

A. Test Results: Change Management Practices Review (CM-1)

1.0 Description

The objective of the Change Management Practices Review (CM-1) was to evaluate the overall policies and practices for managing changes to the procedures and Operational Support Systems (OSS) necessary for establishing and maintaining effective operations between BellSouth and Competitive Local Exchange Carriers (CLECs). The test also focused on the reasonableness of change intervals and tracking mechanisms. Interviews, reviews of BellSouth's change event notifications, and documentation reviews were conducted, along with observations of change control meetings, to evaluate the change management process.

2.0 Methodology

This section summarizes the test methodology.

2.1 Business Process Description

During the course of this evaluation, BellSouth's change management process underwent multiple changes. A former process for managing change, the *Electronic Interface Change Control Process (EICCP)*¹, was replaced by a revised process, the *Interim Change Control Process* (interim process). BellSouth, with the agreement of some CLECs, formally implemented this interim process on April 17, 2000 for a three-month trial, subject to further modification following the trial period. On August 23, 2000, a majority of CLECs participating in that month's change control status meeting voted to remove this process' "interim" status, thereby changing its title to the *Change Control Process (CCP)*².

On October 17, 2000, BellSouth initiated a series of five full- or half-day CCP "process improvement" meetings with interested CLECs, the last of which was held on February 21, 2001. The purpose of these meetings was to allow BellSouth and CLECs the opportunity to address, through discussion and negotiation, a number of CLEC concerns with the August 23, 2000 baseline CCP. KCI attended each of the five face-to-face meetings as an observer. As of the date of this report, the outcome of these sessions resulted in BellSouth's publishing one formal update to the *Change Control Process* (version 2.1, February 9, 2001), with another version to be issued following CLEC voting on revisions proposed at the final February 21, 2000 meeting.

¹ Published August 14, 1998 and in effect at the outset of this evaluation.

² During the August 2000 BellSouth/CLEC monthly status meeting, BellSouth called for a vote to remove the 'interim' status from the operating change control process. Six of nine CLECs participating on the call voted in favor of the measure, with one later rescinding its favorable vote.

The *Change Control Process* establishes a framework to manage and communicate changes to selected electronic interfaces, associated manual processes, and supporting documentation among BellSouth and CLECs. The *Change Control Process* delineates changes into six types:

- Type 1 - System Outage
- Type 2 - Regulatory Change
- Type 3 - Industry Standard Change
- Type 4 - BellSouth-Initiated Change
- Type 5 - CLEC-Initiated Change
- Type 6 - CLEC Impacting Defects.

Either BellSouth or a CLEC can initiate the change management process by submitting an appropriate change request (CR), classified as one of the six types listed above. Type 1 change requests are used when a system is totally unusable or when existing functionality degrades to the point of disruption of a CLEC's ability to conduct business with BellSouth. Type 2 changes are required to comply with newly passed legislation, regulatory requirements, or court rulings. Type 3 changes are required to bring OSS used between BellSouth and the CLEC community into compliance with new industry standards. Type 4 changes are any that affect the interfaces between CLECs' and BellSouth's OSS, which BellSouth desires to implement on its own accord. Type 5 changes are those that are initiated by a CLEC through the submission of a formal change request to BellSouth. Type 6 changes are defects reported in a production environment that affect CLEC operations, causing deviation from the baseline system parameters, and may require workarounds or clarification. Another classification, Expedited Feature, represents 1) a Type 6 change request that is not validated to be a defect, which is then re-classified as a feature; or 2) a Type 2-5 change request that the CLEC and BellSouth determine should be expedited due to its business impact.

The Change Control Process employs four process flows to differentiate among Type 1, Types 2-5, Type 6, and Expedited Feature change requests. Each process flow features distinct cycle times, accountability, sub-process activities, and inputs/outputs for each step in the process. An escalation process is also in place for each process flow type. BellSouth uses a change request log to track CRs through their life cycle, and as a measurement tool for adherence to prescribed intervals and cycle times. The BellSouth Change Control Manager and staff coordinate all activities within the change control process. Prioritization of candidate change requests for implementation is determined during the Change Review Meetings among BellSouth and CLECs.

Intervals are defined in the Change Control Process for change events including software releases, documentation changes, and documentation updates. Notifications are issued via postings on BellSouth's Interconnection Web site and via email.

2.2 Scenarios

Scenarios were not applicable to this test.

2.3 Test Targets & Measures

The test target was BellSouth's Change Management Process. Sub-processes, functions, evaluation criteria, and associated test cross-reference numbers are summarized in the following table. The last column "Test Cross-Reference" indicates where the particular measures are addressed in section 3.1 "Results & Analysis."

Table VIII-1.1: Test Target Cross-Reference

| Sub-Process | Function | Evaluation Criteria | Test Cross-Reference |
|-------------------|-----------------------------|---|-------------------------------|
| Change Management | Developing Change Proposals | Completeness and consistency of change development process | CM-1-1-1 CM-1-1-2 |
| | Evaluating Change Proposals | Completeness and consistency of change evaluation process | CM-1-1-3 1-1-4 CM-1-1-7 |
| | Implementing Change | Completeness and consistency of change implementation process | CM-1-1-7 |
| | Intervals | Reasonableness of change interval | CM-1-1-5 |
| | Documentation | Timeliness of documentation updates | CM-1-1-6 |
| | Tracking Change Proposals | Adequacy and completeness of change management tracking process | CM-1-1-7 1-1-8 CM- |

2.4 Data Sources

The data collected for the test are summarized in the table below.

