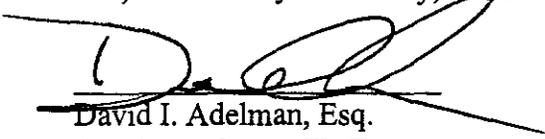


IV. CONCLUSION

WorldCom recognizes that this Commission stands alone in the Southeast because it is the only commission in BellSouth's territory that has shown the political fortitude to make local residential competition a reality. And although the Commission does not have the most resources or the largest staff, it has stepped up to the technical challenges involved and done much of the heavy lifting for the entire region. For that WorldCom is grateful, and so should be Georgia consumers, who are benefiting from the Commission's hard work and determination. Yet WorldCom hastens to add that success is by no means assured. If problems described above that affect Georgia consumers every day are not resolved, if the remaining work is not done, if BellSouth's system for addressing those problems is not fixed, there remains the real possibility that residential competition will not survive. While WorldCom recognizes the resource constraints confronting the Commission, this work is too important to be left undone. WorldCom believes the proposal outlined above would address outstanding issues efficiently and can be implemented with the resources available to the Commission. WorldCom respectfully requests that its proposal be adopted.

For the foregoing reasons, WorldCom respectfully requests that the Commission establish expedited workshops or other proceedings it deems appropriate to address OSS, change management and data integrity issues.

RESPECTFULLY SUBMITTED, this 18th day of January, 2002.



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CERTIFICATE OF SERVICE

This is to certify that copies of the **WORLDCOM'S PETITION TO ADDRESS OSS, CHANGE MANAGEMENT AND DATA INTEGRITY ISSUES** have been served upon the following persons and parties of record by hand delivery or first class mail, postage prepaid, this 18th day of January, 2002.

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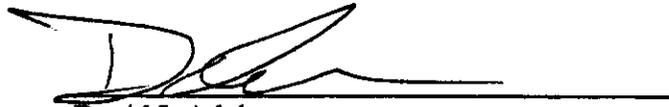
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David I. Adelman

APPENDIX B

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DAVID L. BURGESS, CHAIRMAN
LAUREN "BUBBA" McDONALD, JR.
ROBERT B. BAKER, JR.
BOB DURDEN
STAN WISE



DOCKET # 6863-U

DEBORAH K. FLANNAGAN
EXECUTIVE DIRECTOR

DOCUMENT # 53390

REECE McALISTER
EXECUTIVE SECRETARY

Georgia Public Service Commission

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RECEIVED

FA (404) 656-2341
www.psc.state.ga.us

February 18, 2002

FEB 18 2002

To: All Parties of Record

EXECUTIVE SECRETARY
G.P.S.C.

In Re: Docket No. 6863-U - Consideration of BellSouth Telecommunications, Inc.'s Entry Into Inter LATA Services Pursuant to Section 271 of the Telecommunications Act of 1996

On January 18, 2002, WorldCom filed a petition with the Commission requesting, "expedited workshops or other proceedings" to address OSS, change management and data integrity issues. AT&T filed a motion in support of WorldCom's petition on January 23, 2002. On February 1, 2002, BellSouth filed its response.

In order to assist the Staff and the Commission in determining what future proceedings should be held, if any, the parties are directed to file the following information concerning certain issues raised in WorldCom's petition:

- (1) Migration by telephone number and name – The parties should provide data concerning the number of LSRs submitted using this functionality, including the number of LSRs rejected or clarified and the reasons given for the rejection or clarification. Data concerning any problems encountered in using this functionality also should be provided, including the problem of a mismatch between the customer's address in RSAG and on the CSR, as alleged in WorldCom's petition.

- (2) Parsed CSRs – The parties should provide all testing results or commercial usage concerning parsed CSR functionality. Data about any problems encountered in using this functionality also should be provided. Finally, parties should identify any fields that BellSouth does not provide in parsed format and indicate whether other ILECs provide such fields in parsed format.
- (3) Line Loss Reporting – The parties should provide detailed information concerning the line loss reports BellSouth has provided and is providing. Any party that claims customers have been double billed as a result of BellSouth's failure to provide timely or accurate line loss report should provide specific data to support this claim.
- (4) Single C Order Process – The parties should provide data concerning the number of customers that have lost dial tone as a result of BellSouth's use of an "N" and "D" order. This data should include the date of the conversion and the date dial tone was lost as well as an explanation for why the lost dial tone was caused by use of an "N" and "D" order.

