

Attachment 33

AMENDED EXCEPTION 84
BellSouth Florida OSS Testing Evaluation

Date: November 15, 2001

EXCEPTION REPORT

KPMG Consulting has identified an exception as a result of the Provisioning Verification and Validation Evaluation (TVV4).

Exception:

BellSouth failed to use the proper codes when provisioning switch translations. (TVV4)

Background:

As part of its Operational Support System (OSS) testing efforts in Florida, KPMG Consulting is conducting a switch translation test to verify the provisioning of service and features.

To understand how BellSouth provisions service and features in its switches, KPMG Consulting requested BellSouth switch translation codes used while provisioning features and services in 5E, 1A, DMS and EWSD type switches. To conduct the verification test, KPMG Consulting requested the switch translations for a random sample of telephone numbers and verified the translation accuracy using the switch translation codes provided by BellSouth. KPMG Consulting considers the services or features requested for that telephone number to have been provisioned properly if the codes that KPMG Consulting observed on the switch translations for a telephone number are consistent with the codes provided by BellSouth,

Issue:

KPMG Consulting applies a success standard of 95%¹ when testing BellSouth's ability to provision service and features. KPMG Consulting has reviewed 265 switch translation reports. KPMG Consulting has identified that the switch translation reports of 25 telephone numbers did not match the switch translation codes provided by BellSouth. BellSouth is currently at 90.5% accuracy of provisioning switch translations.

The discrepancies that KPMG Consulting found are outlined below:

Issue 1 - Suspension of the service provisioned on EWSD (Siemens) switch type

¹ KPMG Consulting applied standards based on its professional judgment in the absence of 1) FPSC-approved standards or 2) documented BellSouth guidelines.

AMENDED EXCEPTION 84

BellSouth Florida OSS Testing Evaluation

Per BellSouth, the codes "State=SB and State=IS" is to be included in the switch translation report for EWSD switch type when a suspension of service is requested. The investigated orders and their results are listed below:

No.	PO#	VER	Telephone Number	CC	Result
1A	016011FPEN100003	00	8504340092	9993	Found "State=SB" only.
1B	016011FPEN100010	00	8504290580	9993	Found "State=SB" only.
1C	016101FPEJ100002	00	8504380686	9993	Found "State=SB" only.

This finding implies that BellSouth did not provision the suspension of the service on EWSD switches correctly.

Issue 2 - Suspension of the service provisioned on DMS switch type

Per BellSouth, the codes ORSUS and ORTESS are to be included in the switch translation report for DMS switch type when a suspension of service is requested. The investigated orders and their results are listed below:

No.	PO#	VER	Telephone Number	CC	Result
2A	016011FPTN101018	00	9043551067	9993	Found the code "RSUS ORSS TESS"
2B	016011FPTN100021	00	9043582714	9993	Found the code "RSUS ORSS TESS"
2C	016011FPTN100029	00	9545226082	9993	Found the code "RSUS ANCT TESS"
2D	016011FPRN100036	00	9545227342	9993	Found the code "RSUS ANCT TESS"
2E	016021FPEN100002	00	9046320608	9993	Found the code "RSUS ORSS TESS"
2F	016031FPTN002003	00	9548320409	9993	Found the code "RSUS ANCT TESS"
2G	016041FPEN100005	00	9545223488	9993	Found the code "RSUS ANCT TESS"
2H	016041FPTN102008	00	9545227392	9993	Found the code "RSUS ANCT TESS"
2I	016041FPTN101011	00	9545228308	9993	Found the code

AMENDED EXCEPTION 84
BellSouth Florida OSS Testing Evaluation

No.	PON	VER	Telephone Number	CC	Result
					"RSUS ANCT TESS"
2J	016101FPTJ100008	00	9547632563	9993	Found the code "RSUS ANCT TESS"
2K	016101FPTJ100010	00	9043583476	9993	Found the code "RSUS ORSS TESS"
2L	016101FPLJ100014	00	9547639349	9993	Found the code "RSUS ANCT TESS"

This finding implies that BellSouth did not provision the suspension of the service on DMS switch type correctly.

Issue 3 - Provisioning of speed calling feature on EWSD switch type

Per BellSouth, the code "SC1 SC1CC" is to be included in the switch translation report for EWSD switch type when the speed-calling feature (USOC = ESL) is requested. KPMG Consulting found "SC1=SH1CC" in the switch translation reports for the following orders:

No.	PON	VER	Telephone Number	CC
3A	010032FPTN100017	00	8504348164	9993
3B	010032FPTN101018	00	8504348255	9993

This finding implies that BellSouth did not provision the speed calling feature on EWSD switch type correctly.

Issue 4-

No.	PON	VER	Telephone Number	CC
4	002041FPEJ100001	00	8504690632	9990

1. Call waiting was not properly provisioned. Per BellSouth, the code "CWT STND CWC Y" should be found on switch translation report for EWSD switch type for call waiting feature (USOC = ESX). KPMG Consulting found "CWT=STND, CWC=STND" instead.
2. Speed calling was not properly provisioned. Per BellSouth, the code "SC2 SC2CC" should be found on switch translation report for EWSD switch type for speed calling feature (USOC = ESF). KPMG Consulting found "SC2=SH2CC" instead.

AMENDED EXCEPTION 84
BellSouth Florida OSS Testing Evaluation

Issue 5 -

No.	PON	VER	Telephone Number	CC
5	002041FPEJ100004	01	9045981758	9991

The 900/976 and N11 blocking feature was not properly provisioned. Per Bellsouth, the 900/976 and N11 blocking feature (USOC=CREX6) should be provisioned by a Line Treatment Group for DMS switch type. The Line Treatment Group for the Jacksonville, Clay St. office is LTG 12 for both Flat Rate and Message Rate. KPMG Consulting found the Line Treatment Group of 106 for the telephone number of 9045981758.

Issue 6 -

No.	PON	VER	Telephone Number	CC
6	002121FPTJ101013	00	4073527229	9990

Result: The LPIC specified in the local service request was "NONE". Per BellSouth, PTC 9199 should appear on the switch translation reports. KPMG Consulting found PTC 5124.

Issue 7 -

No.	PON	VER	Telephone Number	CC
7	002141FPTJ010013	00	8502333680	9990

The hunting feature was not properly provisioned.

Issue 8 -

No.	PON	VER	Telephone Number	CC
8	002191FPEN100001	00	9045980360	9990

The three-way calling feature was not properly provisioned. Per Bellsouth, the code "3WC" should be found on the switch translation reports for DMS switch type for the three-way calling feature (USOC=ESC). KPMG Consulting was not able to find the code "3WC" on the switch translation report for the telephone number of 9045980360 provided by BellSouth.

Issue 9 -

AMENDED EXCEPTION 84
BellSouth Florida OSS Testing Evaluation

No.	PON	VER	Telephone Number	CC
9	006031FPEJ002001	00	5618350214	9990

The call-waiting feature was not properly removed. Per Bellsouth, the code "CWC1" should be found on the switch translation reports for DMS switch type for the call-waiting feature (USOC=ESX). KPMG Consulting found the code "CWC1" on the switch translation report for the telephone number of 5618350214 provided by BellSouth when the request for removing the call-waiting feature was submitted.

Issue 10 -

No.	PON	VER	Telephone Number	CC
10	010161FPEN100004	00	8504290402	9993

Call waiting was not properly provisioned. Per BellSouth, the code "CWT STND CWC Y" should be found on switch translation report for EWSD switch type for the call waiting feature (USOC = ESX). However, KPMG Consulting found "CWT=STND, CWC=STND".

Issue 11 -

No.	PON	VER	Telephone Number	CC
11	020041FPTJ100012	01	5618056182	9990

The LPIC specified in the local service request was "0288". KPMG Consulting found PTC 5124.

Amendment:

KPMG Consulting has reviewed switch translations for 397 telephone numbers, and 56 of those telephone numbers do not match the switch translation codes provided by BellSouth. Currently, features and services are provisioned in the switch accurately for 86% of the telephone numbers validated. The new discrepancies identified are:

Issue 3: Provisioning of speed calling short feature (USOC = ESL)

The additional discrepancies listed below are linked to Issue 3 of the original Exception. Per section 4.2 of Custom Calling Services - RCMAG Methods and Procedures (Section 193-700-008BT, Issue C, November 2000), the code on VFY information view for speed calling short (USOC = ESL) for the EWSD switch should be "SC1=SC1CC" as KPMG Consulting originally stated in the exception. KPMG Consulting was not able to find in

KPMG Consulting, Inc.

11/15/01

Page 5 of 10

AMENDED EXCEPTION 84
BellSouth Florida OSS Testing Evaluation

BellSouth's provided documents that the switch changes the input of SC1=SC1CC to SC1=SH1CC as BellSouth responded to this exception. Therefore KPMG Consulting expects to find "SC1=SC1CC" on the VFY view of the EWSD switch. KPMG Consulting found "SC1=SH1CC" in the switch translation for the following orders:

No.	PON	VER	Telephone Number	CC
3C	010021FPRN100005	00	8504299193	9993
3D	010021FPRN100005	00	8504299188	9993

BellSouth's M&Ps show that the speed calling short features were not properly provisioned in EWSD switch.

Issue 7: Provisioning of hunting feature

The discrepancies listed below are linked to Issue 7 of the original Exception.

No.	PON	VER	Telephone Number	CC
7B	002141FPTJ001011	00	3056883098	9990
7C	012051FPTJ001008	00	8502338431	9993
7D	013021FPEN000003	00	9545233144	9993
7E	013021FPEN000003	00	9545223720	9993

The hunting feature was not properly provisioned.

Issue 12:

No.	PON	VER	Telephone Number	CC
12	010061FPEJ100003	00	9043541846	9993

1. Caller ID with anonymous call reject feature was not provisioned. Per BellSouth, the code "CND NOAMA CNAMD NOAMA ACRJ INACT" should be found on

AMENDED EXCEPTION 84
BellSouth Florida OSS Testing Evaluation

the switch translation report for DMS switch type for caller ID with anonymous call reject feature (USOC = NXMCR). KPMG Consulting was not able to find the code on the switch translation provided by BellSouth.

2. The RingMaster feature was not provisioned. Per BellSouth, the code "SDN" with the telephone number should be found on switch translation reports for the DMS switch type for the RingMaster feature (USOC = DRS). KPMG Consulting was not able to find the code on the switch translation provided by BellSouth.

Issue 13:

No.	PON	VER	Telephone Number	CC
13	020021FPTN100014	01	4079037394	9990

The telephone number was not provisioned.

Issue 14:

No.	PON	VER	Telephone Number	CC
14A	051041FPEN000011	00	8502365754	9990
14B	051041FPEN000013	00	8502366919	9990

The switch translation provided by BellSouth showed that no OE was assigned to these numbers. Since each telephone number has 5 DID trunks, KPMG Consulting considered that 5 lines (DID 1 to DID 5) per each telephone number were not provisioned.

Issue 15: Provisioning of call waiting feature (USOC = ESX) on 1A switch type

Per section 7.1 of Call Waiting Services - RCMAG Methods and Procedures (Section 193-900-128BT, Issue A1, November 2000), the code on the VFY information view for call waiting (USOC = ESX) for an 1A switch should be "ESX". KPMG Consulting was not able to find "ESX" on the translations for the following orders:

AMENDED EXCEPTION 84
BellSouth Florida OSS Testing Evaluation

No.	PON	VER	Telephone Number	CC
15A	010051FPEJ100007	AA	3056810752	9993
15B	010051FPTJ101010	AA	3056813350	9993
15C	010051FPTJ100012	AA	3056813604	9993
15D	010051FPTJ100014	AA	3056814435	9993
15E	010072FPTJ000012	AA	3056810567	9993
15F	010072FPTJ000012	AA	3056810668	9993
15G	010072FPTJ000012	AA	3056810898	9993
15H	010072FPTJ000012	AA	3056812125	9993
15I	010072FPTJ000012	AA	3056812351	9993
15J	010072FPTJ000012	AA	3056812402	9993
15K	010072FPTJ000012	AA	3056812418	9993
15L	010072FPTJ000012	AA	3056812430	9993
15M	010072FPTJ000012	AA	3056812446	9993
15N	010072FPTJ000012	AA	3056812453	9993
15O	010072FPTJ000012	AA	3056812624	9993
15P	010072FPTJ000012	AA	3056813331	9993
15Q	010072FPTJ000012	AA	3056813937	9993
15R	010072FPTJ000012	AA	3056814062	9993
15S	010072FPTJ000012	AA	3056814099	9993
15T	010072FPTJ000012	AA	3056814279	9993
15U	010072FPTJ000012	AA	3056814361	9993

AMENDED EXCEPTION 84
BellSouth Florida OSS Testing Evaluation

15W	010072FPTJ000012	AA	3056814385	9993
15X	010072FPTJ000012	AA	3056814462	9993
15Y	010072FPTJ000012	AA	3056814849	9993
15Z	010072FPTJ000012	AA	3056814904	9993
15AB	010072FPTJ000012	AA	3056814957	9993
15AC	010072FPTJ000012	AA	3056815084	9993
15AD	010072FPTJ000012	AA	3056815142	9993
15AE	010072FPTJ000012	AA	3056816280	9993
15AF	010072FPTJ000012	AA	3056819591	9993

Issue 16: Provisioning of caller id (USOC = NSD) on 1A switch type

Per BellSouth, "icl 0001" should appear in the 1A switch translation report for the speed caller id feature. However, KPMG Consulting was unable to find "icl 0001".

