

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

In the Matter of)
)
Joint Application by BellSouth Corporation,)
BellSouth Telecommunications, Inc.)
and BellSouth Long Distance, Inc., for) WC Docket No. 02-307
Provision of In-Region, InterLATA)
Services in Florida and Tennessee)
_____)

**COMMENTS OF WORLDCOM, INC. ON THE APPLICATION
BY BELL SOUTH FOR AUTHORIZATION TO PROVIDE IN-REGION,
INTERLATA SERVICES IN FLORIDA AND TENNESSEE**

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INTRODUCTION AND EXECUTIVE SUMMARY

Despite progress from a year of intensive focus on BellSouth's change management process in section 271 proceedings, BellSouth's implementation of that process remains inadequate. BellSouth's latest pronouncements show that it feels no obligation to implement CLEC changes in the order in which they have been prioritized and does not intend to provide CLECs adequate notice of CLEC-affecting changes.

BellSouth claims to have devoted vast resources to improving change management, but WorldCom's remaining concerns are not for the most part a resource issue. BellSouth could resolve most of these remaining concerns simply by changing its internal approach and beginning to work more effectively with CLECs.

During the Georgia/Louisiana section 271 proceedings, WorldCom discussed at length BellSouth's failure to implement prioritized CLEC changes and its failure to notify CLECs of important back-end system changes. BellSouth agreed to alter its change management process in ways that satisfied the Commission that these problems had been resolved. But this optimism has proven premature. Indeed, in its *Five State Order*, the Commission stated that "many of the same problems with BellSouth's adherence to the change management process that we noted in the *BellSouth Georgia/Louisiana Order* still exist." *Five State Order* ¶ 178. Nonetheless, the Commission approved BellSouth's application in part because BellSouth had made some improvements in its change management process and in part because BellSouth's performance had not deteriorated. *Id.* In particular, BellSouth had adopted the "50/50 plan" to ensure adequate allocation of release space to CLECs. *Id.* ¶ 184. In addition, as the Commission explained, "BellSouth has recently expanded the definition of 'CLEC-affecting' in a manner that

will increase the amount of information BellSouth provides to competitive LECs regarding future releases.” *Id.* ¶ 185. Unfortunately, however, neither of these modifications is having its full intended impact, and BellSouth continues to withhold information necessary for the change management process to work effectively.

This is the final section 271 application in the BellSouth region. BellSouth needs to get it right once and for all before this application is approved.

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TABLE OF CITATION FORMS

FCC Order	
<i>Five State Order</i>	<i>In re Joint Application By BellSouth Corp., BellSouth Telecommunications, Inc., and BellSouth Long Distance, Inc. for Provision of In-Region, InterLATA Services in Alabama, Kentucky, Mississippi, North Carolina, and South Carolina, WC Docket No. 02-150, FCC 02-260 (rel. Sept. 18, 2002).</i>
Other Materials	
Ex. WNS-26	Exhibit to Declaration of William N. Stacy on Behalf of BellSouth (BellSouth App. A, Tab I).
Ex. WNS-36	Exhibit to Declaration of William N. Stacy on Behalf of BellSouth (BellSouth App. A, Tab I).

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Change management has been the central issue with respect to BellSouth’s OSS during a year of intensive work through the section 271 process. BellSouth needs to complete the work it has begun by adequately implementing its paper commitments on change management, and must do so even without extensive pressure from CLECs and regulators on every issue.

I. BellSouth Is Not Committed To Implementing Changes In Prioritized Order

The point of prioritizing change requests ("CRs") is to ensure that the changes CLECs care about most are implemented first in order to avoid customer-impacting problems and costly inefficiencies. That is why under the BellSouth change management plan “[s]izing and sequencing of prioritized change requests will begin with the top priority items and continue down through the list until the capacity constraints have been reached for the next release.”

Ex. WNS-26 at 39. The Release Package that is eventually developed can deviate from this order but only based on group consensus. *Id.* at 40.¹

CLEC control over their share of the release schedule is even clearer under the 50/50 plan. As the Commission noted, under the 50/50 plan, “competitive LECs prioritize their change requests, and these are slotted for implementation in competitive LEC releases. BellSouth and competitive LECs each have the right to prioritize the features in their releases.” *Five State Order* ¶ 184.

