

October 28, 2004



**Minimum Standards for  
Local-to-Local Carrier Changes  
Docket No. CG 02-386**

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## >> What is an End User Migration (EUM)?

- **“EUM” is a term that the industry uses to describe the migration of end users from an “old” local service provider to a “new” local service provider.**
  - EUM includes CLEC-to-ILEC, CLEC-to-CLEC, etc.
- **ILEC-to-CLEC migrations are regulated by the Commission and the states.**
- **For the most part, CLEC-to-ILEC and CLEC-to-CLEC migrations are not regulated by the Commission or the states.**
  - Some states that have established guidelines: New York, New Hampshire, Illinois, Texas, Oregon.
  - The Commission’s local service freeze and number portability rules regulate aspects of these migrations.

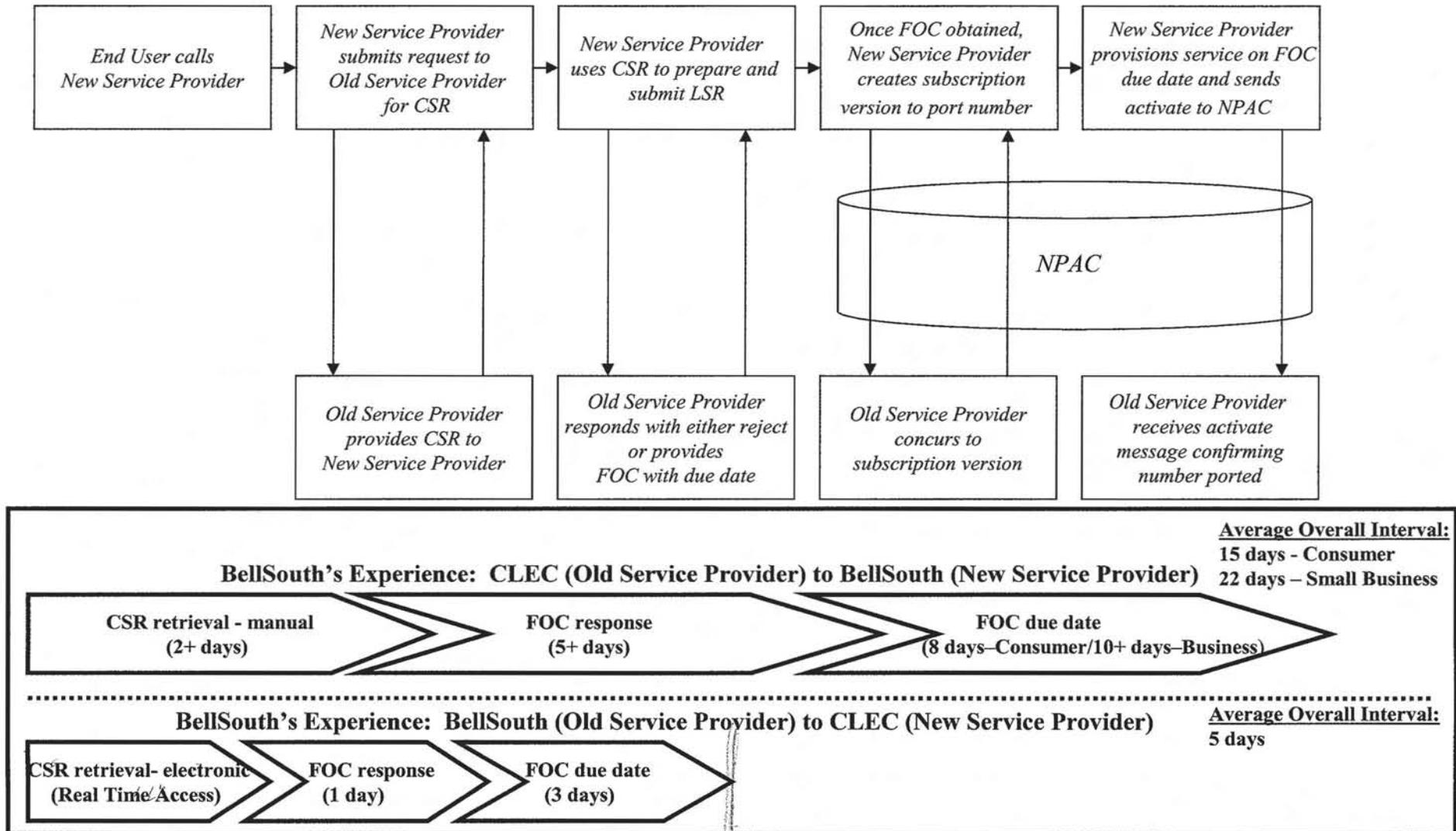
## **>> EUM Issues are being raised in many venues. Why now?**

- **Competition and churn have increased in the local market.**
- **The increase of facilities-based competition with number portability requires cooperation between competing local service providers.**
- **The increase of migrations that are not seamless and timely due to a lack of uniformity, timeliness, business rules, and accountability.**

## >> Facilities-Based End User Migration (EUM)

- Customers switching local service providers demand seamless and timely migration of local service.
- It is critical for local service providers to exchange customer account information when the customer: (1) switches between facilities-based local service providers, and (2) wants to keep the same telephone number (LNP). The following must occur for successful migrations:
  - The old provider must provide the new provider with business rules for exchanging account information and submitting local service requests (LSRs).
  - The old provider must provide the new provider with account information in a uniform and timely manner.
  - The old provider must provide the new provider with clarifications to, or confirmations of, the LSR in a timely and uniform manner.
- Because many CLECs do not provide the above, customers frequently do not receive seamless and timely migrations of local service. Instead, they experience extended delays in establishing new service, and they may blame the new provider when the old provider has withheld necessary information from the new provider.

