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September 10, 2002

Ms Marlene H. Dortch
Secretary
Federal Communications Commission
The Portals
445 12th Street, S.W.
Washington, D.C. 20554

Re: WC Docket No. 02-150

Dear Ms Dortch:

This is to inform you that on September 9,2002, Ernest Bush, Glenn Reynolds, Robert Blau and I met with Greg Cooke, Aaron Goldberger and Gina Spade to discuss issues related to BellSouth's change management performance. We used the attached documents for our discussion of the number of defects in BellSouth's recent software release 10.6 and our efforts to meet the Florida Public Service Commission's performance standard for implementing change requests.

During the meeting we also discussed AT&T's assertion, described in an *ex parte* filed on September 6, 2002, that our implementation of change request CR0756 (UNE-P calling scope) in Release 10.6 caused hundreds of UNE-P orders submitted electronically to be rejected or to fall out for manual handling. In its *ex parte*, AT&T noted that as of September 6, BellSouth was investigating the issue and had not yet designated it as a defect.

In response to AT&T's assertion, Mr. Bush explained that three factors contributed to the fall out experienced by AT&T in ordering UNE-P, none of which was attributable to a defect in Release 10.6. First, Mr. Bush noted that despite notifications sent to it in June and July of this year, AT&T failed until late last week to update its interconnection agreement to include the new uniform service order codes, or USOCs, that it would need to use to define a customer's

UNE-P calling scope. This caused orders with the new USOCs to be rejected because the USOCs were not in AT&T's interconnection agreement tables. BellSouth is now in the process of updating the AT&T tables and expects to finish this task by close of business on September 10 2002.

Second, Mr. Bush explained that AT&T has failed to populate the Line Class of Service field on its LSRs in certain cases when it wanted to order the new calling scope and has instead placed the necessary data in the Feature Details field. Placing the Line Class of Service information in the Feature Detail field rather than the Line Class of Service field causes the BellSouth OSS to ignore the data. The result is that AT&T may receive a UNE-P with a derived calling scope that may or may not match what it sought to order. This requirement was also discussed in a BST/ CLEC meeting on June 3, 2002 and is documented in the minutes and Question/Response Log from that meeting, and again in the carrier notification issued on July 25, 2002, which clearly indicates that a CLEC ordering UNE-P must specify the scope of the associated calling area by entering a new Line Class of Service USOC in the LSR Line Class of Service field.

Finally, Mr. Bush explained that some of the LSRs for which AT&T is receiving reject notices are LSRs requesting primary interLATA carrier, or PIC, changes on UNE-P accounts. The rejections are occurring because the edit for the Line Class of Service field changed from optional to prohibited in Release 10.6. for both "conversions as is" and for PIC change requests. This means that before Release 10.6, if AT&T put data in the Line Class of Service field for a Line Activity type of "W" (convert-as-is) or "P" (PIC change), the data were ignored. After Release 10.6, if AT&T puts data in this field under these conditions, the LSR is rejected with an error message "LNECLSSVC PROHIBITED WITH LNA =W or P". Although the BellSouth Business Rules – Local Ordering, or BBR-LO, was not updated, which is a documentation defect, the release itself is consistent with the previously published user requirements. If AT&T had coded to those user requirements, which its employees had reviewed prior to implementation of Release 10.6, the rejections associated with PIC changes would not have occurred. Bernadette Seigler and Lynne Montelone represented AT&T in the June 3, 2002 meeting. This specific edit was discussed in the June 3, 2002 carrier meeting concerning CR0756, and is clearly documented in response to an AT&T question in item 10 in the Question/Response log, which was provided to the CLECs on June 13, 2002 .To correct the defect in BBR-LO, BellSouth will issue both a carrier notification and a change to the BBR-LO as soon as possible.

Finally, AT&T's claims of "hundreds of rejects" appear to be somewhat exaggerated. A study of the AT&T LSRs rejected for these reasons for 10 business days from August 25, 2002 to September 9, 2002 shows that 297 LSRs were rejected, an average of slightly less than 10 per day.

In accordance with Section 1.1206, I am filing two copies of this notice and attachments and request that you place them in the record of the proceeding identified above. Thank you.

