TO REACH A FINDING THAT CLECS ARE NOT IMPAIRED WITHOUT UNBUNDLED LOCAL SWITCHING?

A. As I pointed out in my direct testimony, if this Commission were to reach a finding that CLECs are not impaired without unbundled local switching, the conversion of the CLECs' embedded base of customers served by UNE-P would not commence until August 2005 (seventeen months from the time this testimony is filed) and then would be migrated to the CLECs' own switches over a 21 month transition period as set out by the FCC in its Triennial Review Order. Thus,

1 BellSouth has almost a year and a half to get ready for something that will occur
2 over an almost two-year period. I showed calculations in my direct testimony (as
3 did BellSouth witness Al Heartley) deriving the personnel BellSouth would have
4 to hire and train even in a “worst case” scenario. I also testified regarding the
5 steps BellSouth would take to accommodate such a scenario. I would note,
6 however, that my “worst case” scenario was predicated on a finding that all the
7 Commissions in BellSouth’s nine-state region would find that CLECs were
8 impaired in no markets in BellSouth’s region and that BellSouth and no CLECs
9 reached agreement whereby the CLEC’s customers would remain on BellSouth’s
10 switches at market rates. My calculations considered even such an unlikely
11 outcome and concluded that BellSouth could accommodate the volumes of hot
12 cuts resultant from such an outcome.

13
14 **D. IDLC**

15
16 Q. ON PAGE 16 OF HIS TESTIMONY, MR. WEBBER ARGUES THAT IDLC LINES
17 ARE NOT AVAILABLE TO BE CUT VIA THE HOT CUT PROCESS. IS HE
18 CORRECT?

19
20 A. No. IDLC lines are available to be cut via BellSouth’s batch hot cut process.
21 IDLC lines require that the line be cut to a new facility, and thus require a field
22 dispatch. This does not mean, however, that the line is not available to be cut via
23 the hot cut process. I described the IDLC conversion options at length in my
24 direct testimony.

25

1 Q. IN THE HOT CUT PROCESS, IS IT POSSIBLE THAT CERTAIN REQUESTED
2 HOT CUTS IN A PARTICULAR BELLSOUTH CENTRAL OFFICE MAY
3 POSSIBLY BE FULFILLED USING SL2 LOOPS?
4

5 A. First, let me explain that IDLC equipment allows connecting loops directly to
6 switching equipment without intervening equipment referred to as Central Office
7 Terminals or "COTs". In older forms of Digital Loop Carrier ("DLC") equipment,
8 the individual loops are multiplexed onto high-speed transmission facilities at the
9 DLC Remote Terminal ("RT") for transport to the serving central office. At the
10 central office, the high-speed transmission facilities are de-multiplexed back to
11 discrete pairs (one for each customer loop). With IDLC, there is a device
12 referred to as the COT but it does not perform the de-multiplexing back to
13 discrete loops. Rather it is used for administrative purposes. This means that
14 the high-speed transmission facilities (usually operating at DS-1) containing the
15 multiplexed loops are connected directly to the switching equipment and other
16 means for providing unbundled loops must be utilized. Some of those methods
17 (for example, the use of so-called "side door" or "hair pin") must be designed so
18 as to make sure all required assignments are performed. It is this circuit
19 designing that requires that certain unbundled loops be provisioned as SL2
20 loops. This Commission has previously addressed and set the rates that
21 BellSouth may charge CLECs for SL2 loops.
22

23 Q. REGARDING BELLSOUTH'S HOT CUT PROCESS, ARE THERE ANY
24 TECHNICAL OR OPERATIONAL CONSTRAINTS SUCH AS MASS
25 DEPLOYMENT OF IDLC AND FIBER THAT WOULD PREVENT CLECS FROM

1 SERVING CUSTOMERS OVER THEIR OWN FACILITIES?

2
3 A. No, for the reasons set forth in Mr. Tennyson's rebuttal testimony.

4
5 Q. MR. WEBBER FURTHER ALLEGES, ON PAGE 25 OF HIS TESTIMONY, THAT
6 THE PROCESS OF REASSIGNING THE FACILITY IS "ANYTHING BUT
7 SIMPLE," AND "CAN CAUSE NUMEROUS SERVICE-IMPACTING PROBLEMS"
8 FOR THE END-USER. PLEASE COMMENT.