The information outlined above should be as specific as possible and must be provided in the form of an affidavit. The parties are directed to file this information by February 25, 2002.

Copies of such filings should be served on parties electronically or by hand delivery.



Leon Bowles
Director of Telecommunications

BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION

In the matter of:)
)
Consideration of BellSouth Telecommunications, Inc.'s) **6863-U**
InterLATA Services Pursuant to Section 271 of the)
Telecommunications Act of 1996.)

CERTIFICATE OF SERVICE

I hereby certify that the Letter dated February 18, 2002 in the above-referenced docket was filed with the Commission's Executive Secretary, and copies of same were served upon all parties and persons listed below or via hand-delivery where indicated by an asterisk, or by first-class mail addressed as follows:

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So certified this 18th day of February, 2002.

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Atlanta, GA 30334
(404) 656-4540

A handwritten signature in cursive script that reads "Leon Bowles". The signature is written in black ink and is positioned above a horizontal line.

Leon Bowles
Director of Telecommunications



Suzanne W. Ockleberry
Senior Regional Attorney
Law & Government Affairs

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FAX 404 810-5901

February 25, 2002

BY HAND DELIVERY

Mr. Reece McAlister
Executive Secretary
Georgia Public Service Commission
244 Washington Street
Atlanta, GA 30334

RECEIVED

FEB 25 2002

**EXECUTIVE SECRETARY
G.P.S.C.**

Re: Consideration of BellSouth Telecommunications, Inc.'s Entry into Interlata Services Pursuant to Section 271 of the Telecommunications Act of 1996; Docket No. 6863-U

Dear Mr. McAlister:

Enclosed please find an original and fifteen (15) copies of "Response of AT&T Communications of the Southern States, L.L.C., Teleport Communications Atlanta, L.L.C. and AT&T Broadband Phone of Georgia, L.L.C. to Georgia Public Service Commission's Request for Information in Docket 6863-U" in the above-referenced docket. I have also enclosed a diskette containing the document. After filing the originals, please return two additional copies stamped "filed".

Thank you for your assistance in this matter.

Very truly yours,


Suzanne W. Ockleberry

Enclosures
cc: Parties of Record

**BEFORE THE
GEORGIA PUBLIC SERVICE COMMISSION**

In re:)	
)	
Consideration of BellSouth)	Docket No. 6863-U
Telecommunications, Inc.'s Entry into)	
InterLATA Services Pursuant to Section)	
271 of the Telecommunications Act of)	
1996)	

**RESPONSE OF AT&T COMMUNICATIONS OF THE SOUTHERN STATES, L.L.C.,
TELEPORT COMMUNICATIONS ATLANTA, L.L.C., AND AT&T BROADBAND
PHONE OF GEORGIA, L.L.C. TO GEORGIA PUBLIC SERVICE COMMISSION'S
REQUEST FOR INFORMATION IN DOCKET 6863-U**

AT&T Communications of the Southern States, L.L.C., Teleport Communications Atlanta, L.L.C., and AT&T Broadband Phone of Georgia, L.L.C. (collectively "AT&T") submit the joint-affidavit of Jay Bradbury and Bernadette Seigler in response to the Georgia Public Service Commission's ("Commission's") request for information in Docket No. 6863-U. AT&T is providing information on Issue 2, parsed Customer Service Records ("CSRs"), and Issue 4, the single C order process.

The joint-affidavit of Bradbury and Seigler outlines the problems AT&T has encountered with BellSouth Telecommunication Inc.'s ("BellSouth's") so-called "implementation" of CSR parsing for Competitive Local Exchange Carriers ("CLECs"). BellSouth placed its parsed CSR software programming in production on January 5, 2002, but did not provide CLECs with documentation for the parsing software until two weeks prior to implementation. Because of the delay, AT&T has not yet completed its development of its software or had the opportunity to test BellSouth's implementation. AT&T is unable to submit test results or commercial usage data on CSR parsing at this time. Furthermore, BellSouth has not yet addressed several of the defects associated with its CSR parsing functionality.