Table VIII-1.2: Data Sources for Change Management Practices Review

| Document | File Name | Location in Work Papers | Source |
|--|--------------------|--------------------------------|---------------|
| <i>BellSouth Electronic Interface Change Control Process</i> | No Electronic Copy | CM-1-A-2 | BLS |
| BLS Release Manager Interview Report | No Electronic Copy | CM-1-A-3 | KCI |
| BLS Customer Support Interview Report | No Electronic Copy | CM-1-A-4 | KCI |
| BLS Change Control Manager Interview Report | No Electronic Copy | CM-1-A-5 | KCI |
| BLS Documentation Owners Interview Report | No Electronic Copy | CM-1-A-6 | KCI |
| BLS Systems Architect Interview Report | No Electronic Copy | CM-1-A-7 | KCI |
| BLS External Response Team Interview Report | No Electronic Copy | CM-1-A-8 | KCI |
| BLS Internal Change Process Interview Report | No Electronic Copy | CM-1-A-9 | KCI |
| Change Control Staff Interview Report | No Electronic Copy | CM-1-A-10 | KCI |
| <i>ENCORE Electronic Interface Management Process</i> | No Electronic Copy | CM-1-A-11 | BLS |
| <i>ENCORE Electronic Interface Ordering Procedure</i> | No Electronic Copy | CM-1-A-12 | BLS |
| <i>Feature/Defects Process and States</i> | No Electronic Copy | CM-1-A-13 | BLS |
| <i>Defect Change Management Status</i> | No Electronic Copy | CM-1-A-14 | BLS |
| <i>Feature/Defect Definition</i> | No Electronic Copy | CM-1-A-15 | BLS |
| Electronic Interface Change Control Calendar | No Electronic Copy | CM-1-A-16 | BLS |
| <i>Change Request Log</i> | No Electronic Copy | CM-1-A-17 | BLS |
| Preliminary Priority List 9/28/1999 | No Electronic Copy | CM-1-A-18 | BLS |
| EICCP Steering Committee Meeting Minutes 9/14/1999 | No Electronic Copy | CM-1-A-19 | BLS |
| EICCP Steering Committee Meeting Minutes 9/28/2000 | No Electronic Copy | CM-1-A-20 | BLS |
| EICCP Steering Committee Meeting Minutes 11/30/1999 | No Electronic Copy | CM-1-A-21 | BLS |
| EICCP Steering Committee Meeting Minutes 1/26/2000 | No Electronic Copy | CM-1-A-22 | BLS |

| Document | File Name | Location in Work Papers | Source |
|---|--------------------|-------------------------|--------|
| EICCP Steering Committee Meeting Minutes 2/29/2000 | No Electronic Copy | CM-1-A-23 | BLS |
| Steering Committee Re-schedule Email Notice 3/21/2000 | No Electronic Copy | CM-1-A-24 | BLS |
| Meeting Email Notice For Developing Requirements Related To Ordering xDSL Loops | No Electronic Copy | CM-1-A-25 | BLS |
| RPM Meeting Re-schedule Email Notice For 11/16/1999 | No Electronic Copy | CM-1-B-1 | BLS |
| EICCP Meeting Email Notice For 10/21/1999 and 12/9/1999 | No Electronic Copy | CM-1-B-2 | BLS |
| Steering Committee Member List | No Electronic Copy | CM-1-B-3 | BLS |
| Enhancement Review Meeting Notice and Agenda For 9/28/1999 | No Electronic Copy | CM-1-B-4 | BLS |
| EICCP Steering Committee Meeting Notice and Agenda For 1/26/2000 | No Electronic Copy | CM-1-B-5 | BLS |
| BLS/CLEC Conference Call Email Notice For Upcoming Changes | No Electronic Copy | CM-1-B-6 | BLS |
| Defect Email Notice Update | No Electronic Copy | CM-1-B-7 | BLS |
| Carrier Notification Letters 1999 | No Electronic Copy | CM-1-B-8 | KCI |
| Carrier Notification Letters 2000 | No Electronic Copy | CM-1-B-9 | KCI |
| Carrier Notification Interval Table | No Electronic Copy | CM-1-B-10 | KCI |
| Customer Guide Interval Table | No Electronic Copy | CM-1-B-11 | KCI |
| TAG Guide Interval Table | No Electronic Copy | CM-1-B-12 | KCI |
| <i>Change Control Log</i> (March 2000) | No Electronic Copy | CM-1-B-13 | BLS |
| <i>Change Control Log</i> (April 2000) | No Electronic Copy | CM-1-B-14 | BLS |
| <i>Interim Change Control Process</i> , Version 1.5, April 26, 2000 | No Electronic Copy | CM-1-B-15 | BLS |

