

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 MILTON McELROY, 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 8 pages and 1 exhibits.

Milton McElroy Jr.

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 3, 2005

1 BELL SOUTH TELECOMMUNICATIONS, INC.
2 REBUTTAL TESTIMONY OF MILTON MCELROY JR.
3 BEFORE THE ALABAMA PUBLIC SERVICE COMMISSION
4 DOCKET NO. 29054
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 Milton McElroy Jr. My business address is 575 Morosgo Drive,
12 Atlanta, Georgia 30324. My title is Director – Interconnection Services.
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14 Q. PLEASE SUMMARIZE YOUR BACKGROUND AND EXPERIENCE WITH
15 BELL SOUTH.
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17 A. I have over fifteen years experience in the telecommunications industry. My
18 experience includes various engineering, operations and staff assignments at
19 BellSouth. I earned a Bachelor of Science degree from Clemson University in
20 Civil Engineering in 1988 and a Master's degree in Business Administration from
21 Emory University in 2001. Additionally, I am a registered Professional Engineer
22 in Alabama, North Carolina, and South Carolina.
23

24 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?
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1 A. The purpose of my testimony is to respond to certain issues raised in the
2 testimony of Mark David Van de Water of AT&T Communications of the Southern
3 States, LLC ("AT&T"), and Sherry Lichtenberg of MCI WorldCom
4 Communications, Inc. and MCIMetro Access Transmission Services, Inc. ("MCI")
5 by introducing BellSouth's Mass Migration process that, like the Batch migration
6 process described in Ken Ainsworth's Direct testimony, also exceeds the
7 requirements of the TRO.

8

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

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

24

1 Q. MR. VAN DE WATER AND MS. LICHTENBERG BOTH CRITICIZE
2 BELL SOUTH'S BATCH HOT CUT PROCESS AS INSUFFICIENT, AND
3 PROVIDE A CONSIDERABLE LIST OF RECOMMENDATIONS FOR
4 INCLUSION IN ANY BATCH PROCESS. PLEASE RESPOND.

5

6 A. As described in the Direct testimony of Ken Ainsworth, BellSouth's Batch Hot Cut
7 Process complies with the requirements of the *Triennial Review Order* and allows
8 for the seamless and efficient migration of UNE-P service to UNE-L service such
9 that Competitive Local Exchange Companies ("CLECs") are not impaired without
10 access to unbundled switching.

11

12 That being said, BellSouth will adopt a third hot cut process to address alleged
13 CLEC concerns about batch provisioning and non-recurring costs at such time as
14 it receives unbundled switching relief in UNE Zones cut by Component Economic
15 Areas. The third process is known as the Mass Migration Conversion Process.

16

17 With the advent of the Mass Migration Conversion Process, BellSouth will offer
18 three migration options to CLECs:

19

- 20 1. Individual Conversions
- 21 2. Batch Migration Process as described in the testimony of Mr. Ken
22 Ainsworth
- 23 3. Mass Migration Conversions.

24

1 Exhibit MM-3, attached hereto, provides process overview and flows for the
2 Mass Migration Conversion Process.

3
4 Q. PLEASE GENERALLY DESCRIBE THE MASS MIGRATION CONVERSION
5 PROCESS.

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7 A. While BellSouth disagrees with the CLEC criticism that its Batch Process is not a
8 batch provisioning process, in a further effort to meet CLEC needs, BellSouth
9 has developed the Mass Migration Conversion Process. Generally, the Mass
10 Migration Conversion Process allows a CLEC to submit a spreadsheet of
11 telephone numbers and some other minimal information to BellSouth for
12 conversion. Once the CLEC submits the spreadsheet, BellSouth performs all the
13 other tasks associated with the cut including order submission and number
14 porting. BellSouth gains efficiencies through this process by eliminating the
15 coordination between BellSouth and the CLEC and by batching the provisioning
16 orders and eliminating duplicative dispatches.

17
18 The gains in efficiencies result in lower costs to the CLECs. Not only do the
19 CLECs avoid the costs associated with the hot cuts from their side of the
20 network, but they pay a reduced non-recurring charge for the cuts themselves.
21 In addition, BellSouth will charge the CLEC a reduced recurring rate when the
22 conversion process begins with the service order creation, as discussed in
23 greater detail below. The immediate access to the lower rate should make the
24 CLEC indifferent as to when the end-user's loop is actually cut from BellSouth's
25 switch to the CLEC's switch.

