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August 16, 2002

EX PARTE

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
The Portals
445 12th St. SW
Washington, D.C. 20554

Re: WC Docket 02-150

Dear Ms. Dortch:

BellSouth has continued to strengthen the Change Control Process since its successful application to provide long distance service in Georgia and Louisiana. As set out below, the continuing improvement in the process is reflected in many areas, including key areas such as successful implementation of high-priority CLEC features, improvements in the process for discovering, minimizing and fixing software defects, improvements in the prioritization process, and improved performance in releasing documentation on time or early. In addition, BellSouth's CCP performance is now subject to additional performance measures, further improving the transparency of the process, and performance penalties, providing further incentives to meet the requirements of the process. *See* Evaluation of the Department of Justice, at 3 ("BellSouth's Application demonstrates that, in conjunction with the state commissions, it has made substantial progress in addressing issues previously identified by the Department.") By any measure, BellSouth's CCP has improved since its filing of its approved Georgia/Louisiana 271 application.

The Commission examines the overall change management process to determine whether the process "provide[s] sufficient access to the BOC's OSS" to allow an efficient competitor a meaningful opportunity to compete. Georgia/Louisiana, at ¶ 179. In addition to the continuing improvements in the change management process discussed below, the purpose of the change management process – whether the BOC is providing sufficient access to its OSS – is being served. BellSouth's OSS continues to improve in ways responsive to CLEC concerns. Among other things, rejects have been reduced significantly over the past year because of the implementation of telephone number

migration and a parsed CSR (which has recently been further enhanced); CLECs can now order more products (such as line splitting, UDCs and EELs) electronically; and UNE-P orders with voicemail and call forwarding now flow through. BellSouth's OSS now handles over 500,000 CLEC orders per month. The fact that flow through remained consistently high this year despite this increase in order volumes has particular relevance to change management because BellSouth has implemented several major upgrades to CLEC interfaces. The fact that flow through did not deteriorate when new releases were implemented shows that the documentation and assistance provided under the CCP allows CLECs to successfully manage their side of the interface upgrades and to take advantage of the new functionalities.¹

New Feature Implementation

BellSouth's track record this year at implementing major releases that provide important additional OSS functionality to CLECs shows that the CCP is working successfully and continues to improve. Some of these upgrades provide functionality not available from other successful 271 applicants at the time of approval. These upgrades include:

- Fully parsed CSR
- Single C order process
- Mechanized ordering for line splitting
- Mechanized ordering of unbundled digital channels
- Creation of new listings in LENS
- Ability to view multiple CSRs simultaneously
- Provision of connecting facility assignment information via pre-order inquiry
- Mechanized ordering of EELs
- Removal of telephone number from a LENS LSR

Additional major CLEC features are on track for implementation this year. BellSouth will implement the remainder of the top 15 upgrades that CLECs had prioritized earlier this year including:

- Mechanization of ordering for partial migration of UNE Loops
- Ability to electronically specify changes in directory delivery addresses
- UNE to UNE Bulk Migrations (significant programming effort in Release 11.0)
- Mechanization of Completion Notice on Incorrect LSR Version
- Electronic reject for invalid record change orders

¹ BellSouth has focused on improving documentation and technical assistance to CLECs. BellSouth has been providing documentation in advance of CCP deadlines, *Stacy Reply Affd.*, para. 27 (tables showing documentation requirements and release dates for recent releases), and increasing technical representation at forums. This improved communications with competing carriers provides further assurance of smooth transitions between releases, which is a key focus of the Commission's change management inquiry. *See New York Order*, at para. 103.

BellSouth is thus plainly acting to improve its electronic processes in ways that the CLECs themselves have identified as being most important to them.

Substantial Resources Are Devoted To CCP

These accomplishments are not surprising given the substantial resources BellSouth devotes to the CCP. In 2002 alone, BellSouth will invest approximately 300,000 programmer hours and \$108 million for the improvement of the OSS provided for CLECs. *See Stacy Reply Affd.*, para. 47. BellSouth plans to devote comparable resources in 2003. These resources are spent on highly qualified software companies – Accenture and Telcordia – who are nationally respected programming vendors. As independent third parties, these vendors have every incentive to provide high quality software. *See Stacy Reply Affd.*, at para. 76. As discussed above, these resources have translated into concrete and important upgrades, allowing CLECs to submit over 500,000 orders per month with high mechanized flow-through rates.

BellSouth's commitment to the CCP does not stop with the upgrades discussed above. In addition to the implementation of the Top 15 CLEC requests, BellSouth has implemented, or is scheduled to implement, 25 other change requests for features this year, bringing the total to 40 implemented or scheduled feature change requests for 2002. Since the inception of the change control process to August 5, 2002, BellSouth has implemented 19 Type 2 Mandates, 44 Type 4 (BellSouth-initiated) and 43 Type 5 (CLEC-initiated) change requests. *See Stacy Reply Affd.*, at para. 21.