No.	PON	VER	Telephone Number	CC
16A	020051FPRJ100019	00	3056855419	9990
16B	020051FPRJ100020	01	3056857124	9990

Issue 17: Telephone numbers were not disconnected

The LSR account activity specified an account disconnect, but the telephone numbers listed below were not disconnected.

No.	PON	VER	Telephone Number	CC
17A	044042FPMC000002	00	8504327458	9993
17B	044042FPMC000002	00	8504326913	9993

AMENDED EXCEPTION 84
BellSouth Florida OSS Testing Evaluation

17C	044042FPMC000002	00	8504327546	9993
17D	044042FPMC000002	00	8504327942	9993

Issue 18: Provisioning of Call Return (USOC=NSS) on 1A Switch Type

The LSR account and line activities were "Migrate as Specified", however, KPMG Consulting was unable to find "ac s", which is the code for Call Return (USOC=NSS).

No.	PON	VER	Telephone Number	CC
18A	005101FPEN100005	AA	3056881561	9990
18B	005101FPEN100005	AA	3056884950	9990

Impact:

BellSouth's inability to accurately provision or remove services and /or features may result in a decrease in CLEC customer satisfaction. Mishandling of customer requests will negatively impact a customer's perception of the CLEC's ability to provide quality service.

Attachment 34

AMENDED EXCEPTION 130
BellSouth Florida OSS Testing Evaluation

Date: January 28, 2002

EXCEPTION REPORT

KPMG Consulting has identified an exception as a result of the testing activities associated with the Provisioning Verification and Validation Evaluation. (TVV4)

Exception:

BellSouth's systems or representatives did not consistently provision service in a timely manner for orders submitted by KPMG Consulting (TVV4). This Exception was originally issued as Observation 141.

Background:

As part of its Operational Support System (OSS) testing efforts in Florida, KPMG Consulting conducted a Completion Notice (CN) Data Integrity Validation test to ensure that orders were provisioned on the due date specified by the Firm Order Completion (FOC) response. KPMG Consulting visited Central Offices the day after the due date on the FOC. KPMG Consulting also visited Recent Change Memory Administration Groups (RCMAGs) in Florida and the Directory Listing Center in Atlanta to ensure that records were updated in a timely manner.

KPMG Consulting expected that all physical and systems work would be completed during the visit to BellSouth Central Offices, RCMAGs, and Directory Listing Center. In order to verify the completion of orders KPMG Consulting:

- Analyzed COSMOS records, which detail cable and pair assignments.
- Physically verified that the cable pairs were connected and a dial tone was present.
- Verified Switch Translation records when appropriate.
- Verified history records from the RCMAG.
- Verified the date when Directory Listing records updated if a directory listing was requested by the order.
- Verified that telephone numbers were disconnected on the due date as specified in the LSR.

AMENDED EXCEPTION 130
BellSouth Florida OSS Testing Evaluation

Issue:

KPMG Consulting applies a success standard of 95%¹ when testing BellSouth's ability to provision orders in a timely manner. KPMG Consulting has reviewed 43 orders. Based on these findings, BellSouth has provisioned 88.4% of the observed orders in a timely manner. KPMG Consulting has found the following discrepancies:

Issue 1: The Original Due Date on the COSMOS record reflected the due date specified by the FOC, but the due date was changed in COSMOS.

	PON	VER	CC	Result
1A	012031FPEJ000007	01	9993	The original due date on the COSMOS records was 9/17/01, which was the FOC due date. However, the due date on the COSMOS records was changed to 9/18/01.
1B	020011FPLN101024	00	9990	The original due date on the COSMOS records was 9/17/01, which was the FOC due date. However, the due date on the COSMOS records was changed to 9/18/01.

Issue 2: The Directory Listing Records did not update in a timely manner.

	PON	VER	CC	Result
2A	020011FPLN101025	00	9990	The FOC due date was 9/18/01, but a no listing found was received during KPMG Consulting's Directory Listing Visit on September 21. The LSR specified a Non-Published listing for 5618336218.
2B	020041FPTJ100016	00	9990	The FOC due date was 9/17/01, but the Directory Listing record updated on 9/20/01.
2C	072011FPEF100006	00	9990	The FOC due date was 9/11/01, but a directory listing record for a retail account was received during KPMG Consulting's visit to the Directory Listing Center on September 21. The order was submitted on 8/31/01, but a LSR clarification was not received until 10/2/01.

¹ KPMG Consulting applied standards based on its professional judgment in the absence of 1) FPSC-approved standards or 2) documented BellSouth guidelines.

AMENDED EXCEPTION 130
BellSouth Florida OSS Testing Evaluation

Amendment:

BellSouth agreed with KPMG Consulting on all of the issues identified in the initial tests. KPMG Consulting retested these issues (date). During retesting activities, KPMG Consulting reviewed 88 orders, 78 of which provisioned in a timely manner. Based on these findings, BellSouth provisioned 88.6% of the orders in a timely manner.

Retest Issue 1: The Original Due Date on the COSMOS record reflected the due date specified by the FOC, but the due date was changed in COSMOS. This issue is related to Issue 1 in Exception 130.

	PON	VER	CC	Result
R1A	012051GPTJ003006	00	9993	The original due date for 3524908420 on the COSMOS record was 12/17/01, which corresponded with the FOC due date. However, the due date on the COSMOS records was changed to 12/18/01.
R1B	012051GPTJ001007	00	9993	The original due date for 3053716852 on the COSMOS record was 12/17/01, which corresponded with the FOC due date. However, the due date on the COSMOS records was changed to 12/18/01.
R1C	012051GPTJ000010	00	9993	The original due date for 3053729297 on the COSMOS record was 12/17/01, which corresponded with the FOC due date. However, the due date on the COSMOS records was changed to 12/18/01.

Retest Issue 2: The MARCH history record updated even though the orders listed were issued with an Activity Type "W" (Full Conversion of Service to New LSP As Is).

	PON	VER	CC	Result
R2A	001131GPLN100013	00	9990	According to BellSouth, an order with Activity Type "W" should not trigger an update in MARCH. However, the MARCH record for 3524905390 has an update of 12/17, which corresponds with the FOC due date.
R2B	001141GPEN100003	00	9990	According to BellSouth, an order with Activity Type "W" should not trigger an update in MARCH. However, the MARCH

AMENDED EXCEPTION 130
BellSouth Florida OSS Testing Evaluation

	PON	VER	CC	Result
				record for 8504691926 has an update of 12/18, which corresponds with the FOC due date.
R2C	001141GPEN100009	00	9990	According to BellSouth, an order with Activity Type "W" should not trigger an update in MARCH. However, the MARCH record for 8504379283 has an update of 12/18, which corresponds with the FOC due date.

Retest Issue 3: The MARCH, COSMOS, Switch Translations or Directory Listing records did not appropriately update on the FOC due date.

	PON	VER	CC	Result
R3A	010072GPTJ000008	00	9993	KPMG Consulting expected to find MARCH records for all lines associated with this order updated on the FOC due date of 12/17/01. The MARCH record for 3053712659 shows that MARCH did not update correctly for this telephone number since the last MARCH update occurred on 11/02/01.
R3B	011071GPLJ103015	02	9993	KPMG Consulting expected MARCH updates to occur on the FOC due date of 12/17/01. The MARCH record for 3054006746 updated on 12/18/01 and the MARCH record for 3053735755 updated on 11/02/01. A caption listing was retrieved from the Directory Assistance Database even though the LSR did not specify a caption listing.
R3C	012031GPEJ000003	00	9993	KPMG Consulting expected 8504341810 to have all systems and physical work completed on the FOC due date of 12/18/01. MARCH did not have a history record and the COSMOS due date is 10/17/01. The switch translation record reports that 8504341810 is disconnected.
R3D	012031GPLJ000018	00	9993	KPMG Consulting expected to find service for 9043547330. However, the number is unassigned in the switch and neither the MARCH nor the COSMOS records

AMENDED EXCEPTION 130
BellSouth Florida OSS Testing Evaluation

	PON	VER	CC	Result
				correspond with the FOC due date of 12/19.
R3E	016093GPEJ000002	00	9993	When KPMG Consulting visited the Central Office on 12/18/01, COSMOS showed a pending due date of 12/17 for 3053716045 & 3053710337. KPMG Consulting did not expect to see a pending order in COSMOS.
R3F	018051GPEJ100004	00	9993	The LSR specified a disconnect for 9043510974, but KPMG Consulting found that the number was not disconnected on 12/20/01 even though the FOC due date was 12/19/01.

Impact:

BellSouth's inability to provision service in a timely manner may result in a decrease in Competitive Local Exchange Carrier (CLEC) customer satisfaction.

Attachment 35

OBSERVATION 152
BellSouth Florida OSS Testing Evaluation

Date: December 05, 2001

OBSERVATION REPORT

KPMG Consulting has identified an observation as a result of the Provisioning Verification and Validation Tests (TVV4).

Exception:

BellSouth failed to use the proper codes when provisioning Operator Services/Directory Assistance. (TVV4)

Background:

To validate the provisioning of Operator Services/Directory Assistance (OS/DA) in BellSouth switches, KPMG Consulting requested BellSouth switch translation codes used for provisioning OS/DA in 5ESS and DMS 100 type switches. KPMG Consulting reviewed Line Class Codes and Line Treatment Groups on the switch translation reports to determine if they were consistent with the OSDA service specified in the Local Service Request (LSR).