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Q. CAN YOU PROVIDE MORE SPECIFICITY ABOUT THE PROCESS?

A. Certainly. A Mass Migration request allows a CLEC to submit a spreadsheet for the purpose of migrating large numbers of non-complex UNE-P service to UNE-L with LNP (Local Number Portability). Approximately 70% of the embedded base of UNE-P service within the BellSouth region is residential class of service. The majority of the remaining embedded base of business class of service is non-complex. The Mass Migration process has been established for simple large scale residential and small business embedded base mass conversions. The intent is for this process to provide the flexibility by applying the “80% rule” (i.e., the simple UNE-P conversions). In keeping with this principle, the following “simple” UNE-L services will be eligible for Mass Migrations:

- o 2 Wire Unbundled Voice Loop – Service Level 1 (“SL1”)
- o 2 Wire Unbundled Voice Loop – Service Level 2 (“SL2”)
- o 2 Wire Unbundled Copper Loop – Non-Designed (UCL-ND)

To utilize this process, a planning phase will be conducted with the CLEC prior to the submission of its first mass migration spreadsheet. The purpose of the planning meeting is to ensure that the CLEC switch is operational and ready for the Telephone Numbers (“TNs”) to be translated. Additionally, this phase will allow for negotiations of dates based on the volume level of conversions for the mass migration batch conversions and to confirm that the CLEC is aware of the information that is required on the spreadsheet.

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Next, the CLEC submits a spreadsheet with pertinent information for the telephone numbers that the CLEC wants to migrate. BellSouth then internally project manages and completes all migration activities for pre-ordering, ordering and provisioning including all Local Number Porting (“LNP”) activity. From a CLEC perspective, the Mass Migration Conversion Process will allow for seamless pre-ordering, ordering and provisioning batch migrations. In contrast to the Batch Process, the Mass Migration Conversion Process shifts the “control” of the conversion activities back to BellSouth. This “control” allows for even greater efficiencies that can be passed along to CLECs with even steeper Non-Recurring Charge (“NRC”) discounts.

Again, the intent of the Mass Migration Conversion Process is to provide an option for a CLEC to provide minimal information to BellSouth and for BellSouth to handle all conversion activities. This will allow BellSouth to have more autonomy with the timing of conversions so as to balance its workforce with the workload.

Due to the efficiencies in force and load balancing that BellSouth will gain in the Mass Migration Process, this process will be offered to CLECs at higher level of discount for the NRC. The discount structure can be seen in the following table.

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

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To address concerns that CLECs may have with the timing of mass migration conversions, during the mass migration period, BellSouth will offer to bill the CLEC at the UNE-L recurring charge price instead of billing the CLEC for the various components that comprise the UNE-P (i.e., loop, port, usage, etc.). Said another way, once a CLEC submits to BellSouth a list of telephone numbers which triggers initiation of service orders, the CLEC will have the opportunity to pay the UNE-L recurring rate rather than the recurring rates for the elements that comprise the UNE-P. BellSouth will also initiate the non-recurring rate for each TN conversion (minus the discount) on the same date as the UNE-P to UNE-L recurring charge change. Normally, BellSouth's billing systems are constructed to bill on the actual conversion dates when service orders are completed. In the case of the Mass Migration process, however, the pricing changes previously described will be effected through billing adjustments and credits once the individual telephone numbers are migrated to the CLEC's switch and the service orders are completed.

1 Q. WOULD YOU SUMMARIZE YOUR TESTIMONY?

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3 A. BellSouth has developed yet another efficient batch process option to speed the
4 conversion from UNE-P to UNE-L as required by the TRO. The Mass Migration
5 Conversion Process has been developed with a specific purpose – to convert
6 large numbers of CLEC UNE-P facilities to CLEC switching with minimal CLEC
7 involvement in the individual cutovers. To that end, the Mass Migration process
8 is designed for UNE Zones cut by Component Economic Areas where relief from
9 UNE-P is granted.

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11 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

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13 A. Yes.

