BELLSOUTH'S BATCH HOT CUT PROCESS

August 4, 2004

BellSouth's Batch Hot Cut Process

- Legal framework set up by the TRO
- In addition to BellSouth's individual hot cut process, BellSouth has an operational and reliable batch hot cut process that has been enhanced based on CLEC input
- There is general agreement on many aspects of the hot cut process
- CLECs have no empirical evidence refuting the efficacy of BellSouth's batch hot cut process

Parties generally agree on the batch hot cut process

- What the process entails
- UNE-P to UNE-L
- Seamless and Simultaneous

BellSouth's Batch Process Evolved from the Individual Hot Cut Process

- BellSouth hot cut and loop provisioning processes designed with CLEC input and under PSC supervision
  - State proceedings reviewed loop provisioning and hot cut processes
    - PSC workshops
    - Georgia hot cut reconciliation process
    - Arbitrations
  - Third-party testing of provisioning processes
- BellSouth has consistently demonstrated its ability to perform hot cuts and has exemplary hot cut performance that has been thoroughly reviewed by the nine state commissions and the FCC in 271 proceedings
- Individual hot cut process is efficient, reliable and scalable

BellSouth's Batch Hot Process

- BellSouth's Batch Hot Cut Process Provides Efficiencies
  - Preordering
  - Project Management
  - Batch Ordering
  - Batch Provisioning

BellSouth's Batch Hot Process (continued)

- Bulk LSR
  - 99 accounts
  - 25 telephone numbers
  - 2,475 TNs per request

BellSouth's Batch Hot Process (continued)

- Batch Hot Cut Process
  - Pre due-date activities
  - Due-date activities

Timing and Rates*

Number of Telephone Numbers	Targeted Interval	Targeted NRC Reduction
Individual Hot Cut	3 - 5 Business Days	0%
Bulk Hot Cut – 2 to 2475	15 Business Days	10%

Enhancements to BellSouth's Batch Hot Cut Process

- BellSouth has Responded to CLECs' Criticisms
  - During the hot cut workshops, CLECs recommended changes.
  - BellSouth incorporated CLECs' changes to the batch hot cut process.

Enhancements to BellSouth's Batch Hot Cut Process (continued)

> BellSouth Enhancements

- ☑ After Hours Cuts
- ☑ Weekend Cuts
- ☑ Account Cut on Same Day
- ☑ Time Window
- ☑ Timely Restoral Process
- ☑ CLEC to CLEC UNE-P to UNE-L Migrations
- ☑ CLEC to CLEC UNE-L to UNE-L Migrations
- ☑ Email Notification
- ☑ DSO EELS
- ☑ Scheduler
- ☑ Notification System
- ☑ Shorter Intervals

Third party testing of BellSouth's batch hot cut process

- BellSouth's Batch Hot Cut Process Works
  - PriceWaterhouseCoopers (PWC) affirmed BellSouth's assertions with an independent third party audit
  - BellSouth followed its process
  - BellSouth's process is regional

Scalability of BellSouth's batch hot cut process

- BellSouth's Batch Hot Cut Process is Scalable
  - BellSouth developed force requirements assuming "worst case scenario"
    - Used highest monthly inward UNE-P volume encountered
    - Used highest monthly inward UNE-L volume encountered
    - Assumes BellSouth gains relief in EVERY market
    - Assumes BellSouth and CLECs reach agreement for CLEC to stay on BellSouth's switches in NO market
    - Assumes high rates of "churn" and customer trouble reports
  - BellSouth can hire the required technicians and supervisors
  - Can find, hire and train them in four (4) months

BellSouth has performed over 13,000 Hot Cuts in a 3 month period

- Hot Cut Results Remain Excellent (January – May 2004)

  Coordinated Customer Conversions
  - 9200+ lines converted
  - 99.84% completed in 15 minutes; benchmark 95%
  - Average completion time 2 min. 43 sec.

  Hot Cut Timeliness - % Within Interval & Average Interval
  - 5200+ orders
  - 99.51% met standard; benchmark 95%

  Percentage Provisioning Troubles in 7 days
  - 99% of circuits had no troubles reported
  - Measures all reports, not just actual troubles

  Coordinated Customer Conversions Average Recovery Time
  - Less than 1% of circuits required recovery

BellSouth has proposed additional measurements for its batch hot cut process

- Batch Hot Cut Measures
  - New pre-ordering measurement
    - PO-3. UNE Bulk Migration – Response Time
  - New provisioning measurement
    - P-7E. Non-coordinated Customer Conversions - % Completed and Notified on Due Date
  - Revise four ordering measurements to include batch migration LSRs
    - 0-7 Percent Rejected Service Requests
    - 0-8 Reject Interval
    - 0-9 Firm Order Confirmation (FOC) Timeliness
    - 0-11 FOC and Reject Response Completeness
  - Revise P-7: Coordinated Customer Conversions Include the time to notify the CLEC