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

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

Parties generally agree as to what the batch hot cut process entails

> MCI's Definition of a Batch Process

Deposition of
Sherry Lichtenberg
February 5, 2004

Q. ... Can you please affirmatively define what a batch process is?

A. Yes. A batch process is a seamless economic efficient process that relies on automated ordering tools and to the the extent possible, on some automation of the actual work that allows a CLEC to send -- to have multiple customers migrated on the same day without -- with a very short period of loss of dial tone, and a very short period of the inability to receive calls or activate their features.

Pp. 72-73, Ln. 21-25; 1-3

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Parties generally agree as to what the batch hot cut process entails (continued)

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Pp. 72-73, Ln. 21-25; 1-3

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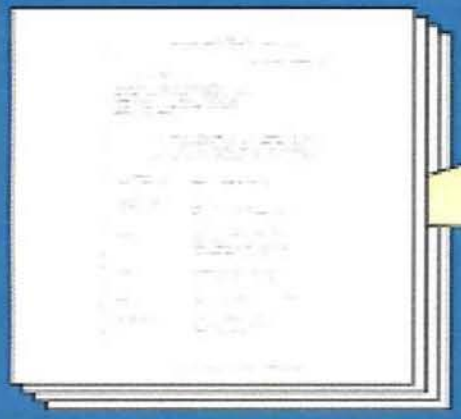
Parties generally agree as to what the batch hot cut process entails (continued)

> AT&T's Definition of a Batch Process



Deposition of
Mark D. Van de Water
February 11, 2004

Q. Okay. So your definition of a batch provisioning process is working a set of undefined amount of hot cuts within a time window. Yes or no?

A. Yes.

Pg. 75, Ln. 22-25

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The parties generally agree that batch hot cut process is used to move embedded base of UNE-P to UNE-L

> MCI Agrees Batch Process Is for UNE-P to UNE-L

Deposition of
Sherry Lichtenberg
February 5, 2004

Q. ... I just want to make sure that what the FCC is referring to as a batch hot cut process in its Triennial Review Order is the equivalent of what you are referring to as the transition hot cut process, or the batch transition process?

A. That is correct.

Pg. 101, Ln. 13-18

A. The transition hot cut process addresses the base customer that currently exist on UNE-P.

Pg. 103, Ln. 22-23

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The parties generally agree about the terms "seamless" and "simultaneous"

> What Is a "Seamless" Hot Batch Cut?

- By definition, hot cut "process necessarily disconnects service to the customer for a brief period of time."

FN 1409

The parties generally agree about the terms "seamless" and "simultaneous" (continued)

> MCI's Definition of "Seamless"

Deposition of
Sherry Lichtenberg
February 5, 2004

Q. Well, what is your definition of seamless?

* * *

A. ... My definition of seamless is to minimize the disruption to the customer in the very smallest, to the very smallest amount possible.

Pg. 56, Ln. 7, 9-12

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The parties generally agree about the terms "seamless" and "simultaneous" (continued)

> Deposition of David A. Nilson

Deposition of
David A. Nilson
February 11, 2004

Q. Okay. would you agree with me that a hot cut can be seamless even with a minimal disruption of service?

A. Absolutely, without a doubt.

Pg. 64, Ln. 9-11

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The parties generally agree about the terms "seamless" and "simultaneous" (continued)

> AT&T's Definition of Simultaneous

Deposition of
Mark D. Van de Water
February 11, 2004

Q. Mr. Van de Water, can you define the term simultaneously as it's used in the TRO?

* * *

Q. Could it mean multiple hot cuts taking place in the same central office in a single day?

A. Yes.

Pp. 69-70, Ln. 6-7; 3-5

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BellSouth's Batch Hot Process

BellSouth's Batch Hot Cut Process Provides Efficiencies

- Preordering
- Project Management
- Batch Ordering
- Batch Provisioning

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BellSouth's Batch Hot Process (continued)

BELLSOUTH UNE-P to UNE-L BULK MIGRATION Project Notification

Customer Information

PON	Special Handling	Desired Due Date	Order Coordination (OC) TN	Existing Access Telephone Number	Error Code NAME	Existing UNE Plan (state)	Telephone Number	Old Unit Assignment	New UNE-L Unit (state)	Order Number	Due Date

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

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

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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
- DS0 EELs
- Scheduler
- Notification System
- Shorter Intervals

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Third party testing of BellSouth's batch hot cut process

> Direct Testimony of Mark D. Van de Water

Direct Testimony of
Mark D. Van de Water
December 4, 2003

A. Pre-implementation testing should include third party "time and motion" study of the hot cut process, and third party-monitored ILEC testing using its own collocation and migration of significant numbers of its own customers through hot cuts from direct connection to its switch to its collocation equipment installed to operate as a pseudo-CLEC specifically for this test.