9
10 A. Mr. Webber's allegations are without merit and he provides no evidence to
11 support them. The process that Mr. Webber speaks of certainly is simple and is
12 something that ILECs perform on a daily basis. The process of which he speaks
13 simply is moving a given end user from one facility to another (i.e. moving from
14 IDLC to copper). BellSouth performs these tasks on a routine basis and does so
15 without incident. As I stated earlier and in my direct testimony, BellSouth's
16 performance measures for coordinated hot cuts demonstrate that the average
17 out of service time for hot cuts is 2:54 minutes. This includes hot cuts where
18 facility changes are involved.

19
20 **E. Automation of the Hot Cut Process**

21
22 Q. AT&T ARGUES (VAN DE WATER TESTIMONY AT PAGE 19) THAT THE
23 MANUAL HOT CUT PROCESS "IS INHERENTLY INCAPABLE OF
24 SUSTAINING VOLUMES" NECESSARY TO SUPPORT UNE-L. DOES THIS
25 PREMISE ACCORD WITH THE *TRIENNIAL REVIEW ORDER*?

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A. No, it does not. AT&T argued that the FCC should require Electronic Loop Provisioning and the FCC rejected that argument. Despite its unsubstantiated finding that the hot cut process causes impairment, the FCC directed the states to implement a process that would alleviate impairment, presuming that such a manual process was achievable. This holding, in conjunction with the FCC's explicit rejection of AT&T's ELP process, undermines Van de Water's argument that a manual process is "inherently incapable of sustaining volumes." BellSouth witness Gary Tennyson addresses the infeasibility of the CLECs' electronic processes in more detail.

F. Miscellaneous Issues

Q. MCI ADVOCATES THE ESTABLISHMENT OF A COMMISSION WORKSHOP TO ADDRESS ALLEGED ISSUES WITH BELL SOUTH'S HOT CUT PROCESS (LICHTENBERG TESTIMONY AT PAGE 28). IS THIS NECESSARY?

A. While under ordinary circumstances BellSouth fully supports collaborative improvements to its processes (See Line Sharing Collaborative), BellSouth cannot support the CLECs' requests for collaboration in this instance. First, the CLECs' requests for collaboration only have occurred after the commencement of the state impairment cases. Further, and most importantly, the CLECs have admitted that no matter how many improvements BellSouth makes to its manual process, the CLECs will continue to argue they are impaired without an eight (8) billion dollar retrofit of BellSouth's network to allow for automated hot cuts.

1 Finally, the CLECs' arguments are disingenuous in that despite the fact that the
2 Florida collaborative on CLEC-to-CLEC migrations and BellSouth's Line Sharing
3 Collaborative addressing migrations with line splitting are on-going; the CLECs
4 have chosen to raise the issues in those collaboratives in this hearing. These
5 facts seem to evidence that the CLECs themselves will not rely on collaboratives.
6 Given the CLECs' positions, it does not make sense for BellSouth to devote time
7 and resources to a doomed process.

8
9 However, BellSouth has always stated that it was willing to consider specific
10 process changes proposed by the CLECs. While the CLECs have chosen to
11 make these suggestions via this docket, as opposed to through operational
12 channels, BellSouth has listened. In an effort to be responsive, BellSouth has
13 agreed to make the following enhancements (which address virtually all of the
14 CLECs' concerns) to its effective and seamless batch hot cut process:

- 15 • Batch process will be applicable to CLEC-to-CLEC migrations (UNE-P to
16 UNE-L);
- 17 • Batch process will be applicable to CLEC-to-CLEC migrations (UNE-L to
18 UNE-L) at such time as necessary systems changes can be made;
- 19 • Batch process will guarantee that an end user's account will all be cut on
20 the same day;
- 21 • Batch process will include after-hours and Saturday cuts;
- 22 • Batch process will guarantee a four-hour time window for coordinated hot
23 cuts;
- 24 • Batch process will include a timely restoral process if there is a problem
25 with the cut;

- 1 • BellSouth will implement a web-based communication system for non-
- 2 coordinated hot cuts similar to that implemented by Verizon and SBC;
- 3 • BellSouth will reduce the 14-day provisioning interval in the batch process
- 4 to 8 days;
- 5 • BellSouth will implement a scheduling tool similar to Verizon's;
- 6 • Batch process will include hot cuts to DS0 EELs.

