

**BEFORE THE
GEORGIA PUBLIC SERVICE COMMISSION**

In re:)	
)	
Consideration of BellSouth)	Docket No. 6863-U
Telecommunications, Inc.'s Entry into)	
InterLATA Services Pursuant to Section)	
271 of the Telecommunications Act of)	
1996)	

JOINT-AFFIDAVIT
OF
JAY M. BRADBURY & BERNADETTE SEIGLER
ON BEHALF OF
AT&T COMMUNICATIONS OF THE SOUTHERN STATES, L.L.C.,
TELEPORT COMMUNICATIONS ATLANTA, L.L.C., AND
AT&T BROADBAND PHONE OF GEORGIA, L.L.C.

STATE OF GEORGIA
COUNTY OF FULTON

Before me, a notary public in and for said state and county, this day personally appeared Jay M. Bradbury and Bernadette Seigler, who, being by me first duly sworn, depose and state as follows:

1. Jay M. Bradbury is the District Manager in the AT&T Law and Government Affairs organization and provides support to AT&T's business units and other internal organizations in the area of Operations Support Systems. Mr. Bradbury's business address is 1200 Peachtree Street, Suite 8100, Atlanta, Georgia 30309. Mr. Bradbury previously filed an affidavit in this docket on May 31, 2001 and now submits this joint-affidavit on behalf of AT&T Communications of the Southern States, L.L.C., Teleport Communications Atlanta, L.L.C., and AT&T Broadband Phone of Georgia, L.L.C. (collectively "AT&T").

2. Bernadette Seigler is employed as the District Manager for AT&T Local Services Access Management for Operations Support Systems for Local Interconnection in AT&T's Southern Region. Ms. Seigler's business address is 1200 Peachtree Street, Suite 8100, Atlanta, Georgia 30309. Ms. Seigler previously filed an affidavit in this docket on May 31, 2001 and now submits this joint-affidavit on behalf of AT&T.

PURPOSE OF JOINT-AFFIDAVIT

3. This affidavit responds to the Georgia Public Service Commission's ("Commission's") letter of February 18, 2002, requesting information on certain specific issues raised in WorldCom's Petition to Address OSS, Change Management and Data Integrity Issues and AT&T's Motion in Support of WorldCom Inc.'s Petition to Address OSS, Change Management and Data Integrity Issues. This affidavit addresses Commission-identified Issue 2, dealing with parsed Customer Service Records ("CSRs"), and Issue 4, the single C order process.

PARSED CUSTOMER SERVICE RECORDS

4. As detailed in the Affidavit of Jay M. Bradbury, filed May 31, 2001 in Docket No. 6863-U, AT&T and other Competitive Local Exchange Carriers ("CLECs") have been requesting parsed CSRs since 1998.¹ BellSouth Telecommunications, Inc. ("BellSouth") provides parsed CSR data to its own retail operations, but has repeatedly delayed implementation of CSR parsing for CLECs. BellSouth finally implemented what it considers acceptable CSR parsing for CLECs on January 5, 2002. As described below, problems remain with BellSouth's so-called "implementation" of CSR parsing, including lack of stability in the implementation,

¹ Affidavit of AT&T witness Jay M. Bradbury, Georgia Public Service Commission, Docket No. 6863-U (May 31, 2001) at ¶ 28.

delayed or inadequate workarounds for identified defects, and failure to provide a fully fielded parsed CSR.

5. The implementation of BellSouth's CSR parsing functionality has not been stable. Since BellSouth put its parsed CSR software programming into production, 24 notices of defect have been issued. BellSouth has recently addressed a number of those defects, but at least 7 of the defects identified thus far remain outstanding. BellSouth has categorized all of the still outstanding defects as "low impact." Under the Change Control Process ("CCP"), BellSouth is required to publish workarounds for defects classified as "low impact" within three business days. The defects were all submitted to the CCP on January 31, 2002, while the workarounds were not published until February 15, 2002.

6. The workarounds published on February 15 place a significant burden on CLECs. Each of the workarounds for these so-called "low impact" defects requires CLECs to manually determine if the CSR they have retrieved is impacted by the defect, or else risk rejection of the Local Service Request ("LSR"). If impacted by the defect, the CLEC must then take additional manual action to ascertain the correct information necessary to complete the LSR. The 7 defects that cause this additional work are not scheduled to be corrected until March 23, 2002. Thus, although BellSouth contends it has implemented CSR parsing, that parsing is effectively unavailable for CLECs retrieving CSRs.

7. Implementation of fixes for the outstanding defects will also likely require updates or changes to the specifications that accompany the software programming. Accurate and stable specifications are necessary in order for CLECs to develop the code required on their end to test and utilize BellSouth's CSR parsing functionality. Without a stable set of

specifications from BellSouth to work from, CLECs like AT&T will not dedicate scarce resources to developing the necessary parallel software.