Sincerely,

Kathleen B. Levitz

Kathleen B. Levitz

Attachments

cc: Aaron Goldberger
Greg Cooke
Gina Spade
Matt Brill
Dan Gonzalez
Jordan Goldstein
Chris Libertelli
Susan Pié
James Davis-Smith

Release 10.6 CLEC Affecting Defects
(Includes those found in 10.6 verification but not introduced with 10.6)

CR Number	Release	Severity	System	Description	Impact	Fix Date
?	OSS99	4	LESOG	LESOG returning invalid error message on CRIS timeout.	Very rare, only occurs upon CRIS timeout. 9/3: determined not to be "CLEC affecting".	9/4
CR-0927	10.6	3	DOM	DOM sending wrong error message when CLEC attempts to migrate lines to UCL-ND that CLEC does not own.	3 orders per month. Manual work around involves checking company identifier when receiving clarification.	Release 11.0 (12/8)
CR-0928	10.6	3	DOM	DOM not including circuit id (ECCKT) on UCL-ND disconnect FOCs.	3 orders per month. Manual work around requires CLEC to check disconnect order in CSOTS or call LCSC.	Release 11.0 (12/8)
CR-0929	10.6	3	DOM	DOM not sending completion notice on UCL-ND full migration orders	15 orders per month. Manual work around requires checking CSOTS on completion date or calling LCSC.	Release 11.0 (12/8)
CR-0930	10.6	3	DOM	DOM not sending cancellation notice on UCL-ND full migration cancelled orders.	3 orders per month. Manual work around requires checking CSOTS on date supp was issued or calling LCSC.	Release 11.0 (12/8)
CR-0932	10.6	2	EDI	EDI orders with feature field not populated are having other required data dropped. LEO is then rejecting order back to CLEC.	5 PONS from AT&T; 1 PON from Network Telephone	8/28

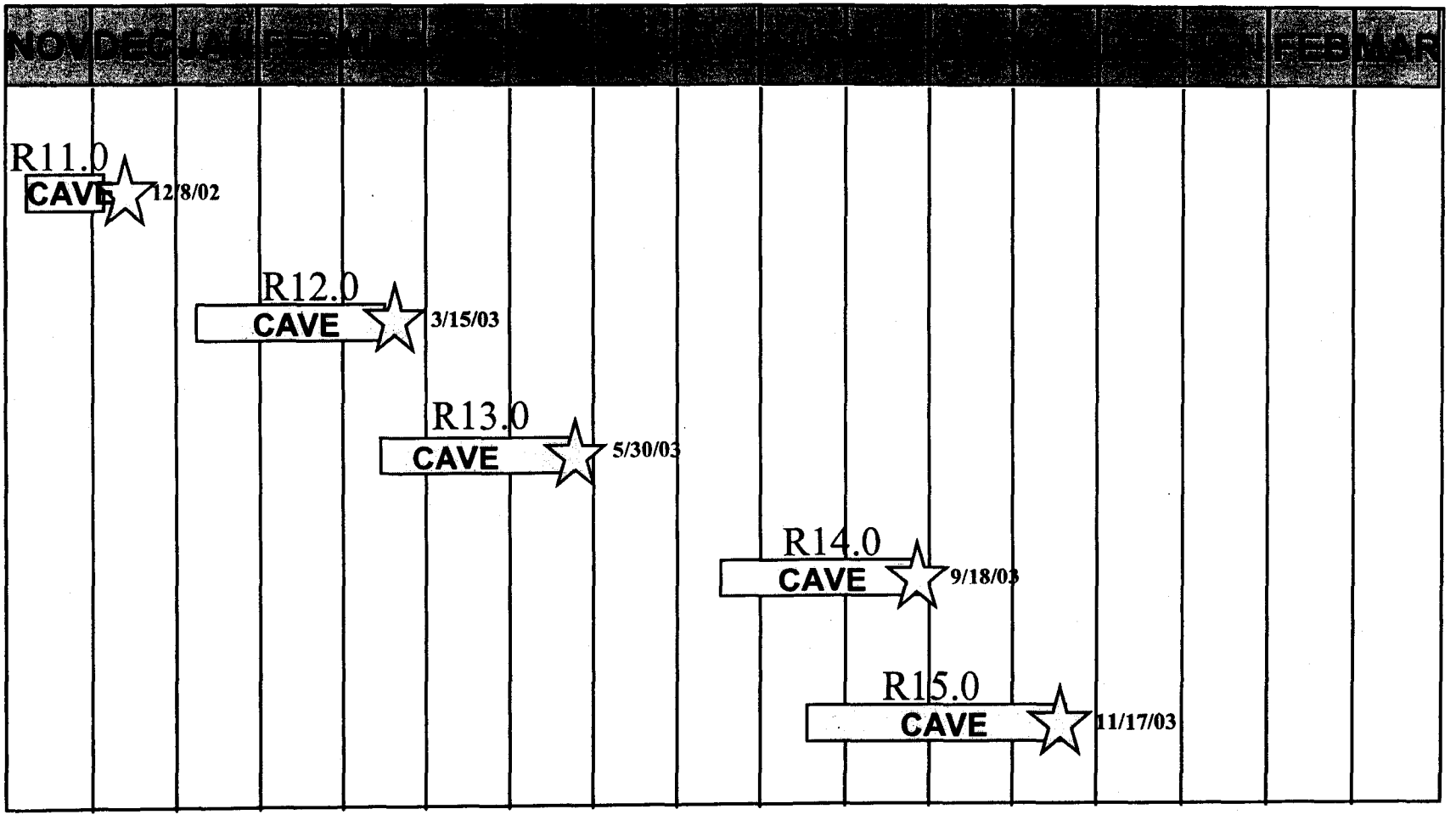
Release 10.6 CLEC Affecting Defects
(Includes those found in 10.6 verification but not introduced with 10.6)