Programming and Documentation Constraints on Feature Implementation

BellSouth is implementing change requests as quickly as possible given the timelines in the CCP and the inherent complexities in making simultaneous changes to a single OSS. The CCP timelines govern the number of releases that can be done in a given year by mandating a certain amount of lead time for each step in the process including providing user requirements to the CLECs (36 weeks prior to a release); finalizing those requirements; developing the specific system requirements; coding and testing the new functionality; and testing in CAVE prior to production.

The fact that BellSouth uses a single OSS constrains the number of simultaneous software releases that can be efficiently worked. In simplistic terms, it is akin to several groups of people trying to edit the same document simultaneously. At present, for example, developers are completing the testing of Release 10.6, writing code for Release 11.0, and planning Release 12.0. These releases build on one another and are interdependent. That is, an issue that arises in programming Release 10.6 can affect the code that needs to be written for Release 12.0; or, said another way, the code being written for Release 12.0 must work with the final version of each prior release. There is thus a limit to the number of such releases that can be efficiently constructed at any one time. Moreover, because of the long lead times required by CCP and the fact that each release must track the ones before it, there is a limit on number of releases that can be done in a particular year. Finally, it is worth noting that releases are inherently

something other than “business as usual” for both BellSouth and the CLECs and so an unlimited number of releases is not desirable.

While these types of constraints are to some degree inherent in programming complex system changes, BellSouth is working to mitigate the impact the impact by addressing these system constraints. In BellSouth’s case, one of the main factors in programming constraints is LESOG, the service order generator that handles most types of LSRs. A limited number of developers can work on LESOG (or any part of the system) at any point in time, and thus, even if the funding for this function were doubled, the work could not be accelerated appreciably. As part of its constant effort to update its systems, however, BellSouth has begun deployment of the Telcordia technology (SGG, DOM and COG) to provide a new infrastructure that would, among other things, allow development parallel to LESOG, and provide a rules-based service order generator that would accelerate future system development. BellSouth has discussed this infrastructure change with the CLECs through the CCP and the commissions. The initial deployment of this new architecture provided the platform for ordering of xDSL loops; since that time, BellSouth implemented electronic loop makeup and parsed CSR on this platform. This work is planned to continue into 2003. The new platform will provide a more flexible, scalable architecture that will continue to improve BellSouth’s ability to respond to CLEC requests.

Allegations of CCP Backlog Are Incorrect

While the CLECs allege a substantial “backlog” of change requests, the facts demonstrate that each request in the process is being handled appropriately and in accordance with the process which BellSouth and the CLECs jointly developed. CLEC claims of “backlog” are inflated but, even by AT&T’s own account, Bellsouth has made substantial progress in the last few months in clearing the alleged “backlog” of feature requests. While AT&T claimed in the Georgia/Louisiana proceeding that there were 93 feature requests that had not been implemented in February 2002, here it asserts that there were a total of 65 feature requests that had not been implemented in June 2002. See AT&T April 19, 2002, *ex parte*, Georgia/Louisiana Application, at 2, CC Docket 02-35; AT&T Bradbury/Norris Decl., at para. 35. While BellSouth does not accept these figures, they do show a substantial improvement even under AT&T’s analysis.

Attachment A (with accompanying charts as Attachments 1-4) describes each change request that has not yet been implemented and its current status in the CCP. There are only three change requests in the Pending category, and none of the three involves a change to OSS software. Each of the other change requests is progressing through the steps of the CCP process. That process is subject to a number of performance measures, monitoring by the CCP community and state public service commissions, and to penalties in every BellSouth state.

As Attachment A demonstrates, AT&T’s alleged “backlog” does not exist. The change requests currently in CCP are being handled efficiently and in accordance with the documented process. It is unreasonable to expect that there will ever come a time that

the New, Pending, and Candidate Request categories are empty – so long as CLECs continue to submit requests to the CCP, there will be requests in each category. The critical fact, however, is that the requests are moving through the process and are being implemented in a timely fashion. There is no doubt that BellSouth is meeting that commitment.

Defect Minimization

In addition to the number of features implemented, BellSouth's performance this year has been notable for the fact that despite the increasing complexity of the releases, the percentage of defects has declined. When the complexity of BellSouth's software releases is considered (measured in the number of function points), the ratio of defects per function point has **decreased** steadily over time from .00708 defects/function point in Release 10.3 (January 2002) to .00467 defects/function point in Release 10.5 (June 2002). This is an important fact in that it indicates that while the absolute number of defects may appear to remain constant, BellSouth actually is improving its release quality as the releases become more complex. *See Stacy Reply Exhibit WNS-32 (table providing third-party analysis of BellSouth software releases).*