Pg. 19

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Third party testing of BellSouth's batch hot cut process (continued)

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

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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

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

CLECs' criticisms of BellSouth's hot cut performance are groundless

> MCI Admits Its Testimony Regarding BellSouth's Batch Hot Cut Performance Is Speculative

Deposition of
Sherry Lichtenberg
February 5, 2004

Q. ... MCI, rather, has no firsthand evidence of BellSouth's performance with respect to hot cuts?

A. At this point in Florida, BellSouth – I'm sorry, MCI has no firsthand evidence of BellSouth's performance, that is correct.

* * *

Q. Okay. So it is speculative, correct?

A. Yes.

Pg. 58, Ln. 14-18; 24-25

CLECs' criticisms of BellSouth's hot cut performance are groundless (continued)

> Deposition of Cheryl Bursh

Deposition of
Cheryl Bursh
February 13, 2004

Q. Does AT&T have any empirical evidence to suggest that BellSouth is not performing batches on time?

A. Well, we're not doing batch migrations today.

Q. So your answer would be no?

A. No --

Pg. 56, Ln. 5-11

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CLECs' criticisms of BellSouth's hot cut performance are groundless (continued)

> Deposition of Jay M. Bradbury

Deposition of
Jay M. Bradbury
February 18, 2004

Q. Mr. Bradbury, can you identify any facts to support Ms. Brenner's testimony identified here?

A. I do not have any of those facts with me today, no, sir.

Pp. 63-64; Ln. 24-25; 1-2

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CLECs' criticisms of BellSouth's hot cut performance are groundless (continued)

BellSouth Seventh Set of Interrogatories
January 21, 2004

Interrogatory 266:

State all facts and identify all documents that support Ms.

Response:

... Since the time of Ms. Brenner's Declaration, those tools/data keeping has changed and current versions (or even the last version) of those documents do not exist.

that were dynamic (i.e., information changed routinely and it was not necessary to maintain the many versions of the documents). Since the time of Ms. Brenner's Declaration, those tools/data keeping has changed and current versions (or even the last version) of those documents do not exist.

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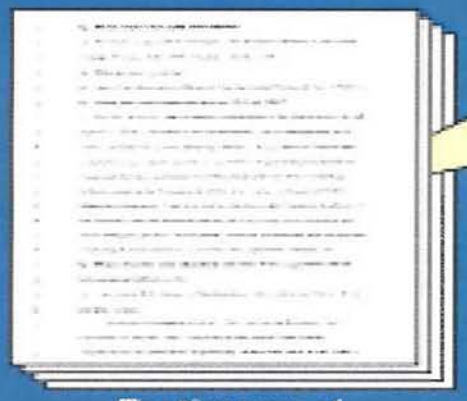
CLECs actually using unbundled loops acquired from BellSouth are generally pleased with the hot cut process

> FDN Generally Supports BellSouth's Hot Cut Process



Testimony of
Michael P. Gallagher

A. ...Further, FDN believes that the hot cut process of the ILECs works well for the most part....

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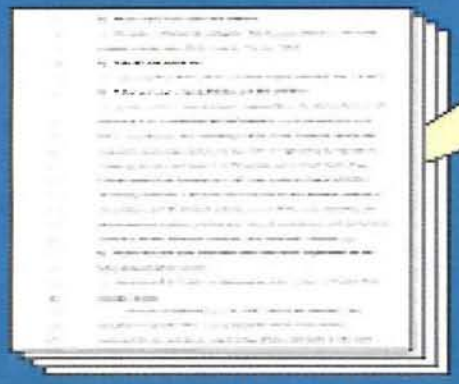
CLECs actually using unbundled loops acquired from BellSouth are generally pleased with the hot cut process (continued)

> FDN's View on IDLC



Deposition of
Michael P. Gallagher

Q. Why do you think other carriers consider the hot cut process too difficult?

A. ...On a daily basis, FDN and BellSouth work cooperatively together to install loops through IDLC for mass market customers....

Pp. 7-8

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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.
  O-7 Percent Rejected Service Requests
  O-8 Reject Interval
  O-9 Firm Order Confirmation (FOC) Timeliness
  O-11 FOC and Reject Response Completeness
- Revise P-7: Coordinated Customer Conversions Include the time to notify the CLEC

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