BellSouth, however, does not feel bound by the change management plan. When in September 2002 BellSouth proposed possible schedules to CLECs for the 2003 releases, the schedules deviated far from the order in which CLECs had prioritized changes. Under each schedule, BellSouth proposed implementation of only CLEC requests 1 and 2 in the next release and tentatively “targeted” inclusion of CLEC requests 6, 9, 10, 12, 14, 18, 20 and 22 in that release, but not CLEC requests 3, 4, 5, 7, 8, 11, 13, etc. BellSouth offered no explanation for this deviation from CLEC priorities.

After significant CLEC protest, BellSouth subsequently improved its proposed schedule to bring it more in line with CLEC priorities. On September 12, BellSouth provided information on other possible combinations of change requests for 2003. Then, on October 3, BellSouth provided what was ostensibly the actual schedule for 2003 releases. However, this schedule still deviated substantially from CLEC priorities. The 2003 schedule did not include the CRs that

¹ Later in the change control document, the process of creating a release package is describing without noting the implementation of changes in prioritized order: “BellSouth will present its proposed release package.... CLEC/BST consensus will be used to create the approved Release Package. CLECs, based on group consensus, may request changes to the proposed scope (like for like-size CR’s).” Ex. WNS-36 at 64. But the clear intent of prioritization is for BellSouth to follow that prioritization in creating a release package and only deviate from it based on group consensus.

CLECs prioritized on September 25 as number 4 (CR 0284), 6 (CR 0127), 10 (CR 0085), 12 (CR 0135), 13 (CR 0221), 14 (CR 0113), and 15 (CR-0367).² Instead, BellSouth scheduled for implementation CRs that CLECs had ranked number 16 (CR 0440), 19 (CR 0336), 21 (CR 0408) and 23 (CR 0439).³ The changes ranked from 16 to 23 were all changes initiated by BellSouth. Again BellSouth offered no explanation for its deviation from CLEC priorities. The deviation clearly was not based on capacity constraints as some of the CRs scheduled to be implemented were projected to take more release space than higher prioritized CRs that were not scheduled to be implemented.

CLECs did not accept this new schedule, however. When considering a recent proposal to include a high priority CR in place of a different CR, CLECs returned the ballot without voting and informed BellSouth that it should be implementing all CLEC changes in the order in which they had been prioritized. In response, late on October 8, BellSouth provided what in essence was a new schedule. BellSouth informed CLECs that it could implement the change CLECs had prioritized as number 6 in place of a different change. BellSouth added the change CLECs had prioritized as number 10 to the schedule. With respect to the changes CLECs had prioritized as 13 and 14, BellSouth informed CLECs that these changes had already been implemented. With respect to the changes CLECs had prioritized as 4, 12, 15, 17 and 20, BellSouth provided some explanation for why it could not implement those changes.

If the new schedule is actually carried out, it now appears that most of the CLEC prioritized changes will be implemented in 2003. In part this is because BellSouth informed CLECs that two CLEC change requests had already been implemented – something of which it

² All of the CRs had also been prioritized on May 22, 2002 with rankings that differed only slightly from their September rankings. The difference is that two changes CLECs had prioritized in May were not re-prioritized, as they were already slotted to be implemented.

should have informed CLECs before we reprioritized CRs in September. It remains the case, however, that BellSouth will not implement all CLEC prioritized changes in 2003 and thus clearly will not meet the 60 week standard set by the Florida Commission. Indeed, BellSouth affiant William Stacy acknowledges that BellSouth will not meet the 60 week deadline if CLECs decide, as they have done, that BellSouth should implement industry standard release LSOG 6. Stacy Aff. ¶ 232. But the implementation of an industry standard release does not excuse BellSouth's failure to commit to implementation of CLEC change requests in 60 weeks. The industry standard release is vital for CLECs especially since BellSouth did not implement LSOG 5 and thus is already behind the rest of the industry.