# >> Summary of LNP Local-to-Local Carrier Change - BellSouth's Experience



## >> EUM Regulatory Activities

- States that have established guidelines for end user migrations between facilities-based providers:

<u>State</u>	<u>Docket Number</u>
Illinois Commerce Commission	01-0539
New Hampshire Public Utilities Commission	DT-02-132
New York Public Service Commission	00-C-0188
Oregon Public Utility Commission	UM-1068
Public Utility Commission of Texas	Project No. 24389

- The Michigan PSC is developing end user migration guidelines in docket U-11830. The participants have worked collaboratively for nearly a year, but have nine (9) issues in dispute.
- In addition, the participants in the Florida Public Service Commission's Telecommunications Competitive Issues Forum are developing end user migration rules. The participants, including BellSouth, began discussion in the summer of 2002. As of today, the participants have not finalized the EUM rules.

## >> Excerpts from EUM Regulatory Activities

Source	Excerpt
Oregon Public Utility Commission Order Dkt. No. UM-1068 January 14, 2004	<p>“The purpose of this rule is to provide for an exchange of information, in order to ensure that a requesting Local Service Provider (LSP) has enough customer information from the current LSP, so a customer can migrate local exchange service from one LSP to another in a <u>seamless and timely manner, without delays or unnecessary procedures.</u>”</p>
Texas Public Utility Commission Order Project No. 24389 January 8, 2004	<p>“The new rule and Migration Guidelines ensure that... <u>customers can migrate from one CLEC to another or from a CLEC to an ILEC in a seamless manner without encountering abnormal delays, service interruptions, and cumbersome procedures...</u>”</p>
New York Public Utility Commission Order Dkt. No. 00-C-0188 June 14, 2002	<p>“We instituted this proceeding to examine the issues associated with migration of customers between Competitive Local Exchange Carriers (CLECs) and from CLECs to Verizon New York (Verizon) by order issued January 26, 2000. We noted that, now that CLECs serve a significant portion of New York State’s CASE 00-C-0188 consumers, <u>it is timely to ensure that CLECs have the appropriate procedures in place so that customers can change local service carriers efficiently.</u>”</p>

# >> EUM Issues Raised in Regulatory Proceedings and the Industry Forum

- Issues about end user migrations between facilities-based providers were raised in the following state TRO proceedings:

<u>State</u>	<u>Docket Number</u>
Alabama Public Service Commission	29054, Phase II
Florida Public Service Commission	030851-TP
Georgia Public Service Commission	17749-U
Kentucky Public Service Commission	2003-00379
Louisiana Public Service Commission	U-27571
Mississippi Public Service Commission	2003-AD-714
North Carolina Public Service Commission	P-100, Sub 133q
Public Service Commission of South Carolina	2003-327-C
Tennessee Regulatory Authority	03-000491

- The issue of facilities based end user migrations has been raised at the Federal Communications Commission:

<u>Docket</u>	<u>Status</u>
CG02-386	Open
WB 04-313	Open

- The *Local Service Migrations Guidelines, Issue 1* of the Ordering and Billing Forum (OBF) of the Alliance for Telecommunications Industry Solutions (ATIS) became "final" during the OBF meeting of October 2004.

## >> EUM Excerpts from Regulatory Proceedings

Source	Excerpt
<p>From the Testimony of Mark David Van de Water of AT&amp;T, filed in Georgia PSC Docket 17749-U, on December 23, 2003.</p>	<p><u>"As the mass market matures, migrations between CLECs will occur more frequently. Currently, there are no standard or agreed-upon processes or intervals between CLECs for responding to requests for information such as customer service records or other customer transition information that is needed to create service orders."</u></p>
<p>From the Testimony of Mark David Van de Water of AT&amp;T, filed in Georgia PSC Docket 17749-U, on December 23, 2003.</p>	<p><u>"...efficient processes must be developed for both the 'winning' and the 'losing' CLECs so they can place orders with the ILEC and interact with each other and the ILEC to have customers efficiently migrated. Without these improvements, the current lack of efficient and equitable ordering and provisioning process for CLEC to CLEC hot cut migrations will create more delay, customer confusion, expense, and customer outages in the industry."</u></p>
<p>From the Declaration of Sherry Lichtenberg of MCI, filed in FCC Docket WC 04-313, on October 4, 2004</p>	<p><u>"By contrast, UNE-L migrations between CLECs and winbacks from UNE-L to retail require manual CSR retrieval steps that delay the migration process by several days."</u></p>

## >> Why should this Commission act now?

- **The Commission, rather than the individual states, should develop mandatory minimum standards for EUM.**
  - Customers will benefit from a required uniform set of minimum standards. This will ensure customers throughout the nation have a positive experience when changing local service providers. BellSouth's *ex parte* presentation on September 22, 2004 for CG Dkt. 02-386 contains recommended mandatory minimum standards.
  - Only a few states have established standards; BellSouth's experience in Florida shows that it can be time-consuming to proceed on a state-by-state basis. The parties in Michigan have worked collaboratively for nearly a year, but have nine (9) issues still in dispute.
  - The states could add to the minimum standards, and provide additional guidance, such as metrics.

## >> Recommendation

- BellSouth recommends that the Commission issue a Further Notice of Proposed Rulemaking addressing the local-to-local EUM issue when it issues an order in CG 02-386 regarding minimum CARE standards.
- An FNPRM would allow the Commission to develop a complete record on the issues related to EUM and the need for mandatory minimum standards and guidelines.