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VIA HAND DELIVERY

July 17, 1997

Ms. Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Re: Docket No. 960786-TL Consideration of BellSouth
Telecommunications, Inc.'s entry into InterLATA
services pursuant to Section 271 of the Federal
Telecommunications Act of 1996.

Dear Ms. Bayo:

Please find enclosed for filing, an original and fifteen
copies of the Direct Testimony of Melissa L. Closz filed on
behalf of Sprint Communications Company Limited Partnership
and Sprint Metropolitan Networks Inc. in the above
proceeding.

Please acknowledge receipt and filing of the above by
stamping the duplicate copy of this letter and returning the
same to this writer.

ACK Thank you for your assistance in this matter.

AFA

APP Sincerely,

CAF
CMU *Green Sandy Khayree*

CTR Benjamin W. Fincher

ENC

INT BWF/th

5t01g
cc: Parties of Record
C. Everett Boyd

Enclosures

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION
DOCKET 960786-TL
SPRINT COMMUNICATIONS COMPANY LIMITED PARTNERSHIP
SPRINT METROPOLITAN NETWORKS, INC.
DIRECT TESTIMONY OF MELISSA L. CLOSZ

JULY 17, 1997

Q. PLEASE STATE YOUR NAME AND ADDRESS.

**A. My name is Melissa L. Cloz. My business address is 151 Southall Lane, Maitland,
Florida 32751.**

Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?

**A. I am employed by Sprint Communications Company Limited Partnership ("Sprint") as
Director- Local Market Development.**

Q. ON WHOSE BEHALF ARE YOU TESTIFYING?

**A. I am testifying on behalf of Sprint Communications Company Limited Partnership
("Sprint") and Sprint Metropolitan Networks, Inc ("SMNI").**

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1 Q. PLEASE EXPLAIN THE RELATIONSHIP BETWEEN SPRINT
2 COMMUNICATIONS COMPANY LIMITED PARTNERSHIP AND SPRINT
3 METROPOLITAN NETWORKS, INC.

4

5 A. Sprint Communications Company Limited Partnership is a Delaware Limited
6 Partnership. The partners are subsidiaries of Sprint Corporation. Sprint Metropolitan
7 Networks is a subsidiary of Sprint Corporation.

8

9

10 Q. PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND AND WORK
11 EXPERIENCE.

12

13 A. I have a Master of Business Administration degree from Georgia State University in
14 Atlanta, Georgia and a Bachelor of Business Administration degree from Texas
15 Christian University in Fort Worth, Texas. I have been employed by Sprint for over
16 six years and have been in my current position since February, 1997. Previous
17 positions within the Local Telecommunications Division of Sprint include General
18 Manager of Sprint Metropolitan Networks, Carrier Markets Manager of Sales and
19 Technical Support and General Manager of United Telephone Long Distance- Florida.
20 Within Sprint's Long Distance Division, I served as Group Manager- Market
21 Management and Customer Support for the Intermediaries Marketing Group. Prior to
22 joining Sprint, I was employed by AT&T for five years in various sales and sales

1 management positions within their long distance division. I also owned and operated a
2 consumer marketing business for two years.

3

4 Q. WHAT ARE YOUR PRESENT RESPONSIBILITIES?

5

6 A. My present responsibilities include representation of Sprint and SMNI in
7 interconnection negotiations with BellSouth Telecommunications, Inc. ("BellSouth").
8 In addition, I am responsible for coordinating Sprint's entry into the local markets
9 within BellSouth's states. I also interface with BellSouth's account team supporting
10 Sprint to communicate SMNI's service and operational issues and requirements.

11

12

13 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

14

15 A. The purpose of my testimony is to address issues relevant to the Commission's review
16 of BellSouth Telecommunications, Inc.'s entry into interLATA services pursuant to
17 Section 271 of the Telecommunications Act of 1996 and Docket 960786-TL.

