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May 9, 2002

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
Room TW-A325  
445 12<sup>th</sup> Street, SW  
Washington, DC 20054

Re: CC Docket 02-35

Dear Ms. Attwood:

This letter is being provided in response to a request from the Staff of the Wireline Competition Bureau for an update on BellSouth's Change Control Process ("CCP"). As detailed in BellSouth's Supplemental Application, CCP is not a stagnant process but rather evolves over time to meet the changing needs of the participants. As such, CCP itself is subject to change control processes to ensure that any proposed modifications are prioritized and implemented in an orderly manner. Indeed, the Commission has emphasized that one of the criteria for evaluating an effective change control process is whether the Bell company's process provides a forum for evaluating and improving the change management framework on a going-forward basis.

As the staff is aware, BellSouth and the CLECs are in fact in the midst of such a process addressing several improvements requested by the CLECs. This current process is taking place under the auspices of the Georgia Public Service Commission (GPSC). Although this process is not yet complete, BellSouth is pleased to report that consensus has been reached on the bulk of the CLEC requests. The remaining issues upon which complete agreement have not been reached have recently been referred to the GPSC for resolution. Pursuant to the staff's request, this letter summarizes the current status of this

process and updates the information filed as part of BellSouth's Supplemental Application.

### **I. BellSouth's CCP Satisfies The Test Laid Out In The Commission's 271 Orders**

As an initial matter, there is no question that BellSouth's change control process as it currently exists satisfies the test adopted by the Commission in evaluating whether a BOC's change management plan affords an efficient competitor a meaningful opportunity to compete. BellSouth's application contains a detailed analysis showing that BellSouth's CCP satisfies every element of the Commission's test. *See e.g.* Supplemental Reply Affidavit of William Stacy, at ¶¶11-47.<sup>1</sup>

In particular, the Commission's 271 Orders highlight two important prerequisites to an acceptable change management process. The first is that CLECs receive timely and adequate notice of changes. *New York Order* at ¶¶ 101 et seq. BellSouth's CCP provides for that notice by requiring BellSouth to provide substantial documentation, and the ability to test, to CLECs well before the date of relevant software changes. BellSouth is meeting these requirements. The following table shows the notice schedule for the next two BellSouth releases. BellSouth has met every requirement for these releases.

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<sup>1</sup> First, information relating to BellSouth's CCP is clearly organized and readily accessible to CLECs. BellSouth's documented process is extremely comprehensive and covers a wide range of change management issues, and is accessible to CLECs via BellSouth's CCP website. Second, CLECs have had, and continue to have, input in the design and operation of the CCP. This fact is best evidenced by the recent workshops and modifications to the process. Third, the CCP defines a procedure for the timely resolution of change management disputes using state commission. Fourth, the CCP provides a stable test environment that mirrors production. Fifth, BellSouth provides to CLECs effective and appropriate documentation and support for the purpose of building an electronic gateway. That more than 300 CLECs have established at least one electronic interface to BellSouth's OSS and used these interfaces in 2001 to submit over 4.1 million electronic service requests (89% of all requests submitted) and more than 325,000 electronic trouble reports is confirmation of the effectiveness of the information and support provided by BellSouth. Finally, sixth, BellSouth has demonstrated throughout the course of its Application and Supplemental Application a pattern of compliance with CCP, including handling requests on a timely manner and implementing both BellSouth and CLEC-requested changes. *See, generally NY 271 Order* at paras 101 et sequ.

**Documentation Summary for Release 10.5: Scheduled 5/18-5/19/02**

Document	CCP Due Date:	Actual Date Provided:	Met CCP commitment (Yes or No)
Release Package Meeting	1-11-02	12-12-01	Yes
Draft User Requirements	1-11-02	12-14-01	Yes
Final User Requirements	1-18-02	01-22-02, 01-23-02, and 02-06-02	Yes:CLECs requested 3 add'l meetings to discuss draft user requirements.
TAG API Version 0.0	4-19-02	04-05-02	Yes
Carrier Notification - CAVE	N/A	04-03-02	Yes
EDI Specs	N/A	N/A: No EDI Changes	N/A
Release Production Letter	4-18-02	4-15-02	Yes
Post BBR-LO	4-19-02	03-01-02	Yes