The information requested by the Commission pertaining to Issue 4, the single C order process, is also provided in the joint-affidavit of Bradbury and Seigler. AT&T customers have experienced numerous instances of loss of service upon conversion from BellSouth service to AT&T UNE-P service due to BellSouth's insufficient migration process. BellSouth continues to effectuate conversion to UNE-P by using two separate orders, the "N" and "D" orders, rather than using the single C order. The resulting instances of loss of dial tone are disruptive to customers and put AT&T and other CLECs at a significant competitive disadvantage.

In addition to the issues identified by the Commission in its request for information, AT&T, in its Motion in Support of WorldCom Inc.'s Petition to Address OSS, Change Management and Data Integrity Issues described a number of additional areas of concern. These areas include data integrity and change management.¹ AT&T has provided information on its concerns regarding data integrity and change management as part of the Commission's six-month review of BellSouth's performance measurement plan and in the ongoing reviews being conducted by KPMG Consulting, Inc.

AT&T welcomes the opportunity to continue to work with the Commission to insure that AT&T's concerns are adequately addressed. In closing, BellSouth has not yet demonstrated that the concerns raised by AT&T, other CLECs and the FCC have been adequately remedied. As a result, BellSouth is not providing the OSS' CLECs need in order to compete against BellSouth.

¹ In his statement upon BellSouth's withdrawal of its Georgia/Louisiana 271 application, Federal Communications Commission ("FCC") Chairman Powell identified data integrity and change management as two of the areas in which questions remain. Statement of FCC Chairman Michael Powell on withdrawal of BellSouth's 271 Georgia/Louisiana application, December 20, 2001.

**BEFORE THE
GEORGIA PUBLIC SERVICE COMMISSION**

In re:)	
)	
Consideration of BellSouth)	Docket No. 6863-U
Telecommunications, Inc.'s Entry into)	
InterLATA Services Pursuant to Section)	
271 of the Telecommunications Act of)	
1996)	

**JOINT-AFFIDAVIT
OF
JAY M. BRADBURY & BERNADETTE SEIGLER
ON BEHALF OF
AT&T COMMUNICATIONS OF THE SOUTHERN STATES, L.L.C.,
TELEPORT COMMUNICATIONS ATLANTA, L.L.C., AND
AT&T BROADBAND PHONE OF GEORGIA, L.L.C.**

STATE OF GEORGIA
COUNTY OF FULTON

Before me, a notary public in and for said state and county, this day personally appeared Jay M. Bradbury and Bernadette Seigler, who, being by me first duly sworn, depose and state as follows:

1. Jay M. Bradbury is the District Manager in the AT&T Law and Government Affairs organization and provides support to AT&T's business units and other internal organizations in the area of Operations Support Systems. Mr. Bradbury's business address is 1200 Peachtree Street, Suite 8100, Atlanta, Georgia 30309. Mr. Bradbury previously filed an affidavit in this docket on May 31, 2001 and now submits this joint-affidavit on behalf of AT&T Communications of the Southern States, L.L.C., Teleport Communications Atlanta, L.L.C., and AT&T Broadband Phone of Georgia, L.L.C. (collectively "AT&T").

2. Bernadette Seigler is employed as the District Manager for AT&T Local Services Access Management for Operations Support Systems for Local Interconnection in AT&T's Southern Region. Ms. Seigler's business address is 1200 Peachtree Street, Suite 8100, Atlanta, Georgia 30309. Ms. Seigler previously filed an affidavit in this docket on May 31, 2001 and now submits this joint-affidavit on behalf of AT&T.

PURPOSE OF JOINT-AFFIDAVIT

3. This affidavit responds to the Georgia Public Service Commission's ("Commission's") letter of February 18, 2002, requesting information on certain specific issues raised in WorldCom's Petition to Address OSS, Change Management and Data Integrity Issues and AT&T's Motion in Support of WorldCom Inc.'s Petition to Address OSS, Change Management and Data Integrity Issues. This affidavit addresses Commission-identified Issue 2, dealing with parsed Customer Service Records ("CSRs"), and Issue 4, the single C order process.

