

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

CC Docket No.: 01-277

In re:)	
Application of BellSouth Corporation)	AFFIDAVIT OF DORIS J.
Pursuant to Section 271 of the Telecommunications)	BABB ON BEHALF OF
Act of 1996 to Provide In-Region, InterLATA)	XO COMMUNICATIONS
Services in Georgia and Louisiana)	

Doris J. Babb, being first duly sworn, deposes and says:

1. I am Doris J. Babb, Senior Project Manager, for XO Communications, Inc. ("XO"). My business address is 2700 Summit Avenue Plano, TX 75074.

2. In my current position, I am responsible for accurate and timely delivery of electronic messages between XO and other telecommunications carriers , including BellSouth.

3. I have approximately ten years in the Electronic Data Interface ("EDI") field. My background includes over 2 years of experience in the telecommunications industry working directly with EDI analysis and project management of e-commerce applications. I have extensive knowledge and understanding of the LSOG ordering and provisioning process as it relates to EDI.

4. My affidavit demonstrates that BellSouth ("BST") does not provide CLECs with nondiscriminatory access to its operational support systems ("OSS") and functions as required by the FCC and this Commission.

Access to Unbundled Network Elements (OSS) (Checklist Item 2)

A. **BellSouth Has Delayed Implementation of EDI Interface Upgrades.**

5. In his affidavit filed in Georgia with BellSouth's comments, Mr. William Stacy stated at paragraph 197: "After the January 14, 2000 implementation of Release 6.0 of EDI and Releases 3.0 and 3.1 of TAG, some CLECs chose not to upgrade their EDI and TAG ordering interfaces. As a result, the flow-through enhancements that occurred with these new releases and those subsequent will not be realized in these CLECs' flow-through percentages."

6. XO chose to upgrade its EDI upgrade last December to Release 6.0 (also referred to as OSS99). However, XO has been stymied by repeated BellSouth delays. The flow-through enhancements Mr. Stacy references will not be realized by XO because of BellSouth delays. These delays have cost XO money and reduced XO's productivity.

7. XO cannot implement new releases of EDI until BellSouth certifies XO for a new release through a series of tests – Physical Connectivity, Validity, Syntax, and Production Verification (the "Certification Tests"). Mr. Stacy describes these and other related tests in paragraph 107 of his OSS affidavit.

8. In August, XO requested BellSouth to schedule testing for November 2000 for the upgrade to EDI Release 6.0. In a BellSouth Carrier Notification (SN91082007) dated October 23, 2000, however, XO and other CLECs were advised that testing would be suspended until December 15, 2000. BellSouth also separately notified XO that all testing would be shut down during the month of December 2000 and part of January 2001.

9. We were concerned about this delay in testing because XO was anxious to implement EDI Release 6.0. This new release would eliminate a lot of manual processing of XO orders within BellSouth's internal back office systems.

10. BST did not make its test windows available for EDI Release 6.0 (for any CLECs) until the end of March 2001. Given BellSouth's delay, XO was 3 months behind its scheduled implementation for the EDI upgrade.

11. In early April 2001, XO requested that BellSouth schedule XO for the Certification Tests. BellSouth advised XO that it was fourteenth on the list for testing and that the earliest that XO would be scheduled for testing would be August 2001. XO was forced by BellSouth's schedule to further delay implementation of EDI Release 6.0. Because of BellSouth's delays, XO had to put this project on hold.

12. XO, on a weekly basis, requested that BellSouth expedite the Certification Testschedule. In early May, BellSouth informed XO that several CLECs had dropped off the test list and that BellSouth could schedule XO's Certification Testing sometime in early June. Upon receiving news of BellSouth's availability to test in June, we then attempted to schedule a June 18th testing date. BellSouth response, however, was that August 1st was the earliest available date for testing. . We finally were able to persuade BellSouth to permit XO to begin the Certification Tests on July 2, 2001.

13. On July 10, 2001, XO was informed by BellSouth that BST's EDI was not functioning properly. This delayed the testing and assured that XO would be unable to complete its Certification Testing within the inadequate time frame set forth by BellSouth.

14. Testing did not proceed smoothly due to BellSouth technical difficulties and resource constraints. As a result, XO was not able to deploy the upgrade to its user community until September 13, 2001 – approximately 6 weeks later than the expected

August 1, 2001 date. This BellSouth delay caused other XO projects to be placed in jeopardy.

15. The average time period for completion of Certification Testing within the industry is approximately 6 weeks; however, BellSouth only provided XO with 3 weeks to complete the testing process. Moreover, even after the testing process was completed, XO continued to have problems with BellSouth's EDI Release 6.0 for several weeks. Many of the issues raised at the beginning of the testing process remained open and unresolved throughout XO's Certification Testing. With these issues unresolved, it was certain that XO would not be able to complete its testing in the limited testing window BellSouth had allowed.

16. Consequently, we did experience further delays and did not go in to production as scheduled. Although we are currently in production, there are still issues that remain open and unanswered by Bell South. Even using a conservative estimate, as result of BellSouth's delays XO was deprived of the benefits of EDI Release 6.0 for a minimum of 6 months. Again, in view of the open issues log coupled with the unrealistically short test window, it is a disappointing reality that XO was not able to complete the Certification Testing by August 1st and production was delayed until September 13, 2001.

17. In view of XO's experience, I find it surprising that Mr. Stacy suggests that CLECs are to blame for not realizing the enhanced flow through that EDI Release 6.0 promises. XO has been deprived of these benefits because of BellSouth's delays and inefficiency.

