

ATTACHMENT “A”

ATTACHMENT A

PROJECT NO. 21000

SWBT/Birch Weekly Joint Coordination Conference Call
Minutes (4/18/00 – 6/13/00)

Attachment A is information that is protected from public disclosure under the Texas Open Records Act, TEX. GOV'T CODE ANN. ART. §§ 552.101, 552.104 AND 552.110 (VERNON 1998). These applicable exemptions include trade secrets, and Birch Telecom's commercial or financial information, and could place Birch Telecom at a competitive disadvantage if disclosed. In support of this claim of privilege, Birch Telecom submits that this confidential information is not generally known outside of Birch Telecom, meaning it would be extremely difficult for a competitor to acquire, and is used solely as an internal company work product. Furthermore, this information is distributed only on a limited basis within Birch, and would be extremely valuable to competitors of Birch Telecom.

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ATTACHMENT “B”

ATTACHMENT B

PROJECT NO. 21000

**Performance Measurement 35 Data, Trouble Rate of Orders
within 10 Days of Conversion**

Attachment B is information that is protected from public disclosure under the Texas Open Records Act, TEX. GOV'T CODE ANN. ART. §§ 552.101, 552.104 AND 552.110 (VERNON 1998). These applicable exemptions include trade secrets, and Birch Telecom's commercial or financial information, and could place Birch Telecom at a competitive disadvantage if disclosed. In support of this claim of privilege, Birch Telecom submits that this confidential information is not generally known outside of Birch Telecom, meaning it would be extremely difficult for a competitor to acquire, and is used solely as an internal company work product. Furthermore, this information is distributed only on a limited basis within Birch, and would be extremely valuable to competitors of Birch Telecom.

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ATTACHMENT “C”

ATTACHMENT C

PROJECT NO. 21000

Birch Study of Orders Requiring LSC Manual Intervention
(4/17/00 – 4/21/00)

Attachment C is information that is protected from public disclosure under the Texas Open Records Act, TEX. GOV'T CODE ANN. ART. §§ 552.101, 552.104 AND 552.110 (VERNON 1998). These applicable exemptions include trade secrets, and Birch Telecom's commercial or financial information, and could place Birch Telecom at a competitive disadvantage if disclosed. In support of this claim of privilege, Birch Telecom submits that this confidential information is not generally known outside of Birch Telecom, meaning it would be extremely difficult for a competitor to acquire, and is used solely as an internal company work product. Furthermore, this information is distributed only on a limited basis within Birch, and would be extremely valuable to competitors of Birch Telecom.

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ATTACHMENT “D”

ATTACHMENT D

PROJECT NO. 21000

SWBT/Birch Daily Operational Conference Call Log (4/24/00 – 6/21/00)

Attachment D is information that is protected from public disclosure under the Texas Open Records Act, TEX. GOV'T CODE ANN. ART. §§ 552.101, 552.104 AND 552.110 (VERNON 1998). These applicable exemptions include trade secrets, and Birch Telecom's commercial or financial information, and could place Birch Telecom at a competitive disadvantage if disclosed. In support of this claim of privilege, Birch Telecom submits that this confidential information is not generally known outside of Birch Telecom, meaning it would be extremely difficult for a competitor to acquire, and is used solely as an internal company work product. Furthermore, this information is distributed only on a limited basis within Birch, and would be extremely valuable to competitors of Birch Telecom.

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ATTACHMENT “E”

ATTACHMENT E

PROJECT NO. 21000

**Agenda of Issues in Project 21000 Meeting Before the Commission,
November 10, 1999, and Supporting Examples**

Attachment E is information that is protected from public disclosure under the Texas Open Records Act, TEX. GOV'T CODE ANN. ART. §§ 552.101, 552.104 AND 552.110 (VERNON 1998). These applicable exemptions include trade secrets, and Birch Telecom's commercial or financial information, and could place Birch Telecom at a competitive disadvantage if disclosed. In support of this claim of privilege, Birch Telecom submits that this confidential information is not generally known outside of Birch Telecom, meaning it would be extremely difficult for a competitor to acquire, and is used solely as an internal company work product. Furthermore, this information is distributed only on a limited basis within Birch, and would be extremely valuable to competitors of Birch Telecom.