| Document | File Name | Location in Work Papers | Source |
|--|--------------------|-------------------------|--------|
| Interview Report: BellSouth Change Control Manager: May 17, 2000 | No Electronic Copy | CM-1-B-16 | KCI |
| Change Control Process Monthly Status Meeting Minutes: April 26, 2000 | No Electronic Copy | CM-1-B-17 | BLS |
| Change Control Process Monthly Status Meeting Minutes: May 24, 2000 | No Electronic Copy | CM-1-B-18 | BLS |
| <i>Change Request Log</i> (May 2000) | No Electronic Copy | CM-1-B-19 | BLS |
| Draft: <i>Expedited Feature Process</i> : 5/30/00 | No Electronic Copy | CM-1-B-20 | BLS |
| BLS Documentation Process and <i>Documentation Quality Control Checklist</i> | No Electronic Copy | CM-1-B-21 | BLS |
| <i>Change Request Log</i> (June 2000) | No Electronic Copy | CM-1-B-22 | BLS |
| Interview Report: BellSouth Documentation Process: June 21, 2000 | No Electronic Copy | CM-1-B-23 | KCI |
| Change Control Process Monthly Status Meeting Minutes: June 26, 2000 | No Electronic Copy | CM-1-B-24 | BLS |
| June 28, 2000 Change Review Meeting Agenda | No Electronic Copy | CM-1-B-25 | BLS |
| June 28, 2000 Change Review Meeting Minutes | No Electronic Copy | CM-1-C-1 | BLS |
| Notification of and materials for Conference Call on Expedited Feature Process | No Electronic Copy | CM-1-C-2 | BLS |
| Monthly Status Meeting Agenda: July 26, 2000 | No Electronic Copy | CM-1-C-3 | BLS |
| <i>Change Request Log</i> (July 2000) | No Electronic Copy | CM-1-C-4 | BLS |
| <i>Interim Change Control Process</i> and appendices showing BLS-proposed changes. July 20, 2000 version 1.6 | No Electronic Copy | CM-1-C-5 | BLS |
| Monthly Status Meeting Agenda: August 23, 2000 | No Electronic Copy | CM-1-C-6 | BLS |

| Document | File Name | Location in Work Papers | Source |
|--|--------------------|-------------------------|--------|
| Monthly Status Meeting Minutes: July 26, 2000 | No Electronic Copy | CM-1-C-7 | BLS |
| Tentative Change Control 2000 Release Schedule | No Electronic Copy | CM-1-C-8 | BLS |
| September 27, 2000 Tentative Change Review Meeting Agenda | No Electronic Copy | CM-1-C-9 | BLS |
| Materials Related to Exception 2 | No Electronic Copy | CM-1-C-10 | KCI |
| Materials Related to Exception 17 | No Electronic Copy | CM-1-C-11 | KCI |
| Materials Related to Exception 30 | No Electronic Copy | CM-1-C-12 | KCI |
| Materials Related to Observation 64 | No Electronic Copy | CM-1-C-13 | KCI |
| <i>Change Request Log</i> (August 2000) | No Electronic Copy | CM-1-C-14 | BLS |
| Draft: Defect/Expedite Notification Process | No Electronic Copy | CM-1-C-15 | BLS |
| Monthly Status Meeting Minutes: August 23, 2000 | No Electronic Copy | CM-1-C-16 | BLS |
| Notice of Reduction in Interval for High Impact Defects | No Electronic Copy | CM-1-C-17 | BLS |
| Notice from Sprint on August 23, 2000 vote | No Electronic Copy | CM-1-C-18 | KCI |
| Notice from Rhythms and BLS response on August 23, 2000 vote | No Electronic Copy | CM-1-C-19 | KCI |
| Notice from MCI WorldCom on August 23, 2000 vote | No Electronic Copy | CM-1-C-20 | KCI |
| Materials from BLS to GPSC related to August 23, 2000 vote | No Electronic Copy | CM-1-C-21 | BLS |
| Notice of change in 2 nd Level Escalations within BLS | No Electronic Copy | CM-1-C-22 | BLS |
| <i>Change Control Process</i> , Version 2.0, August 23, 2000 | No Electronic Copy | CM-1-C-23 | BLS |
| Notification of conference call for Proposed Release 8.0 and 8.1 scope | No Electronic Copy | CM-1-C-24 | BLS |