**Documentation Summary for Release 10.6: Scheduled 7/13 – 7/14/02**

Document	CCP Delivery Date Schedule:	Actual Date Provided:	Met CCP commitment (Yes or No)
Release Package Meeting	3-1-02	02-15-02	Yes
Draft User Requirements	3-08-02	2-15-02	Yes;Excludes mandated requirements for Res Id and Ga. Community Calling.
Final User Requirements	3-15-02	03-14-02	Yes
TAG API Version 0.0	6-07-02		
Carrier Notification-CAVE	N/A		
EDI Specs	6-07-02		
Release Production Letter	6-13-02		
Post BBR-LO	6-07-02	4-12-02	Yes

The second key change management concern is whether the Bell company's process provides a forum for evaluating and improving the change management framework on a going-forward basis. *Id.* As evidenced by the current process improvement proceeding in Georgia, BellSouth's CCP clearly provides this forum. Indeed, as detailed in the Stacy/Varner/Ainsworth Supplemental Affidavit (¶¶108-134), BellSouth and the CLEC community are currently in the midst of a thorough and complete review of the entire CCP. This review is being conducted under the procedures

established in the current CCP. As detailed in the following paragraphs, the CCP process has been active and successful. BellSouth and CLECs have reached agreement on almost all the proposals for change. The three remaining issues have recently been referred to the Georgia PSC for resolution, as per the currently established CCP procedures, and are pending before that Commission.

## **II. Status of Georgia Change Control Process Improvement**

Since the filing of the Supplemental Application, BellSouth has conducted three process workshops, one on March 28, 2002, one on April 11, 2002, and one on May 2, 2002. The purpose of these workshops has been to collaborate with CLECs in revising and improving the current CCP. The output of the workshops is reflected in the “redline/greenline” version of the current CCP document. This redline/greenline document reflects CLEC proposals for changes (the red-line version) and Bellsouth’s responses to those proposals (the green-line version). Both the red-line and green-line versions of the CCP document were created at the request of the GPSC. As a result of these workshops, the parties have reached agreement on the following important issues raised by the CLECs:

- **Definition of “CLEC-Affecting Change”**: The CCP applies to those changes to BellSouth systems that are “CLEC-affecting.” In the process improvement workshops, CLECs requested that the scope of this requirement be expanded to apply to a broader array of changes. BellSouth agreed verbatim to the definition proposed by the CLECs. (That definition is broader than the definition used by Verizon in its change control process). Further, on May 2, BellSouth agreed to provide CLECs with all the information CLECs contend they need to determine if a change is CLEC-affecting under the new definition. (This agreement has not yet been balloted.) BellSouth will provide the CLECs with this information on BellSouth system releases through three different means. Bellsouth will provide legacy system release information on the CCP website; maintenance release information will be provided on the CCP Change Control Release Schedule; and all Type 2 through 6 change requests will be posted to the Flagship Feature

Release Schedule. Both the CCP Change Control Release Schedule and the Flagship Future Release Schedule are currently provided to CLECs via e-mail.

- Provision of Change Capacity Information: BellSouth has also agreed to provide CLECS with additional information concerning future change capacity in order to allow them to more efficiently prioritize change proposals. Specifically, BellSouth has committed to provide by May 10, 2002, capacity on a release-by-release basis through the end of 2003. To effectuate this agreement, tomorrow (May 10, 2002) BellSouth will provide CLECs with capacity projections for two different release plans for 2003. The plans will detail two different approaches to equitably dividing resources between CLEC and BellSouth requirements. BellSouth will provide the CLECs with available capacity projections for each release in "units," as the CLECs have requested.<sup>2</sup> BellSouth has also agreed to provide CLECs with timely estimates of the amount of capacity (also in units) required for all Type 4 and Type 5 change requests that are candidates for prioritization. Indeed, as agreed, BellSouth provided such information on March 27, 2002, for all such Type 4 and Type 5 change requests. Subsequent to that meeting, the CLECs asked BellSouth to size the Type 2 flow-through features. Although sizing of Type 2 features is not required by the current CCP, BellSouth agreed to provide this information to the CLECs. BellSouth is in the process of sizing the Type 2 requests and will provide that information to the CLECs no later than 5 business days prior to the May 22, 2002, prioritization meeting pursuant to the CCP process. Finally, BellSouth has agreed to provide CLECs with historical capacity information for 2002 on a quarterly basis. BellSouth will provide CLECs with the actual capacity used in the first quarter of 2002 on May 10. In light of the above, CLECs will have on a going forward basis, both a projected capacity view and actual capacity view, by quarter, to enable them to compare projections with actuals.
- Prioritization of CLEC Change Requests: On May 22, CCP will be convened to re-prioritize change requests that are candidates for prioritization. Before that