CR Number	Release	Severity	System	Description	Impact	Fix Date
CR-0933	10.6	4	LESOG	LESOG incorrectly causing orders to fall to LCSC for manual processing. System is failing to remove Inside Wire Subscriber FID from conversion orders. Causes order to drop to LCSC for correction.	330 orders per week. Could result in delay in FOC receipt.	9/4
CR-0934	10.4?	2	LESOG	LESOG is not removing FIDS IB and ZIWS from UNE-P single C orders. Improper indication of re-use of facilities on Single C order.	1,776 impacted orders in August. Orders fall to the LCSC for correction, CLECs FOCs could potentially be delayed.	9/4
CR-0935	10.6	2	LESOG	LESOG incorrectly returning error message when CLEC attempts to restore denied account. Error message indicates that account not in denial status.	CLECs advised to re-submit SUP for any restoral LSR for accounts that have not been restored. Recorded 700 instances since introduction of 10.6.	8/29

Release 10.6 CLEC Affecting Defects
(Includes those found in 10.6 verification but not introduced with 10.6)

CR Number	Release	Severity	System	Description	Impact	Fix Release
CR-0936	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
CR-0937	10.5	4	DOM	DOM is not validating SUP version number. System is allowing SUPs to be processed with same or earlier version numbers.	CLECs call LCSC. July volume was 9 affected orders.	Release 11.0 (12/8)
CR-0940	Pre-10.6	3	LNP	LNP Gateway is failing to convert values associated with the FBI (Final Bill Indicator) DID on the LSR properly. Causes affected orders to fail a SOER edit and drop to the LCSC for correction.	January thru May, 2,016 rejects	TBD (10/15)