8. Finally, BellSouth’s CSR parsing release does not provide fully fielded parsed CSRs. At least eleven fields that CLECs have requested and for which there is data present in the CSR are not included in parsed format. As the matrix below illustrates, other Incumbent Local Exchange Carriers (“ILECs”) provide these fields in parsed format.

Provision of CSR Fields in Parsed Format				
<i>CSR Field</i>	<i>BellSouth</i>	<i>Southwestern Bell Telephone (“SBC”)</i>	<i>SBC (formerly Ameritech)</i>	<i>Verizon</i>
TOS – Type of Service	No	Yes	No	Yes
NAME – End User Name (not for directory delivery)	No	Yes	Yes	Yes
LST – Local Service Termination	No	Yes	Yes	No
DGOUT – DID Digits Out	No	Yes	Yes	Yes
HNTYP – Hunting Type	No	Yes	No	Yes
HTSEQ – Hunting Sequence	No	Yes	No	Yes
SGNL – Signaling	No	Yes	No	No
STYC – Style Code	No	Yes	Yes	Yes
TOA – Type of Account	No	Yes	Yes	No
LNPL – Listed Name Placement	No	Yes	Yes	No
BRO – Business/Residence Placement Override	No	Yes	Yes	Yes

9. In February BellSouth issued change requests CR0651 and CR0652 announcing plans to provide parsing for six of these fields in March. The change requests were initially published on February 7th. On February 12th they were declared regulatory mandates and scheduled for implementation on March 23, 2002. BellSouth explained that these six fields must be parsed under regulatory mandate from the Florida Public Service Commission (“FPSC”) in Docket No. 000731. The FPSC orders in FPSC Docket No. 000731 were issued in June and

September 2001. Thus, parsing for these six fields should have been provided in BellSouth's January 5, 2002 release of its CSR parsing functionality. On February 21, BellSouth announced that it had decided to reclassify these change requests as CLEC initiated, that it was not scheduling the implementation of the four fields associated with CR0652, and insisted that the CLECs vote concerning the implementation of the two fields associated with CR0651.² Thus, it is now uncertain that BellSouth will provide parsing of any additional fields required to complete implementation of a compliant parsed CSR.

SINGLE C ORDER PROCESS

10. In order to convert customers from BellSouth service to a CLEC UNE-P service, BellSouth uses two separate internal orders. A new or "N" order accomplishes the conversion to UNE-P, while a disconnect or "D" order disconnects the customer's service from BellSouth service. The problem arises when BellSouth's procedures fail to ensure that the two orders are related and coordinated. If BellSouth does not process the orders in the proper sequence, the customer's service is disconnected pursuant to the "D" order before the customer has been converted to the CLEC UNE-P service pursuant to the "N" order. Failure to coordinate the "N" and "D" orders results in customers' loss of dial tone.

11. AT&T has experienced numerous loss of service problems and additional UNE-P provisioning problems due to BellSouth's inadequate migration process, in both Georgia and Florida, the two states in the BellSouth region where AT&T is using UNE-P to provide service

² BellSouth has now asked CLECs to vote (using a procedure outside of the strictures of the CCP) on whether its plans to implement parsing for two of the six fields should continue. Such a vote is inappropriate under the CCP and undercuts BellSouth's obligation to parse all of the remaining unparsed fields.

to its business customers.³ From July through November 2001, AT&T customers experienced at least 81 instances of outages or impaired service within the first 72 hours of migration from BellSouth to AT&T UNE-P service. These instances are detailed in the matrix included as Exhibit JMB/BS –1.⁴ AT&T believes that many of these problems are caused by the separation of the N and D orders.

12. The incidents of loss of service or impaired service for newly migrated AT&T UNE-P customers puts AT&T and other CLECs at a significant competitive disadvantage. Loss of service or impaired service is disruptive to customers, causing inconvenience and loss of business. Furthermore, BellSouth's role in causing the loss of service is largely hidden from the customer's view. The conversion from BellSouth service to CLEC UNE-P service should have no effect on the end user's service at all. Because BellSouth continues to use two orders to migrate customers to UNE-P rather than the single C order, unpredictability and unreliability remain in the conversion process.

³ Affidavit of AT&T witness Bernadette Seigler, Georgia Public Service Commission, Docket No. 6863-U (May 31, 2001) at ¶¶ 9-22.

⁴ Additional troubles and outages reported after 72 hours are not included in Exhibit JMB/BS-1. These troubles are handled by a different internal organization within AT&T and data was not available at the time of filing.