While BellSouth always strives for defect-free releases, and was disappointed in the absolute number of defects found in Release 10.5, the vast majority of defects (as defined by CCP) in Release 10.5 affected a very small number of CLEC orders. Thirty (30) of the thirty-five (35) CLEC-affecting defects that were identified affected between one and ten LSRs. Most of the thirty defects, and the related LSRs, were the result of LSRs submitted in version 10.4 that finished processing in version 10.5. This is a unique and limited situation that did not deprive CLECs of a meaningful opportunity to compete. Any issues related to orders in transition would typically be cleared in a two to three day period following implementation, and would not affect orders placed after the new release was implemented. BellSouth also moved rapidly to fix the remaining five defects and had them all corrected within days of the release. *See Stacy Reply Affd., at para. 78.*

In addition, BellSouth engaged QP Management Group, a company that specializes in evaluating software quality, and asked it to evaluate recent BellSouth software releases, and then to compare those releases to other corporations producing software of similar size and complexity using the same standard metric – Defects per Function Point. QP Management Group concluded that based on its evaluation, BellSouth's software for releases 10.3, 10.3.1, 10.4 and 10.5 compared favorably to the industry best in class in terms of Defect per Function Point. *See Stacy Reply Affd., at para. 75.*

BellSouth continues to take steps to improve its software releases. For example, the Commission "encourage[d] BellSouth to continue to accept and consider any input from competitive LECs regarding software problems they discover during testing before BellSouth decides to implement a new software release." *Georgia/Louisiana, at para. 182.* In response, BellSouth expanded CAVE testing opportunities for CLECs, expanded and formalized pre-release communications with CLECs concerning defects and has

proposed formal processes for deferring implementation of a release due to defects, including a CLEC go/no go recommendation on release implementation. *See* Stacy Reply Affd., at para. 6, 12, 94-107. The Department of Justice has noted these improvements as well as the fact that BellSouth, state regulators and CLECs are working together to improve this process. DOJ Comments, at 12.

Furthermore, BellSouth plans to modify its implementation of Release 10.6 to “push” existing LSRs through the systems before installing the new software to avoid, to the extent possible, the defects that appear as a result of LSRs in progress in the old software. BellSouth also has hired a third-party vendor to expand BellSouth’s internal release testing. The Florida Commission adopted three new measures, which are discussed more fully below, to measure BellSouth’s performance with respect to defects. In addition, the FPSC ordered new defect correction timeframes that BellSouth has implemented – 10 business days for Severity 2 impact; 30 business days for Severity 3 impact; and 45 business days for Severity 4 impact.

Defect Correction Requires Minimal Resources

Several CLECs have argued that BellSouth is unable to implement a sufficient number of change requests due to the programming capacity that it must dedicate to the resolution of defects. However, the amount of capacity used to correct the defects is a small fraction of the total capacity available.² In 2002, for example, the amount of resources utilized for defect correction (Type 6 – defect capacity utilization vs. all other utilization) can be determined directly from the first and second quarter capacity utilization data furnished to the CLECs through the CCP. In 2002, BellSouth used less than 8% of available capacity for defect correction.

CCP Process Improvements

BellSouth has now fully implemented the 50/50 prioritization process under which BellSouth and competing carriers will split change control resources evenly. This process was supported by KPMG and adopted by the Florida Public Service Commission. BellSouth has implemented this proposal on a region-wide basis and so, consequently, the CLECs will have 50% of BellSouth’s production release capacity in 2003. DOJ notes that BellSouth has made “a number of additional positive developments relating to its change control process...since the Department filed its Georgia/Louisiana II Evaluation.” DOJ highlighted BellSouth’s agreement to accept the CLECs’ proposed definition of “CLEC-Affecting.” DOJ Evaluation, at 9.

As important as the effectiveness of the CCP itself is BellSouth’s compliance with the process. There is no doubt that the process is active. Since March 28, 2002,

² Capacity is measured in “units.” Each unit represents 100 hours of programmer time. BellSouth routinely provides software programming information to CLECs in these units under CCP requirements. For example, BellSouth publishes projected and historical information on the number of units necessary to implement software changes. *See* Georgia/Louisiana Order, at para. 183, n. 686. BellSouth has continued to provide CLECs with timely projected and historical capacity information.

BellSouth has held 47 CCP meetings. From July 16 to present alone, the CCP has had 12 meetings, and there are 6 more scheduled through end of August. In addition, BellSouth has provided all of the documentation for Release 10.6, and the Draft and Final User Requirements for Release 11.0 scheduled for December 7-8. BellSouth also has provided the Draft User Requirements for four of the six features in Release 12.0 that is scheduled for March 2003 and is working collaboratively with the CLECs on the two remaining features. Finally, BellSouth recently provided the CLECs with the 2nd Quarter Capacity Report showing actual capacity usage of the systems during the 2nd Quarter 2002 for feature development.