Current Release Schedule



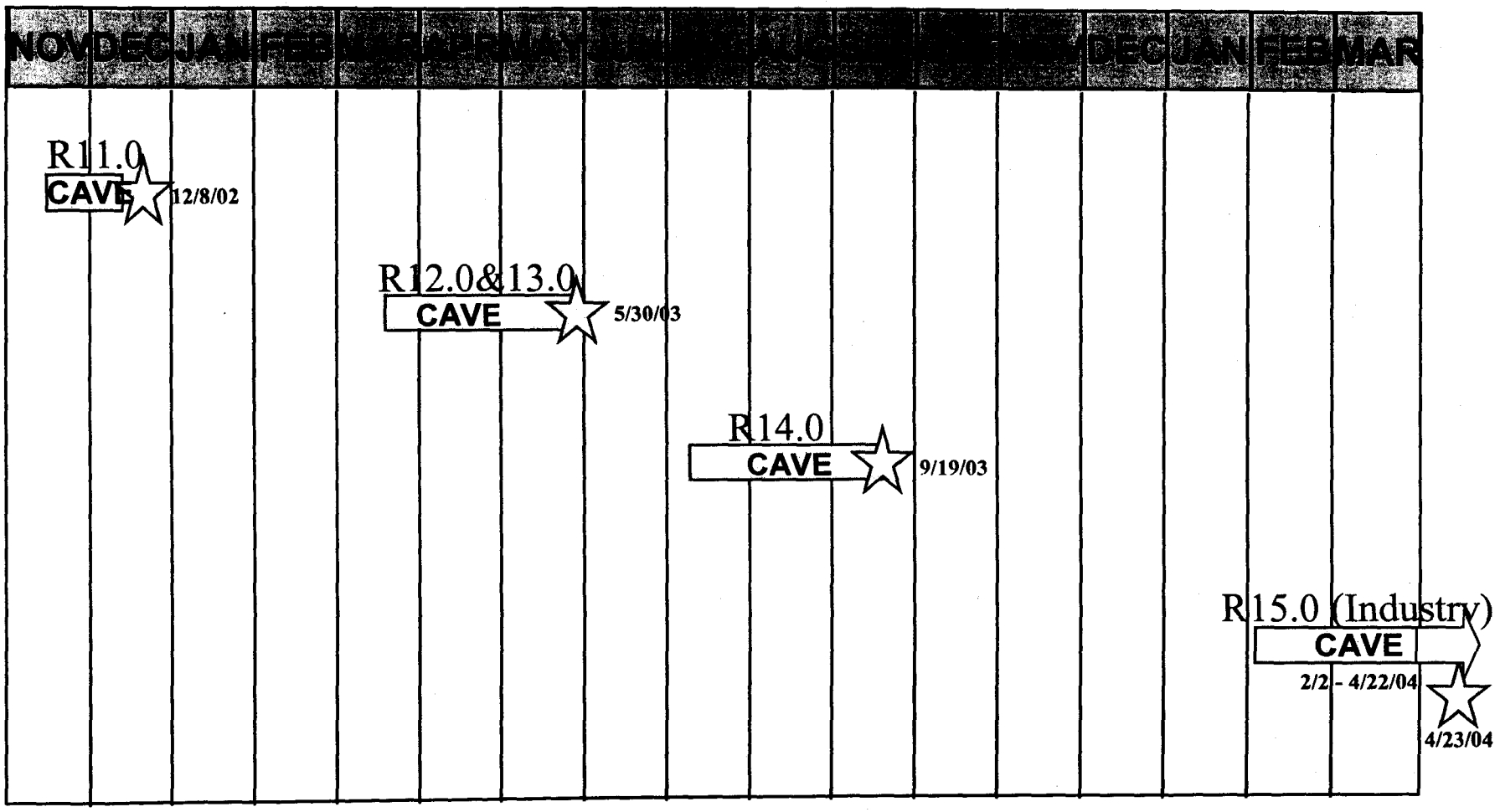
NOTE: Maintenance releases not depicted on chart.

Current Schedule Summary

- Maintains the current number and dates of releases
- Interactive agent and EDI pre-order in Release 13.0
- Contains overlap in testing between releases
- Maintains implementation of ELMS6 in 2003
- Limits the number of sized CCP prioritized features that can be implemented in 2003