PARSED CUSTOMER SERVICE RECORDS

4. As detailed in the Affidavit of Jay M. Bradbury, filed May 31, 2001 in Docket No. 6863-U, AT&T and other Competitive Local Exchange Carriers ("CLECs") have been requesting parsed CSRs since 1998.¹ BellSouth Telecommunications, Inc. ("BellSouth") provides parsed CSR data to its own retail operations, but has repeatedly delayed implementation of CSR parsing for CLECs. BellSouth finally implemented what it considers acceptable CSR parsing for CLECs on January 5, 2002. As described below, problems remain with BellSouth's so-called "implementation" of CSR parsing, including lack of stability in the implementation,

¹ Affidavit of AT&T witness Jay M. Bradbury, Georgia Public Service Commission, Docket No. 6863-U (May 31, 2001) at ¶ 28.

delayed or inadequate workarounds for identified defects, and failure to provide a fully fielded parsed CSR.

5. The implementation of BellSouth's CSR parsing functionality has not been stable. Since BellSouth put its parsed CSR software programming into production, 24 notices of defect have been issued. BellSouth has recently addressed a number of those defects, but at least 7 of the defects identified thus far remain outstanding. BellSouth has categorized all of the still outstanding defects as "low impact." Under the Change Control Process ("CCP"), BellSouth is required to publish workarounds for defects classified as "low impact" within three business days. The defects were all submitted to the CCP on January 31, 2002, while the workarounds were not published until February 15, 2002.

6. The workarounds published on February 15 place a significant burden on CLECs. Each of the workarounds for these so-called "low impact" defects requires CLECs to manually determine if the CSR they have retrieved is impacted by the defect, or else risk rejection of the Local Service Request ("LSR"). If impacted by the defect, the CLEC must then take additional manual action to ascertain the correct information necessary to complete the LSR. The 7 defects that cause this additional work are not scheduled to be corrected until March 23, 2002. Thus, although BellSouth contends it has implemented CSR parsing, that parsing is effectively unavailable for CLECs retrieving CSRs.

7. Implementation of fixes for the outstanding defects will also likely require updates or changes to the specifications that accompany the software programming. Accurate and stable specifications are necessary in order for CLECs to develop the code required on their end to test and utilize BellSouth's CSR parsing functionality. Without a stable set of

specifications from BellSouth to work from, CLECs like AT&T will not dedicate scarce resources to developing the necessary parallel software.

8. Finally, BellSouth's CSR parsing release does not provide fully fielded parsed CSRs. At least eleven fields that CLECs have requested and for which there is data present in the CSR are not included in parsed format. As the matrix below illustrates, other Incumbent Local Exchange Carriers ("ILECs") provide these fields in parsed format.

Provision of CSR Fields in Parsed Format				
CSR Field	BellSouth	Southwestern Bell Telephone ("SBC")	SBC (formerly Ameritech)	Verizon
TOS – Type of Service	No	Yes	No	Yes
NAME – End User Name (not for directory delivery)	No	Yes	Yes	Yes
LST – Local Service Termination	No	Yes	Yes	No
DGOUT – DID Digits Out	No	Yes	Yes	Yes
HNTYP – Hunting Type	No	Yes	No	Yes
HTSEQ – Hunting Sequence	No	Yes	No	Yes
SGNL – Signaling	No	Yes	No	No
STYC – Style Code	No	Yes	Yes	Yes
TOA – Type of Account	No	Yes	Yes	No
LNPL – Listed Name Placement	No	Yes	Yes	No
BRO – Business/Residence Placement Override	No	Yes	Yes	Yes

9. In February BellSouth issued change requests CR0651 and CR0652 announcing plans to provide parsing for six of these fields in March. The change requests were initially published on February 7th. On February 12th they were declared regulatory mandates and scheduled for implementation on March 23, 2002. BellSouth explained that these six fields must be parsed under regulatory mandate from the Florida Public Service Commission ("FPSC") in Docket No. 000731. The FPSC orders in FPSC Docket No. 000731 were issued in June and

September 2001. Thus, parsing for these six fields should have been provided in BellSouth's January 5, 2002 release of its CSR parsing functionality. On February 21, BellSouth announced that it had decided to reclassify these change requests as CLEC initiated, that it was not scheduling the implementation of the four fields associated with CR0652, and insisted that the CLECs vote concerning the implementation of the two fields associated with CR0651.² Thus, it is now uncertain that BellSouth will provide parsing of any additional fields required to complete implementation of a compliant parsed CSR.