7

8 These enhancements to BellSouth's already-compliant Batch Hot Cut Process

9 should address virtually all of the CLEC's alleged criticisms of the process. I

10 have attached as Exhibit KLA-7 the UNE-P to UNE-L Bulk Migration CLEC

11 Information Package, which was updated and posted to the web on February 18,

12 2004. It contains many of the enhancements that I have just mentioned.

13

14 **G. UNE-L Performance**

15

16 Q. IS MS. LICHTENBERG'S CHARACTERIZATION, ON PAGES 35-36 OF HER

17 TESTIMONY, OF INCREASED OUT OF SERVICE TIMES AND CUSTOMER

18 HARM FOR TROUBLES IN A UNE-L ENVIRONMENT ACCURATE?

19

20 A. No, quite the contrary. BellSouth's performance data demonstrates that the

21 Maintenance Average Duration time for 2 Wire Analog Loops is less that it is for

22 UNE-P. For the period November 2002 through October 2003, the average

23 duration time for trouble reports for 2 Wire Analog Loops Non-Designed was

24 14.01 hours, while the average duration time for trouble reports for 2 Wire Analog

25 Loops Designed was 5.52 hours. For this same period, the average duration

1 time for trouble reports for UNE-P was 18.64 hours. (Please see Exhibit KLA-8)
2 This data demonstrates that CLECs are not impaired due to increase out of
3 service times and customer harm in the UNE-L environment as Ms. Lichtenberg
4 states. Mr. Varner discusses BellSouth's performance in more detail.

5

6 Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?

7

8 A. Yes.



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**



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

<u>SVCREQID</u>	<u>REUSESVCOR</u> <u>D</u>	<u>PON</u>	<u>PROJNU</u> <u>M</u>	<i>OUTSID</i> <i>E DISP</i>	<i>INSIDE</i> <i>DISP</i>	<u>CIRCUIT ID</u>
				<u>OSP REQ</u>	<u>CO REQ</u>	
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



GO-AHEAD NOTIFICATION
January 22, 2004

CLEC: (CLEC OCN)

BellSouth SVC ORD # <u>Number</u>	Due Date	Wire Center	Circuit Identification	Purchase Order Number	<u>Project Number</u>	Notification Date/Time
NR111111	1/22/04 3:30pm	954761	80.TYNU.xxxxxx..SB	PON123456	ABC123 45	1/22/04 10:32 am
NR222222	1/22/04 3:30pm	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



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	<u>Project Number</u>	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 3:30pm	80.TYNU.xxxxxx-SB	PON123460		1/21/04 09:00 am

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

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*

***Unbundled Dedicated Transport –
Bulk Migration to EELs
Marketing Service Description
Version 1
Draft***

Document Prepared by:

Michael Hurst, Product Manager 205-977-1223

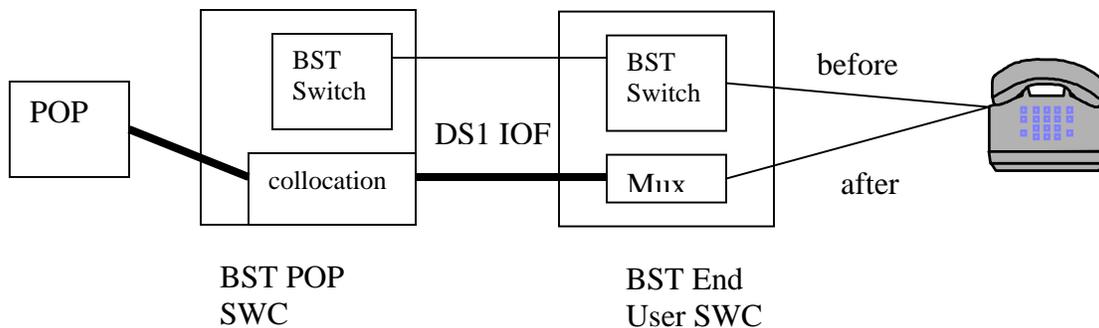
Bulk Migration to EELs

I. MARKETING SERVICE DESCRIPTION

There is a need to offer Competitive Local Exchange Companies (CLECs) the ability to utilize a bulk migration methodology to migrate from retail, resale, and Unbundled Network Element Platform (UNE-P) to Unbundled Dedicated Transport – Enhanced Extended Links (EELs). This process will require changes to the utilization of the existing Bulk Migration process. Unless otherwise described below, all the features of the UNE-P to UNE-L Bulk Migration process will be used for this process as well. This includes but is not limited to time windows for conversions, restoral process, after hours cuts, same day migrations, etc.

