

**BEFORE THE
GEORGIA PUBLIC SERVICE COMMISSION**

In re:

Consideration Of BellSouth Telecommunications,)	
Inc.'s Entry Into InterLATA Services)	
Pursuant To Section 271 Of The)	Docket No. 6863-U
Telecommunications Act Of 1996)	
_____)	

AFFIDAVIT OF SHERRY LICHTENBERG

The undersigned, first being duly sworn, states that:

1. My name is Sherry Lichtenberg. My business address is 701 S. 12th St., Arlington, Virginia 22202. I am employed by WorldCom, Inc. in the Mass Markets local services team as a senior manager. I will refer to the business unit of WorldCom that offers local residential service as "MCI." My duties include designing, managing, and implementing MCI's local telecommunications services to residential customers on a mass market basis nationwide, including Operations Support Systems ("OSS") testing. I have twenty years experience in the telecommunications market, five years with MCI and fifteen years with AT&T. Prior to joining MCI, I was Pricing and Proposals Director for AT&T Government Markets, Executive Assistant to the President, and Staff Director for AT&T Government Markets and had a number of positions in Product and Project Management.

2. The purpose of my affidavit is to respond to the Staff's request for information concerning certain OSS issues raised in WorldCom's Petition to Address OSS, Change Management and Data Integrity Issues. Specifically, Staff requested parties to address migration by telephone number and name, parsed CSRs, line loss reporting and the single C order process.

As I will discuss below, we have seen some improvements in BellSouth's performance resulting from the Commission's October 19, 2001 Order ("October 271 Order") in this Docket, although the improvements have taken longer than we would have hoped. Still, significant problems still remain that need to be addressed. Just as importantly, the *process* for dealing with such problems is flawed and should be addressed so the Commission can be assured that BellSouth continues to improve its OSS even after it is no longer in the regulatory spotlight. To achieve that objective, a change management process must be developed that implements change requests within a reasonable time and in a manner that enables testing and validation by both BellSouth and CLECs to ensure that they do not harm the existing systems.¹

Migration by Telephone Number and Name

3. WorldCom requested BellSouth to process migration orders based on telephone number and name on August 9, 2000. This functionality is critical to CLECs because address problems lead to a high number of rejections, which in turn lead to delays in turning up the service that customers have requested. Only when this Commission required BellSouth to provide migration by telephone number and name in the October 271 Order did BellSouth begin to implement the requested change, except that BellSouth implemented migration by telephone number and service address house number ("TN and SANO") instead. Contrary to BellSouth's statements in its filings in this docket, MCI only acceded to editing against the SANO and not the customer's name when BellSouth told MCI that BellSouth's systems would reject high numbers of orders if this specific edit were implemented. MCI is still unclear about the actual

¹ CLECs have submitted comments in Docket No. 7892-U on the specific changes they would like to see made in the change management process.

basis for BellSouth's concern, since it appears not to be a problem for other ILECs, but agreed to BellSouth's request so that the process could move forward. After a number of fits and starts, BellSouth completed initial implementation on November 17, 2001.²

4. After November 17, MCI experienced a significant problem with rejects that occurred because BellSouth's Regional Street Address Guide ("RSAG") database did not match its Customer Service Record ("CSR") database. The result was that orders were being rejected when MCI submitted the SANO contained in the RSAG if the CSR reflected a different SANO. The only way to deal with such a rejection was for an MCI representative to spend about twenty-five minutes calling the BellSouth Local Carrier Service Center ("LCSC") for each reject so the problem could be straightened out manually. BellSouth did not address this issue until earlier this month, when it removed the front-end edit checks against the CSR.³

5. MCI has said all along that implementation of its requested change would improve reject rates and that has proved to be the case. MCI has seen a reduction in its internally calculated reject rate of roughly 10 percentage points, from about 29% in October to about 19% in the first half of February. MCI appreciates the Commission's assistance in bringing about this result, which will lower turnaround times in provisioning local service to Georgia consumers. What is troubling, however, is that it took BellSouth a year and a half to put this functionality in place, and then only after this Commission ordered BellSouth to do so. Even more troubling is that this level of responsiveness was provided while BellSouth was supposedly on its best

² Problems with implementation are discussed in detail in WorldCom's FCC Reply Comments and supporting Declaration in the initial Georgia/Louisiana 271 case, which were filed on November 13, 2001.