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Exhibit MM-3

Mass Migration Conversion Process

>> *Listening >> Answering*



Content—Mass Migration Conversion Process

- Process Overview
- Process Flow
- Day-by-Day Process Flow
- Glossary



Mass Migration Conversion

Offerings

- Available for non-complex embedded base UNE-P customers migrating to UVL SL1 and SL2 UNE-Loop, and UCL-ND (>80% of embedded base)
- Spreadsheet in lieu of individual LSRs or Bulk LSRs
- May include multiple COs
- No volume limitations
- Discount rates
- BLS performs ordering, porting and provisioning activities
- Joint planning phase conducted to negotiate up-front activities and migration period

Advantages

- CLEC to submit large quantities of non-complex UNE-P lines to be migrated via a single request
- The CLEC will not be required to track individual orders or migrations
- CLECs do not have to submit LSRs or coordinate any porting activity
- CLEC experiences seamless pre-ordering, ordering and provisioning batch migrations.
- Reduced cost to CLEC



Mass Migration Conversion

Process Overview

- Mass Migration request are defined by UNE Zones cut by Component Economic Area (CEA)
- BellSouth will implement this Mass Migration Conversion option for CLEC at such time as it receives unbundled switching relief in UNE Zones cut by Component Economic Areas
- Mass Migration is available for migrating existing non-complex residential and business Port/Loop Combination services to Unbundled Loops with LNP
- Eligible UNE-L services:
 - 2 Wire Unbundled Voice Loop – Service Level 1 (SL1)
 - 2 Wire Unbundled Voice Loop – Service Level 2 (SL2)
 - 2 Wire Unbundled Copper Loop – Non-Designed (UCL-ND)
- Minimum of 500 lines per Mass Migration request
- Mass Migrations of 500 – 2000 lines will be completed within a negotiated period based on actual volume, but not expected to exceed to 60 days
- Mass Migrations exceeding 2000 lines will be completed within a negotiated period based on actual volume, but not expected to exceed to 180 days
- BellSouth will internally perform all of the project management, pre-ordering, ordering, provisioning, testing, and porting operations and completion notification necessary to update CLEC records and complete the project in the specified time frame on behalf of the CLEC



Mass Migration Conversion

Process Overview

- A Planning Phase will be conducted with each CLEC prior to the submission of the mass migration spreadsheet. The purpose of the planning meeting is to ensure that the CLEC switch is operational. Additionally, this phase will allow for negotiations of dates based on the volume level of conversions and to confirm spreadsheet requirements
- CLEC would submit spreadsheet including information for TNs to be migrated after a Planning Phase between the CLEC and the BellSouth Project Manager
- Directory listings will remain the same during the migration process
- CLEC EATN's will be considered frozen during the migration period. If an end-user customer changes carriers during the migration period, the CLEC must contact the BellSouth PM to have the TN removed from the mass migration batch conversion project.
- CLECs must establish dial tone for each TN on their switch by the day of spreadsheet submission for mass migrations involving 500 to 2000 TNs, and within a negotiated time period for mass conversions of greater than 2000 TNs.
- Monthly recurring rate will be reduced to the UNE-L rate when conversion service orders are activated
- NRC rate deductions of 15% for 500-2000 conversions and 25% for >2000 conversions will be applied at same time
- Service order charges for mechanized orders (SOMEK) will be charged based on the current rules for individual Local Service Requests (LSRs) created per EATN of a Bulk Request