18

19 Q. WHAT IS THE IMPORTANCE OF THIS DOCKET TO SPRINT AND SMNI?

20

21 Sprint is a certificated interexchange carrier providing long distance
22 telecommunications services within Florida. Sprint and SMNI are both certificated as
23 Alternative Local Exchange Companies (ALECs) in Florida. Sprint has also finalized

1 its interconnection agreement with BellSouth in Florida. That agreement is currently
2 pending Commission approval. SMNI's agreement with BellSouth is also on file with
3 the FPSC. Moreover, Sprint is in the process of finalizing negotiations in all other
4 states in which BellSouth operates as an Incumbent Local Exchange Company (ILEC).
5 In addition, SMNI has been operating as an ALEC in BellSouth franchise territory in
6 Orlando, Florida, since March, 1996. Accordingly, Sprint has first hand experience
7 with issues relevant to this docket.

8

9 Q. DOES YOUR TESTIMONY ALSO ADDRESS ISSUES GERMANE TO THE
10 COMMISSION'S ASSESSMENT OF BELL SOUTH'S STATEMENT OF
11 GENERALLY AVAILABLE TERMS AND CONDITIONS ("SGAT") UNDER
12 SECTION 252 (f) OF THE ACT?

13

14 A. Yes. The portions of my testimony which discuss interconnection implementation
15 concerns and operational readiness affect a new entrant's ability to offer competitive
16 services. Therefore, a discussion of BellSouth's checklist compliance under Section
17 271 of the Act also apply to an examination of the SGAT under Section 252(f) since
18 new entrants would be able to obtain interconnection services through the SCAT. I
19 am not an attorney and I am not here to offer legal analysis, but it seems clear from an
20 operational standpoint that the same standards, the interconnection requirements
21 found in Section 251 and the requirements of cost-based rates in Section 252(d), apply
22 to both the 271 checklist analysis and the 252(f) analysis.

1 Q. WHAT ISSUES WOULD YOU LIKE TO ADDRESS?

2

3 A. I would like to address Issues 3 and 3(a) as identified by the Commission in its
4 “Tentative Issues List.” Specifically, I will address three aspects of Issue 3 and 3(a).
5 They are Operational Support Systems (“OSS”), BellSouth’s proposed performance
6 measurements, and performance issues relevant to SMNI’s experience as an ALEC in
7 Florida.

8

9 Q. WHAT IS THE FIRST ISSUE YOU’D LIKE TO ADDRESS?

10

11 A. I will address issue 3 which has been stated as follows:

12

13 “Has BellSouth provided nondiscriminatory access to network elements in accordance
14 with the requirements of sections 251 (c)(3) and 252 (d) (1) of the
15 Telecommunications Act of 1996, pursuant to 271 (c) (2) (B) (ii) and applicable rules
16 promulgated by the FCC?”

17

18 Q. WHAT SPECIFIC ASPECTS OF ISSUE 3 WILL YOU ADDRESS FIRST?

19

20 A. I would like to address the area of Operational Support Systems.

21

22 Q. ARE OPERATIONAL SUPPORT SYSTEMS RELEVANT IN THIS DOCKET?

1 A. Yes. The competitive checklist in Section 271(c) of the Act includes
2 nondiscriminatory access to network elements. OSSs have been defined as a network
3 element by the FCC in its First Report and Order in CC Docket No. 96-98 (issued
4 August 8, 1996). More specifically, BellSouth has an obligation to provide new
5 entrants nondiscriminatory access to the systems utilized for the various OSS
6 functions, Pre-Order, Ordering & Provisioning, Maintenance, Usage and Billing.

7

8 Q. PLEASE DESCRIBE THE OSS FUNCTIONS.

9

10 A. "Pre-Order" can be described as preparatory work necessary to submit an accurate and
11 complete order. Pre-Order includes things like address verification, services &
12 features availability, telephone number assignment, dispatch scheduling, establishment
13 of due date, and customer service records. This information is obtained from the
14 ILEC.

15

16 "Ordering/Provisioning" is the function of actually submitting the necessary
17 information to the ILEC so that service can be installed. The order includes among
18 other things the information from the Pre-Order function. It also includes feedback
19 from the ILEC to the ALEC regarding confirmation of order receipt, order
20 completion, etc.

21

1 **“Maintenance”** is the function utilized by the ALEC to report and monitor problems
2 with services provided by the ILEC. It includes generation of trouble reports,
3 troubleshooting, status updates, reporting, etc.