³ As I note below, we are concerned that this workaround solution may give rise to other problems downstream because the database mismatch still has not been reconciled.

behavior while it tried to convince regulators that it should be allowed into the in-region long distance business. And although MCI has seen improvement in its reject rate, there are still some implementation issues that need to be resolved, as I discuss below.

6. Staff has requested the parties to provide the number of LSRs submitted using the functionality BellSouth has provided for migration by TN and name (as noted, the migration is actually by TN and SANO), along with the number of LSRs rejected and the reasons for rejection. According to our records, for the four-week period from January 19 to February 15, 2001, MCI submitted 15,976 LSRs for the migration of customers from BellSouth to MCI.⁴ Of the 3,182 LSRs rejected by BellSouth, 633 fell out for manual processing and were rejected by the LCSC and 2,548 LSRs were rejected electronically. Attachment 1 reflects the reason given for each reject.

7. Staff asked about the data mismatch between the RSAG and CSR discussed in WorldCom's Petition. As I noted above, earlier this month BellSouth removed the front-end edit checks against the CSR. Based on MCI's data from February 2-15, it appears that this change has eliminated the rejections caused by the data mismatch. BellSouth did not, however, reconcile the RSAG and CSR databases, so that, for example, house numbers, zip codes and other information continue to appear differently in the two databases. MCI is concerned that because BellSouth has not reconciled the databases, CLECs may experience downstream problems when the information they submit on the LSR does not match the customer's CSR. For instance, after service is provisioned and MCI receives a completion notice, the service orders associated with the LSR may not be able to complete in billing until the discrepancy is

⁴ Other LSRs for feature changes and the like are not included in this figure.

manually resolved. Until the billing system is updated, MCI will not be able to submit changes to the customer account. Further, because MCI has received a completion notice, it will begin billing the customer, but BellSouth will not stop billing the customer until the service orders are completed in billing, which means the customer may be double billed.

8. BellSouth has maintained that these problems are minimal and that customers are automatically credited when the CSR is finally updated and the migration complete, but we have no way of knowing that this is the case. What we do know is that BellSouth continues to have delays in completing orders through billing because of mismatches in their various customer records databases. Because CLECs have no visibility into the BellSouth billing system to see when and whether CLECs are updated timely and accurately, we do not yet have data on the extent of these downstream problems. We have, however, begun to work with BellSouth to determine the source of the numerous “not your customer” rejects we have been receiving on LSRs for feature or other changes for our customers. BellSouth has determined that many of these rejects are the result of BellSouth delays in updating the customer records in the downstream systems. Although many CLECs have complained of incorrect or delayed updates to the CSR, BellSouth has not undertaken the task of bringing the CSR and RSAG into alignment, nor has it agreed to implement the billing completion notice that MCI requested through change control beginning in June 2001.

9. Staff also inquired about other problems CLECs may be experiencing with BellSouth’s implementation of the new migration functionality. One problem is that although we no longer appear to be receiving invalid electronic address rejects, we are continuing to receive invalid address rejects on LSRs that fall out for manual processing. For the period

January 19 to February 15, 2002, we received thirty such invalid rejects. These rejects apparently are occurring because some LCSC representatives are continuing either to edit the entire address or to check the SANO against the CSR rather than the RSAG. We are working with the LCSC to correct this training issue.