A. Basic Service Features:

- a. BellSouth will accept a completed Bulk Migration Project Notification, herein known as Project Notification. The Project Notification will identify the local loop circuits that are to be migrated to EELs.
- b. BellSouth will check the Project Notification and, if correct, will begin negotiation of due dates. If incorrect, BellSouth will return the Project Notification to the CLEC with documentation describing the error conditions.
- c. BellSouth will notify the CLEC of the due dates.
- d. Subsequent to the due date notification, BellSouth will accept a Bulk Request package from the CLEC and separate the PONs into separate LSRs, while populating the LSR fields and generating LSRs.
- e. BellSouth will project manage the migration to EELs using an existing unbundled dedicated channelized DS1 interoffice channel terminating to a collocation arrangement, which is a migration prerequisite. This will include order issuance and coordination. BellSouth’s internal network forces will perform all provisioning and testing functionality. All internal databases will be changed to reflect this migration.
- f. BellSouth will bill the CLEC the non-recurring and recurring rate for the unbundled EEL upon provisioning.



Not to be disclosed outside of BellSouth without written permission.

Bulk Migration to EELs

B. Basic Service Capabilities:

CLEC will be able to request to have its end user's non-complex residence and business lines (shown below) migrated to an EEL.

USOC	Description
1FB	Business, 2-wire Voice Grade Business Line
1FR	Residence, 2-wire Voice Grade Residence Line

Table 1

The Project Notification Process:

- Complete the **BellSouth UNE-P to UNE-L Bulk Migration Project Notification** form according to instructions.
- Electronically submit the **Project Notification** to the email Project address of the CLEC's assigned BellSouth Project Manager (PM). For help with identifying a Project Support Manager, contact your BellSouth Customer Support Manager.
- The BellSouth PM 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 PM will coordinate with BellSouth's field forces to schedule the migration Due Dates.
- Once the review with the field forces is complete, the BellSouth PM 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** once it has been submitted to the BellSouth PM.

Requirements:

- For complete ordering requirements, refer to the UNE to UNE Bulk Migration of the Local Ordering Handbook.
- Bulk Migration is available for migrating existing **non-complex** Port/Loop Combination services (retail, resale, UNE-P) to Unbundled Loops with Local Number Portability (LNP) to an EEL.
- A UNE Loop will be provided for each ported telephone number formerly associated with the existing service.
- The existing services that can be migrated are listed in Table 1.
- The resulting EEL codes are listed in Tables 3, 4 and 5. They must be in the CLEC's Interconnection Agreement.

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Bulk Migration to EELs

- 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, 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 existing services on a Bulk Request must be migrated to a single UNE local loop 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 (SOMECH) will be charged based on the current rules for individual Local Service Requests (LSRs) created per EATN of a Bulk Request.
- A BellSouth Project Manager (PM) will project manage the Bulk Request.
- CLEC must submit a BellSouth Bulk Migration Project Notification, herein known as Project Notification, to the BellSouth PM prior to the CLEC's placing the mechanized Bulk Request.
- CLEC may specify Desired Due Dates (DDD) for each EATN. However, the BellSouth PM will negotiate firm Due Dates for the Bulk Request.
- 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 Bulk Migration Project Notification form once it has been submitted to the BellSouth PM.
- 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 to be migrated.

BellSouth Bulk Migration Project Notification Interval:

- The "*PM Targeted Response Interval*" column in the table below represents the targeted number of business days in which the PM 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 No. of Days in Advance to Submit Project Notification*" column in the Table 2. This column represents the number of days that the Project Notification must be submitted in advance of the earliest DDD.

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Bulk Migration to EELs

- “*Minimum No. of Days*” includes the interval for the 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 PM will attempt, where possible, to assign the work such that migrations occur on the requested DDD.