| Document | File Name | Location in Work Papers | Source |
|--|--------------------|-------------------------|--------|
| Meeting Minutes: Release 8.0 Package Meeting: September 18, 2000 | No Electronic Copy | CM-1-C-25 | BLS |
| Notice from AT&T regarding BLS's issuance of BellSouth Business Rules for Local Ordering, Issue 9G; includes BLS's response | No Electronic Copy | CM-1-D-1 | KCI |
| Notification of conference call and Targeted Releases 8.0, 8.1, 9.0, and 10.0 scope | No Electronic Copy | CM-1-D-2 | BLS |
| September 27, 2000 Change Review Meeting agenda and Release Management Status documents | No Electronic Copy | CM-1-D-3 | BLS |
| <i>Change Request Log</i> (September 2000) | No Electronic Copy | CM-1-D-4 | BLS |
| Revised 9/27/00 Change Review Meeting Pending Change Requests to be Prioritized | No Electronic Copy | CM-1-D-5 | BLS |
| Conference Call Minutes: Release 8.0: September 22, 2000 | No Electronic Copy | CM-1-D-6 | BLS |
| BLS notice of proposed meeting to address Change Control Process improvements | No Electronic Copy | CM-1-D-7 | BLS |
| Meeting Minutes: September 27, 2000 Change Review Meeting | No Electronic Copy | CM-1-D-8 | BLS |
| BLS Notice of CCP Process Improvement Meeting: October 17, 2000; and major topics for discussion | No Electronic Copy | CM-1-D-9 | BLS |
| BLS notice of Release 8.0 User Requirements conference call | No Electronic Copy | CM-1-D-10 | BLS |
| CCP Process Improvement Meeting Agenda: October 17, 2000; and AT&T's suggested changes to the <i>Change Control Process</i> document | No Electronic Copy | CM-1-D-11 | BLS |

| Document | File Name | Location in Work Papers | Source |
|--|--------------------|-------------------------|--------|
| BLS notice of change to scope of Release 8.0 | No Electronic Copy | CM-1-D-12 | BLS |
| Meeting Minutes: Release 8.0 Requirements Review: October 12, 2000 | No Electronic Copy | CM-1-D-13 | BLS |
| Monthly Status Meeting agenda: October 25, 2000 | No Electronic Copy | CM-1-D-14 | BLS |
| BLS Release Management Status document | No Electronic Copy | CM-1-D-15 | BLS |
| <i>Change Request Log</i> (October 2000) | No Electronic Copy | CM-1-D-16 | KCI |
| Meeting Minutes: CCP Monthly Status Meeting: October 25, 2000 | No Electronic Copy | CM-1-D-17 | BLS |
| BLS notice of CLEC Test Environment conference call and corresponding Overview | No Electronic Copy | CM-1-D-18 | BLS |
| BLS notice of second CCP Process Improvement Meeting: November 1, 2000; and agenda | No Electronic Copy | CM-1-D-19 | BLS |
| Materials related to Observation 88 | No Electronic Copy | CM-1-D-20 | KCI |
| Meeting Minutes: CLEC Test Environment: October 31, 2000 | No Electronic Copy | CM-1-D-21 | BLS |
| Meeting Minutes: CCP Process Improvement Meeting: November 1, 2000 | No Electronic Copy | CM-1-D-22 | BLS |
| “Matrix” documentation format example from Telcordia | No Electronic Copy | CM-1-D-23 | BLS |
| Meeting Minutes: Change Control Process Review Meeting (CLEC organized) and AT&T’s revised suggested changes to the <i>Change Control Process</i> document | No Electronic Copy | CM-1-D-24 | BLS |
| CLEC Test Environment – Timeline and dialogue from Albion Connect, Inc. | No Electronic Copy | CM-1-D-25 | BLS |

| Document | File Name | Location in Work Papers | Source |
|---|--------------------|-------------------------|--------|
| BLS notice of Release 9.0 User Requirements conference call: November 13, 2000 | No Electronic Copy | CM-1-E-1 | BLS |
| Monthly Status Meeting agenda: November 15, 2000 | No Electronic Copy | CM-1-E-2 | BLS |
| BLS notice regarding expedited CR#EDI020900_001 to be included in Release 8.0 | No Electronic Copy | CM-1-E-3 | BLS |
| BLS notice regarding implementation date change for CLEC test environment | No Electronic Copy | CM-1-E-4 | BLS |
| Revised agenda and materials for Monthly Status Meeting: November 15, 2000 | No Electronic Copy | CM-1-E-5 | BLS |
| <i>Change Request Log</i> (November 2000) | No Electronic Copy | CM-1-E-6 | BLS |
| BLS notice of third CCP Process Improvement Meeting: December 7, 2000; and tentative agenda | No Electronic Copy | CM-1-E-7 | BLS |
| Meeting Minutes: November 13, 2000 Release 9.0 User Requirements | No Electronic Copy | CM-1-E-8 | BLS |
| Meeting Minutes: November 15, 2000 CCP Monthly Status | No Electronic Copy | CM-1-E-9 | BLS |
| Agenda for CCP Process Improvement Meeting: December 7, 2000 | No Electronic Copy | CM-1-E-10 | BLS |
| CLEC notification of delay of Release 8.0.1 | No Electronic Copy | CM-1-E-11 | BLS |
| CLEC notification of Release 8.0.2 scheduled for 12/9/00 | No Electronic Copy | CM-1-E-12 | BLS |
| Revised 12/7/00 CCP Process Improvement Meeting agenda | No Electronic Copy | CM-1-E-13 | BLS |
| CLEC notification of delay of Release 8.0.2 | No Electronic Copy | CM-1-E-14 | BLS |
| Monthly Status Meeting agenda and materials: December 13, 2000 | No Electronic Copy | CM-1-E-15 | BLS |