10. MCI has detected at least one other problem with BellSouth's implementation of migration by TN and SANO. When MCI submits an LSR that does not (and should not) have directory listing pages (because no listing changes are being requested), and the customer's listing name on the LSR does not match the CSR, BellSouth is returning an automated reject (clarification) called "Invalid/Missing Listing Name or Type." To fix these rejects, MCI must manually check LENS to determine the listing name and resubmit the LSR with the information as it appears on the CSR. This experience suggests that at least in some circumstances, the BellSouth systems are checking the listing name as well as the TN and SANO when it performs its edit checks. This requirement does not appear in the BellSouth business rules and the resulting reject appears to be a result of the "fixes" made to the migrate by TN and SANO functionality. There were seventeen such rejects for the period January 19 to February 15. The PONs for these rejects are included in Attachment 2.

Parsed CSRs

11. CLECs have long sought a CSR in parsed format because if the data is parsed, it can be transferred electronically from the CSR to the LSR, reducing the possibility of mistakes made when retyping information onto the LSR. Receiving parsed data also is helpful because the CLEC representative can electronically transfer information from the CSR to the CLEC's own systems, reducing errors in future transactions down the road. MCI has used the parsed

CSR successfully in New York and Pennsylvania to simplify the customer negotiation process. The MCI representative can review the information on the CSR with the customer to review existing features and determine what the customer wants to retain or delete. This functionality is particularly important for small businesses, since it is critical that CLECs determine which features exist on each of the customer's lines so that they can ensure that the migration can proceed successfully. Finally, the parsed CSR allows CLECs to determine whether the customer has high speed data service and whether this service exists on the customer's billing telephone number ("BTN"). This is critical to CLECs, since BellSouth refuses to migrate any customer lines when high speed data service exists on the BTN.

12. CLECs requested CSR parsing functionality on August 12, 1999. After more than two years, the Commission directed BellSouth to provide CSR parsing functionality by January 5, 2001 in its October 271 Order. BellSouth implemented that functionality on January 5. As with the migration by TN and SANO release, there were a number of defects that needed to be corrected, and not all of them have been corrected.

13. Staff requested the parties to provide CSR parsing testing results or commercial usage and data, and to identify any fields that BellSouth does not provide in parsed format, with an indication of whether other ILECs provide such fields in parsed format. MCI continues to have doubts about the adequacy of the parsed CSR functionality that BellSouth has provided, but because MCI has not yet tested that functionality, MCI will defer to other parties with respect to the issues raised by Staff. We still view the parsed CSR as important to our future plans and appreciate the Commission's role in bring about its development. If MCI develops additional

responsive information concerning parsed CSRs during the pendency of this docket, it will provide such information to the Commission.

Line Loss Reporting

14. If an MCI local residential customer decides to return to BellSouth (or go to another CLEC), the only way MCI finds out is through a line loss report that must be provided by BellSouth. Because MCI provides local residential service on a mass market basis, it requested BellSouth to provide such line loss reports via an electronic batch process known as Network Data Mover (“NDM”). Using line loss reports received via NDM, MCI can change its records electronically to ensure that the customer receives an accurate, final bill. If MCI does not receive a line loss report from BellSouth, MCI will continue to bill the customer, which will result in double billing. The customer, knowing he or she is no longer an MCI customer, probably will not pay the bill. Eventually, MCI will send a request to BellSouth to suspend the customer’s service, which BellSouth will reject, informing MCI that the customer no longer belongs to us. MCI then will have to investigate BellSouth’s claim and, if valid, determine what the final billing date should have been. To make matters more complicated, BellSouth often provides usage data to MCI after the customer has migrated away from us, so determining the final bill date is sometimes difficult. Even worse, when concerned customers call MCI, their former local service provider, to dispute their bill, MCI has no indication that the customer has left and no way to determine that the bill was improper.

15. Staff requested the parties to provide detailed information concerning the line loss reports BellSouth has provided and is providing, and detailed information to support claims that

customers have been double billed as a result of BellSouth's failure to provide timely or accurate line loss reports.