Issue:

According to the Line Class Codes and Line Treatment Groups, KPMG Consulting has found that OSDA was not properly provisioned for 11 telephone numbers. The discrepancies that KPMG Consulting found are outlined below:

Mismatch of Line Class Codes and/or Line Treatment Groups in Switch Translation Reports

The Line Treatment Groups and Line Class Codes found on the switch translation reports do not match those provided by BellSouth for Operation Services Directory Assistance. The investigated orders and their results are listed below:

No.	PON	VER	Telephone Number	CC	Result
1A	001061FPEJ100016	02	4073513469	9993	The LSR specified a ZSRC FID of "UCCSU" for OSDA. As per BellSouth, for ZSRC FID = "UCCSU"

OBSERVATION 152
BellSouth Florida OSS Testing Evaluation

					the actual Line Class Code = "CSU" but the switch translation record has Line Class Code = "1MR".
1B	002041FPEJ100009	00	9545221935	9993	The LSR specified a ZSRC FID of "SCCKU" for OSDA. As per BellSouth, for ZSRC FID = "SCCKU" the actual Line Class Code = "CKU" and Line Treatment Group = "300" but the switch translation record has Line Class Code = "1MR" and Line Treatment Group = "0".
1C	002041FPTJ100016	00	9545224968	9993	The LSR specified a ZSRC FID of "SCCK4" for OSDA. As per BellSouth, for ZSRC FID = "SCCK4" the actual Line Class Code = "CK4" and Line Treatment Group = "301" but the switch translation record has Line Class Code = "1MR" and Line Treatment Group = "0".
1D	011061FPTJ100002	00	9544639868	9993	The LSR specified a ZSRC FID of "UCCSU" for OSDA. As per BellSouth, for ZSRC FID = "UCCSU" the actual Line Class Code = "CSU" and

OBSERVATION 152

BellSouth Florida OSS Testing Evaluation

					Line Treatment Group = "303" but the switch translation record has Line Class Code = "1MR" and Line Treatment Group = "0".
1E	011071FPLJ000017	00	4073708513	9993	The LSR specified a ZSRC FID of "UCCSU" for OSDA. As per BellSouth, for ZSRC FID = "UCCSU" the actual Line Class Code = "CSU" but the switch translation record has Line Class Code = "1MR".
1F	011071FPLJ000017	00	4073708693	9993	The LSR specified a ZSRC FID of "UCCSU" for OSDA. As per BellSouth, for ZSRC FID = "UCCSU" the actual Line Class Code = "CSU" but the switch translation record has Line Class Code = "1MR".
1G	011131FPLJ000017	00	9544639649	9993	The LSR specified a ZSRC FID of "SCCKU" for OSDA. As per BellSouth, for ZSRC FID = "SCCKU" the actual Line Class Code = "CKU" and Line Treatment Group = "300" but the switch translation record has Line Class Code = "1MR" and Line Treatment Group = "0".
1H	013101FPTJ101011	00	9544626503	9993	The LSR specified a

OBSERVATION 152
BellSouth Florida OSS Testing Evaluation

					ZSRC FID of "UCCS4" for OSDA. As per BellSouth, for ZSRC FID = "UCCS4" the Line Class Code = "CS4" and Line Treatment Group = "304", but the switch translation record has Line Class Code = "1MR" and Line Treatment Group = "0".
II	013101FPTJ100011	00	9544628341	9993	The LSR specified a ZSRC FID of "UCCS4" for OSDA. As per BellSouth, for ZSRC FID = "UCCS4" the actual Line Class Code = "CS4" and Line Treatment Group = "304" but the switch translation record has Line Class Code = "1MR" and Line Treatment Group = "0".
1J	018051FPEJ100009	00	9545274284	9993	The LSR specified a ZSRC FID of "UCCSX" for OSDA. As per BellSouth, for ZSRC FID = "UCCSX" the actual Line Class Code = "CSX" and Line Treatment Group = "305" but the switch translation record has Line Class Code = "1MR" and Line Treatment Group = "0".
1K	018051FPEJ100009	00	9544671362	9993	The LSR specified a ZSRC FID of

OBSERVATION 152
BellSouth Florida OSS Testing Evaluation

					“UCCSX” for OSDA. As per BellSouth, for ZSRC FID = “UCCSX” the actual Line Class Code = “CSX” and Line Treatment Group = “305” but the switch translation record has Line Class Code = “1MR” and Line Treatment Group = “0”.
--	--	--	--	--	--

Impact:

BellSouth’s inability to accurately provision OS/DA could result in a decrease in CLEC customer satisfaction. Mishandling of customer requests will negatively impact a customer’s perception concerning the CLEC’s ability to provide quality service.

Attachment 36

EXCEPTION 156
BellSouth OSS Testing Evaluation

Date: February 22, 2002

EXCEPTION REPORT

KPMG Consulting has identified an Exception as a result of the Provisioning Verification and Validation (TVV4) test and the Collocation and Network Design Process (PPR6) test.

Exception:

BellSouth failed to properly establish and test Line Class Codes (LCCs), which were requested by KPMG Consulting for Operator Services/Directory Assistance (OS/DA) services. This Exception was originally issued as Observation 152 (PPR6).

Background:

As part of the Operational Support System (OSS) testing efforts in Florida, KPMG Consulting conducted an OS/DA test to measure BellSouth's ability to correctly provision OS/DA services.

KPMG Consulting submitted Service Inquiries, which requested the establishment of LCCs to ensure proper routing of calls when OS/DA services are ordered via the Local Service Request (LSR). The Service Inquiries included the establishment of LCCs in Fort Lauderdale and Orlando Central Offices (COs) for unbranded and branded OS/DA services. Once the LCCs are established, BellSouth's method and procedures¹ require that test calls be performed to verify that the LCCs properly route OS/DA calls as requested in the Service Inquiry.

Issue:

KPMG Consulting applies a success standard of 95%² when testing BellSouth's ability to accurately provision orders. KPMG Consulting reviewed 36 telephone lines and found 21 telephone lines were provisioned correctly, resulting in a 58.3% success rate. The discrepancies are listed below:

Issue 1: LCCs found on the switch translation records for the Fort Lauderdale SESS switch did not match the OS/DA services specified by the LSR. Based on KPMG Consulting's research and clarification calls with BellSouth, the LCCs listed below were not built in the Fort Lauderdale CO, and hence OS/DA services did not provision properly.

¹ Unbundled Local Switching (Selective Carrier Routing Switched Based) Service Description and Specifications Implementation Methods and Procedures – Issue 4, June 2001, Unbundled Local Switching IAESS Implementation Methods and Procedures – June 2001, and Unbundled Local Switching Siemens Telecom Networks EWSD Implementation Methods and Procedures – May 2000.

² KPMG Consulting applied standards based on its professional judgment in the absence of 1) FPSC-approved standards or 2) documented BellSouth guidelines.

EXCEPTION 156
BellSouth OSS Testing Evaluation

No.	PON	VER	Telephone Number	CC	Result
1A	001041FPEN100004	03	4073512442	9993	The LSR specified a ZSRC FID of "UCUSC" for OS/DA. As per BellSouth, for ZSRC FID = "UCUSC" the actual LCC = "USC" but the switch translation record has LCC = "1FR".
1B	002221FPTN100011	00	4073527561	9990	The LSR specified a ZSRC FID of "SC4KC" for OS/DA. As per BellSouth, for ZSRC FID = "SC4KC" the actual LCC = "4KC" but the switch translation record has LCC = "1FR".
1C	007011FPEN100004	00	4073522321	9993	The LSR specified a ZSRC FID of "SCUKC" for OS/DA. As per BellSouth, for ZSRC FID = "SCUKC" the actual LCC = "UKC" but the switch translation record has LCC = "1FR".
1D	007011FPEN100005	00	4073522655	9993	The LSR specified a ZSRC FID of "SC4KC" for OS/DA. As per BellSouth, for ZSRC FID = "SC4KC" the actual LCC = "4KC" but the switch translation record has LCC = "1FR".

EXCEPTION 156
BellSouth OSS Testing Evaluation

1E	007011FPEN100005	00	4073522510	9993	The LSR specified a ZSRC FID of "SC4KC" for OS/DA. As per BellSouth, for ZSRC FID = "SC4KC" the actual LCC = "4KC" but the switch translation record has Line Class Code = "1FR".
1F	007011FPTN101010	00	4073524161	9993	The LSR specified a ZSRC FID of "SCXKC" for OS/DA. As per BellSouth, for ZSRC FID = "SCXKC" the actual LCC = "XKC" but the switch translation record has LCC = "1FR".
1G	007011FPTN101010	00	4073524139	9993	The LSR specified a ZSRC FID of "SCXKC" for OS/DA. As per BellSouth, for ZSRC FID = "SCXKC" the actual LCC = "XKC" but the switch translation record has LCC = "1FR".
1H	011121FPEN100008	00	4073526721	9993	The LSR specified a ZSRC FID of "SCXKC" for OS/DA. As per BellSouth, for ZSRC FID = "SCXKC" the actual LCC = "XKC" but the switch translation record has LCC = "1FR".
1I	011121FPEN100008	00	4073526745	9993	The LSR specified a ZSRC FID of

EXCEPTION 156
BellSouth OSS Testing Evaluation

					“SCXKC” for OS/DA. As per BellSouth, for ZSRC FID = “SCXKC” the actual LCC = “XKC” but the switch translation record has LCC = “1FR”.
1J	079011FPEN100004	00	4072262100	9993	The LSR specified a ZSRC FID of “SC4KC” for OS/DA. As per BellSouth, for ZSRC FID = “SC4KC” the actual LCC = “4KC” but the switch translation record has LCC = “1FR”.
1K	079022FPEN100004	00	4079031601	9993	The LSR specified a ZSRC FID of “SC4KC” for OS/DA. As per BellSouth, for ZSRC FID = “SC4KC” the actual LCC = “4KC” but the switch translation record has LCC = “1FR”.

Issue 2: When Service Inquiries are submitted to build LCCs for a DMS 100 switch, a LCC and an associated Line Treatment Group (LTG) are built. Therefore, KPMG Consulting expects to find the correct LCCs and LTGs for OS/DA services provisioned in a DMS 100 switch. LTGs found on the ~~switch translation records for the DMS 100 switch did not match the OS/DA services specified by the LSR.~~

No.	PON	VER	Telephone Number	CC	Result
2A	010161FPLN000016	01	9547689277	9993	The LSR specified a ZSRC FID of “UCUSC” for OS/DA. As per BellSouth, for ZSRC FID = “UCUSC” the actual LTG = “309”

EXCEPTION 156
BellSouth OSS Testing Evaluation

					but the switch translation record has LTG = "0".
2B	010081FPTN102017	04	9545258517	9993	The LSR specified a ZSRC FID of "UCXSC" for OS/DA. As per BellSouth, for ZSRC FID = "UCXSC" the actual LTG = "311" but the switch translation record has LTG = "23".
2C	010081FPTN102017	04	9545258190	9993	The LSR specified a ZSRC FID of "UCXSC" for OSDA. As per BellSouth, for ZSRC FID = "UCXSC" the actual LTG = "311" but the switch translation record has LTG = "0".
2D	010081FPTN102017	04	9545258261	9993	The LSR specified a ZSRC FID of "UCXSC" for OSDA. As per BellSouth, for ZSRC FID = "UCXSC" the actual LTG = "311" but the switch translation record has Line Treatment Group = "23".

Issue 3: ~~According to BellSouth documents and employees, call through tests are performed to ensure proper provisioning of OS/DA services. However, BellSouth failed to properly perform call tests, resulting in the discrepancies listed above.~~

Impact:

BellSouth's inability to accurately provision OS/DA services could negatively impact a customer's perception of a CLEC's ability to provide quality service.

KPMG Consulting, Inc.