SINGLE C ORDER PROCESS

10. In order to convert customers from BellSouth service to a CLEC UNE-P service, BellSouth uses two separate internal orders. A new or "N" order accomplishes the conversion to UNE-P, while a disconnect or "D" order disconnects the customer's service from BellSouth service. The problem arises when BellSouth's procedures fail to ensure that the two orders are related and coordinated. If BellSouth does not process the orders in the proper sequence, the customer's service is disconnected pursuant to the "D" order before the customer has been converted to the CLEC UNE-P service pursuant to the "N" order. Failure to coordinate the "N" and "D" orders results in customers' loss of dial tone.

11. AT&T has experienced numerous loss of service problems and additional UNE-P provisioning problems due to BellSouth's inadequate migration process, in both Georgia and Florida, the two states in the BellSouth region where AT&T is using UNE-P to provide service

² BellSouth has now asked CLECs to vote (using a procedure outside of the strictures of the CCP) on whether its plans to implement parsing for two of the six fields should continue. Such a vote is inappropriate under the CCP and undercuts BellSouth's obligation to parse all of the remaining unparsed fields.

to its business customers.³ From July through November 2001, AT&T customers experienced at least 81 instances of outages or impaired service within the first 72 hours of migration from BellSouth to AT&T UNE-P service. These instances are detailed in the matrix included as Exhibit JMB/BS -1.⁴ AT&T believes that many of these problems are caused by the separation of the N and D orders.

12. The incidents of loss of service or impaired service for newly migrated AT&T UNE-P customers puts AT&T and other CLECs at a significant competitive disadvantage. Loss of service or impaired service is disruptive to customers, causing inconvenience and loss of business. Furthermore, BellSouth's role in causing the loss of service is largely hidden from the customer's view. The conversion from BellSouth service to CLEC UNE-P service should have no effect on the end user's service at all. Because BellSouth continues to use two orders to migrate customers to UNE-P rather than the single C order, unpredictability and unreliability remain in the conversion process.

³ Affidavit of AT&T witness Bernadette Seigler, Georgia Public Service Commission, Docket No. 6863-U (May 31, 2001) at ¶¶ 9-22.

⁴ Additional troubles and outages reported after 72 hours are not included in Exhibit JMB/BS-1. These troubles are handled by a different internal organization within AT&T and data was not available at the time of filing.

I declare under penalty of perjury that the facts stated herein are true and correct, to the best of my knowledge, information and belief.

Bernadette Seigler
Bernadette Seigler

SWORN TO and subscribed before me this 25th day of February, 2002.

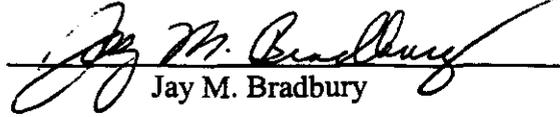
Tonya M. Coker
Notary Public

(SEAL)

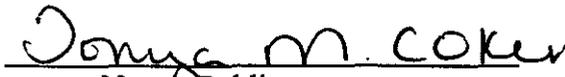
My Commission Expires:

Tonya M. Coker
Notary Public, Cobb County, Georgia
My Commission Expires 12/31/2004

I declare under penalty of perjury that the facts stated herein are true and correct, to the best of my knowledge, information and belief.


Jay M. Bradbury

SWORN TO and subscribed before me this 25th day of February, 2002.


Notary Public

(SEAL)

My Commission Expires:


Tonya M. Coker
Notary Public, Cobb County, Georgia
My Commission Expires August 3, 2002

Joint Affidavit of Jay M. Bradbury and Bernadette Seigler
GPSC Docket No. 6863-U
Exhibit JMB/BS -1

PROPRIETARY

CERTIFICATE OF SERVICE

Docket No. 6863-U

This is to certify that a copy of **“Response of AT&T Communications of the Southern States, L.L.C., Teleport Communications Atlanta, L.L.C. and AT&T Broadband Phone of GA , L.L.C. to GA Public Service Commission’s Request for Information in Docket 6863-U”** has been served upon the parties of record by electronic mail.

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