4

5 **“Usage”** is the function where the ILEC sends to the ALEC the information necessary
6 for the ALEC to bill its end users. An example of this is the call detail records created
7 when a ALEC end user makes a telephone call.

8

9 **“Billing”** is the function whereby the ILEC submits information to the ALEC for the
10 services the ILEC has provided to the ALEC, i.e., the wholesale invoice for services
11 resold by the ALEC.

12

13 The most critical functions as determined by the impact to the end user include Pre-
14 Order, Ordering & Provisioning, Maintenance and Usage. It’s imperative that these
15 functions provide nondiscriminatory access as described previously.

16

17 **Q. WHAT IS MEANT BY NONDISCRIMINATORY ACCESS?**

18

19 **A. Nondiscriminatory access in this regard means the OSS interfaces must provide (1)**
20 **equivalence to the ILEC for information availability, (2) equivalence of information**
21 **accuracy, and (3) equivalence of information timeliness.**

22

1 Q. WHY IS NONDISCRIMINATORY ACCESS NECESSARY?

2

3 A. Nondiscrimination, sometimes referred to as parity, is a prevalent theme throughout
4 the Act and the FCC's First Report and Order. It is the standard that has been set to
5 ensure an environment is created that is conducive to competition. A lesser standard
6 would certainly hinder competition. Since the Act seeks to create an environment
7 where effective competition can take place, it is clear that anything less than
8 nondiscriminatory access to OSSs is unacceptable in accomplishing our goal.

9

10 Q. PLEASE SUMMARIZE SPRINT'S PERSPECTIVE ON BELLSOUTH'S INTERIM
11 OPERATIONAL SUPPORT SYSTEMS AS REPRESENTED BY BELLSOUTH.

12

13 A. Fundamentally, Sprint believes that nondiscriminatory access to operational support
14 systems encompasses more than publishing descriptions of the functionality that the
15 systems are intended to provide. It is achieved when the systems interfaces are
16 functioning in a real world operating environment such that the resulting experience
17 for the end user ALEC customer is at parity with what BellSouth provides its own
18 customers. This is the only true test of whether the nondiscriminatory access test with
19 respect to operational support systems has been met.

20

21 Q. DO THE BELLSOUTH OSS INTERFACES MEET THE STANDARD OF
22 NONDISCRIMINATORY ACCESS?

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A. No. Although BellSouth is developing interfaces for each of the OSS functions, the two primary concerns are: (1) the interfaces BellSouth has introduced to date are not fully deployed and tested; and (2) the proposed OSS interfaces are only interim solutions.

Q. PLEASE EXPAND ON YOUR FIRST CONCERN.

A. BellSouth has recently introduced several interim interfaces for use by the ALEC community. These interfaces still support only certain products, features and service order parameters. Many enhancements to accommodate these gaps in functionality are planned by BellSouth. But until these interfaces are fully developed, deployed and tested in a real world operating environment, their ability to provide parity to what BellSouth experiences in providing service to its own customers will not be known. In its 3/21/97 Order rejecting BellSouth's SGAT (Docket No. 7253-U), for example, the Georgia Public Service Commission found that "[n]ondiscriminatory access to [OSS] is an integral part of providing access to unbundled network elements, as well as making services available for resale", and that "[t]he record shows that BellSouth has not yet demonstrated that it is able to fulfill these important aspects of the Statement's provisions on a nondiscriminatory basis that places CLECs at parity with BellSouth."

Q. PLEASE PROVIDE A FEW EXAMPLES.

1 A. In testimony in other states, BellSouth has asserted that “each interface is now fully
2 operational.” While Sprint does not dispute BellSouth’s assertion that the interfaces
3 discussed in its testimony are operational, it is important to point out that there are
4 numerous gaps in functionality that are still being addressed.

5
6 For example, electronic access to Customer Service Record (CSR) information,
7 according to BellSouth, has just become available. When ALECs have the opportunity
8 to use this capability, it is Sprint’s understanding that ALECs will have the ability to
9 print one screen of information at a time compared to BellSouth’s own retail operation,
10 where multiple pages can be printed on command. LENS will also only enable ALECs
11 to view the first 50 pages of the customer’s record. A phone call to the Local Carrier
12 Service Center (LCSC) is required to obtain the additional pages in the record. These
13 small differences in functionality have a significant negative impact to an ALEC’s sales
14 or service representative’s productivity, particularly when dealing with large, multi-line
15 business customers. There is also a corresponding impact as far as being able to
16 provide an ALEC customer with the same experience that BellSouth provides its own
17 customers.