B. BellSouth Has Delayed Related OSS Enhancements.

18. Prior to the EDI 6.0 release, XO communicated with BellSouth's EDI gateway via a modem connection. As a part of its migration to EDI Release 6.0, XO converted to a dedicated line connection (CONNECT:Direct™). This direct connection is not only less expensive but also a more efficient arrangement than the current modem connection. To facilitate this conversion, in May 2001, XO requested BellSouth to provide XO with sample computer code so that XO programmers could construct the computer code necessary to support this application.

19. On May 8, 2001, BellSouth agreed on a Unix operating system platform connection and provided XO with sample code for the Unix system. XO completed the programming using the Unix code. With the code complete, XO was ready to begin testing the connection. Another test – an Application Connectivity Test – is also required to verify communication is properly established between BellSouth and XO. On May 16, 2001, the Application Connectivity Test was conducted successfully.

20. Subsequently, BellSouth informed XO that the Unix platform was not functioning correctly and switched XO off the Unix platform to a new operating system – MVS. In response to this system failure, XO had to expend significant additional resources to accommodate this change. This change added further delay to the processes and set XO back another four weeks in our Application testing efforts.

C. BellSouth's OSS Documentation is Inadequate.

21. At paragraph 39 of his OSS affidavit, Mr. Stacy states that “the significant number of users of TAG and EDI, combined with the substantial usage and integration of

the pre-ordering and ordering interfaces, clearly demonstrates the adequacy of BellSouth's documentation for CLECs." I strongly disagree.

22. BellSouth's documentation on EDI Release 6.0 is inadequate and unclear. Most of the issues on the open issues log referenced in paragraph 15 of this affidavit are the result of the inadequacy of BellSouth's documentation. XO has frequently had to request samples of data, clarification of BellSouth business rules, and explanations of field data usage for the transactions for which code must be written. BellSouth's inadequate documentation is another factor contributing to the delay in XO's ability to realize the benefits of EDI Release 6.0.

D. BellSouth's Delays Are Resulting in Lost XO Revenues and Productivity.

23. XO has had and continues to have every incentive to implement this upgrade as quickly as possible. The previous version of EDI severely limited XO's ability to order unbundled network elements ("UNEs") efficiently and cost effectively. In turn, these limitations of BellSouth's OSS limit XO's ability to compete against BellSouth. Some of these limitations are summarized below:

- BellSouth could not process orders for unbundled DS-1 loops through the current version of EDI. Virtually all of the DS-1 loops XO orders to transport local service/data to customers are provisioned as UNEs. Currently all UNE DS-1 loops have to be ordered by fax on a manual local service request ("LSR").
- Orders to BellSouth for xDSL loops and for ISDN/BRI loops could not be submitted electronically. Currently all such orders are ordered by fax on a manual LSR.

- BellSouth could not electronically process orders where customers are porting some numbers and disconnecting others. Under BellSouth's current process, XO must either port all the numbers, then disconnect the ones the customer does not want after conversion (which is a records nightmare), or order via fax on a manual LSR.
- BellSouth could not process complex directory listings through EDI (i.e., customers who have caption listings). These listings must be ordered via fax on a manual LSR.

24. Implementation of EDI Release 6.0 allowed XO to perform all of the functions described above (with the exception of xDSL orders - due to BellSouth limitation).

25. BellSouth's delay in allowing XO to implement EDI Release 6.0 cost XO [REDACTED] of dollars. Ordering via faxed manual LSRs is nearly three times more expensive for XO than electronic ordering. The cost to XO to process a fax order is \$42; the cost of an EDI order is \$18. To illustrate the significance of these savings, consider that in a four-month period last fall, XO submitted [REDACTED] orders to BellSouth by fax. Had XO been able to submit those orders electronically, the savings to XO just for four months would have been approximately \$ [REDACTED]

26. The circumstances described above illustrate that BellSouth is not providing CLECs with nondiscriminatory access to BellSouth's OSS. In turn, BellSouth's discrimination is adversely affecting XO's ability to compete with BellSouth.

E. **BellSouth Testing Has Impaired XO's Order Processing.**

27. In early February, BellSouth informed XO that it would have to conduct a mandatory Application Connectivity Test of its own EDI translator system with all CLECs using EDI. This test was unrelated to the EDI Release 6.0 certification testing or XO's Application Connectivity Testing and was designed solely for BellSouth's benefit. BellSouth informed XO that this test would last one hour, during which time XO's existing EDI interface would be down. During the one-hour test period XO was informed that it would not be able to submit any electronic orders to BellSouth.

28. XO scheduled its Provisioning Manager, Kristen Hudson, and another member of its Application Support Team to be at BellSouth's offices at 6:00 AM CST on the day of the test to minimize interruption of XO's order processing.

29. Instead of the anticipated one hour service interruption as BellSouth promised, the testing lasted nearly five hours. After five hours, XO requested BellSouth to terminate the test because it had disabled XO's ability to process any orders for customers. BellSouth requested one more hour of testing, and the testing was completed by 12:00 PM CST. The testing lasted a total of six hours, costing XO a half-day's worth of order processing time.

I hereby swear that the foregoing is true and correct to the best of my information
and belief.

/s/ _____
Doris J. Babb

Subscribed and sworn to before me
this ____ day of October, 2001.

Notary Public

My commission expires: _____