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ATTACHMENT “F”

ATTACHMENT F

PROJECT NO. 21000

**SWBT/Birch Joint Quality Assurance Study Guidelines and
Sampling of 100 Orders Requiring LSC Manual Intervention
(5/26/00 – 6/9/00)**

Attachment F is information that is protected from public disclosure under the Texas Open Records Act, TEX. GOV'T CODE ANN. ART. §§ 552.101, 552.104 AND 552.110 (VERNON 1998). These applicable exemptions include trade secrets, and Birch Telecom's commercial or financial information, and could place Birch Telecom at a competitive disadvantage if disclosed. In support of this claim of privilege, Birch Telecom submits that this confidential information is not generally known outside of Birch Telecom, meaning it would be extremely difficult for a competitor to acquire, and is used solely as an internal company work product. Furthermore, this information is distributed only on a limited basis within Birch, and would be extremely valuable to competitors of Birch Telecom.

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ATTACHMENT “G”

REDACTED VERSION – PUBLIC

ATTACHMENT G

PROJECT NO. 21000

Correspondence Detailing Inappropriate Comments
Made by SWBT to a Birch Customer

Attachment G contains information that is protected from public disclosure under the Texas Open Records Act, TEX. GOV'T CODE ANN. ART. §§ 552.101, 552.104 AND 552.110 (VERNON 1998). These applicable exemptions include trade secrets, and Birch Telecom's commercial or financial information, and could place Birch Telecom at a competitive disadvantage if disclosed. In support of this claim of privilege, Birch Telecom submits that this confidential information is not generally known outside of Birch Telecom, meaning it would be extremely difficult for a competitor to acquire, and is used solely as an internal company work product. Furthermore, this information is distributed only on a limited basis within Birch, and would be extremely valuable to competitors of Birch Telecom.

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A REDACTED VERSION IS ATTACHED.

From: Kettler, Patti
Sent: Thursday, June 08, 2000 11:19 AM
To: Carla Rowland (E-mail)
Cc: Mederick Rodgers (E-mail); Mary Pat Regan (E-mail)
Subject: _____

Carla:

As you are keenly aware, Birch ordering and provisioning related problems continue to worsen, as substantiated by our recent re-sampling of orders, i.e. the error rate has increased to 35%.

_____ suffered the consequences of these problems last Monday I believe. However, in this case, the SBC Retail Business office serving this market made matters significantly worse, which is an understatement of the impact to Birch. The italicized paragraph below summarizes the feedback we received from the customer.

Dawna just got off of the phone with _____ and they informed her that Bell told her that there was no way that their service would be restored today. They also told her that for their service to be restored today that she needed to cancel service with Birch sign back up with Bell and they could get it restored as soon as possible. As crazy as it sounds, the customer was told by someone at Bell that it would be June 14th before her service would be restored through Birch. This customer did call into Bell themselves due to the situation they are in with _____ involved and this was the information they were given. Therefore, the customer is adamant about cancelling so they can get restored today. Bell told the customer that they had to receive a canceled order from us before they could convert them back. Furthermore, one of their vendors who is a customer that has not been provisioned yet got wind of this and have called in expressing their concerns regarding their account.

This is obviously only the customer's perspective, provided via Birch sales. However, the facts (from the dates of your service orders and the trouble resolution information we obtained from the LOC) support this general description.

Birch just launched service in the _____ community. We have submitted _____ orders so far, and _____ (12%) of the conversions have experienced significant customer impacting problems, including complete or partial loss of dial tone in over half of the cases. Word travels fast in these smaller business communities; unfortunately the word about Birch is not good as a consequence of the service problems imposed by SBC.