18
19 Moreover, until electronic access to CSRs is tested in a “live” operating environment
20 and experience is gained serving customers with this new functionality, its ability to
21 provide parity in the customer experience is unknown.

22

1 BellSouth has also stated in testimony in another state that, “There is a limited need for
2 pre-ordering information for orders involving existing customers who already have
3 telephone numbers and installed services and who just want to switch service
4 providers.” Sprint’s experience as an ALEC in Florida and in other states, both as a
5 resale and facilities-based provider, has without exception demonstrated that real time,
6 interactive access to CSR information is absolutely critical to providing accurate
7 service pricing information and other service enhancement recommendations. It is well
8 known within telecommunications sales and service organizations that many customers
9 don’t know exactly what services and features they have, or may believe they have
10 something that they don’t. ALECs must be able to view and access this information in
11 parity with BellSouth in order to provide parity with respect to the customer’s service
12 experience.

13
14 As another example, BellSouth has further stated that unbundled network elements
15 such as loops, ports, and interim number portability can be ordered via LENS.
16 However, Sprint has been told by BellSouth that this capability is the functional
17 equivalent of submitting these orders via facsimile, and that actual on-line ordering
18 capability for unbundled network elements will not be introduced until some point in
19 the future. Sprint’s current experience in ordering unbundled network elements from
20 BellSouth in Florida, which I will discuss in more detail later, demonstrates that
21 exchange of information which is dependent upon human intervention is subject to
22 error and ultimately results in a diminished level of service to the ALEC customers.

1 Sprint believes that this is a good example of where a system's availability clearly does
2 not equate to "fully operational."

3

4 From a practical standpoint, ALECs ordering unbundled network elements via
5 BellSouth's EXACT system will have to interface separately with BellSouth's LENS
6 system to place certain service or feature orders or, for example, get CSR information.
7 The EXACT interface was actually designed to support interexchange carrier access
8 orders, not unbundled network elements. Since true electronic ordering functionality
9 has not yet been introduced for LENS, the multi-system interface required in order to
10 provide end user customers with service is both operationally and functionally
11 burdensome for ALECs, and most certainly does not provide a parity experience for
12 ALEC customers.

13

14 A few final examples with respect to LENS include the inability for an ALEC to submit
15 change orders when an error has been identified or when the customer changes his
16 order. ALECs must cancel and re-issue these orders with the probable result of an
17 extended due date for the customer. The functionality to issue a "change" order is still
18 under development.

19

20 In addition, if a customer has already converted to an ALEC's service and wishes to
21 add or remove features, LENS will not currently support this "change" order. A paper
22 Local Service Request ("LSR") submitted via facsimile to the LCSC is required.

1

2 Q. PLEASE DISCUSS SPRINT'S CONCERNS REGARDING THE TROUBLE
3 ANALYSIS AND FACILITIES INTERFACE ("TAFI").

4

5 A. Trouble Analysis and Facilities Interface (TAFI) is currently limited to resale
6 services only that can be related to a telephone number. It does not support circuits.
7 While BellSouth has stated that TAFI can also be used to submit troubles associated
8 with unbundled network elements such as unbundled ports or interim number
9 portability, once again Sprint has been advised that this functionality is the equivalent
10 of sending a facsimile transmission since human intervention will be required to
11 retrieve the information and re-enter such troubles into the appropriate BellSouth
12 system. Clearly, this does not equate to "access" to BellSouth's underlying OSS and
13 most definitively is not "access to the information and functions in BellSouth's
14 operational support systems in substantially the same time and manner as BellSouth
15 has access for its retail customers," as BellSouth claims.