In addition, BellSouth is complying with the 10-business day interval to respond to New requests. From February 2002 through June 2002, CLECs submitted 16 Type 5 change requests. BellSouth met the 10-day interval for 13 of those requests. On the three BellSouth did not meet the interval, BellSouth needed additional time to investigate the requests, and informed the originating CLECs that additional time would be needed. After taking the additional time, BellSouth accepted one of the requests, proposed an alternative solution for another of the requests that BellSouth initially requested based on cost that the CLEC accepted, and rejected the third request that the CLEC subsequently cancelled.

Finally, there are measures in place to ensure that BellSouth's compliance with its CCP obligations continues. As discussed in the Stacy Reply Affidavit, the Florida Public Service Commission recently has ordered BellSouth to implement six new change control measures. These measures are as follows: (1) CM-6: Percent of Software Errors Corrected in X (10, 30, 45) Business Days; (2) CM-7: Percent of Change Requests Accepted or Rejected Within 10 Business Days; (3) CM-8: Percent of Change Requests Rejected; (4) CM-9: Number of Defects In Production Releases; (5) CM-10: Software Validation; and (6) CM-11: Percent of Change Requests Implemented Within 60 Weeks of Prioritization. BellSouth has agreed to report data pursuant to these measures in all nine of its states. In addition, the Florida Commission ordered BellSouth to pay penalties on measures CM-6, CM-7, and CM-11. BellSouth also has agreed to voluntarily pay these penalties in all five states at issue here, as well as Tennessee and Louisiana (BellSouth expects the Georgia Commission to order these, or similar, penalties in its CCP process). These measures and the associated penalties will provide additional assurance that BellSouth will continue to maintain the high level of excellence it has achieved in the CCP process.

Conclusion

BellSouth has devoted, and will continue to devote, substantial resources to change control. This year, BellSouth will implement the Top 15 features as prioritized by CLECs. The CCP plan also has been modified this year in collaboration with the CLECs, and through the involvement of state commissions and KPMG. The plan provides a thorough and detailed process for implementing software upgrades. The process is measured by up to 11 performance measures that provide objective information on BellSouth's performance every month. Several of those measures have penalties attached

to them that BellSouth has agreed voluntarily to pay in the five states in this application (as well as Louisiana and Tennessee). BellSouth's track record this year of successfully implementing major software upgrades for CLECs while reducing the percentage of defects is strong evidence of a successful change management plan. The fact the CCP plan has been recently updated, that BellSouth's performance under the plan is closely measured, and that state commissions are watching attentively provides strong additional guarantees that the CCP will continue to function efficiently.

In accordance with Commission rules, I am filing copies of this notice and attachments and request that they be included in the record of the proceeding identified above.

Sincerely,

A handwritten signature in black ink, appearing to read "Glenn T. Reynolds". The signature is fluid and cursive, with a long horizontal stroke at the end.

Glenn T. Reynolds

Attachments

cc: Michelle Carey
Aaron Goldberger
Susan Pie
James Davis-Smith (Department of Justice)

ATTACHMENT A

Change requests characterized by CLECs as “backlog” in the process can be divided into four main categories: New (those requests for which BellSouth has 10 business days to accept or reject the request); Pending (those requests BellSouth has accepted and are awaiting prioritization); Candidate Request (those requests that have been prioritized); and Scheduled (those requests that have been slotted in a release). As of August 5, 2002, there were 57 Type 4 (BST-initiated) and Type 5 (CLEC-initiated) change requests in the process. Attachments 1-4 to this filing set forth the universe of change requests as of August 5, 2002 divided into those four categories. When each category is reviewed, it is clear that the process is functioning as it should.

The first category of requests is New change requests (Attachment 1). As of August 5, 2002, there were 22 Type 4 and Type 5 New change requests in this category. Of those twenty-two (22), the requesting CLEC has agreed to cancel four (4) of those. Two additional requests concern CCP process changes and one of those two will be implemented on August 19. Another 6 have been addressed by BellSouth and are awaiting CLEC authorization for closure (which they have no obligation to give). Five are in process with responses due in the next few days, and the remaining requests are the subject of discussions between BellSouth and the CLEC to develop a workable request. As Attachment 1 demonstrates, each request is moving through the process – there are no lingering requests.

The second category of requests is Pending (Attachment 2). As of August 5, there were only 3 pending change requests. Of those, CR 501 deals with the CCP process itself and is being handled as part of the GPSC process. CR 404 is a documentation issue that does not require OSS software development. Finally, based on BellSouth input and a CLEC-only industry meeting, the CLECs agreed to modify CR 654. BellSouth is awaiting those modifications. None of these requests can be fairly viewed as a pending OSS software change.

The third category is Candidate Requests (Attachment 3). As of August 5, there were 27 Type 4 and Type 5 Change Requests. All of these requests were prioritized by the CLECs in the May 2002 prioritization meeting for releases scheduled in 2003. Of the 27, two requests (EDI pre-ordering (101) and Interactive Agent (186)) have been slotted for Release 12.0 (a BellSouth release) in March 2003. On September 6, 2002, BellSouth will provide to the CLECs the features that will be slotted for implementation in Release 13.0, scheduled for May 2003. Release 13.0 is the first CLEC production release under the 50/50 prioritization proposal. Of the 27 Candidate Requests, 19 of those are CLEC-initiated. Of those nineteen, six were not submitted until 2002, two are scheduled for Release 12.0, and five were prioritized at number 15 or below for 2003 (after having not been prioritized in the Top 15 for 2002).