02/22/02

Page 5 of 5

Attachment 37

00001

1 BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

2

3 In the matter of:

Docket No. P-55, Sub 1022

4 Application of BellSouth
Telecommunications, Inc. To Provide
5 In-Region InterLATA Services Pursuant to
Section 271 of the Telecommunications Act
6 Of 1996

~~~~~

7

8

DEPOSITION OF

9

DENNIS L. DAVIS

10

September 19, 2001

11

1:12 p.m

12

675 West Peachtree Street  
Atlanta, Georgia

13

14

Sharon A. Gabrielli, CCR-B-2002

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00002

1 APPEARANCES OF COUNSEL

2 On behalf of the BellSouth Telecommunications, Inc.:

3 ANDREW SHORE, ESQ.

4 BellSouth Telecommunications, Inc.

5 675 West Peachtree Street

6 Suite 4300

7 Atlanta, Georgia 30375-0001

8 .

9 On behalf of AT&T:

10 TRACI M. VANEK, ATTORNEY AT LAW

11 MICHAEL A. HOPKINS, ESQ.

12 McKenna & Cuneo, LLP

13 1900 K Street, N.W.

14 Washington, D.C. 20006-1108

15 .

16 Also Present:

17 Jay M. Bradbury

18 .

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00003

1 Deposition of Dennis Davis  
2 September 19, 2001

3 DENNIS DAVIS, having been first  
4 duly sworn, was deposed and testified as  
5 follows:

6 EXAMINATION

7 BY-MS.VANEK:

8 Q. Mr. Davis, for the record, my name  
9 is Traci Vanek. And I'm here on behalf of  
10 AT&T to take your deposition today. Have you  
11 been deposed before?

12 A. No.

13 Q. You have not, okay. The court  
14 reporter is here, as you see, taking down my  
15 questions and your answers. So if you could  
16 provide yes or no answers rather than shaking  
17 your head or nodding your head, that would be  
18 helpful for her.

19 A. Okay.

20 Q. And in addition, it is hard for  
21 her to create a clean record if two people  
22 are speaking at the same time; so if you'll  
23 let me finish my questions, I will do my  
24 best not to interrupt your answers. Is that  
25 okay?

00004

1 A. Okay.

2 Q. If I ask a question that you  
3 don't understand, please let me know that so  
4 I can try to make it clearer. And if you  
5 don't make that known to me, if you go ahead  
6 and answer the question, I'll assume that you  
7 understood it. Is that --

8 A. Okay.

9 Q. You're a BellSouth employee; is  
10 that correct?

11 A. Yes.

12 Q. How long have you worked for  
13 BellSouth?

14 A. 24-plus years.

15 Q. And what's your position with  
16 BellSouth at this time?

17 A. Director Encore solutions delivery.

18 Q. And how long have you been in  
19 that position?

20 A. Since June of this year.

21 Q. And what are the responsibilities  
22 of that position?

23 A. I have functions for release  
24 management, project management, user testing,  
25 user requirements, change control process,

00005

1 software vendor process.

2 Q. Are you also responsible for the  
3 CAVE project management?

4 A. Yes.

5 Q. And who held your position before  
6 you assumed it in June?

7 A. Terry Hudson.

8 Q. What was your prior position?  
9 A. Director of the local number  
10 portability program management office.  
11 Q. How long were you in that  
12 position?  
13 A. Approximately 16 months.  
14 Q. Six to eight months. And what  
15 was your position --  
16 A. 16.  
17 Q. Oh, I'm sorry. 16 months. And  
18 what was your position prior to that?  
19 A. I was a project manager for local  
20 number portability.  
21 Q. In the course of your employment  
22 with BellSouth, I assume you've become  
23 familiar with the change control process; is  
24 that correct?  
25 A. Yes.

00006

1 Q. And how have you gained that  
2 familiarity? Has it just been since you took  
3 the position you're now in in June, or did  
4 you have exposure to it prior to that?  
5 A. It was only since June.  
6 Q. Approximately how much of your  
7 work time each week do you spend on the  
8 change control process or related matters?  
9 A. I think it varies.  
10 Q. Could you give me an estimate?  
11 It varies from what to what?  
12 A. Well, it varies on the -- I guess  
13 it varies on the activity generated from it,  
14 whether my manager needs my assistance,  
15 something of that nature.  
16 Q. So the heaviest week that you  
17 spend working on CCP-related tasks would be  
18 how much, what percent of your time?  
19 A. Are you referring to just one  
20 week? You just want an example? Is that  
21 what you want?  
22 Q. I'm just trying to get an idea of  
23 how much time you spend on this one area.  
24 A. Ask your question again, please.  
25 Q. The heaviest week that you would

00007

1 ~~spend most time on the change control process~~  
2 ~~or related tasks, about what percent of your~~  
3 ~~time does that take up?~~  
4 A. I would say less than five  
5 percent.  
6 Q. BellSouth change control process is  
7 also known, for short, as the CCP; is that  
8 correct?  
9 A. Yes.  
10 Q. And BellSouth produces a change  
11 control document describing the CCP; is that  
12 correct?  
13 A. Yes.  
14 Q. Is this document a copy of that?  
15 MR. SHORE: Are you going to make

16 that a deposition exhibit?  
17 MS. VANEK: I'm going to,  
18 actually, but I want him to tell me that it  
19 is it before I --

20 THE WITNESS: Yes.  
21 MS. VANEK: I would like to make  
22 that Exhibit number 1 for the deposition.  
23 (WHEREUPON, Davis Exhibit-1 was  
24 marked for identification.)

25 Q. (By Ms. Vanek) This document,  
00008  
1 Exhibit number 1, is dated September 10th,  
2 2001. It's marked as Version 2.6; is that  
3 correct?

4 A. Yes.  
5 Q. Is that the most current version  
6 of the change control process document?

7 A. It's the most current that I'm  
8 aware of, yes.

9 Q. If you would please turn to the  
10 second page without a number. It's on --  
11 there on the back. Near the bottom of the  
12 page, the second paragraph from the bottom,  
13 the second sentence states that this document  
14 does not create an obligation on the part of  
15 BellSouth Telecom or the CLECs -- I'm  
16 paraphrasing obviously -- to perform any  
17 modification, change or enhancement of any  
18 product or service; is that correct?

19 A. Yes.  
20 Q. Mr. Davis, is there any provision  
21 in this document that requires BellSouth to  
22 comply with reasonable changes or improvements  
23 requested by CLECs?

24 A. Ask your question again.  
25 Q. Is there any provision in this

00009  
1 document that requires BellSouth to comply  
2 with reasonable changes or improvements  
3 requested by CLECs?

4 A. The process states that BellSouth  
5 has three provisions that could cause us to  
6 not accept a request, and those -- if I can  
7 state them. I'll find them for you.

8 Q. Please do.  
9 A. If you'll bear with me.

10 Q. Of course.  
11 A. Let me look at the table of  
12 contents a moment. Okay. It's on page 30.  
13 It's the last paragraph. "BellSouth may  
14 determine that a CLEC-initiated change request  
15 cannot be accepted because of cost, industry  
16 direction, or because it's considered  
17 technically not feasible to implement."

18 Q. And that's your answer to my  
19 question. I'm not sure that -- let me  
20 restate it because I'm not sure that you  
21 heard it, but tell me if I'm wrong.

22 I asked you whether there is a  
23 provision in this document that requires

# Attachment 38

# Change Control Process Back Log

## Overall Feature Change Request Back Log

2/20/02<sup>1</sup>

| Change Request Status | Number of Change Requests in Back Log | Submission Date of "Oldest" Request in Back Log |
|-----------------------|---------------------------------------|-------------------------------------------------|
| New                   | 29                                    | 8/00                                            |
| Pending               | 17                                    | 9/00                                            |
| Candidate Request     | 32                                    | 8/99                                            |
| Scheduled             | 15                                    | 8/99                                            |
| Total                 | 93                                    | -                                               |

New – Indicates a Change Request has been received by the BellSouth Change Control Manager ("BCCM") but has not been validated. The interval for validation is 10 business days.

Pending – Indicates a Change Request has been accepted by the BCCM and scheduled for Change Review and prioritization. Change Review occurs at each monthly status meeting, prioritization occurs in March, June, August and December.

Candidate Request – Indicates a Change Request has completed the Change Review and prioritization process and is ready to be scheduled to a release.

Scheduled – Indicates a Change Request has been scheduled for a release.

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<sup>1</sup> All information summarized here was obtained from the BellSouth Change Control Log provided to the CLECs by e-mail on February 20, 2002.

# Change Control Process Back Log

## New Status Back Log Detail

New – Indicates a Change Request has been received by the BellSouth Change Control Manager (“BCCM”) but has not been validated. The interval for validation is 10 business days.

| Change Request # | Type                       | Submission Date |
|------------------|----------------------------|-----------------|
| 132              | 5                          | 8/00            |
| 222              | 5                          | 11/00           |
| 245              | 5                          | 12/00           |
| 320              | 5                          | 2/01            |
| 357              | 5                          | 3/01            |
| 400              | 5                          | 5/01            |
| 404              | 5                          | 5/01            |
| 443              | 5                          | 6/01            |
| 446              | 5                          | 7/01            |
| 461              | 4                          | 8/01            |
| 466              | 5                          | 8/01            |
| 468              | 4                          | 8/01            |
| 477              | 5                          | 8/01            |
| 487              | 5                          | 9/01            |
| 505              | 4/2                        | 9/01            |
| 506              | 4/2                        | 9/01            |
| 586              | 5                          | 1/02            |
| 587              | 5                          | 1/02            |
| 622              | 5/2                        | 1/02            |
| 625              | 5/2                        | 1/02            |
| 644              | 5                          | 2/02            |
| 645              | 4/2                        | 2/02            |
| 646              | 4                          | 2/02            |
| 647              | 4                          | 2/02            |
| 651              | 4/2/5                      | 2/02            |
| 652              | 4/2/5                      | 2/02            |
| 653              | 4                          | 2/02            |
| 654              | 5                          | 2/02            |
| 655              | 5                          | 2/02            |
| TOTAL = 29       | Type 5 = 19<br>Type 4 = 10 |                 |

Type 4 = BellSouth Initiated

Type 5 = CLEC Initiated

Type 2 = Regulatory (a number of changes in this back log were opened as Type 4 or 5 and then reclassified as Type 2)

12 New Status Change Requests listed in the Change Request Log were excluded from this analysis because they were either still “new” because of CLEC inactivity or were requesting changes to the CCP.

# Change Control Process Back Log

## Pending Status Back Log Detail

Pending – Indicates a Change Request has been accepted by the BCCM and scheduled for Change Review and prioritization. Change Review occurs at each monthly status meeting, prioritization occurs in March, June, August and December.

| Change Request # | Type                      | Submission Date | Status Date |
|------------------|---------------------------|-----------------|-------------|
| 184              | 5                         | 9/00            | 10/00       |
| 246              | 5                         | 12/00           | 1/01        |
| 284              | 5                         | 1/01            | 2/01        |
| 345              | 5                         | 3/01            | 5/01        |
| 353              | 5                         | 3/01            | 4/01        |
| 392              | 5                         | 5/01            | 6/01        |
| 399              | 5                         | 5/01            | 6/01        |
| 408              | 4                         | 5/01            | 6/01        |
| 426              | 4                         | 6/01            | 7/01        |
| 439              | 4                         | 7/01            | 7/01        |
| 440              | 4                         | 7/01            | 7/01        |
| 465              | 4                         | 8/01            | 9/01        |
| 518              | 4/2                       | 10/01           | 10/01       |
| 534              | 4                         | 10/01           | 11/01       |
| 541              | 5/2                       | 11/01           | 11/01       |
| 563              | 5/2                       | 12/01           | 12/01       |
| 629              | 5                         | 2/02            | 2/02        |
| Total = 17       | Type 5 = 10<br>Type 4 = 7 |                 |             |

Type 4 = BellSouth Initiated

Type 5 = CLEC Initiated

Type 2 = Regulatory (a number of changes in this back log were opened as Type 4 or 5 and then reclassified as Type 2)

2 Pending Status Change Requests listed in the Change Request Log were excluded from this analysis because they were requesting changes to the CCP.

# Change Control Process Back Log

## Candidate Request Status Back Log Detail

Candidate Request – Indicates a Change Request has completed the Change Review and prioritization process and is ready to be scheduled to a release.

| Change Request # | Type                                      | Submission Date | Status Date |
|------------------|-------------------------------------------|-----------------|-------------|
| 3                | 5/2                                       | 3/00            | 4/01        |
| 53               | 5                                         | 5/00            | 9/00        |
| 85               | 4                                         | 6/00            | 4/01        |
| 88               | 5/2                                       | 6/00            | 4/01        |
| 101              | 5                                         | 7/00            | 4/01        |
| 104              | 5                                         | 7/00            | 4/01        |