16

17 Q. WHAT HAS SMNI EXPERIENCED IN UTILIZING BELLSOUTH'S
18 OPERATIONAL SUPPORT SYSTEMS?

19

20 A. SMNI, a facilities-based operation in Florida, is provisioning service to customers
21 utilizing unbundled network elements obtained from BellSouth. Since SMNI has its
22 own central office switch and a limited fiber optic backbone network, it must order

1 numerous service types from BellSouth including local loops, local number portability,
2 directory listings, interoffice trunks and local interconnection trunks.

3
4 SMNI currently utilizes EXACT to electronically transmit local loop orders to
5 BellSouth. This has resulted in improved accuracy in the actual orders submitted
6 compared to the previous process which was transmission via facsimile.

7
8 In order to fully provision service to SMNI end users, however, SMNI must place
9 separate service orders with BellSouth for local number portability (if the customer is
10 keeping his BellSouth number) and for the customer's directory listing. These are
11 currently being processed via facsimile.

12
13 Since there is no way to electronically coordinate the receipt of these orders by
14 BellSouth, and there is no way for the SMNI service representative to know which
15 BellSouth representative will receive the EXACT order processed, a telephone follow-
16 up is required by the SMNI service representative to insure that the orders are
17 properly coordinated.

18
19 SMNI is aware that LENS is available for transmission of the directory listing order,
20 but has been reluctant to insert another interface into what can only be described as an
21 inherently immature and cumbersome order process. Moreover, electronic
22 transmission would not eliminate the burden of coordinating the orders since EXACT
23 and LENS do not interface with each other.

1

2 Further, SMNI is receiving CSR information currently via facsimile request and
3 receipt. Sprint learned only recently that electronic access to CSRs had been
4 introduced by BellSouth and is hopeful that it can take advantage of this capability in
5 Florida given that it represents an opportunity for improvement over the fully manual
6 process currently utilized.

7

8 Q. WHAT IMPACT HAS THE CURRENT OPERATIONAL SUPPORT SYSTEM
9 ENVIRONMENT HAD ON SMNI'S ABILITY TO PROVIDE QUALITY
10 SERVICE TO ITS CUSTOMERS?

11

12 A. SMNI has found it necessary to add personnel whose sole responsibility is to hand
13 walk customers through the pre-order, ordering and provisioning processes. Beyond
14 the higher operating costs and cumbersome administrative environment, the result to
15 customers has been lengthy service installation intervals and an extended sales process.

16

17 Q. PLEASE EXPAND ON THE CONCERN RELATIVE TO INTERIM
18 INTERFACES.

19

20 A. Earlier in this testimony, it was noted that the interfaces introduced by BellSouth for
21 use by ALECs are only interim solutions. This is consistent with Sprint's observations
22 in other regions where incumbent local exchange companies (ILECs) have developed,

1 in most cases, a Graphical User Interface (GUI) in front of their legacy or retail
2 systems, or relied upon other standard transmission methodologies such as EDI.

3

4 There are numerous shortcomings in these interfaces. As examples, they don't
5 conform to industry standards and they don't provide flow-through to the ALECs'
6 own operational support systems.

7

8 Q. PLEASE DESCRIBE WHY CONFORMANCE OF OPERATIONAL SUPPORT
9 SYSTEMS TO INDUSTRY STANDARDS IS CRITICAL.

10

11 A. The lack of industry standard operational support systems interfaces means that
12 ALECs have to use different interfaces for each RBOC or independent telephone
13 company market served. Since every GUI system is unique, significant development,
14 administration and training expenses will be incurred by every ALEC that chooses to
15 operate in more than one ILEC market.

16

17 ALECs will be significantly disadvantaged in a competitive local market from both a
18 time and cost perspective if forced to develop numerous system interfaces and provide
19 training and administrative support for multiple systems and processes.

20

21 Q. WHAT IS MEANT BY "FLOW-THROUGH" BETWEEN BELLSOUTH AND
22 ALEC OSS?

1

2 A. Flow-through means the ALEC's electronic OSS will interact or interoperate with
3 BellSouth's electronic OSS. This is sometimes referred to as a "machine-to-machine"
4 interface since it excludes manual or "human-to-machine" interaction.