As BellSouth has informed the Commission, even given the CLECs' decision to implement an industry release in 2003, BellSouth still expects to implement the vast majority of Candidate Requests in 2003. *See Stacy Reply Affd.*, para. 58-60. In addition, when viewed in terms of capacity, there is no question that BellSouth is dedicating adequate resources to the process. For example, the estimated units for 23 of the 27 Candidate Requests (Type 4 and 5) is approximately 640 units.³ In Release 13.0 alone (the CLEC production release), BellSouth has allotted 578 units. Granted, Release 13.0 will need to include Type 2 change requests and defects as well, but the facts show that BellSouth is allocating appropriate resources to addressing Type 4 and 5 change requests. As BellSouth previously discussed with the Commission, had the CLECs not chosen to implement an industry release in 2003, BellSouth estimated that it could have implemented approximately 80% of the Type 2 and Type 5 change requests by the end of 2003. *See Stacy Reply Affd.*, para. 58.

The final category of requests is Scheduled Change Requests (Attachment 4). There are five Type 4 and 5 requests scheduled for implementation in 2002, including the ability to migrate UNE to UNE Orders in bulk.

³ Two of the Candidate Requests are still being scoped and so no capacity is yet available. This was discussed in the Stacy Reply Affd., para. 35-36. In addition, two other change requests are already scheduled for Release 12.0 in March.

SCHEDULED CHANGE REQUESTS

ATTACHMENT 1

Status (New, Pending, etc.)	Type 2,3, 4,5,6,	Originator	Description	CCP CR #	Comments/Status
S	4	BELLSOUTH	Update to the BST Business Rules for Local Ordering (BBR-LO), Service Center (SC) Field. Add a new valid entrie for the SC Service Center FIELD "lcsi = Bst LNP to Resale/UNE P Migrations" for REQ TYP E,M,P,N & ACT TYPs V,P,Q, LNA of V,G.	849	Manual process impacted only. To be discussed at 7/24/02 CCP monthly meeting. Documentation only.
S	4	BELLSOUTH	LENS- Allow Changes in Directory Deliveries, Add Fields to Indicate Type of Dir & Delivery Sch	196	
S	5	AT&T	Order Tracking Request	40	Phase 1A impl 10.3.1, Phase 1B impl 10.4, Phase 2A xdsi in 10.5 and LNP in Phase 2B in 11.0
S	5	AT&T	Implement ability to migrate UNE to UNE Orders in Bulk	215	
S	5	AT&T	CN Returned on incorrect LSR version	241	

CANDIDATE CHANGE REQUESTS

ATTACHMENT 2

Statu s (New, Pendi ng, etc.)	Type 2,3, 4,5,6,	Originator	Description	CCP CR #	Comments/Status
RC	4	BELLSOUTH	BAN1/BAN2 Fields	408	This change was initiated by BST to improve Billing integrity by requiring the use of the Ban1/BAN2 fields, instead of allowing "E" for existing. This change was prioritized #25 of 26 by the CLECs on 5-22-02. Mechanized workarounds currently are in place.
RC	4	BELLSOUTH	To add business rule qualifying "FBI" as "Not Valid for CLEC to CLEC, DLEC to DLEC, or DLEC to CLEC migration"	439	Prohibits the use of the Final Billing Indicator on CLEC to CLEC migrations. Prioritized #26 of 26 by the CLEC on 5-22-02. Mechanized workarounds are currently in place.
RC	4	BELLSOUTH	ERL Field (EU Form) Change (A new ERL valid entry option "C" when the end user desires to terminate directory listings)	440	Provides a new option with positive confirmation of listing to be deleted on migration orders. Prioritized #20 of 26 by the CLEC on 5-22-02. Mechanized workarounds are currently in place.
RC	4	BST	Web-based LSR - LSR templates on the LENS web site for submitting REQ TYP/ACT types which can not be submitted in LENS today	85	Provides for electronic submission of a wider variety of LSRs than those that are accepted as manual orders today. 7/15/02 Per SME for Phase 1, bus rules complete & requirements baselined. Manual processes for all these LSR types exist today. Less than 7% of the total LSRs would be affected by this CR. Prioritized #12 of 26 by the CLEC on 5-22-02.
RC	4	BST	Provide Solicited Notifications in TAG (BST)	178	This functionality will be provided in a slightly different manner with TAG Transformation Project. Initial deployment is part of release 11.0. Final deployment is planned for Release 13.0 Prioritized #13 of 26 by the CLEC on 5-22-02.
RC	4	BST	Route from TAG Navigator to CORBA Bridge (NCB) Router to Multiple Gateway Notification Servers	179	This functionality will be provided in a slightly different manner with TAG Transformation Project. Initial deployment is part of release 11.0. Final deployment is planned for Release 13.0 Prioritized #17 of 26 by the CLEC on 5-22-02.
RC	4	BELLSOUTH	Ability to Populate LQTY when Requesting a Partial Pre-order Query for Due Date Est (LENS/REQ TYP	221	This is a pre-ordering feature to allow the CLEC to obtain a calculated Due date for an order with multiple loops. Prioritized #16 of 26 by the CLEC on 5-22-02. A partially mechanized workaround is in place.

