

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)
)
Joint Application by BellSouth Corporation,) CC Docket No. 02-150
BellSouth Telecommunications, Inc.)
and BellSouth Long Distance, Inc., for)
Provision of In-Region, InterLATA)
Services in Alabama, Kentucky, Mississippi,)
North Carolina, and South Carolina)
_____)

**REPLY DECLARATION OF SHERRY LICHTENBERG
ON BEHALF OF WORLDCOM, INC.**

Based on my personal knowledge and on information learned in the course of my duties,
I, Sherry Lichtenberg, declare as follows:

1. I am the same Sherry Lichtenberg who previously filed a declaration in this proceeding. The purpose of my reply declaration is to describe recent developments with respect to change management on which WorldCom relies in its Reply Comments. I will not repeat here the material included in my prior Declaration.

2. BellSouth's failure to manage change effectively continues. On July 25, 2002, BellSouth announced that CLECs would have to amend their interconnection agreements to allow them to place orders using new Universal Service Order Codes if they wished to take advantage of the changes scheduled to go into effect with Release 10.6 on August 24, 2002.

3. No contract amendment should be needed. The changes scheduled for Release 10.6 are intended to correct a number of defects, including BellSouth's improper treatment of

some intraLATA calls as local calls. CLECs should not need to amend their contracts to avoid the ongoing impact of defects in BellSouth's OSS.

4. At a minimum, BellSouth should have announced the need for contract amendments well before it did. BellSouth first informed CLECs in April of the changes scheduled for Release 10.6 and should have announced any need for contract changes at that time – especially since the changes were then scheduled to occur in July. Amending contracts with BellSouth is often a difficult process, and BellSouth has once again compounded that difficulty.

5. BellSouth's upcoming implementation of Release 10.6 is a source of worry for a second reason as well. Eleven defects have already been discovered in the software released into the CAVE test environment for carrier-to-carrier testing, including one that BellSouth labeled "critical" and six that BellSouth labeled "serious". If BellSouth's internal testing were working as it should, there would have been few, if any, defects by the time the release was placed into the CAVE environment. The purpose of carrier-to-carrier testing is primarily for CLECs to determine whether their interfaces will work with the ILEC's interface; it is only secondarily to root out any remaining glitches in the ILEC's interface. The number of defects already discovered in CAVE makes it more difficult for CLECs to test their interfaces effectively. It also makes it more likely that the release will contain significant errors when released into production.

6. The Florida PSC has ordered BellSouth to implement performance measures on (1) the number of defects in future releases; (2) the interval for correction of defects; and (3) the validation of software by BellSouth. But the most important measure, the number of defects in future releases, is not associated with any penalty. Moreover, these measures apply only in

Florida. For the moment, then, there is no basis for concluding that BellSouth's performance in releasing new software is acceptable.

7. BellSouth's failure with respect to the change management notification process also continues. As the Department of Justice pointed out in its Evaluation, BellSouth recently implemented numerous changes to performance measures without notifying CLECs. DOJ Eval. at 13.

8. Similarly, BellSouth failed to provide CLECs notice of the change it made to its interface to begin rejecting CLEC orders that included requests for BellSouth long distance service. In my initial Declaration, I described this change. Although this was a CLEC-affecting change under both the old and the new definition of CLEC affecting, BellSouth implemented the change without notifying CLECs. Indeed, WorldCom began receiving rejects on such orders weeks before BellSouth announced to CLECs that such orders would be rejected.

9. BellSouth's policy of rejecting CLEC orders that include a request for BellSouth long distance service continues. Indeed, BellSouth has informed WorldCom that at present there is no operational agreement it could enter to begin transmitting such orders. *See* Att. 1 hereto, Letter from Janet Kibler, July 30, 2002.

10. BellSouth's process of managing change remains inadequate.

CONCLUSION

This concludes my declaration on behalf of WorldCom.