5

6 Q. WHY IS FLOW-THROUGH TO ALEC SYSTEMS IMPORTANT?

7

8 A. Without full system flow-through, ALEC orders will have to be re-keyed by either the
9 BellSouth representatives or the ALEC. This manual intervention creates significant
10 opportunity for errors. These errors can have a significant negative impact on a
11 ALEC's ability to provide quality service and creates an impediment to the
12 development of local competition.

13

14 Q. WHAT IS YOUR UNDERSTANDING OF BELLSOUTH'S PLANS FOR THE
15 DEVELOPMENT OF PERMANENT OPERATIONAL SUPPORT SYSTEM
16 INTERFACES?

17

18 A. BellSouth, like many other ILECs, has proposed "customized" electronic
19 interfaces that reside in front of the many systems the ILEC uses itself. These
20 interfaces will conform to industry standards whenever possible and provide full
21 systems flow-through, or "electronic bonding." As of this date, these interfaces have
22 not been designed, tested or released to the ALEC community. Further, until the
23 systems have been operational in a real world environment and functioning to support

1 ALEC customers, it cannot be determined whether they are adequate to meet the
2 nondiscriminatory access standard.

3

4 Q. WHAT IS THE SECOND ISSUE YOU'D LIKE TO ADDRESS?

5

6 A. The second issue is the Commission's Issue 3(a), which states:

7

8 "Has BellSouth developed performance standards and measurements? If so, are they
9 being met?"

10

11 Q. WHAT IS SPRINT'S UNDERSTANDING OF THE STATUS OF THE
12 ESTABLISHMENT OF PERFORMANCE MEASUREMENT STANDARDS AND
13 EVALUATION OF THEIR ACHIEVEMENT?

14

15 A. It is Sprint's understanding that negotiation of performance measures between
16 BellSouth and AT&T were just recently concluded. Sprint's recently filed
17 interconnection agreement with BellSouth in Florida states that the parties shall
18 mutually agree on specific quality measurements within 45 days of the Agreement's
19 approval. Sprint further understands that the systems modifications necessary to
20 actually capture performance element measures and produce reports are currently
21 being developed.

22

1 Sprint's experience with its facilities-based ALEC operation operating in Orlando,
2 Florida, provides a current example of the status of the implementation of performance
3 measurements.

4
5 Sprint's ALEC operation has been serving customers utilizing unbundled network
6 elements in Florida since July 1996. SMNI orders placed with BellSouth for unbundled
7 network elements would include, as examples, local loops, local number portability,
8 directory listing information, interoffice trunks and interconnection trunks.

9
10 As of this date, SMNI has not been provided any information relative to BellSouth's
11 performance in support of the pre-order, ordering, provisioning or maintenance of
12 services purchased from BellSouth.

13
14 Sprint has requested that performance measurement information be provided relative
15 to BellSouth's support of the Orlando facilities-based operation. BellSouth has
16 indicated that the supporting processes to produce the measurements are still being
17 developed and committed to reporting back to Sprint as to which performance
18 elements could currently be captured and reported. Sprint is currently awaiting
19 BellSouth's response to our inquiry.

20
21 Sprint appreciates BellSouth's commitment to performance standards but contends
22 that the act of publishing an agreed upon list of performance measurements is
23 fundamentally different from demonstrating that the stated performance targets can be

1 met. Putting the performance measurements, as mutually agreed, in writing is a good
2 first step. Actually meeting the agreed upon performance targets on a consistent basis
3 is the only true indicator of whether BellSouth is fulfilling its obligation to provide
4 resale services and unbundled network elements in parity with what it provides to itself
5 and others.

6
7 In the Georgia Commission's recent Order rejecting BellSouth's Statement of
8 Generally Available Terms and Conditions (p.30), they state that "BellSouth can
9 improve the Statement by specifying the standards to which it can commit in providing
10 interconnection and unbundled access to network elements." The Commission further
11 suggests that "BellSouth may submit its internal standards for comparative purposes,"
12 and that these standards "need not be a part of the Statement, but will be relevant in
13 documenting that CLECs are treated on a nondiscriminatory basis."