| Document | File Name | Location in Work Papers | Source |
|---|--------------------|-------------------------|--------|
| <i>Change Request Log</i> (December 2000) | No Electronic Copy | CM-1-E-16 | BLS |
| CLEC notification of Parsed CSR conference call: 1/18/01 | No Electronic Copy | CM-1-E-17 | BLS |
| Meeting Minutes: 12/7/00 CCP Process Improvement meeting | No Electronic Copy | CM-1-E-18 | BLS |
| Meeting Minutes: CCP Monthly Status Meeting: December 13, 2000 | No Electronic Copy | CM-1-E-19 | BLS |
| 12/18/00 Advance copy to CLECs of revision history for <i>BellSouth Business Rules for Local Ordering, Issue 9K</i> | No Electronic Copy | CM-1-E-20 | BLS |
| 1/10/01 CCP Process Improvement Meeting agenda | No Electronic Copy | CM-1-E-21 | BLS |
| BLS Notification of and User Requirements for CLEC Test Bed conference call | No Electronic Copy | CM-1-E-22 | BLS |
| BLS proposed changes to Defect Section of <i>CCP</i> document | No Electronic Copy | CM-1-E-23 | BLS |
| CLEC Test Bed Issue Log for 1/17/01 conference call | No Electronic Copy | CM-1-E-24 | BLS |
| Tentative Agenda for 1/31/01 Change Review Meeting | No Electronic Copy | CM-1-E-25 | BLS |
| Notification of 1/18/01 CLEC Test Bed User Requirements Meeting | No Electronic Copy | CM-1-E-26 | BLS |
| Notification of 1/25/01 User Requirements Meeting – Enhancements to Mechanization of Loop Makeup (CR0279) | No Electronic Copy | CM-1-E-27 | BLS |
| BLS Change Control Process Document Consensus Voting Ballot | No Electronic Copy | CM-1-E-28 | BLS |
| 1/18/01 AT&T email to CLEC community with Information on CCP Document Ballot | No Electronic Copy | CM-1-E-29 | BLS |

| Document | File Name | Location in Work Papers | Source |
|---|--------------------|-------------------------|--------|
| “Revised” BLS Change Control Process Document Consensus Voting Ballot | No Electronic Copy | CM-1-E-30 | BLS |
| Meeting Minutes and Original Change Request Related to Parsed CSR | No Electronic Copy | CM-1-E-31 | BLS |
| 1/22/01 AT&T email to CLEC Community with Information on CCP Document Ballot | No Electronic Copy | CM-1-E-32 | BLS |
| Meeting Minutes From 1/17/01 and 1/18/01 CLEC Test Environment Meeting | No Electronic Copy | CM-1-E-33 | BLS |
| Notification of 1/31/01 Change Review Meeting | No Electronic Copy | CM-1-E-34 | BLS |
| <i>Change Request Log</i> (January 2001) | No Electronic Copy | CM-1-E-35 | BLS |
| Updated 1/31/01 Change Review Request List and Log | No Electronic Copy | CM-1-E-36 | BLS |
| Revised Pending Change Request List for 1/31/01 Meeting | No Electronic Copy | CM-1-E-37 | BLS |
| Meeting Minutes From 1/10/01 CCP Process Improvement Meeting | No Electronic Copy | CM-1-E-38 | BLS |
| <i>Change Control Process</i> , Working Document, December 5, 2000, V.2.0 | No Electronic Copy | CM-1-E-39 | BLS |
| Change Control Process Improvement Meeting- January 10, 2001 CLEC Ballot Voting Results | No Electronic Copy | CM-1-E-40 | BLS |
| January 25, 2001 Enhancements to Mechanization of Loop Makeup User Requirements Meeting Minutes | No Electronic Copy | CM-1-E-41 | BLS |
| January 31, 2000 Change Review Meeting, Final Ranking Tally | No Electronic Copy | CM-1-E-42 | BLS |

| Document | File Name | Location in Work Papers | Source |
|--|--------------------|-------------------------|--------|
| January 31, 2001 Change Review & Monthly Status Meeting Meeting Minutes | No Electronic Copy | CM-1-E-43 | BLS |
| January 31, 2001 Change Review Meeting Information Package | No Electronic Copy | CM-1-E-44 | BLS |
| CLEC Documentation Meeting Minutes, February 1, 2001 | No Electronic Copy | CM-1-F-1 | BLS |
| BellSouth <i>Change Control Process</i> , V.2.1, February 1, 2001, reflecting Process Improvement Meeting Voting Results | No Electronic Copy | CM-1-F-2 | BLS |
| AT&T's February 11, 2001 E-Mail to CLECs and BellSouth Change Control Suggesting Revision to Minutes of January 10, 2001 Process Improvement Meeting | No Electronic Copy | CM-1-F-3 | AT&T |
| February 13, 2001 Notice of Formation of Flow Through Improvement Task Force | No Electronic Copy | CM-1-F-4 | BLS |
| BellSouth's February 13, 2001 Response to AT&T's February 11, 2001 e-mail regarding January 10, 2001 meeting minutes, including amended minutes | No Electronic Copy | CM-1-F-5 | BLS |
| <i>Change Control Process</i> , Working Document, February 16, 2001, V.2.1 | No Electronic Copy | CM-1-F-6 | BLS |
| <i>Change Control Process</i> , V.2.1.A, February 16, 2001 | No Electronic Copy | CM-1-F-7 | BLS |
| BellSouth's February 20, 2001 Response to AT&T Regarding Questions on CCP Document V.2.1.A | No Electronic Copy | CM-1-F-8 | BLS |
| BellSouth's February 20, 2001 e-mail to CLECs providing clarification on February 16, 2001 version of <i>Change Control Process</i> | No Electronic Copy | CM-1-F-9 | BLS |