CANDIDATE CHANGE REQUESTS

			A/ACT=C)		
RC	4	BELLSOUTH	Remove CIC from "Required" column on REQ TYP AB & BB/LNP	336	Removes the requirement for a CIC entry on LNP orders, and corrects an error in the business rules. Prioritized #23 of 26 by the CLEC on 5-22-02. A mechanized workaround is in place.
RC	5	XO	LENS-Ability to view resold CSR's	184	BellSouth has provided access to all of BellSouth's retail Customer service records to the CLECs. This request would allow the CLECs to view the CSRs for resold services or UNEP services and requires development of a completely new front end for this pre-ordering transaction to identify the owner of each CLEC account and to allow only that owner to view the account.
RC	5	BIRCH TELECOM	LENS/TAG - ability to view resold/UNE-P CSRs	246	Similar to CR 184 - BellSouth has provided access to all of BellSouth's retail Customer service records to the CLECs. This requests would allow the CLECs to view the CSRs for resold services or UNEP services and requires development of a completely new front end for this pre-ordering transaction to identify the owner of each CLEC account and to allow only that owner to view the account.
RC	5	TIME WARNER	LNP Range of Telephone Numbers	284	Enhances the existing ability to port a range of Telephone numbers versus existing functionality of listing each number to be ported on a separate line of the LSR.
RC	5	EAST FLORIDA COMMUNICATIONS	LENS/TC Opt for Completed Orders	392	This function is currently provided via a manual process to provide transfer of call numbers on disconnected accounts. The CR would mechanize the process.
RC	5	MCI WORLDCOM	Billing Completion Notifier (BCN)- Provide a new notifier to CLECs when their orders have completed thru the BST billing system	443	This is a new notifier to allow the CLEC to determine when the billing record activities have been completed, (vs. the provisioning activities). This information already exists in the CSR system, but this CR provides a proactive notification to the CLEC.
RC	5	BIRCH TELECOM, INC.	LENS CSR - PSO & LSF Indicators, Indicate all TN#'s and ability to print individual CSR sections or entire CSR	466	Enhances the existing ability to view a Customer Service Record by providing the ability to deal with sections of the record vs. the entire record
RC	5	NETWORK TELEPHONE	Key Indicator on CSR - TACT FID	629	The information on the terms and Conditions applying to an end users account are available to the CLEC directly from the end user during their negotiations. BST advised CLECs during the 3/27/02 Change Review Meeting that the following FIDS apply to this request: TA (Term

CANDIDATE CHANGE REQUESTS

					Agreement), TAC (Terms and Conditions), TACT (Terms and Conditions Standard Template) and TACR (Terms and Conditions Temporary – Non- Revenue). Pending scheduling. EDI pre-ordering, a large item, was prioritized higher and is scheduled for 3/03.
RC	5	NIGHTFIRE/ VAR TEC	Translate and Parse data for the following information on CSR (TOA, BRO, STYC, DGOUT, TOS & LNPL)	652	This information is not maintained in a parsed format on BellSouth's CSR. BellSouth has agreed to work with the CLECs to translate various fields on the CSR and provide these items of information. The fact the these fields are not available was considered by the Commission in its GA-LAII decision.
RC	5	AT&T/SBC TELECOM	Add LNP Ordering to LENS	675	In Process. LNP ordering functionality is already in place for EDI and TAG
RC	5	AT&T	Electronic Ordering of Line Sharing w/DLEC Splitter. BST offers Line Sharing via e-ordering only if BST provides the splitter yet not if the DLEC provides the splitter.	676	In Process. The Line-sharing collaborative developed the existing process for BST provided splitters, and this CR would modify that to allow DLEC owned splitters.
RC	5	NUVOX	Association Between FOC, LSR, NPAC NuVox request notification of another LSR in clarification or FOC status determined on the telephone numbers to be ported.	690	This deals with conflicts between two or more in process LSRs on LNP orders. BST is investigating methods to resolve.
RC	5	NETWORK ONE	Allow PIC & LPIC to be Submitted as No Change in LENS & TAG	176	Functionality is currently available by submitting an LSR with a specific Line Activity (LNA) code. This request simplifies that process.
RC	5	NIGHTFIRE	Implement an EDI Pre-Ordering Solution	101	This CR provides an additional method of access to the Pre-ordering functionality that already exists in TAG. 1 CLEC and 1 vendor have requested this functionality.
RC	5	MARIETTA FIBERNET	LENS Large Account Inquiry Enhancement- Ability to Access Numbers Behind SLA's	104	This functionality enhances the existing functionality for obtaining Customer Service Records by allowing the CLEC to pull very large account records electronically.