Carla, Birch would like to receive a letter of explanation regarding _____ as your earliest convenience. Suffice it to say, our current market entry problems in _____ are receiving a great deal of attention within Birch.

Best Regards,
Patti Kettler
Director, ILEC Carrier Relations

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ATTACHMENT “H”

REDACTED VERSION – PUBLIC

ATTACHMENT H

PROJECT NO. 21000

Sample of SWBT Win-Back Customers Who Returned to SWBT from Birch

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Examples of Customers That Returned to SBC as a Result of Ordering and Provisioning Problems

- Birch sent original conversion over with NC (Network Channel) – SPSC (Code for 5 db loop) and the ECCKT (Exchange Carrier Circuit ID) – Design. It fell out and was re-keyed by LSC (Local Service Center) and NC – SPSC and the ECCKT – Non Design. Birch's order was correct.
- Bell then issued a subsequent version with the ECCKT – Design and the NewChannel (8 db loop) SPSL. It should have been NC SPSC.
- Order D026936 from SWB then went to CPC (engineering department). They did not see the related C order due to the LSC Rep failing to RRSO that C order. (Link C/D)
- Service Rep cancelled the D order.
- The LSC again issued orders to convert customer D order (could not be identified) & C002362. The order had the ECCKT – Design and NC SPSL. C went through reassigning pairs to non-working pairs.

The customer went down on at least two separate occasions. Twice SWB used the wrong NC code on their orders, among other mistakes.

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- This was a conversion order of 6 lines.
 - The order was put into jeopardy on three separate occasions. Each jeopardy was proved to be invalid:
 - Facility shortage could not be confirmed with SWBT technician present
 - TN's already working (this because the N orders were completed – multi-order problem caused by current jeopardy process)
 - Invalid address (again this is a straight conversion)
 - On each jeopardy we received, the N orders subsequently had to be disconnected (again, a problem associated with the 3 order process.).
 - Customers service went down on 3 separate occasions.
 - _____, C092645, LSR 20000331L03158

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- Conversion of two existing lines, addition of one new install. The process was started first part of May.
 - Line : _____ MBTN (Main Billing Telephone Number) original due date 5/2
 - Line _____ new install original due date 5/2
 - Line _____ existing line. Converted to Birch 5/2.
 - Lines : _____ were received jeopardy due to no access.
 - The Toll file guides had to be disconnected because they had completed.
 - There were 15 orders, combination of C, D and N orders on these two lines.
 - Customer lost dial tone on _____ MBTN 3 times while we tried to convert.
 - Customer threatens to file a FCC and PUC complaint against Birch.
 - When this is all said and done, customer was never on Birch service.

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- Order C906096
- The hunting for the 3 line hunt group. The main line _____ was not rolling to lines 2 and 3.
- Birch reported to SWBT LSC on 4/26 stating this problem. Advised by Loretta/SWBT the lines were not working because of D854130 which was disconnecting the lines. Birch had not placed disconnect orders.
- 4/28 Birch's repair took the issue back to SWB and spoke with Rachael who advised hunting was indeed on the order C906096 but not in switch. Commitment given was 4/29 by 11 am.
- Birch went to Gay with LSC CAST to have issue escalated as Birch was told incorrect info by Loretta on 4/26.
- 4/28 PM called the LOC and spoke to Chris who said that N821051 DD 4/17 removed hunting. Called the LSC and spoke w/Adrian who said that this was not true. Looked at our conversion order and it is in good standing.
- Repair ticket was completed at 2:33pm on 4/28.
- This issue is an example of the run around often experienced when Birch makes initial contact with SWBT.

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- Order was for a new install.
 - SWB tech went to customer location and spoke to the customer ~~who~~ who quoted the technician as stating "Birch screwed up the work order and he doesn't know why he was there".
 - The tech left without doing anything .
 - New line was never installed and customer started having problems with her features (call waiting & caller id) when SWBT went to her location. Customer reported they had been working until then.
 - Customer has gone back to SWB prior to completing conversion.

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