| Document | File Name | Location in Work Papers | Source |
|--|--------------------|-------------------------|--------|
| BellSouth Proposed Subteam Notice | No Electronic Copy | CM-1-F-10 | BLS |
| Materials related to Observation 99 | No Electronic Copy | CM-1-F-11 | BLS |
| BellSouth Draft of Release Management Process- February 21, 2001 | No Electronic Copy | CM-1-F-12 | BLS |
| February 21, 2001 Meeting Minutes and CLEC Voting Ballot | No Electronic Copy | CM-1-F-13 | BLS |
| February 21, 2001 CCP Process Improvement Meeting Agenda | No Electronic Copy | CM-1-F-14 | BLS |
| Notification of February 21, 2001 CCP Process Improvement Meeting | No Electronic Copy | CM-1-F-15 | BLS |
| BellSouth- and CLEC- Proposed Revisions of Section 9.0 of CCP Document | No Electronic Copy | CM-1-F-16 | BLS |
| BellSouth Notice of Re-Scheduling of Release 10.0 Package Meeting | No Electronic Copy | CM-1-F-17 | BLS |
| Monthly Status Meeting Agenda, February 28, 2001 | No Electronic Copy | CM-1-F-18 | BLS |
| Materials and Agenda for February 28, 2001 Monthly Status Meeting | No Electronic Copy | CM-1-F-19 | BLS |
| February 28, 2001 Monthly Status Meeting Meeting Minutes | No Electronic Copy | CM-1-F-20 | BLS |
| <i>Change Request Log (February 2001)</i> | No Electronic Copy | CM-1-F-21 | BLS |
| Agenda for March 14, 2001 Release 9.4 Package Meeting and Revised Release Management Process Draft | No Electronic Copy | CM-1-F-22 | BLS |

2.4.1 Data Generation/Volumes

This test relied on review of BellSouth documentation, interviews with BellSouth personnel, and observations of change control meetings.

2.5 Evaluation Methods

The Change Management Practices Review began with a review of BellSouth's *EICCP*³, associated change control documentation, and established process flows. Interviews were conducted with personnel responsible for BellSouth-CLEC change management, release management, documentation, Carrier Notifications (CNs), and systems and processes for BellSouth internal change management. Following BellSouth's introduction of the revised *Interim Change Control Process* and subsequent *Change Control Process*, KCI executed re-testing activities that included additional interviews, documentation reviews, and observation of BellSouth-CLEC change control meetings. These activities were supplemented with a review of BellSouth's applicable change notification Web site for change event postings.

2.6 Analysis Methods

The Change Management Practices Review included a checklist of evaluation criteria developed by KCI during the initial phase of the BellSouth - Georgia OSS Evaluation. These evaluation criteria provided the framework of norms, standards, and guidelines for the Change Management Practices Review.

The data collected were analyzed employing the evaluation criteria referenced above.

3.0 Results Summary

This section identifies the evaluation criteria and test results.

3.1 Results & Analysis

The results of this test are presented in the table below. Definitions of evaluation criteria, possible results, and exceptions are provided in Section II.

Table VIII-1.3: Evaluation Criteria and Results

| Test Cross-Reference | Evaluation Criteria | Result | Comments |
|----------------------|--|-----------|--|
| CM-1-1-1 | Change management process responsibilities and activities are clearly defined. | Satisfied | KCI's initial review of BLS's <i>EICCP</i> process demonstrated that change management process responsibilities and activities were clearly defined within its limited scope. The <i>Change Control Process</i> , the development of which was initiated at a two-day BLS-CLEC workshop in February |

³ See footnote 1.

| Test Cross-Reference | Evaluation Criteria | Result | Comments |
|----------------------|---|-----------|---|
| | | | <p>2000, encompasses a broader scope, and clearly defines respective BLS and CLEC change control responsibilities and activities.</p> <p>As part of BLS's revised process, BLS increased its Change Control staff to better manage and execute change control responsibilities, and to enhance the effectiveness of the process. As compared to the staffing associated with the <i>EICCP</i>, BLS change control staffing under the revised process has been increased from one part-time BLS Change Control Manager (BCCM) to a full time staff of four, including a Director. The process also includes provisions for a defined three-level escalation process, as well as a dispute resolution process, to resolve BLS-CLEC conflicts and/or issues. During the course of KCI's evaluation, the escalation process was formally utilized by CLECs nine times. The formal dispute resolution process was not employed during KCI's evaluation period.</p> |
| CM-1-1-2 | Essential elements of the change management process are in place and adequately documented. | Satisfied | <p>The <i>Change Control Process</i> documentation describes the steps in the change management process, including how changes are initiated, evaluated, and implemented.</p> <p>During initial testing of BLS's <i>EICCP</i>, deficiencies were noted. Specifically, the scope of the <i>EICCP</i> process included change requests only for enhancements (to features) that affect users of BLS's electronic interface applications. Change requests for defects and for associated manual processes were excluded from the process.</p> <p>BLS's <i>Change Control Process</i> addresses these deficiencies by delineating change requests into six types, including a category for defects. The process expressly incorporates manual processes that have the potential to impact electronic interfaces. The process also requires the use of the change control process for BLS-</p> |