CANDIDATE CHANGE REQUESTS

RC	5	SOUTHERN TELECOM	LENS Inquiry - View Customer Record - Use 3-digit customer code in validation logic	113	This functionality enhances the existing functionality for obtaining Customer Service Records by allowing the CLEC to pull records using the customer code, instead of the telephone number for the account.
RC	5	ITC/DELTA COM	Provide Notification that a CSR is Pending a Svc Order during Pre-Order Step - TAG	127	This adds new functionality not currently present in BST's pre-ordering transactions.
RC	5	AT&T	Merging of Accounts-Mechanized method to migrate TNs/lines into an existing acct & change the listing on a single order.	135	Reached tentative agreement w/AT&T to submit to OBF. Issue for new field NATN was presented to OBF & accepted on 5/6/02
RC	5	WORLDCOM	Implement Interactive Agent Protocol TCIP/SSL3 for Ordering	186	Provides a new transport protocol, in addition to the existing EDI protocols to enhance the CLECs ability to submit single orders.
RC	5	AT&T	Lift Restrictions on LEAN/LEATN to allow CLECs to combine accts using a single LSR (formerly CR#EDI0812990 007)	367	Original functionality requested was not supported by BST's legacy systems. Currently working jointly with the CLEC to develop scenarios to direct the programming of this feature.

NEW CHANGE REQUESTS ATTACHMENT 3

Statu s (New, Pendi ng, etc.)	Type 2,3, 4,5,6,	Originator	Description	CCP CR #	Comments/Status
N	4	BELLSOUTH	CCP Process Change - Production & Industry Release Deliverables	841	At the 7/24/02 monthly mtg, CLECs agreed to ballot this change. Industry consensus reached on this issue. CCP document will be updated on 8/19.
N	5	WORLDCOM	Fielded Completion Notifications (WorldCom) MCI request that BST provide a fielded format for EDI Fielded Completion Notification.	132	BST cannot support request due to cost; CLEC requested that CR remain open.
N	5	AT&T	Modify CCP document	171	CLEC requested that this CR remain open until issues addressed via GPSC process.
N	5	MANTISS	Electronic Processing of Line Loss Notification	320	BST cannot support request due to cost; this functionality is already provided via Network Data Mover and a Web Report. Telephone number and email of requesting CLEC no longer valid so unclear how to contact customer to continue dialogue or close request.
N	5	AT&T	UNE via ASR21 (formerly CR#ORD030200_001)	378	BST rejected because OBF does not support ordering UNEs on ASRs. Co-sponsored by WorldCom. WorldCom advised that (related) CR could be canceled on 3/20/01. AT&T asked that this CR remain open. CCP sent email to AT&T on 3/20/02 requesting status and again on 4/26/02.
N	5	SPRINT	ULM Make Up-mechanize system to allow for electronic modifications to an existing Loop order	387	CLEC agreed to cancel.
N	5	SPRINT	Interval Change for Missed Appointments	400	CLEC agreed to cancel.

NEW CHANGE REQUESTS ATTACHMENT 3

Statu s (New, Pendi ng, etc.)	Type 2,3, 4,5,6,	Originator	Description	CCP CR #	Comments/Status
N	5	NETWORK TELEPHONE	UDC Ordering Process - email option	424	This CR is being related to CR0085 - Web based LSR as an alternative solution. Waiting on originator to authorize closure.
N	5	SPRINT	Eliminate/Change the Requirement of the FRN/RSID Usage Sprint is proposing that BST systems not require the FRN/RESID information when submitting an electronic order or manual order.	446	CLEC agreed to cancel.
N	5	SPRINT	Electronic Jeopardy Notifications	477	BST investigating and has requested additional time.
N	5	ITC DELTACOM	CLEC Access to All Pending Orders	717	BST cannot support report - technically not feasible. Waiting on customer to authorize closure. CCP sent email to originator on 6/13/02 requesting a status or cancellation. 8/7 BST discussing this CR & alternatives with CLEC.
N	5	GLOBAL CROSSING	Change of Policy CLEC needs BellSouth to change their policy of allowing hand written info on a LSR.	789	BellSouth is unable to support this request due to cost. BST experience with handwritten LSRs is that it is a drain on resources (CLEC & BST) with back & forth questions & clarifications regarding illegible entries. On appeal, BellSouth suggested that CLEC review web site for online forms. These forms may assist CLEC. 6/19/02 Conf call was held with CLEC. CLEC has capability to send orders via fax directly from their PC. It was agreed that this was an interim solution. CLEC & BST are also looking at electronic options for CLEC. 7/19/02 BST unable to support original request to submit handwritten LSRs due to cost as previously stated. BST understands primary issue to be electronic ordering of REQ TYP B & C. BST allows this via TAG & EDI. CCP CR 0675 will allow LNP via LENS. 8/7/02 CCP sent request to CLEC for status or authorization to cancel.