16. From May 15, 2001 to September 30, 2001, BellSouth did not provide line loss reports for customers that either were deemed to have been migrated in error by BellSouth⁵ or that were not designated for line loss reporting when BellSouth retail orders were handled manually. To date, BellSouth still has not provided line loss reports for these customers.⁶ MCI began asking for a recovery of this data as soon as it discovered that this information was missing, but BellSouth only recently determined that it can find these missing notifiers and will be able to provide them to MCI. BellSouth has stated it will provide this information by May 7, 2002, but has provided no indication of where the data has been located, why it has taken so long to find it and why it will take so long to re-send it.

17. On December 4, 2001, BellSouth sent MCI 2,745 line loss reports covering the period from October 1, 2001 to December 1, 2001. These reports had not been sent to MCI previously, either because the BellSouth sales representative had (incorrectly in most cases) listed the migration reason as "switched in error" or because the line loss report designator had not been added to the order. Most, if not all, of these customers would have been double billed by MCI because it did not know these customers had opted for another local service provider.

⁵ With respect to alleged slamming, it must be borne in mind that it is the BellSouth customer representative who takes the customer's winback order and puts the reason for the migration on the order. Thus, it is BellSouth that purports to determine whether or not a customer was migrated to MCI in error, not the customer. In the cases MCI has investigated, it has found that the customer in fact was not slammed, and that the BellSouth representative's notation to that effect was in error.

⁶ BellSouth has sought to downplay this problem by arguing that it provides all line loss reports for "switched in error" telephone numbers on its website. But the point of receiving line loss reports via NDM is to automate the process. If NDM reports have to be manually cross-checked against information on a web site, the utility of NDM reports will have been undermined.

Beginning December 14, BellSouth provided weekly lists of line loss reports that it had not provided previously. The number of customers for each week beginning December 2001 is provided below:

<u>Week ending</u>	<u>Number of Missing Line Loss Reports Provided</u>
Dec. 14	435
Dec. 21	288
Dec. 31	249
Jan. 7	172
Jan. 14	256
Jan. 21	233
Jan. 30	334
Feb. 4	155
Feb. 12	31
<u>Feb. 19</u>	<u>33</u>
TOTAL	2,186

A spreadsheet with the 2,745 line loss reports provided on December 4 and the subsequent 2,186 reports that have been provided through the week ending February 19 is appended as Attachment 3. The weekly recoveries beginning in December appear to have eliminated the problem with double billing for customers who left MCI from that point forward; however, significant manual work is and has been required to check the recovery data against internal MCI data and the BellSouth line loss website, to upload this data into the MCI billing systems, to resolve customer billing complaints , and to work with sometimes irate customers to explain the problem and assure them that their accounts have been credited properly. MCI's local financial operations team has had to dedicate significant resources to this recovery since it was discovered and continues to audit all line loss data to ensure that the BellSouth "fix" actually has addressed the problem.

18. In February, BellSouth upgraded its OSS so that line loss reports for customers alleged to be “switched in error” were included in the NDM transmissions. MCI evaluated the accuracy of the post-upgrade NDM reports by checking 99 “switched in error” ANIs shown on BellSouth’s website on February 12, 2002. As of February 18, MCI had received NDM reports for 92 of those customers, but had not received them for seven. The seven ANIs for which NDM reports had not been received are included in Attachment 4.

19. According to the MCI Account Team, the problem with certain manually handled BellSouth retail orders is scheduled for resolution in May of this year, but since internal BellSouth software fixes are not covered under BellSouth’s change management process, it is unclear not only how this problem will be addressed but how CLECs will know that the fix has been completed. (This change is not listed on the BellSouth change management schedule because BellSouth apparently considers it not to be “CLEC impacting.”) Until the software is corrected, line loss notifications for manual errors will have to be recovered on a weekly basis.

20. In summary, BellSouth has made slow progress toward fixing the line loss reporting problem, but further work remains to be done. Given the customer impact involved, BellSouth has not moved toward resolution with the sense of urgency that was called for. Again, this experience brings to light the need for improvements to BellSouth’s process for resolving problems so consumers do not bear the brunt of OSS deficiencies.

Single C Order Process

21. From the time MCI launched local residential service in Georgia through January 25, 2002, it has received reports from 6,712 customers who have lost dial tone. Of those, 2,474 lost dial tone within thirty days of being migrated to MCI and 381 lost dial tone within five days.