| Test Cross-Reference | Evaluation Criteria | Result | Comments |
|----------------------|---------------------|--------|---|
| | | | <p>initiated changes.</p> <p>On May 30, 2000 BLS proposed a process for “expedited feature” change requests for those cases in which a claimed defect is not validated to be such, yet requires expedited handling. This initial draft process was later modified via the BLS-CLEC change control process improvement meetings, and formally incorporated into the <i>Change Control Process</i> document (version 2.1, February 9, 2001).</p> <p>In September 2000 KCI identified a discrepancy in BLS’s adherence to the documented <i>CCP</i>, as it issued an updated version of the <i>BellSouth Business Rules for Local Ordering</i> (BBR-LO), Issue 9G, without issuing a BLS-initiated change request. In response, BLS enhanced its internal process to ensure that BLS-identified documentation defects follow the stated change control process. KCI re-testing confirmed that BLS issued a Type 6 change request (CR159) and followed the corresponding process for documentation defect corrections that appeared in a subsequent version, BBR-LO, Issue 9H.</p> <p>In February 2001 KCI identified an additional discrepancy in BLS’s adherence to the documented <i>CCP</i>. BLS did not consistently provide email notification to CLECs for Type 1 system outages during the period September 2000 – January 2001.</p> <p>In response, BLS implemented corrective actions to ensure its compliance with Type 1 system outage notification that included: 1) placing administrative duties for this process with a single member of the responsible organization; 2) providing a template of necessary information to be contained in email notifications to the responsible party; 3) enhancing the process for reporting and accountability to BLS management for activities related to this process; and 4) identifying a revised policy for the resending of email</p> |

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| | | | notifications for which delivery failure occurs. |

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| CM-1-1-3 | Change management process has a framework to evaluate, categorize, and prioritize proposed changes. | Satisfied | <p>BLS's <i>Change Control Process</i> categorizes change requests into six types. Process flow steps for evaluating and prioritizing change requests are detailed in the process document. These activities include CLECs' preliminary prioritization and final prioritization, both of which occur in conjunction with the BLS/CLEC Change Review meeting. KCI observed the BLS-CLEC June 28, 2000 Change Review meeting and identified as a deficiency the absence of BLS subject matter experts (SMEs) at this session. Participation by SMEs to present BLS-initiated change requests and to answer CLECs' technical questions would have improved the effectiveness of the meeting. BLS subsequently agreed to ensure appropriate SME participation in future Change Review Meetings.</p> <p>KCI then observed the BLS-CLEC September 27, 2000 and January 31, 2001 Change Review Meetings, at which the appropriate BLS SMEs were present. Their participation allowed for effective, informative meetings.</p> <p>The number of CLECs participating in the change control process increased during the course of this evaluation, as did the number of discrete change requests submitted by all participants. This quantity increase resulted in a backlog of "candidate" change requests that, at the time of this report, were prioritized but unscheduled for implementation into a release. Substantial discussion was devoted to the resolution of this issue at many of the BLS-CLEC CCP Process Improvement and Change Review meetings.</p> <p>At the January 31, 2001 Change Review Meeting, CLECs again expressed concern over the amount of time required for implementation of work requests (change requests).</p> <p>BLS asked the CLECs to make a</p> |

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| | | | <p>recommendation, by consensus, on a method by which to manage the priority of those work requests that were previously prioritized, but not yet targeted for a specific release.</p> <p>CLEC recommendations included:</p> <ul style="list-style-type: none"> • Prioritization of 1/31/01 pending CRs, as planned, at that meeting. • At the March 2001 Change Review Meeting, for any CRs not scheduled for a release, BLS should provide a comparison of work hours required for each, and the available hours of programming time for upcoming releases. • BLS should provide the sizing of all CRs (including old CRs) for which scheduling into a release had not occurred, sizing for the scheduled CRs, and the amount of capacity that would be available after regulatory mandates were scheduled for implementation. • At each quarterly Change Review meeting, those CRs that had not yet been scheduled for a release would be re-prioritized. <p>At the February 21, 2001 CCP Improvement Meeting, further discussion on this topic and these recommendations took place. As an outcome, the following items were added to a CLEC-BLS voting ballot as “meeting consensus” (no major objection from either BLS or participating CLECs) items for incorporation as potential documented changes to the <i>Change Control Process</i>, subject to the results of a formal vote:</p> <ul style="list-style-type: none"> • [BLS will] provide preliminary size and scope information on each pending change request to CLECs (with note that an outstanding action item exists to further define the characteristics of the sizing metric). • Non-scheduled changes will be combined with new pending requests and re-ranked quarterly to ensure a |