| 113              | 5                                         | 7/00            | 4/01        |
| 127              | 5                                         | 8/00            | 4/01        |
| 135              | 5                                         | 8/00            | 4/01        |
| 139              | 4                                         | 8/00            | 4/01        |
| 144              | 4                                         | 8/00            | 4/01        |
| 160              | 5/2                                       | 8/00            | 4/01        |
| 176              | 5                                         | 9/00            | 4/01        |
| 178              | 4                                         | 9/00            | 4/01        |
| 179              | 4                                         | 9/00            | 4/01        |
| 180              | 4                                         | 9/00            | 4/01        |
| 181              | 4                                         | 9/00            | 4/01        |
| 186              | 5                                         | 9/00            | 4/01        |
| 215              | 5                                         | 11/00           | 4/01        |
| 221              | 4                                         | 12/00           | 4/01        |
| 228              | 4/2                                       | 12/00           | 4/01        |
| 273              | 5/2                                       | 1/01            | 4/01        |
| 314              | 5                                         | 2/01            | 4/01        |
| 315              | 5                                         | 2/01            | 4/01        |
| 336              | 4                                         | 3/01            | 4/01        |
| 351              | 4                                         | 3/01            | 4/01        |
| 364              | 5                                         | 8/99            | 4/01        |
| 367              | 5                                         | 8/99            | 4/01        |
| 491              | 2                                         | 9/01            | NA          |
| 492              | 2                                         | 9/01            | NA          |
| 495              | 2                                         | 9/01            | NA          |
| 496              | 2                                         | 9/01            | NA          |
| Total = 32       | Type 5 = 17<br>Type 4 = 11<br>Type 2 = 4. |                 |             |

Type 4 = BellSouth Initiated

Type 5 = CLEC Initiated

Type 2 = Regulatory (a number of changes in this back log were opened as Type 4 or 5 and then reclassified as Type 2)

# Change Control Process Back Log

## Scheduled Status Back Log Detail

Scheduled – Indicates a Change Request has been scheduled for a release.

| Change Request # | Type                                    | Submission Date | Status Date | Target Date     | Interval (Months -1) |
|------------------|-----------------------------------------|-----------------|-------------|-----------------|----------------------|
| 16               | 5                                       | 4/00            | 12/01       | 3/02            | 22                   |
| 20               | 5                                       | 5/00            | 12/01       | 5/02            | 23                   |
| 29               | 5/2                                     | 5/00            | 2/02        | 7/02            | 25                   |
| 38               | 4                                       | 5/00            | 12/01       | 5/02            | 23                   |
| 40               | 5                                       | 5/00            | 1/02        | 2/02-4/02-11/02 | 20 - 22 - 29         |
| 78               | 5/2                                     | 6/00            | 12/01       | 5/02            | 22                   |
| 96               | 5                                       | 6/00            | 12/01       | 3/02            | 20                   |
| 137              | 5/2                                     | 8/00            | 12/01       | 3/02            | 18                   |
| 145              | 4                                       | 8/00            | 12/01       | 5/02            | 20                   |
| 146              | 4                                       | 8/00            | 12/01       | 5/02            | 20                   |
| 196              | 4                                       | 10/00           | 2/02        | 7/02            | 20                   |
| 241              | 5                                       | 12/00           | 2/02        | 7/02            | 18                   |
| 365              | 5                                       | 8/99            | 12/02       | 5/02            | 32                   |
| 368              | 5                                       | 8/99            | 12/02       | 5/02            | 32                   |
| 494              | 2                                       | 9/01            | 12/01       | 5/02            | 7                    |
| Total = 15       | Type 5 = 10<br>Type 4 = 4<br>Type 2 = 1 |                 |             |                 |                      |

Type 4 = BellSouth Initiated

Type 5 = CLEC Initiated

Type 2 = Regulatory (a number of changes in this back log were opened as Type 4 or 5 and then reclassified as Type 2)

1 Scheduled Change Request listed in the Change Request Log were excluded from this analysis because it requests the addition of LENS to CAVE.

# Attachment 39

# Change Control Process Back Log

## Overall Defect Change Request Back Log

2/20/02<sup>1</sup>

| Change Request Status | Number of Change Requests in Back Log | Submission Date of "Oldest" Request in Back Log |
|-----------------------|---------------------------------------|-------------------------------------------------|
| New                   | 1                                     | 2/02                                            |
| Validated             | 18                                    | 9/00                                            |
| Scheduled             | 14                                    | 10/01                                           |
| Total                 | 33                                    | -                                               |

New – Indicates a Defect Change Request has been received by the BellSouth Change Control Manager ("BCCM") and the change request form validated for completeness.

Validated – Indicates internal analysis has been conducted and it is determined that it is a validated defect.

Scheduled – Indicates a Defect Change Request has been scheduled for a release.

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<sup>1</sup> All information summarized here was obtained from the BellSouth Change Control Log provided to the CLECs by e-mail on February 20, 2002. All documentation defects and defect change requests in "new" status because of CLEC inactivity have been excluded from this analysis.

# Change Control Process Back Log

## New / Validated Defect Status Back Log Detail

New – Indicates a Defect Change Request has been received by the BellSouth Change Control Manager (“BCCM”) and the change request form validated for completeness.

Validated – Indicates internal analysis has been conducted and it is determined that it is a validated defect.

| Change Request # | Status    | Submission Date |
|------------------|-----------|-----------------|
| 656              | New       | 2/02            |
| 99               | Validated | 5/01            |
| 151              | Validated | 9/00            |
| 276              | Validated | 1/01            |
| 277              | Validated | 1/01            |
| 298              | Validated | 1/01            |
| 339              | Validated | 3/01            |
| 403              | Validated | 5/01            |
| 471              | Validated | 8/01            |
| 472              | Validated | 8/01            |
| 473              | Validated | 8/01            |
| 498              | Validated | 9/01            |
| 528              | Validated | 10/01           |
| 547              | Validated | 11/01           |
| 556              | Validated | 11/01           |
| 574              | Validated | 12/01           |
| 585              | Validated | 1/02            |
| 611              | Validated | 1/02            |
| 668              | Validated | 2/02            |
| Total = 19       |           |                 |

# Change Control Process Back Log

## Scheduled Defect Status Back Log Detail

Scheduled – Indicates a Defect Change Request has been scheduled for a release.

| Change Request # | Submission Date | Status Date | Target Date | Interval (Days) |
|------------------|-----------------|-------------|-------------|-----------------|
| 535              | 10/31/01        | 10/31/01    | 3/23/02     | 143             |
| 618              | 1/17/02         | 1/17/02     | 5/18/02     | 121             |
| 620              | 1/17/02         | 1/17/02     | 3/23/02     | 65              |
| 627              | 1/28/02         | 1/28/02     | 3/23/02     | 54              |
| 628              | 1/28/02         | 1/28/02     | 3/23/02     | 54              |
| 633*             | 1/31/02         | 1/31/02     | 3/23/02     | 51              |
| 634*             | 1/31/02         | 1/31/02     | 3/23/02     | 51              |
| 635*             | 1/31/02         | 1/31/02     | 3/23/02     | 51              |
| 636*             | 1/31/02         | 1/31/02     | 3/23/02     | 51              |
| 637*             | 1/31/02         | 1/31/02     | 3/23/02     | 51              |
| 638*             | 1/31/02         | 1/31/02     | 3/23/02     | 51              |
| 639*             | 1/31/02         | 1/31/02     | 3/23/02     | 51              |
| 642              | 2/4/02          | 2/4/02      | 3/23/02     | 47              |
| 658              | 2/12/02         | 2/12/02     | 3/23/02     | 39              |
| Total = 14       |                 |             |             |                 |

\* These seven requests are to implement corrections to defects in BellSouth's implementation of the parsed customer service record. BellSouth has labeled these defects as being "low impact". Despite their classification these seven defects and 16 others similarly classified (and implemented earlier) are being implemented in advance of outstanding defects with greater impact and submitted earlier.

# Change Control Process Back Log

## 2002 Implementation Analysis<sup>1</sup>

|                                        | Release 10.3<br>Implemented<br>January 5, 2002 | Release 10.3.1<br>Implemented<br>February 2, 2002 | Release 10.3.2<br>Implemented<br>February 9, 2002 |
|----------------------------------------|------------------------------------------------|---------------------------------------------------|---------------------------------------------------|
| Number of Features                     | 5                                              | 3                                                 | 0                                                 |
| Submission Date of<br>"Oldest" Request | 8/99                                           | 12/99                                             |                                                   |
| Number of Defects                      | 10                                             | 19                                                | 2                                                 |
| Submission Date of<br>"Oldest" Request | 10/19/01                                       | 8/15/01                                           | 10/12/01                                          |
|                                        |                                                |                                                   |                                                   |
|                                        |                                                |                                                   |                                                   |

<sup>1</sup> All information summarized here was obtained from the BellSouth Change Control Logs provided to the CLECs by e-mail on January 16, 2002 and February 20, 2002. All documentation implementations have been excluded from this analysis.

## Attachment 40

# Change Control Process Back Log

## Details of Release 10.3 Implemented on January 5, 2002

| Change Request # | Type            | Submission Date | Interval<br>(Months for Features<br>Days for Defects) |
|------------------|-----------------|-----------------|-------------------------------------------------------|
| 229              | Feature / (4)   | 11/00           | 13 months                                             |
| 369              | Feature / (5/2) | 8/99            | 28                                                    |
| 409              | Feature / (2/4) | 5/01            | 7                                                     |
| 422              | Feature / (2/4) | 6/01            | 6                                                     |
| 441              | Feature / (2)   | 7/01            | 5                                                     |
| 527              | Defect          | 10/19/01        | 78 days                                               |
| 530              | Defect          | 10/25/01        | 72                                                    |
| 532              | Defect          | 10/25/01        | 72                                                    |
| 536              | Defect          | 10/31/01        | 66                                                    |
| 537              | Defect          | 10/31/01        | 66                                                    |
| 540              | Defect          | 11/5/01         | 60                                                    |
| 542              | Defect          | 11/6/01         | 59                                                    |
| 570              | Defect          | 12/7/01         | 29                                                    |
| 571              | Defect          | 12/7/01         | 29                                                    |
| 573              | Defect          | 12/12/01        | 24                                                    |

# Change Control Process Back Log

## Details of Release 10.3.1 Implemented on February 2, 2002

| Change Request # | Type          | Submission Date | Interval<br>(Months for Features<br>Days for Defects) |
|------------------|---------------|-----------------|-------------------------------------------------------|
| 371              | Feature / (5) | 12/99           | 25 months                                             |
| 557              | Feature / (2) | 11/01           | 2                                                     |