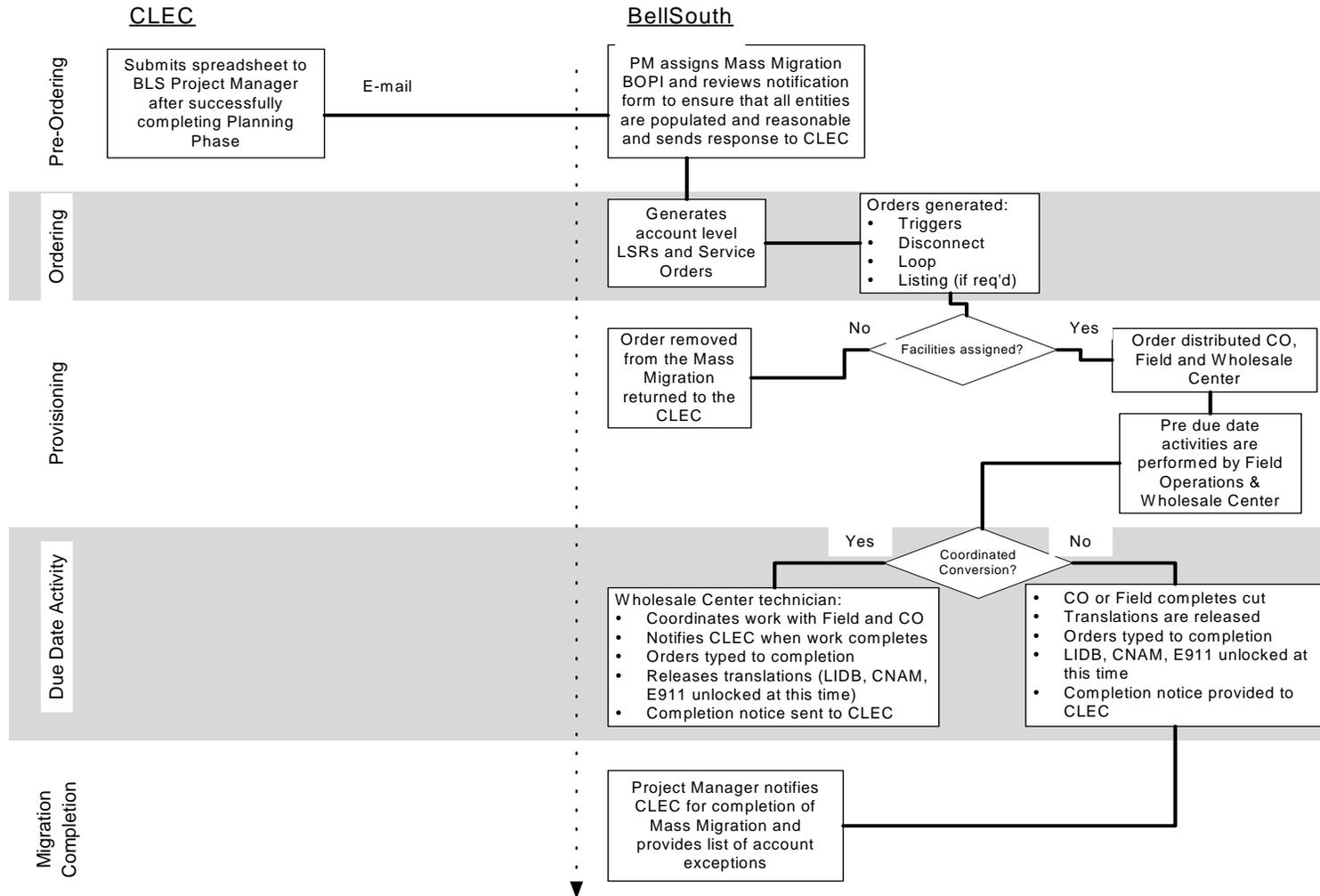
> Mass Migration Conversion

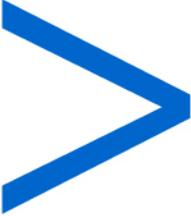
Day-by-Day Process Flow

Pre-Order	<ul style="list-style-type: none"> •CLEC contacts BellSouth Project Manager to initiate planning phase •CLEC e-mails Mass Migration spreadsheet to BLS Project Manager after completion of planning phase •BLS Project Manager will respond to CLEC spreadsheet within the following time: 500 to 2000 TNs—3 business days; >2000 TNs—6 business days
Day 1 to X within the negotiated conversion period	<ul style="list-style-type: none"> •Orders are issued •Order is assigned and distributed to network organizations •BLS does required NPAC activities •Order is screened •Pre due date activities are performed by Field Operations & Wholesale Center •Conversion is completed and telephone number ported •Orders are completed •Releases translations •LIDB, CNAM, E911 unlocked at this time •Completion notices are sent to CLEC after each individual end-user conversion
Migration completion	<p>Project Manager notifies CLEC for completion of Mass Migration and provides list of account exceptions</p>



Mass Migration Conversion Process Flow

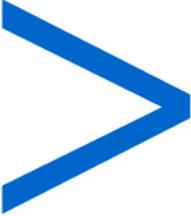




Glossary

Acronyms

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



Glossary

Acronyms

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