Proposal 1
Tentative Schedule

Combine 12.0 and 13.0



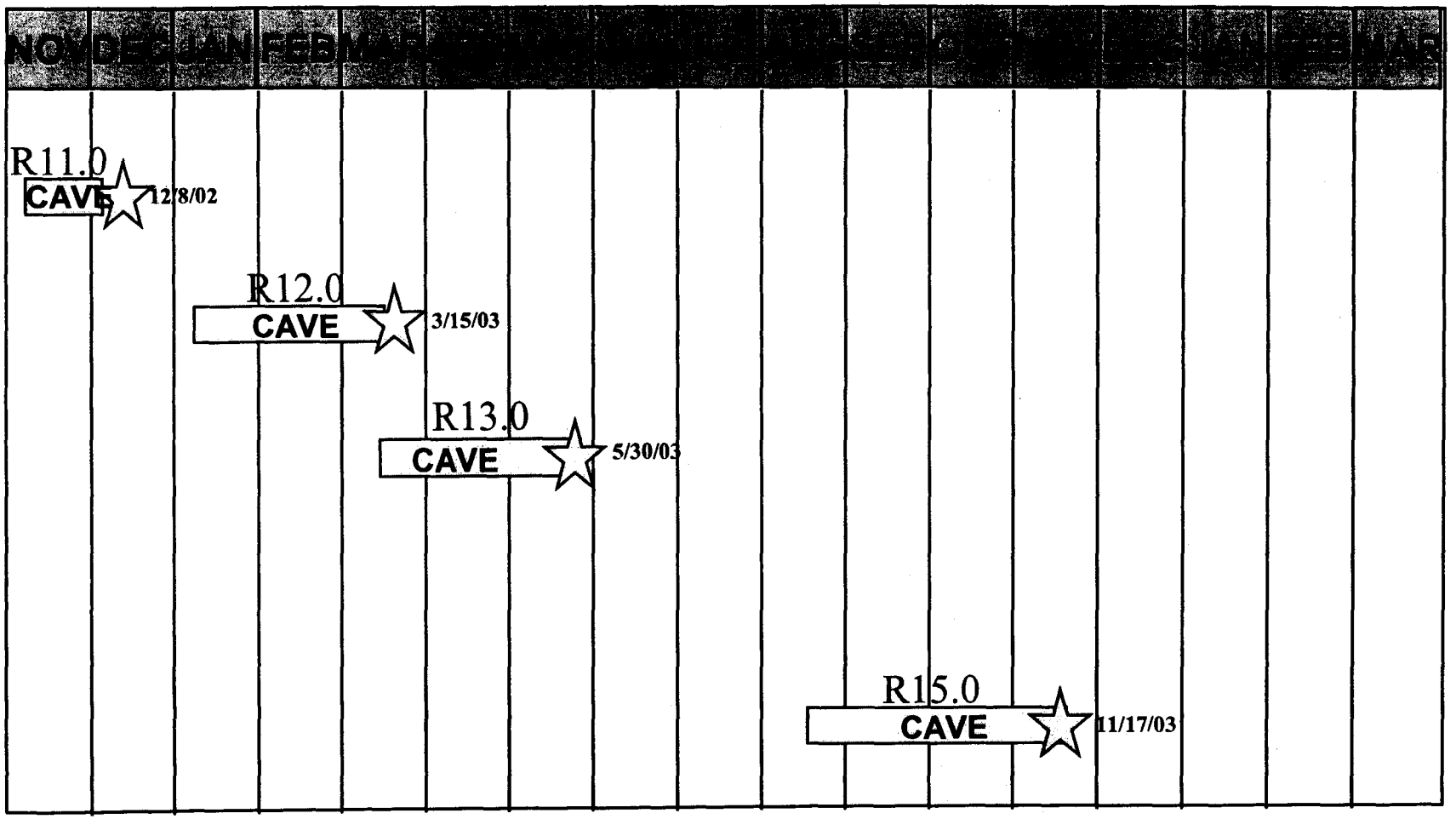
NOTE: Maintenance releases not depicted on chart.

Proposal 1 Summary

- Reduces risks by eliminating overlapping release phases
- Interactive agent and EDI pre-order in Release 12.0/13.0
- BellSouth and CLEC testing improved by removing overlap of release test cycles
- Allows for scoping of all sized CCP features and many FTTF features
- Delays the final implementation of the industry release from November 2003 until early 2004.

Proposal 2
Tentative Schedule

Remove 14.0/Add Capacity to 15.0



NOTE: Maintenance releases not depicted in chart.

Proposal 2 Summary

- Maintains implementation of ELMS6 in 2003
- EDI Pre-Order and Interactive Agent in Release 13.0
- Removes most of the overlap in testing between releases
- Limits the number of sized CCP prioritized features that can be implemented in 2003