NEW CHANGE REQUESTS ATTACHMENT 3

Status (New, Pending, etc.)	Type 2,3, 4,5,6,	Originator	Description	CCP CR #	Comments/Status
N	5	BIRCH TELECOM	Lens Data Extract. Birch respectively submits the request to develop a daily data extract file/tool utilizing Lens firm-order field level detail data.	790	BellSouth response - it is technologically feasible, however, there is a question whether LENS is the best system through which to provide data. BellSouth is considering alternative solutions for providing real time info that CLEC wants. On 6/24/02, CCP sent email to originator requesting a data file layout example to review. On 7/02/02, CLEC shared the Extract File that SBC provides on a daily basis via FTP and /or NDM. BST SME is reviewing. On 8/1/02 SME gave response - not feasible due to cost but CCP has requested addl infor prior to responding to CLEC.
N	5	TALK AMERICA	Need electronic responses for orders sent via fax or Lens Talk America would like to receive all responses back through TAG no matter how they were submitted to BST.	876	BST rejected this request as not technically feasible.
N	5	AT&T	Enable Suspend/Restore at Line Level & One Way or at Inbound vs Outbound Calling Capability	882	BST rejected this request as not technically feasible. This is a new product offering which needs to be resubmitted through the bona fide request process.
N	5	COVAD COMMUNIC ATIONS	Address Build Process Change. Due to BellSouth's current process for adding address information as well as gaining the FRN: BST is charging a manual service order charge to Covad for this work effort when a SOMEK should be accepted.	884	BellSouth rejected this request as not technically feasible, but offered an alternative solution.

NEW CHANGE REQUESTS ATTACHMENT 3

Status (New, Pending, etc.)	Type 2,3, 4,5,6,	Originator	Description	CCP CR #	Comments/Status
N	5	COVAD	Loop Data Extract. Covad requests that BellSouth provide on an extract basis the following loop information. See CR for details.	886	BellSouth rejected the request due to cost. Data is already available through existing interfaces and this request would require development of a new database. BellSouth would agree to accept the item as a Bona Fide Request outside the CCP.
N	5	COVAD	Loop Modification Process Enhancement. The current Loop Modification Process needs to be enhanced to allow CLECs to order repeaters to be added to the loop that is being ordered.	887	Request returned to the CLEC for clarification 8/15/02. Existing UNE loop products already include repeaters (i.e. DS1, DS3, etc.) and the intent of this request is unclear.
N	5	AT&T	Modify CAVE to allow CLECs to test using own company specific data with live CLEC owned accounts and BellSouth test accounts without impacting account status.	896	Response due to CLEC 8/20
N	5	AT&T	CLECs request that the CAVE environment be expanded to allow additional CLEC testing capacity by supporting all versions of TAG and EDI presently active in the Production environment.	897	Response due to CLEC 8/20.

**NEW CHANGE REQUESTS
ATTACHMENT 3**

Status (New, Pending, etc.)	Type 2,3, 4,5,6,	Originator	Description	CCP CR #	Comments/Status
PC	5	IDS Telecom	Ability to view FINAL PO in LENS for LNP Orders. Capability to view FINAL PO so adequate information will be provided on LNP conversions for BST	794	CLEC has agreed to cancel.
PC	5	COVAD	Mechanization of UNE Transport via CAFÉ – CLEC would like to be able to order UNE Transport via Café as the continued use of the LSOG documentation is overly cumbersome	877	Being analyzed, however UNE Transport is already supported by the LSOG processes using LSRs.

**PENDING CHANGE REQUESTS
ATTACHMENT 4**

Status (New, Pending, etc.)	Type 2,3, 4,5,6,	Originator	Description	CCP CR #	Comments/Status
P	5	CENTURYTE L	Loop conversion acceptance policy change. Allowed 24-Hr Loop conversion acceptance.	654	Manual process change. 5/22 – CCP discussed and requested BellSouth to provide additional information that BST provided on 6/16. Originator asked to have CLEC-only meeting that occurred on 6/27. On 7/23, CLECs agreed to submit modifications to this request. Modifications have not been submitted.
P	5	WORLDCOM	Provide the Top 30 EDI Reject/Clarification Reason Codes (Documentation)	404	This information is being provided in a different format directly to the affected CLECs. This is a documentation issue, not a software issue.
P	5	SPRINT (ON BEHALF OF 10 CLECS)	Joint CLEC Proposed Sizing Process for prioritizing and scheduling of CRs for releases	501	Part of the Georgia PSC process for consideration of CCP changes