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<sup>2</sup> A unit is equal to 100 release cycle hours representing time spent planning, implementing and testing software releases.

meeting, BellSouth will have provided the CLECs with the following information: (1) capacity, in units, for two different release views; (2) estimated size, in units, of Type 2 flow-through requests; (3) estimated size, in units, of Type 4 requests; and (4) estimated size, in units, of Type 5 requests. The CLECs can use this information at the May 22 prioritization meeting to slot requests in the different releases according to priority, size and technical feasibility of the particular request. BellSouth will use the information provided by the CLECs to scope<sup>3</sup> the first 2003 production release, and to create a planning view of remaining releases according to available capacity. Once the first release is accepted by the CLECs, the clock will start on BellSouth providing required deliverables to the CLECs such as user requirements.

- **Feature Implementation:** BellSouth has committed to implement the CLECs Top 15 change requests by the end of this year. After May 10, when BellSouth provides the capacity information described above to the CLECs, BellSouth can provide the Commission with the total capacity for 2003 and the total size for the Type 2, Type 4 and Type 5 change requests. This information will allow CLECs and the state and federal regulators to assess the number of requests eligible for prioritization for which there will be release capacity in 2003. Based upon our current evaluation, BellSouth anticipates having sufficient capacity to be able to work a very high percentage of current change requests.

In addition to the above, agreement between BellSouth and the CLECs has been reached on a number of other CCP issues including, but not limited to:

- Enlarge the scope of CCP to include the “development” of new interfaces. Previously, CCP included only the introduction of new interfaces. BellSouth has agreed to enlarge the definition of the CCP to include development of new interfaces.
- Enlarge the scope of CCP to include changes made only to relevant BellSouth documentation.

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<sup>3</sup> "Scoping" a release includes completed business rules and draft user requirements.

- Modification of the Escalation Process under the Dispute Resolution Process. BellSouth has agreed that mediation before a state commission under the dispute resolution process will not be binding on all CCP participants.
- BellSouth agreed to have a representative of the LCSC and IT at CCP meetings, and to have the appropriate subject matter experts and project managers participate as needed.
- BellSouth agreed to hold a quarterly technical meeting with the CCP participants and the BellSouth Technical Team (while the CLECs unanimously voted to adopt this on Ballot 9, they subsequently decided against this type of forum at the May 2, 2002 workshop).
- BellSouth and the CLECs have also been cooperatively working issues surrounding the CAVE testing process. BellSouth expects to resolve these issues and does not expect any of these to require referral to the GPSC.

There remain three issues on which BellSouth and CLECs have not reached agreement. As provided by the CCP, these three issues were submitted to the GPSC for resolution on May 2, 2002. The three issues are described below.

Defect Intervals for Medium and Low Defects: BellSouth currently operates under a CCP requirement to fix medium defects in 90 business days. BellSouth has voluntarily undertaken to correct low impact defects in 120 business days. CLECs have requested deadlines of 20 business days for medium and 30 business days for low impact defects, respectively.

Prioritization and Scheduling of Features: CLECs have requested that all features included in BellSouth production releases be prioritized within the CCP. This proposal would require BellSouth to obtain CLEC consent before it could implement any change to its systems that would be covered under the newly revised and extremely broad definition of “CLEC affecting.” BellSouth has only one vote in the CCP. Thus, this CLEC proposal would give CLECs control over BellSouth systems and could easily prevent BellSouth from making system improvements focused on improving the efficiency of BellSouth’s operations.

CLECs have also requested that all Type 2, Type 4 and Type 5 change requests be implemented within 60 weeks of prioritization. BellSouth opposes the CLECs' position for a variety of reasons. Given that there are no restrictions on the number, scope or cost to BellSouth of CLEC change requests, it is simply unreasonable to expect that every CLEC request be implemented. No other ILEC change control process contains this type of CLEC prioritization. In fact, the Verizon plan specifically states that "Change Requests may not be implemented in the priority order specified by TCs [Telecommunications Companies]...[i]mplementation decisions will remain within Verizon's discretion, consistent with applicable law and regulatory authority and resource constraints. Verizon will consider TC prioritization in exercising this discretion."

BellSouth instead has proposed, similar to the Verizon plan, that there be two types of releases in which prioritized requests and/or defects would be worked – BellSouth production releases and CLEC production releases. All production releases, BellSouth and CLEC alike, will schedule Type 2 mandates, including flow-through requests, subject to available capacity. After those features are scheduled, BellSouth will schedule BellSouth features (Type 4) and may include CLEC features (Type 5) at its discretion based on BellSouth's prioritization. Within the CLEC releases, the CLECs will schedule CLEC features (Type 5) and may include BellSouth features (Type 4) at their discretion based on the CLEC's prioritization. This proposal gives the CLECs and BellSouth the right to prioritize their features in their releases at their sole discretion.