| 606              | Feature / (4) | 1/02            | 1                                                     |
| 459              | Defect        | 8/15/01         | 140 days                                              |
| 580              | Defect        | 12/21/01        | 43                                                    |
| 588*             | Defect        | 1/9/01          | 24                                                    |
| 589*             | Defect        | 1/9/01          | 24                                                    |
| 590*             | Defect        | 1/9/01          | 24                                                    |
| 591*             | Defect        | 1/9/01          | 24                                                    |
| 592*             | Defect        | 1/9/01          | 24                                                    |
| 593*             | Defect        | 1/9/01          | 24                                                    |
| 594*             | Defect        | 1/9/01          | 24                                                    |
| 595*             | Defect        | 1/9/01          | 24                                                    |
| 596*             | Defect        | 1/9/01          | 24                                                    |
| 597*             | Defect        | 1/9/01          | 24                                                    |
| 598*             | Defect        | 1/9/01          | 24                                                    |
| 599*             | Defect        | 1/9/01          | 24                                                    |
| 600*             | Defect        | 1/9/01          | 24                                                    |
| 601*             | Defect        | 1/9/01          | 24                                                    |
| 610*             | Defect        | 1/11/02         | 22                                                    |
| 612              | Defect        | 1/16/02         | 17                                                    |
| 626              | Defect        | 1/25/02         | 8                                                     |

\* These requests are to implement corrections to defects in BellSouth's implementation of the parsed customer service record. BellSouth has labeled these defects as being "low impact". Despite their classification these defects were implemented in advance of outstanding defects with greater impact and submitted earlier.

## Details of Release 10.3.2 Implemented on February 9, 2002

| Change Request # | Type   | Submission Date | Interval<br>(Months for Features<br>Days for Defects) |
|------------------|--------|-----------------|-------------------------------------------------------|
| 520              | Defect | 10/12/01        | 120 days                                              |
| 643              | Defect | 2/4/02          | 5                                                     |

# Attachment 41

**2<sup>ND</sup> AMENDED EXCEPTION 88**  
BellSouth Florida OSS Testing Evaluation

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January 28, 2002

**EXCEPTION REPORT**

An exception has been identified as a result of test activities associated with the Review of the Change Management Process (PPR1).

**Exception:**

**The BellSouth Change Control Prioritization Process does not allow CLECs to be involved in prioritization of all CLEC impacting Change Requests. (PPR1)**

**Background:**

The Change Control Prioritization (CCP) Process is the method used by both CLECs and BellSouth to rank the importance of both CLEC and BellSouth-initiated change requests. The Prioritization process is outlined in the description of Step Five of the overall Change Control process<sup>1</sup> in the BellSouth Change Control Process document<sup>2</sup>.

BellSouth also utilizes an internal prioritization process in conjunction with the CCP. The internal prioritization process occurs during Step Seven of the Change Control Process and includes review of the ranking determined by the CLECs during Step Five of the Change Control Process. The process is as follows:

- The Release Prioritization Team considers all changes from a variety of sources including the (external) Change Control Process, the Third Party Testing Team, the Regulatory Team, and the LCSC and prioritizes them into one master list.
- The Release Prioritization Team creates the master list and integrates the changes from the different sources using the following procedure: The number one priority change requested from each group is ranked in the master list from one to five with one being the highest. The team then ranks the number two priority change requests from each group from six to ten. The number three priority change requests are ranked from 11 to 15 and so forth.
- Additional factors are considered during the reprioritization process and may result in one customer group having a disproportionate number of Change Requests ranked at the top of the master list. These additional considerations are as follows:

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<sup>1</sup> Pages 28-29 and page 47.

<sup>2</sup> v. 2.3, May 18, 2001

- i. Regulatory changes that have been mandated and are due during this release cycle are prioritized first.
- ii. Change Requests that have related functions are given a higher priority than standalone changes.
- iii. Change Requests that are necessary for proper system operation are given a high priority.
- iv. Change Requests that are necessary for or concurrent with the implementation of additional change requests are given high priority.

During interviews with members of the BellSouth Internal Change Management Team conducted by KPMG Consulting, BellSouth asserted that all change requests included in the master prioritization list are related to the Wholesale portion of BellSouth's business.

The BellSouth Change Control Process<sup>3</sup> states that the BellSouth Change Control Process is designed to manage all change requests "that affect external users of BellSouth's Electronic Interface Applications, associated manual process improvements, performance or ability to provide service including defect/expedite notification."

**Issue:**

CLECs are unable to participate in the prioritization of change requests that originate from internal BellSouth organizations (Regulatory Team, Third Party testing Team, the LCSC, and Project Managers) that affect BellSouth's Wholesale business and therefore the CLEC Community. This policy inhibits one of the primary objectives of the CCP "to allow for mutual impact assessment and resource planning to manage and schedule changes."

**Impact:**

BellSouth's Internal Change Management Prioritization Process does not allow the CLEC community to participate in prioritization of change requests that affect CLEC Business. The CLEC Community's lack of participation in change requests that effect CLEC business could result in change requests important to the CLEC Community not being developed or implemented in a timely manner.

**BellSouth Response:**

The Change Control Prioritization Process does allow CLECs to be involved in the prioritization of CLEC impacting Change Requests. A CLEC impacting

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<sup>3</sup> Version 2.3, May 18, 2001

Change Request is defined as, "Any change that either requires the CLEC to modify the way it operates or causes it to rewrite system code." Examples of this are:

- Business rule LSR field usage changes
- New functionality for an interface
- Change existing functionality for an interface
- New REQTYPs
- New field on the LSR form
- Electronic ordering of a product/service

This definition should impact the majority of the CLEC community, if not the entire community, since it is impossible to know how each CLEC has coded its systems.

CLEC impacting change requests may originate from various sources: the (external) Change Control Process, the Third Party Testing Team, the Regulatory Team, the LCSC, or Project Managers. It is transparent to the CLECs what internal BellSouth entity is the actual originator of a request since the originator is only identified, on the Change Request form, as BellSouth. Thus, CLECs have already prioritized Change Requests originated by internal BellSouth organizations in four separate Change Review Meetings. Mandates are not prioritized by the CLECs per the Change Control Process.

All such Change Requests should come through the Change Control Process providing the CLECs an opportunity to prioritize them. As a result of BellSouth's commitment to provide CLECs the ability to participate in the prioritization of these requests, BellSouth has a better understanding of what is important to the CLEC community.

**BellSouth Amended Response:**

In an effort to address CLEC and KPMG concerns in CCP about release resource planning, BellSouth is offering the following proposal: BellSouth will allocate 40% of its annual release capacity for implementing CLEC change requests and/or CLEC-driven mandates. The remaining 60% will be used for implementing public switched network mandates such as NPA overlays and Number Pooling (5-10%), defects and maintenance (approximately 25%), and the remaining 25-30% for BellSouth features and change requests. This allocates more release capacity to CLEC requests including CLEC-driven mandates such as TN validation than to BellSouth requests. BellSouth will provide preliminary unit measurements estimates accompanying each change request that can be used by the CLECs during prioritization. BellSouth will also track the capacity per the above categories and provide a YTD percent capacity used for CLEC requests. This report will be provided at CCP on a quarterly basis, beginning with calendar year 2002.

**KPMG Consulting Amendment:**

KPMG Consulting has the following concerns related to BellSouth's Amended Response to Exception 88:

1. The BellSouth proposal does not address the issue of BellSouth's definition of "CLEC Impacting" change requests. KPMG Consulting has expressed concern that the BellSouth Change Management Process does not provide CLECs the ability to view and/or prioritize all BellSouth Change Requests that impact CLEC business operations. BellSouth defines CLEC Impacting as "Any change that requires the CLEC to modify the way they operate or to rewrite system code." CLECs do not view and/or prioritize change requests deemed by BellSouth to be "non-CLEC Affecting." KPMG Consulting remains concerned that the BellSouth definition of "CLEC Affecting" does not include issues that impact CLEC business operations and does not allow CLECs to conduct mutual impact assessment and resource planning – a stated objective of the BellSouth Change Control Process.<sup>4</sup>
2. The BellSouth proposal states that 40% of the BellSouth annual release capacity will be allocated to the implementation of CLEC Change Requests and "CLEC-driven mandates" The BellSouth proposal does not provide a definition of a "CLEC-driven mandate." KPMG Consulting cannot respond to this portion of the proposal without an adequate understanding of the BellSouth definition for "CLEC-driven mandate."
3. The BellSouth proposal states that 25% of BellSouth annual release capacity will be allocated to the implementation of maintenance and defect change requests. BellSouth states that during the period June 24, 1999 through October 15, 2001, 47% (240 of 511 Change Requests)<sup>5</sup> of Change Requests were classified as defects. KPMG Consulting is concerned that 25% of the BellSouth annual release capacity will not be sufficient to correct defects and conduct maintenance of BellSouth production systems.
4. The BellSouth proposal does not state what mechanism BellSouth will use to determine YTD percent capacity used. Further, BellSouth does not state if this information will be independently verifiable. KPMG Consulting cannot respond to this portion of the proposal without a full understanding of this process.
5. KPMG Consulting will require review of complete process documentation as well as resolution of the above issues before BellSouth proposal can be evaluated.

**BellSouth Response:**

1. BellSouth has submitted Change Request, CR0569, to clarify the definition of "CLEC Affecting." The proposed definition states, "Any change that requires the CLEC to rewrite system code and involves the following types of business rule

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<sup>4</sup> Version 2.6, September 10, 2001

<sup>5</sup> Attachment included in E-mail, From: [Change.Control@bridge.bellsouth.com](mailto:Change.Control@bridge.bellsouth.com); To: CCP Distribution list; Subject: Response to AT&T CR Analysis; October 18, 2001

changes: Change to an R-C-O table in the BBR; a change to a valid entry in a field; a change to data characteristics of a field; or an additional field to a form or screen." This was introduced in the CLEC Meeting on December 12, 2001 and will allow CLECs the ability to view and/or prioritize all BellSouth Change Requests that impact CLEC business operations.

2. CLEC-driven mandates are requests initiated by one or more CLECs through a regulatory channel that result in changes to BellSouth's systems via Orders. Generally, these Orders have date-specific requirements, and address such issues as pre-ordering and/or ordering requirements, for new services, industry standards, reporting requirements, or required new inter-company processes.
3. The CR Analysis Report reflects a total of 240 Type 6 Change Requests. The following is a breakdown of the 240 Change Requests that were submitted as defects through October 15, 2001:

|                          |       |
|--------------------------|-------|
| Submitted CRs as Defects | 240   |
| Cancelled Defects CRs    | - 80  |
|                          | <hr/> |
|                          | 160   |
| Documentation            | 69    |
| System-related           | 91    |

The total number of all CRs, including defects, cancelled is 167. This leaves a total of 344 active CRs.

Since only 26% (91 of 344 Change Requests) of the Type 6 Change Requests were identified as being system-related, BellSouth believes that 25% of the annual release capacity is sufficient to correct defects and conduct maintenance of BellSouth's production system. The 25% release capacity allocation is inline with BellSouth's 2001 track record for defects and maintenance.

4. At the end of each quarter BellSouth will provide a report listing the percent YTD capacity used during the quarter. An example can be seen in the enclosed sample quarterly report attachment. The process is effective January 2002 with Release 10.3.1 and described in the attached proprietary Word document. BellSouth is receptive to independent verification by a neutral third party.
5. Please see all proprietary attachments.

#### **KPMG Consulting Second Amendment**

KPMG Consulting has reviewed the BellSouth response and associated process documentation. KPMG Consulting's opinion on each issue is described below:

1. KPMG Consulting has reviewed Change Request CR0569 and found that BellSouth's proposed definition of CLEC Impacting only addresses some changes to the BellSouth Business Rules for Local Ordering (BBR-LO) or changes that cause a CLEC to rewrite system code. The definition fails to address changes that impact CLEC business operations but do not require coding changes. **The failure of the CLEC Impacting definition to include business processes precludes CLECs from conducting mutual impact assessment and resource planning for interface changes that do not require code to be rewritten.**
2. KPMG Consulting understands the explanation of CLEC-driven mandate. In addition, KPMG Consulting is aware that BellSouth is currently engaged with members of the CLEC Community to determine how CLEC-driven mandates will be applied to capacity allocation. KPMG Consulting will reserve comment on this issue until BellSouth and the CLEC Community reach consensus.
3. KPMG Consulting agrees with the BellSouth analysis of this issue. However, **KPMG Consulting remains concerned that future defect corrections could comprise more than 25 % of annual release capacity.** Please see item 5 below.
4. KPMG Consulting understands the capacity reporting process has been modified from the process described above through discussions between BellSouth and the CLEC Community.
5. KPMG Consulting has reviewed BellSouth internal process documentation and found that it does not address capacity allocation for Industry Releases (Type 3 Changes). Further, it does not provide contingency processes to address the possibility that **predetermined capacity allocations may not be sufficient to address necessary changes to the BellSouth OSS (e.g., CLEC Driven mandates that comprise more than 40% of annual release capacity, Defect corrections that comprise more than 25% of annual release capacity).** KPMG Consulting also needs to understand what if any internal process changes will occur as a result the BellSouth proposal.

## Attachment 42

**From:** Bradbury, Jay M - LGA [bradbury@att.com]  
**Sent:** Wednesday, January 30, 2002 3:05 PM  
**To:** 'Change.Control@bridge.bellsouth.com'; 'Alan.Flanigan@twtelecom.com'; 'alee@epicus.com';  
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'Dwight.Scrivener@wcom.com'; 'dwilliams@nowcommunications.com'; 'EGunn@birch.com';  
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'ESingleton@eztalktelephone.com'; 'evdoty@nextlink.com'; 'eyu@talk.com';  
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To: 'mer@networkwcs.com'; 'MGimmi@nuvox.com'; 'michael.dekorte@Lightyearcom.com'; 'Micki.Jones@wcom.com'; 'mkennedy@newsouth.com'; 'msykes@telcordia.com'; 'mt7210@momail.sbc.com'; 'MWagner@birch.com'; 'Nancy.Welsh@espire.net'; 'Natalie.Franklin@KMCTELECOM.com'; 'NDreier@birch.com'; 'Nicole.Moorman@adelphiacom.com'; 'nmunsie@commsouth.net'; 'NStuckey@birch.com'; 'PBarker@aol.com'; 'PBohn@MediaOne.com'; 'Pkinghorn@eztalktelephone.com'; 'pmckay@momentumbusiness.com'; 'PPinick@birch.com'; 'prehm@nightfire.com'; 'prichardson@trivergent.com'; 'PRubino@Z-TEL.com'; 'pwilson@mpowercom.com'; 'Quan.Nguyen@KMCTELECOM.com'; 'Rae.Couvillion@wcom.com'; 'rbennett@floridadigital.net'; 'rbreckin@telcordia.com'; 'rbuffa@interloop.net'; 'rcostanzo@velocityky.com'; 'Rdupraw@mpowercom.com'; 'Renee.Clark@espire.net'; 'Renee.Clift@dsl.net'; 'reym@networktelephone.net'; 'rharsia@commsouth.net'; 'rhonda.calvert@adelphiacom.com'; 'Rick.Whisamore@wcom.com'; 'rjohnson@epicus.com'; 'robert@alternativephone.com'; 'Ronald.Klamer@wcom.com'; 'rturkel@broadriver.com'; 'ruth@mfn.net'; 'RWilson@City.marietta.GA.US'; 'sandra.kahl@wcom.com'; 'Sandraj@intetech.com'; 'sbowling@caprock.com'; 'SchubertJ@birch.com'; 'schula.hobbs@dsl.net'; 'SCook@City.marietta.GA.US'; 'scott.emener@accesscomm.com'; 'Scott.Hibbard@wcom.com'; 'SELEAZER@talk.com'; 'shane@eatel.com'; 'shannon.smith@itcold.com'; 'Sherry.Lichtenberg@wcom.com'; 'Shirley.Roberts@KMCTELECOM.com'; 'SLively@trivergent.com'; 'smason@interloop.net'; 'smoore@trivergent.com'; 'srober@KMCTELECOM.com'; 'ssarem@mpowercom.com'; 'SStapler@itcdeltacom.com'; 'SSullivan@nwp.com'; 'Stacia.Edwards@KMCTELECOM.com'; 'Debbie.Steen@om1.al.bst.bls.com'; 'Steve.Filliaux@btitele.com'; 'Steve.Moore@mail.sprint.com'; 'steve.sulak@nowcommunications.com'; 'steve.taff@allegiancetelecom.com'; 'susan.sherfey@btitele.com'; 'svc-gate@telcordia.com'; 'swargo@rhythms.net'; 'tagteam@telexcelpartners.com'; 'talleylinda@mindspring.com'; 'tami.m.swenson@accenture.com'; 'Tara.Odems@allegiancetelecom.com'; 'TAYLORJG@LCI.COM'; 'taziz@epicus.com'; 'TChowaniec@dcaweb.net'; 'tfry@commsouth.net'; 'Tim@excleron.com'; 'tim.koontz@networktelephone.net'; 'Debbie.Timmons@om1.al.bst.bls.com'; 'timw@networkonecom.com'; 'Tindal\_Travis/m7\_mail7a@90.11.245.59'; 'TJStokes@trivergent.com'; 'Tlescuero@idstelcom.com'; 'tmontemayer@mantiss.com'; 'tintel@bellsouth.net'; 'Todd@CSII.net'; 'tom.hyde@Cbeyond.net'; 'tonyam@communitytelephone.com'; 'trsmith@trivergent.com'; 'ts1336@sbc.com'; 'Tyra.Hush@wcom.com'; 'usfloridaoss@kpmg.com'; 'wendy.hernandez@comporium.com'; 'WFletcher@birch.com'; 'wmknapek@Intermedia.com'; 'wolfsbrg@cris.com'; 'Yvette.Brown@espire.net'; 'Zachary.Baudoin@KMCTELECOM.com'; 'TNorvell@dcaweb.net'; 'Annette.Hardy@accesscomm.com'; 'Marian.Turk@btitele.com'; 'Louise.Wilds@accesscomm.com'; 'Jan.Dumas@accesscomm.com'; 'Walter.Carnes@accesscomm.com'

Subject: RE: Change Control Sub-Committee Meeting for 02/08/02



CCP12\_7\_CLEC\_01-30-02\_Final....



CLEC CCP pleading 1-30-02 fina...

**Change Management Team and CLECs,**

As was discussed during the 01/22/02 Monthly Status Meeting, the "CLEC Coalition" filed today with the Georgia Public Service Commission a "Red-line Version" of the CCP Document describing for the Commission all of the revisions to the process the coalition members believe need to be implemented.

The Red-Line CCP Document and the associated legal cover pleading are attached to this message for your use. The members of the coalition are identified in footnote 1 of the cover pleading.

Previous drafts of the Red-line CCP Document have been shared with all CLECs identified in this CCP e-mail distribution list and the participation of all CLECs was sought on three conference calls during which the drafts were discussed.

BellSouth is scheduled to provide comments in reply to the Coalition filing

on February 15, 2002 and as you can read in the cover pleading, the Coalition is asking the Commission to schedule a workshop in late February.

There is nothing about the process that the Georgia Commission is conducting that precludes the CLECs and BellSouth from continuing to attempt to reach agreement about changes to the process through direct sub-committee meetings such as the one scheduled for February 8, 2002 described in BellSouth's original message below. As Kyle Kopytchak has already noted this conflicts with the Louisiana Collaborative face to face meeting and needs to be rescheduled - how about Tuesday February 12th?

Given that the Red-line CCP Document filed today includes the CLEC consensus position on a number of issues that have been under discussion between BellSouth and the CLECs in a number of other sub-committees (for example "sizing") can we expand the agenda for the call?

In addition to the items already listed we could:

- discuss where language associated with each (or some) of the bulleted suggested revisions in the cover pleading appears in the Red-line
- discuss how the Red-line language for issues such as "sizing" matches with prior sub-committee discussions
- discuss how the Red-line should be submitted in the form of a change request (as a whole, or divided into issues)
- clarify for BellSouth the intent of the CLEC Red-line language in advance of BellSouth's reply comments.

Please advise if the call can be rescheduled to the 12th and the agenda expanded in this manner.

For the CLEC Coalition

Jay Bradbury and Bernadette Seigler

-----Original Message-----

From: Change.Control@bridge.bellsouth.com  
[mailto:Change.Control@bridge.bellsouth.com]  
Sent: Tuesday, January 29, 2002 5:14 PM  
To: DELETED LIST  
Subject: ID: Change Control Sub-Committee Meeting for 02/08/02

CLECs,

In the last monthly status meeting on 01/22/02, BellSouth Change Control committed to schedule a sub-committee meeting with the CLECs to discuss the following:

- CR0569 - Definition for "CLEC Affecting Change Request"
- Handling of Flow-Through Items and their relation to the sizing effort
- Appeal Process

This meeting will be held on Friday, February 8 at 10:00 EST - 12:00 Noon EST  
as a conference call. The bridge for this conference call will be

205-968-9300, Access 176589.

Please RSVP to Change Control if you plan to participate.

If you have any questions, please advise.

Thanks,

Change Management Team

\_\_\_\_\_ Distributed Message \_\_\_\_\_

Message sent by: Change Control /m6,mail6a

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# Attachment 43

**From:** Change.Control@bridge.bellsouth.com  
**Sent:** Monday, February 11, 2002 5:20 PM  
**To:** Alan.Flanigan@twtelecom.com; alee@epicus.com; alejandro@amexcomm.com; amanda.hill@wcom.com; Annette.Cook@espire.net; Annette.Hardy@accesscomm.com; annettey@Lightyearcom.com; apatel3@telcordia.com; Lynn.Arthur@BellSouth.com; avincent@communitytelephone.com; bbil@4pra.com; bellsouth@nightfire.com; beverly.lockwood@btitele.com; BHughes@nwp.com; Bill.York@wcom.com; billg@telcordia.com; blsinterfacecontrol@kpmg.com; bmurdo@KMCTELECOM.com; Bob.Buerrosse@allegiancetelecom.com; Bobik, Richard A - NCAM; Bradbury, Jay M - LGA; Brenda.Gant@KMCTELECOM.com; Brent.McMahan@networktelephone.net; Seigler, Bernadette M (Bern) - NCAM; BSNotes@talk.com; BStowe@City.marietta.GA.US; bszafran@covad.com; bwellman@idstelcom.com; c\_and\_m@bellsouth.net; c-david.burley@wcom.com; c-Lorraine.Watson@wcom.com; caren.schaffner@wcom.com; CAshford@birch.com; cassandrap@networktelephone.net; Catherine.Gray@alltel.com; cbnaadmin@home.com; cchiavatti@usatelecominc.com; lacovelli, Christopher D - ALIN; CDrake@City.marietta.GA.US; Cecere, Chris - Broadband; cecilia.ortiz@adelphiacom.com; Cedric.Cox@wcom.com; cflanigan@uslec.com; changecontrol.bellsouth@onepointcom.com; Chapmanwe@cep.com; charles.a.stahlberger@xo.com; charrison@mpowercom.com; chaynes@trivergent.com; cheryl@eatel.com; cheryl\_acosta@stratosoilandgas.com; chrisg@pvtel.net; Christine.Schnelle@wcom.com; clarson@dset.com; clhawk@KMCTELECOM.com; CoDavis@covad.com; colleen.e.sponseller@wcom.com; Connie@albionconnect.com; Connie.Nathan@KMCTELECOM.com; conniec@arrowcom.com; Craig@excleron.com; Craig.B.Douglas@MCI.com; cschneider@concretio.com; CSoptic@birch.com; daddymax@netbci.com; daisy.ling@wcom.com; darrin.mcclary@centurytel.com; DDougherty@birch.com; Debra.Pasquale@btitele.com; default.user@BellSouth.com; desiree@communitytelephone.com; dfoust@deltacom.com; dgraham@mantiss.com; dkane@aspiretelecom.com; dmcmanus@trivergent.com; DNapovanice@birch.com; dnathanson@natelcomm.com; DoBeck@MediaOne.com; don@amexcomm.com; donaldsond@epb.net; donna.poe@knology.com; Doreen.E.Raia@wcom.com; dpetry@ix.netcom.com; Dwight.Scrivener@wcom.com; dwilliams@nowcommunications.com; EGunn@birch.com; Elliot.Wrann@dsl.net; epadfield@nextlink.com; ESaeed@northpoint.net; ESingleton@eztalktelephone.com; evdoty@nextlink.com; eyu@talk.com; Faye.Restaino@dsl.net; fjohnson@covad.com; fouts@communitytelephone.com; frankb@cellone-ms.com; Fred.Brigham@wcom.com; Gary@CSII.net; generalg@cris.com; gerrig@Lightyearcom.com; Glenn.Sonnier@usunwired.com; gmelvin@trivergent.com; Lianne.Griffin@BellSouth.com; gulfcoast@dotstar.net; mhillis@telcordia.com; Hwhittington@mpowercom.com; james.d.tomlinson@xo.com; jamesk@onisn.net; Jan.Dumas@accesscomm.com; jason@basicphone.org; jayala@rhythms.net; jbritton@phonesforall.com; Jdavid4715@aol.com; JDuffey@PSC.STATE.FL.US; jeanacherubin@yahoo.com; Jeannie.Seguina@adelphia.com; Jeff.Walker@accesscomm.com; Jennifers@universaltelcominc.com; jerry.hill@accesscomm.com; jfuller@fairpoint.com; JG6837@ctmail.snet.com; jhoze@KMCTELECOM.com; jim.lee@dsl.net; Jim.Meyers@wcom.com; jjohnson@idstelcom.com; jmclau@KMCTELECOM.com; JMMaxwell@Intermedia.com; joanne.baxter@networktelephone.net; JOliver@birch.com; jose.aguilar@btitele.com; jshields@globalc-inc.com; JtWilson2@att.com; jwengert@newsouth.com; jwilwerding@birch.com; karen.grim@mail.sprint.com; karind@covad.com; kathryn\_hinds@globalcrossing.com; kcaudill@idstelcom.com; kcooper@EFTIA.com; Kevin@albionconnect.com; KGillette-Hoskins@quintessent.net; khudson@nextlink.com; KKester@STIS.com; kmarshall@telstar.org; kmiller@northpointcom.com; KPollard@birch.com; kschwartz@covad.com; Timmons, King C (K.C.) - NCAM; ktrygges@covad.com; Uchida, Karen - NLNS; Kyle.Kopytchak@networktelephone.net; launch-now.notify@cscoe.accenture.com; lavernek@arrowcom.com; LCamillo@nwp.com; ldavidov@dset.com; len.chandler@btitele.com; LHamlin@birch.com; LHinton@PrismCSI.net; lijohnso@covad.com; linda@networkonecom.com; lindak@communitytelephone.com; lisa@annox.com; Lminasola@MediaOne.com; Lorraine.Watson@wcom.com; lortega@commsouth.net; Louise.Wilds@accesscomm.com; LWysocki@nwp.com; lynn@mfn.net; lynnj@nowcommunications.com; Mandy.S.Jenkins@alltel.com; Marian.Turk@btitele.com; mark@annox.com; Mark.Mecca@dsl.net; Mary.I.Mitchell@xo.com; marybethkeane@kpmg.com; MatthewBaker@nwp.com; mcbrunnhilde@juno.com; mchappell@kpmg.com; MConnolly@birch.com; mconquest@itcdeltacom.com; mdominick@trivergent.com; mer@networkwcs.com; MGimmi@nuvox.com;

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Subject: ID: Updated 2/12/02 Subcommittee Meeting Agenda



Attention CLECs,

Attached is an updated agenda for our 2/12/02 Subcommittee meeting. We have added an item to discuss release capacity planning (proposal attached).

Also attached is proposed language for the definition of CLEC Affecting Change (CR0569).

Please let us know if you have questions.

Thanks,

Change Management Team

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# BellSouth Change Control Process

## CLEC Sub-Committee Meeting

### Agenda for February 12, 2002

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**Announcement**

| TO                               | COMPANY |
|----------------------------------|---------|
| CLEC Change Control Participants | Various |

**Meeting Information**

| DATE                                                                                                                                                                                                                                                                                                | START TIME   | END TIME            | LOCATION                                       |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------|---------------------|------------------------------------------------|