Equally important, it should not have taken CLEC protest to get BellSouth to provide an explanation of the reasons it did not schedule some changes for implementation. Moreover, BellSouth's explanations remain incomplete. For example, for CR0284, which was ranked fifth by CLECs in May and fourth in September, BellSouth now states that it cannot implement the change because "NANC 3.2 is scheduled for implementation in May 2003 which impacts LNP capacity." But BellSouth has not explained what NANC 3.2 is or why a May implementation of NANC 3.2 precludes implementation of the fourth highest CLEC priority for all of 2003. Similarly, with respect to CR0127, which CLECs had ranked seventh in May and sixth in September, BellSouth explained that it could include this change request on the release schedule but only by excluding a flow through change request (CR0088), because "CR 0088 makes available the capacity for certain modules within SGG required to implement CR0127." Apparently, SGG has a critical impact on available capacity, but BellSouth had not explained this to CLECs or even described what SGG is.

³ In May, CLECs had ranked these CRs 20, 23, 25, and 26.

In any event, this explanation should not have come so late in the process. If BellSouth believes there are constraints that prevent it from following CLECs' prioritization, it should explain them to CLECs and work with CLECs on an acceptable solution. Indeed, when possible, constraints should be revealed before prioritization. BellSouth has stated that certain back-end systems have limits as to the number of simultaneous changes that can be made impacting these systems. But BellSouth has not revealed what these limits are, nor what change requests it believes impact these systems.

BellSouth has not provided this information because, as BellSouth informed CLECs at the September 25 change management meeting, it does not believe it has any obligation to slot CLEC changes in the order in which they have been prioritized or to provide information explaining its slotting decision. That is presumably why for changes prioritized in May, 2002, BellSouth did not initially follow CLEC priorities or explain its deviation from those priorities in developing its release schedule. Although BellSouth now appears to have somewhat capitulated with respect to its 2003 schedule, at least under the glare of the section 271 spotlight, next time it may not. BellSouth must work more cooperatively with CLECs to ensure implementation of CLEC changes in prioritized order.

II. BellSouth Is Not Providing CLECs Proper Notice of CLEC-Affecting Changes

One of the central change management issues during the Georgia/Louisiana section 271 proceeding was BellSouth's failure to provide CLECs notice of important changes in its back-end systems. Notification is vital so that CLECs can prepare for the impact of any such change.

During the Georgia/Louisiana proceedings, BellSouth agreed to a new expanded definition of CLEC-affecting change that was intended to rectify this problem. For any change that comes within the scope of this definition, BellSouth is required to issue a change request

describing the change and follow the mandates of the change control process with respect to documentation and prioritization of that change. The Commission has commented favorably on the new definition. *Five State Order* ¶ 185.

Unfortunately, BellSouth is not providing the required notice. BellSouth provides CLECs almost no information on the changes it implements in the 50% of release capacity it has reserved for itself. For example, BellSouth intends to implement significant infrastructure changes in 2003 concerning TAG XML and ENCORE-IDN. These changes almost certainly fall within the definition of CLEC-affecting changes as they are “unique to the CLEC wholesale environment.” Ex. WNS-26 at 79. These changes will impact the way in which BellSouth processes CLEC orders and could cause significant problems, particularly for those orders that are being processed at the time of the change. ENCORE is the underlying system for processing orders, so changes to the ENCORE environment, including the new platform, could impact order processing across all CLEC products and for all CLECs. CLECs must be provided detailed information and testing windows so that we can help BellSouth to determine if the release will cause processing problems that will impact customers at the time of the change and over the long run. Ex. WNS-36 at 79. The change could also result in extended downtime for this important system.

But BellSouth has not even provided change requests describing these changes as it is required to do. BellSouth must do so and must commit to providing such information in the future. Without this information, CLECs do not know what changes to expect. CLECs also lose any ability to monitor whether BellSouth is limiting its change requests to 50% of release capacity.

CONCLUSION

BellSouth's application for Florida and Tennessee should not be approved until the issues set forth herein are fully resolved.

Respectfully submitted,

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October 10, 2002

Service List

I, Lonzena Rogers, do hereby certify that I have caused a true and correct copy of WorldCom, Inc.'s Comments in the matter of WC Docket No. 02-307, *Application of BellSouth Corporation for Authorization Under Section 217 of the Communications Act to Provide In-Region InterLata Service in the States of Florida and Tennessee*, to be served by first class mail or e-mail on October 10, 2002, on the following:

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