No. of end-user Telephone Numbers	PM Targeted Response Interval	CLEC Days After Receipt from Project Mgr	Bulk Request Submission Requirement	Minimum No. of Days in Advance to Submit Project Notification
2 - 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+	TBD	3 business days	14 business days	Contract CCPM

Table 2

The charts below represent the resulting EEL after the migration. All resulting EELs will have Local Number Portability (LPN)

Basic Class of Service	Loop USOC	Description
UNCVX	UEAL2, UEAR2	2-wire Unbundled Voice Loop – SL2

Local Loop, Table 3

Basic Class of Service	USOC	Description
UNC1X	1D1VG	Voice Grade COCI

Central Office Channel Interfaces, Table 4

Basic Class of Service	USOC	Description
UNC1X	MQ1	DS1 Channelization System
UNC1X	U1TF	DS1 Interoffice Channel

Interoffice Channel, Table 5

B. Forecast:

SERVICE	UNITS			
	2004	2005	2006	2007
UNE-P to EEL	TBD	TBD	TBD	TBD

D. Billing:

Billing will be accomplished through CABS.

Bulk Migration to EELs

1. SIG will not apply.
2. SAW will not apply
3. Billing Guarantee will not apply.
4. State Missed Appointment Credits will apply.
5. Expedite Charges for shorter intervals will apply.
6. Cancellation Charges will apply.
7. Service Order Modification charges will apply.

Pricing Structure:

Existing Service Rearrangement – Change in CFA, Project Management Charges and Service Order charges will apply.

Credit Terms/Payment Plans - There are also no volume or term options for this service.

E. Deployment Schedule:

Ubiquitous deployment assumed. Additional transport capacities may be developed based on the Bona Fide Request process.

F. Distribution Channels:

Use Interconnection Services Sales Channels - current headcount shared among all UNEs. The CLEC CARE SME will compile an Account Team Information Package from the Marketing Service Description as well as work identified by the Project Team during implementation.

G. Product Codes, etc.:

- Unique sales codes for LCSC
- Establish new product codes for services. Product Management will request new product codes from ICS Finance.
- Unique identifiers will be assigned to all recurring rate elements.

H. Product Tracking Needs:

Unit Counter – TBD. Need unique counters for the non-recurring rate element.
Revenue and Expenses - ABIS
Accounted for by: Region/State/GEO/Wire Center/Customer (by ACNA)

Bulk Migration to EELs

I. Tariff/Contract/Agreement:

Standard Contract Agreement

- Product Management will develop appropriate contract language and includes the rate structure within the next standard contract agreement.
- Current headcount for contract administration spread over UNEs.

J. Advertising and Promotion:

There will be no advertising or promotion of this service other than the inclusion of necessary information on the Interconnection WEB site.

K. Customer Training:

- Product Management will include appropriate information regarding these services on the Interconnection WEB site.

L. Staff Support Requirements:

The following requirements are for all Transport Product and Project Management UNEs

Table 1: Headcount Requirements for Transport UNEs

	<u>PG</u>	<u>2004</u>
Product Manager	59 58	1 1
Project Mgrs.	59	2
Project Team	59 58	6 6

UNE-P to UNE-L Bulk Migration

***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

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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 (SOMECS) 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

UNE-P to UNE-L Bulk Migration

CCPM.

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).

UNE-P to UNE-L Bulk Migration

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 <u>must</u> 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 1 st 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 2 nd 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.

UNE-P to UNE-L Bulk Migration

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.