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| | | | <p>current list of priorities is always available. All change requests [will be] considered for every release.</p> <p>KCI's change management evaluation concluded prior to CLEC-BLS voting on these balloted items.</p> |
| CM-1-1-4 | The change management process includes procedures for allowing input from all interested parties. | Satisfied | <p>As described in the <i>Change Control Process</i>, interested parties are offered the opportunity to provide comments and points on change requests at both Change Review Meetings and during Monthly Status Meetings.</p> <p>In addition, BLS facilitated a series of five CCP Process Improvement meetings with CLECs beginning in October 2000 and concluding in February 2001 to address CLEC-proposed changes to the then current CCP. As input, in November 2000, the CLECs presented a collaborative request for CR171, which was originally submitted by one CLEC. BLS provided its responses to these proposed changes in December 2000. CCP Process Improvement meetings were used to discuss, and ultimately vote on, proposed changes.</p> |
| CM-1-1-5 | The change management process has clearly defined and reasonable intervals for considering and notifying customers about proposed changes. | Satisfied | <p>During initial testing, KCI determined that BLS's change management process did not include clearly defined and published notification intervals. As a result of this issue, KCI issued Exception 2.</p> <p>Re-testing activities, focused on the <i>Change Control Process</i>, found that the revised process includes defined and published notification intervals for software releases, documentation changes, and documentation updates. However, the stated 30-day notification interval applicable specifically to software releases maybe insufficient for CLEC coding and associated release preparation. As an example, CLEC systems preparation for a BLS introduction of an entirely new interface/software capability may require more than 30 days time. This issue may be potentially mitigated by the fact that BLS provides 1) an opportunity for some CLEC</p> |

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| | | | <p>participation in beta testing for a new interface, as described in the CCP, Section 10.0, and 2) an interface retirement process whereby a previous version operates in parallel with a new interface for a specified period of time.</p> <p>At the February 21, 2001 process improvement meeting BLS presented CLECs with a proposed revised release management schedule for multiple types of releases (industry major, major, minor) that, if adopted, would significantly expand advance distribution of user requirements and notification to CLECs for each release type. As this draft process was not implemented at the time of this report, no observation of its use was possible during KCI's evaluation.</p> <p>See Exception 2 for additional information on this issue. Exception 2 is closed.</p> |
| CM-1-1-6 | Documentation regarding proposed changes is distributed on a timely basis. | Satisfied | <p>Initially, documentation regarding proposed changes had not been provided to CLECs on a timely and consistent basis. An initial assessment of BLS's actual change event notification history for the period September 9, 1999 through April 21, 2000 revealed inadequate and highly variable notification intervals. This assessment also demonstrated numerous instances of the absence of notification in advance of change events, as well as errors in the Web site posting process. As a result of these errors, KCI issued Exception 17.</p> <p>KCI's monitoring of BLS's change event notification history for the period April 24, 2000 – February 28, 2001 revealed significant improvement in BLS's record for Web postings. BLS also enhanced its notification process by providing Carrier Notifications, in advance of their Web posting, to the change control distribution list via email.</p> <p>BLS developed a revised internal process to avoid defects in postings to the Interconnection Web site. Based on the May 31, 2000 implementation of this</p> |

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| | | | revised process, and on the improved demonstrated accuracy of Web site postings, KCI closed Exception 17. See Exception 17 for additional information on this issue. |
| CM-1-1-7 | Procedures and systems are in place to track information such as descriptions of proposed changes, key notification dates, and change status. | Satisfied | <p>During initial testing, KCI determined that BLS tracking procedures were not adequate. Specifically, no comprehensive mechanism existed for tracking and managing change requests. As a result of these issues, KCI issued Exception 30.</p> <p>As part of the <i>Change Control Process</i>, BLS revised its Change Request Log (beginning in March 2000) to track intervals and provide the ability to determine the status of a discrete change request in the process flow. Key steps of the process flow for change requests, along with 'commit' and 'actual' dates for these events are included in the revised Log.</p> <p>At the request of CLECs participating in Change Review, Monthly Status, and process improvement meetings, BLS amended the Change Request Log multiple times to include additional CLEC-desired information.</p> <p>This mechanism allows the BLS change control staff to verify that the process is in compliance with established cycle times and notification intervals for each request. Exception 30 is closed. See Exception 30 for additional information on this issue.</p> |
| CM-1-1-8 | Criteria are defined for the prioritization system and for severity coding. | Satisfied | <p>BLS's <i>Change Control Process</i> describes a prioritization system for Type 2-5 change requests. CLECs participate in this prioritization process through a system of voting on candidate requests to generate both a Preliminary Priority List and a Final Priority List.</p> <p>BLS differentiates Types 1 (system outages) from Type 6 (defect) change requests. This separation reflects the differing severity levels that exist between the two types, as all system outages are highest priority emergencies. A defect is assigned one of</p> |

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| | | | three impact levels (high, medium, or low) by the originator of a Type 6 change request, who has the ability to assess its impact and indicate such at the time the request is made. A separate Expedited Feature process allows participants to request expedited implementation of features with significant business impact. |