The Commission has recognized the seriousness of this problem, directing BellSouth in the October 271 Order to implement the Single C Order process by January 5, 2002. BellSouth has stated that it cannot comply with the Commission's deadline and that it intends to implement the Single C process by March 23, 2002.

22. Staff has requested the parties to provide data concerning the number of customers who have lost dial tone as a result of BellSouth's current two order process, including the date of conversion, the date dial tone was lost and any explanation of why the lost dial tone was caused by the two-order process.

23. Attachment 5 provides a list of the 2,474 customers losing dial tone within thirty days of migration, including the date of conversion, the date dial tone was lost, and the explanation given by BellSouth for why the customer lost dial tone. These explanations were provided by BellSouth technicians, and MCI does not have visibility into BellSouth's systems that would enable it to evaluate the accuracy of these assessments. But the sheer volume of customers losing dial tone points to a systemic problem, and BellSouth has acknowledged that MCI customers do lose dial tone as a result of the conversion process.

24. On January 25, 2002, MCI sent BellSouth a sample of 227 examples of customers who had lost dial tone and requested BellSouth to investigate. The sample included the majority (227 of 309) of the MCI customers who lost dial tone between December 5 and December 12. BellSouth's response is appended to my affidavit as Attachment 6. For reasons I will explain in the next paragraph, BellSouth only analyzed fifteen of the sample cases. Of those instances, BellSouth acknowledged that four customers (roughly 27%) lost dial tone as a result of the conversion process. Even taking BellSouth's assessment at face value, and assuming that 27%

of the customers who call MCI to report a loss of dial tone lost their phone service as a result of the conversion process, BellSouth's process is causing a great deal of harm to consumers.

25. BellSouth's letter exemplifies how it often deals with MCI's problems. BellSouth declined to review sample cases that were provisioned in November rather than December, thus reducing the sample from 227 to 15 for no good reason. And while BellSouth acknowledged that four customers lost dial tone as a result of the conversion process, it gave no explanation of what happened, which might have been helpful in improving the situation. Rather, the letter attempts to diminish the problem by comparing the number of cases in which BellSouth found conversion related loss of dial tone to the total number of migration orders MCI submitted for the month.⁷ Since MCI submitted only a portion of the losses of dial tone for a week, and BellSouth considered only a small fraction of that sample, such a comparison is meaningless and indeed misleading. More importantly, BellSouth's attempt to diminish the problem twists what should be a problem resolution process into an advocacy process, which helps no one. As if to highlight this last point, when an MCI representative called BellSouth to talk about the letter (as BellSouth invited MCI to do in the last line of the letter), the MCI representative was told that any questions would have to be submitted in writing.

26. BellSouth has stated that its Single C implementation has required a major effort involving many BellSouth systems. MCI submits that implementation of the Single C process may provide a good test of BellSouth's change management process and encourages the Commission to observe the implementation closely. Because of the significant changes that BellSouth will be making to its internal systems in order to implement the single C order, MCI

⁷ BellSouth even overstated the number of migration orders by about 15%.

also encourages this Commission to request that BellSouth provide CLECs with a complete process overview and internal business rules to explain the changes that will be made with this release. This will give CLECs the tools necessary to understand BellSouth's conversion to this process and anticipate problems so that any consumer impact can be minimized.

Conclusion

27. In this Affidavit I have addressed the areas about which Staff specifically inquired, but I should note that MCI discussed other OSS issues in its Petition and additional issues continue to crop up on a regular basis. MCI appreciates the Commission's effort to address issues that MCI has raised, and continues to believe there are enough issues outstanding that would justify the OSS workshop requested in WorldCom's Petition. It is equally important for the Commission to tackle the process issues that I have raised throughout this affidavit. Until BellSouth improves the way that it deals with CLECs and the inevitable problems that will arise in this technology intensive business, it will be difficult for CLECs to compete successfully with BellSouth over the long haul.