UNE-P to UNE-L Bulk Migration

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

State	Maintenance and Repair Products	Nov-02	Dec-02	Jan-03	Feb-03	Mar-03	Apr-03	May-03	Jun-03	Jul-03	Aug-03	Sep-03	Oct-03	Average
FL	2W Analog Loop Non-Design	13.49	13.64	11.43	10.85	12.51	12.80	13.06	15.92	14.74	14.91	15.46	15.67	13.71
GA	2W Analog Loop Non-Design	11.49	10.72	9.79	8.50	9.56	8.20	9.73	11.42	10.14	8.37	9.37	14.18	10.12
KY	2W Analog Loop Non-Design		13.00			5.00		15.50	12.26	4.32	2.51	23.92	2.52	9.88
LA	2W Analog Loop Non-Design								7.39			0.43	7.72	5.18
MS	2W Analog Loop Non-Design	1.00	2.20	37.00	8.25	2.60	14.50	22.20	25.83	13.32	16.93	13.15	9.63	13.88
NC	2W Analog Loop Non-Design	11.60	19.17	2.50	17.00	17.67	14.00	13.40	7.31	2.08	15.00	18.05	16.23	12.83
SC	2W Analog Loop Non-Design	28.71	15.91	24.00	4.00	30.00	17.00	16.29	17.47	28.14	26.93	9.05	21.73	19.94
TN	2W Analog Loop Non-Design	2.00	34.50	4.00	15.75		3.60	46.58	36.83	13.48	24.90	28.27	8.79	19.88
Region 2W Analog Loop Non-Design		11.38	15.59	14.79	10.73	12.89	11.68	19.54	16.80	12.32	15.65	14.71	12.06	14.01
AL	2W Analog Loop Design	6.04	4.28	5.16	4.24	5.99	6.17	9.12	4.81	5.30	4.72	5.33	3.84	5.42
FL	2W Analog Loop Design	5.33	5.55	5.34	4.99	5.81	4.89	5.15	6.05	5.32	5.87	5.51	5.68	5.46
GA	2W Analog Loop Design	4.94	4.35	3.53	5.03	4.89	5.01	6.69	5.34	7.02	5.27	6.02	5.34	5.29
KY	2W Analog Loop Design	3.06	4.07	4.05	5.14	7.38	6.68	4.75	4.24	7.83	4.25	3.78	3.49	4.89
LA	2W Analog Loop Design	4.10	5.32	4.83	5.55	5.01	8.86	5.16	4.99	4.93	8.27	4.64	5.10	5.56
MS	2W Analog Loop Design	7.19	7.33	6.17	6.06	7.15	5.31	7.49	6.89	6.20	6.78	5.95	3.30	6.32
NC	2W Analog Loop Design	4.06	6.85	3.81	5.81	4.43	5.59	4.81	4.14	4.58	4.25	4.15	4.75	4.77
SC	2W Analog Loop Design	4.02	4.64	5.24	5.02	6.64	4.83	5.55	3.97	5.29	4.76	6.79	3.68	5.04
TN	2W Analog Loop Design	6.11	6.48	5.24	6.87	6.50	4.84	8.24	6.14	9.61	9.75	6.73	7.13	6.97
Region 2W Analog Loop Design		4.98	5.43	4.82	5.41	5.98	5.80	6.33	5.18	6.23	5.99	5.43	4.70	5.52
AL	UNE Loop + Port Combinations	25.86	20.51	17.62	16.83	19.50	17.09	27.62	27.65	28.83	29.13	28.63	21.44	23.39
FL	UNE Loop + Port Combinations	12.60	13.36	11.22	10.96	14.33	13.02	14.58	16.82	17.29	18.45	17.45	16.52	14.72
GA	UNE Loop + Port Combinations	14.73	13.61	10.88	11.25	11.85	11.12	14.95	14.89	16.35	17.57	15.95	14.00	13.93
KY	UNE Loop + Port Combinations	18.08	16.22	13.52	19.66	16.24	17.22	21.59	26.32	29.08	28.65	31.87	23.66	21.84
LA	UNE Loop + Port Combinations	36.15	20.70	18.64	17.32	21.92	16.50	14.33	17.88	23.66	20.53	23.83	18.71	20.85
MS	UNE Loop + Port Combinations	48.84	25.80	24.01	22.28	21.17	18.38	23.43	23.30	26.77	29.78	28.05	20.01	25.98
NC	UNE Loop + Port Combinations	11.01	18.99	8.44	8.75	10.59	9.54	11.75	12.83	13.00	13.48	13.09	11.10	11.88
SC	UNE Loop + Port Combinations	15.71	16.35	12.58	11.68	13.33	11.45	14.10	13.62	17.28	26.93	17.33	16.53	15.58
TN	UNE Loop + Port Combinations	14.86	13.54	10.63	17.35	13.83	12.09	26.77	23.57	25.69	33.39	25.16	17.72	19.55
Region UNE Loop + Port Combinations		21.98	17.68	14.17	15.12	15.86	14.05	18.79	19.65	21.99	24.21	22.37	17.75	18.64