| 02/12/02                                                                                                                                                                                                                                                                                            | 10:00 AM EST | 12:00 PM EST - Noon | Conference Bridge: 205 968-9300, Access 176589 |
| <b>MEETING PURPOSE</b>                                                                                                                                                                                                                                                                              |              |                     |                                                |
| <p><b>Discuss the following CCP document issues:</b></p> <ul style="list-style-type: none"> <li>• CR0569 - Definition for "CLEC Affecting" Change Requests</li> <li>• Appeal Process</li> <li>• Handling of Flow-Through Task Force Change Requests</li> <li>• Release Capacity Planning</li> </ul> |              |                     |                                                |
| <b>CALLED BY</b>                                                                                                                                                                                                                                                                                    |              |                     |                                                |
| Dennis Davis - Director - Interconnection Operations                                                                                                                                                                                                                                                |              |                     |                                                |

**Agenda**

| Agenda Items                                             | Participants                   | Time          |
|----------------------------------------------------------|--------------------------------|---------------|
| Introductions                                            | Dennis Davis                   | 10:00 - 10:05 |
| CR0569 - Definition for "CLEC Affecting" Change Requests | Change Management Team/CLECs   | 10:05 - 10:30 |
| Appeal Process                                           | Change Management Team / CLECs | 10:30 - 10:45 |
| Handling of Flow-Through Task Force Change Requests      | Change Management Team / CLECs | 10:45 - 11:15 |
| Release Capacity Planning                                | Change Management Team / CLECs | 11:15 - 11:55 |
| Review Action Items                                      | Change Management Team         | 11:55 - 12:00 |

| Agenda Items        | Participants | Time       |
|---------------------|--------------|------------|
| Wrap-Up and Adjourn | Dennis Davis | 12:00 Noon |

CCP  
Release Capacity Planning  
Proposal

2/12/02

# Release Capacity Planning Proposal

- 3-4 Releases annually (plus maintenance releases)
- Type 2,3,6 Features scheduled prior to Type 4s & 5s
- Provide Release Capacity Measurement Feature Prioritization Matrix (See Release Capacity Measurement Feature Prioritization Matrix Example)
- Provide Forecasted Release Capacity:
  - Estimated capacity assigned to Types 2-6 features provided at time of prioritization (i.e., quarterly)
  - Capacity remaining after assigning Types 2-6 used for slotting Type 4s/5s at time of prioritization
  - 50%/50% approximate capacity split between Type 4s and 5s, implement Type 4s/5s w/i 60 weeks subject to available capacity
- Provide Features planned via Release Schedule. (see CCP Feature Release Implementation Schedule Example)
- Provide Monitoring and Reporting Post-Release Capacity Utilization depicting actual capacity utilized (see Appendix I Example)

# Release Capacity Measurement Feature Prioritization Matrix

| CR Number :        | DESCRIPTION:        |                                                                                                                                    | Draft User Requirement: (Y/N) | Synergies with Other Related CRs  |
|--------------------|---------------------|------------------------------------------------------------------------------------------------------------------------------------|-------------------------------|-----------------------------------|
|                    |                     |                                                                                                                                    |                               |                                   |
| Type CR:           |                     |                                                                                                                                    |                               |                                   |
|                    |                     |                                                                                                                                    |                               |                                   |
|                    |                     |                                                                                                                                    |                               |                                   |
| Systems            | System impacted Y/N | Level of Work Effort:<br>List Number of Units.<br>(incremental units in quarters is permissible) 1<br>Unit=100 Release Cycle Hours | Constraints/ Comments         | Integrated Testing Required (Y/N) |
|                    |                     |                                                                                                                                    |                               |                                   |
| LENS               |                     |                                                                                                                                    |                               |                                   |
| TAG                |                     |                                                                                                                                    |                               |                                   |
| EDI                |                     |                                                                                                                                    |                               |                                   |
| LESOG              |                     |                                                                                                                                    |                               |                                   |
| LNP                |                     |                                                                                                                                    |                               |                                   |
| SGG                |                     |                                                                                                                                    |                               |                                   |
| DOM                |                     |                                                                                                                                    |                               |                                   |
| Other (List each)  |                     |                                                                                                                                    |                               |                                   |
|                    |                     |                                                                                                                                    |                               |                                   |
| <b>Total Units</b> |                     |                                                                                                                                    |                               |                                   |

2002

# CCP Feature Release Implementation Schedule



**1/5/02 Minor Release 10.3 Production (CAVE)**

- Parsed CSR – (CR0369)-2
- Mechanized Line Splitting – (CR0441)-2
- New Install with No Prior Service at Location – (CR0229)- CCP Prioritized April 2001 -4
- Line Splitting-Remove Edit in LMU Prohibiting CLEC from Receiving Loop Data (CR0409)-2
- Mechanized LMU Fix-LFACS/RSAG Address Mismatch Results in Neighborhood Report (CR0422)-2

**2/2/02 Maintenance Release 10.3.1**

- Allow Electronic processing of Unbundled Universal Digital Channel(UDC) Loop Orders-( CCP FTTF)-(CR0557)-2
- Unable to View BTN, PSO, LSF & Directory Information on LENS CSR- (CR0459)-6
- Validation on TN vs Address Req Types A and E (formerly ED11215990001)-(CR0371)-5
- LENS/TAG miscalculation of UNE P Due Dates -(CR0520) -6
- Enhancements to hunting-(CR0606)-4
- Phase 1-Order Tracking-(CR0040)-CCP Prioritized April 2001-#1-5

**3/23/02-3/23/02 Minor Release 10.4 Production**

- SI Enhancement for SL1, SL2, DS0, DS1 and ISDN -(CR0016)-CCP Prioritized April 2001 -5
- Flow thru Request Type CB, Act of P and Q-(CR137)-CCP Prioritized April 2001 -2,5
- Remove a TN from a LENS LSR-(CR0145)-CCP Prioritized April 2001 -4
- Add Ability to Create New Listings in LENS-(CR0096)- CCP Prioritized April 2001-5
- Local Service Freeze-(CR )-2

"TARGETED" - the planning work to include this item in the indicated release is ongoing. A final determination as to whether the item will be included in the release has not been made. Factors such as regulatory mandates, information uncovered in further planning efforts, or other unforeseen circumstances may impact whether the item will be included in the indicated release.

**5/18/02-5/19/02 Minor Release 10.5 Production (CAVE)**

- LSRs in Q Status-Do Not Display Error Message on SUPP- CCP/FTTF -(CR 0494)-2
- Provide CFA via pre-order (formerly TAG0812990001)- (CR 0368)-CCP Prioritized April 2001 - 5
- Change Main Account Number-(CR0365)-CCP Prioritized April 2001 -5
- Extended Loops (EELS)-(CR0078)-CCP Prioritized April 2001 -2,5
- View Multiple CSR s Simultaneously-(CR0020)-CCP Prioritized April 2001 -5
- TOS Field on REQ TYP J-(CR0038)-CCP Prioritized April 2001 -4

**7/13/02-7/14/02 Minor Release 10.6 Production**

- Partial Migration of UNE Loops (REQ TYP A)-(CR0029)-CCP Prioritized April 2001-2
- CN Returned on Incorrect LSR Version-(CR0241)- CCP Prioritized April 2001-5
- Allow Changes in Directory Deliveries-(CR0196)-CCP Prioritized April 2001-4

**11/16/02 - 11/17/02 Major Release 11 Production (CAVE)**

- TARGETED ITEM-UNE to UNE Bulk Migration CR0215- CCP Prioritized April 2001 -5
- TARGETED ITEM-Phase 2-Order Tracking CC Prioritized April 2001 -5

### LEGEND

- Underlined and Not Bold = Completed Release Cycle

- **Bold** = Release Cycle in progress

- *Italicized and not Bold* = Release Cycle not in progress

-NOTE: Feature justification are in parentheses:

Mandates= Type 2 , Standards = Type 3, BST Initiated CR = Type 4, CLEC Initiated CR= Type 5

(CAVE) = Must be tested in CAVE prior to this date:4wks Major/2wks Minor if applicable; CLEC Testing will begin on the Monday following CAVE implementation



2-11-02

**CCP Proposed Language for the definition of CLEC Affecting Change (CR0569)**

Any change that requires the CLEC to rewrite system code and/or involves the following types of business rule changes: Change to an R\_C\_O table in the BBR; a change to a valid entry in a field; an additional field to a form or screen; removal of a form or screen; or a change to data characteristics of a field; including changes to field lengths.

Any of the above changes by BST may cause the CLEC to make (1) changes to CLEC system code; (2) changes in CLEC employee training; (3) changes to CLEC business methods and procedures at the transaction, clarification, or escalation levels; (4) changes to the work assignments of CLEC personnel.

**From:** Bradbury, Jay M - LGA [bradbury@att.com]  
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**To:** 'Change.Control@bridge.bellsouth.com'; 'Alan.Flanigan@twtelecom.com'; 'alee@epicus.com';  
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Subject: RE: Updated 2/12/02 Subcommittee Meeting Agenda

Importance: High

BellSouth previously denied the CLECs request to expand the scope of this meeting to include discussion of the CLEC Red-line CCP document (Change Control e-mail of 2/5/02).

In this e-mail, sent at 5:20 PM the day before the meeting BellSouth now modifies its position on a key item (obviously in response to the Red-line) and unilaterally expands the scope of the meeting to include a new topic (also obviously in response to the Red-line). While I am eager to discuss each of these topics, BellSouth's 11th hour change to the agenda and scope of the meeting limits CLEC's individual and collective ability to analyze, discuss, and meaningfully respond.

Regarding BellSouth's new proposed position on the definition of "CLEC Affecting Changes", the following is the CLEC proposed definition from the Red-line to allow participating CLECs an easy comparison between the proposals:

ANY CHANGE THAT POTENTIALLY MAY CAUSE A CLEC TO MODIFY THE WAY IT OPERATES IN CONDUCTING WHOLESALE BUSINESS TRANSACTIONS WITH BELL SOUTH. MODIFICATIONS

TO THE WAY CLECS OPERATE IN CONDUCTING WHOLESALE BUSINESS TRANSACTIONS WITH BELLSOUTH INCLUDE, BUT ARE NOT LIMITED TO: (1) CHANGES TO CLEC SYSTEM CODE; (2) CHANGES IN CLEC EMPLOYEE TRAINING; (3) CHANGES TO CLEC BUSINESS METHODS AND PROCEDURES AT THE TRANSACTION, CLARIFICATION, OR ESCALATION LEVELS; (4) CHANGES TO THE WORK ASSIGNMENTS OF CLEC PERSONNEL. INTERNAL BELLSOUTH PROCESS CHANGES (EITHER SOFTWARE OR PROCEDURAL) UNIQUE TO THE CLEC WHOLESALE ENVIRONMENT ARE CLEC AFFECTING.

Regarding the expansion of the scope of the meeting to include a discussion of Release Capacity Planning, this topic is covered in various places in the CLEC red-line. The most concise reflection of the CLEC proposals associated with this key area are contained in Section 6, Parts 2, 4, and 5, and in Appendix H and I.

Jay M. Bradbury  
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-----Original Message-----

From: Change.Control@bridge.bellsouth.com  
[mailto:Change.Control@bridge.bellsouth.com]  
Sent: Monday, February 11, 2002 5:20 PM  
To: LIST DELETED  
Subject: ID: Updated 2/12/02 Subcommittee Meeting Agenda

Attention CLECs,

Attached is an updated agenda for our 2/12/02 Subcommittee meeting. We have added an item to discuss release capacity planning (proposal attached).

Also attached is proposed language for the definition of CLEC Affecting Change (CR0569).

Please let us know if you have questions.

Thanks,

Change Management Team

\_\_\_\_\_ Distributed Message \_\_\_\_\_

Message sent by: Change Control /m6,mail6a

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