The amount of programming effort involved in implementing a change request can vary from hundreds to thousands of hours. Consequently, committing to a specific, arbitrarily prescribed, timetable for a potentially unlimited number of CLEC requests is simply not workable. BellSouth's position, namely that BellSouth will size the amount of effort required, notify the CLECs of that sizing, and allow the CLECs to prioritize the implementation "subject to available capacity constraints," is a reasonable compromise that recognizes the need for CLEC input and participation in the process, but retains the flexibility necessary given the size of different work efforts.

- Request to Expedite Type 2/Type 4 BellSouth Features: The CLECs contend that the CLECs should approve any Type 2 (without a mandated implementation date) or Type 4 feature BellSouth requests be expedited due to operational or regulatory needs.

BellSouth's proposal on this issue is straightforward and reasonable. Assuming the parties can agree on separate CLEC releases and BellSouth releases, BellSouth proposes that any expedite request BellSouth makes to include a Type 2 or Type 4 request in a CLEC release will be subject to "mutual consent" of the CLECs and BellSouth. In BellSouth releases, on the other hand, BellSouth will provide notice to CLECs of an expedited request, but will not need CLEC consent to include the Type 2 or Type 4 request. This proposal will protect the rights of the CLECs to control the CLEC releases, while at the same time protecting the ability of BellSouth to handle unforeseen operational needs.

In short, BellSouth has worked very hard to reach consensus with the CLEC community on changes to the CCP process and the hard work has paid off.

### **III. The Georgia Process Improvement Meetings Show the Effectiveness of CCP**

BellSouth submits that the success of the CCP Improvement Workshops is demonstrable evidence that CCP works precisely as envisioned. That is, as this Commission has recognized, a fundamental characteristic of a change control process is that it be responsive and adaptable to changing demands of the parties. Indeed, recent facts belie the suggestion of some CLECs that the current CCP is ineffective. In April 2002 alone, BellSouth held 9 different change control meetings on 8 different days, including the Release 10.6 and 11.0 User Requirements Review meeting, the Flow-Through Task Force meeting, the Monthly Status meeting, and a meeting on the industry release EDI LSOG Mechanization Specification ("ELMS6"). There are 9 more meetings scheduled for May 2002 on 8 different days, including a CAVE testing overview on May 9, the EDI User Group and the TAG Forum. Not only is the process active, it is effective. From the inception of CCP through May 6, 2002, for example, BellSouth has implemented 17 regulatory mandates, 40 Type 4 (BellSouth-initiated) and 39 Type 5 (CLEC-initiated) change requests, including parsed CSR and electronic ordering for line splitting. Additionally, BellSouth has met all of its CCP commitment dates for documentation for both Release 10.5 (scheduled for 5/18-5/19) and Release 10.6 (7/13-7/14), including the due date requirements for Draft User Requirements and Final User Requirements.

Furthermore, there is no truth to the assertions of certain CLECs that BellSouth has some sort of “veto” power over the current process. Pursuant to the transparent rules of the CCP, CLEC change requests are worked in the order they are prioritized by the CLECs, consistent with the available capacity of a given release and any applicable technical constraints. The current CCP process also includes specific escalation procedures that provide for the quick resolution of disputes through upper level BellSouth management and to state regulatory bodies. These procedures ensure that BellSouth’s decisions are not arbitrary. Notably, despite criticisms, CLECs have not used the dispute resolution process for any of the issues raised as part of the present 271 proceeding before this Commission.

We trust this letter demonstrates that the current CCP satisfies the Commission’s precedent by providing CLECs with timely and detailed notice of changes and a “forum in which both competing carriers and the BOC can work collaboratively to improve the method by which changes to the BOC’s OSS are implemented.” *Texas Order* at ¶ 117. As required by the Commission’s rules, I am providing two copies of this letter to the Office of the Secretary for inclusion in the record of this proceeding.

Sincerely,

A handwritten signature in black ink, appearing to read "Glenn T. Reynolds". The signature is fluid and cursive, with the first name being the most prominent.

Glenn T. Reynolds

cc: Dorothy Attwood  
Michelle Carey  
Renee Crittendon  
Susan Pie  
James Davis-Smith