14
15 Sprint agrees with the Georgia Commission's conclusion that the comparison of
16 BellSouth's performance in supporting ALECs to its internal standards is relevant to
17 an evaluation of its ability to treat ALECs on a nondiscriminatory basis. Sprint further
18 believes that comparison of BellSouth's performance in supporting itself and its
19 affiliates to its performance in support of ALECs and the ALEC industry provides the
20 most complete evaluation of nondiscriminatory treatment. Moreover, Sprint sees this
21 documentation as an essential, fact-based evaluation tool critical to parity
22 considerations.

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The key point is that until these performance measurements are captured, reported and evaluated based on actual performance in serving ALEC customers, a factual determination of whether BellSouth is treating ALECs on a nondiscriminatory basis can not take place.

Q. PLEASE DISCUSS THE THIRD ASPECT OF THE ISSUES IDENTIFIED IN THIS PROCEEDING THAT YOU'D LIKE TO ADDRESS, WHICH IS BELLSOUTH'S PERFORMANCE IN PROVIDING UNBUNDLED NETWORK ELEMENTS TO SMNI.

A. As previously noted, SMNI operates as a facilities-based local service provider, focused primarily on the Metropolitan Orlando area. SMNI has experienced ongoing problems when attempting to acquire service from BellSouth. Those problems can be categorized as poor communications, ineffective processes, lack of performance and maintenance problems.

Q. HAS SPRINT COMMUNICATED ITS CONCERNS ABOUT BELLSOUTH'S PERFORMANCE IN SUPPORTING SMNI TO BELLSOUTH?

A. Yes. While there has been a continuing dialogue with BellSouth regarding performance issues since prior to the first service order being placed, formal written

1 correspondence has been underway between the companies since February 6, 1997.

2 This correspondence is attached to this testimony as Exhibit MLC-A

3

4

5 Q. HAS THERE BEEN ANY IMPROVEMENT SINCE THIS WRITTEN
6 CORRESPONDENCE, AS SHOWN IN EXHIBIT MLC-A, BETWEEN SPRINT
7 AND BELLSOUTH.?

8

9

10 A. While individual customer incidents are continuing to be addressed, the underlying
11 process deficiencies leading to the problems have not been corrected, and service-
12 affecting incidents continue to occur.

13

14 Q. WHAT KIND OF PROBLEMS IS SMNI CURRENTLY EXPERIENCING?

15

16 A. Problems are occurring in virtually all phases of the customer activation process. For
17 example, BellSouth regularly misses its commitment to notify SMNI if there is a
18 problem of some kind with an order within 48 hours of its receipt. These delays
19 frequently cause installations to be postponed meaning that SMNI misses the due date
20 commitment to its customer. In fact, if the order problem is discovered close to the
21 scheduled cutover date and orders to disconnect BellSouth's service have been entered
22 into BellSouth's systems, BellSouth has in numerous instances been unable to cancel
23 the disconnect orders and customers have been taken out of service in error. Cutovers

1 have also intermittently been incomplete due to BellSouth provisioning, equipment or
2 network capacity issues. SMNI's wholesale bill has also been problematic. Rate
3 elements have been repeatedly mis-applied and SMNI has had to request adjustments
4 every month. Incorrect provisioning of circuit orders has also caused post-cutover
5 problems such as diminished data transmission capability.

6

7 Q. PLEASE PROVIDE A FEW EXAMPLES.

8

9 A. An ordering problem occurred recently when BellSouth issued its internal orders for
10 one local loop incorrectly twice resulting in an eighteen day installation interval and an
11 executive complaint from the customer.

12

13 Several orders were also delayed when a week after correct orders were issued by
14 SMNI, BellSouth notified SMNI that there was a facilities shortage.

15

16 Within the past week, customers have been taken out of service in error because
17 BellSouth was unable to stop disconnect orders that had been issued on a cutover that
18 had been delayed.

19

20 In another instance, a customer that moved was without service for a day and had only
21 two of fourteen lines operational for another day primarily because BellSouth failed to
22 identify a facilities shortage problem until the Friday before the scheduled Monday

1 cutover. Sprint executive escalations were required to secure commitments to
2 complete the service installation at the end of the second day.

3

4 Finally, a BellSouth error in processing SMNI orders for an interoffice trunking
5 reconfiguration project created an "all circuits busy" condition for callers trying to
6 reach SMNI customers on a recent Monday morning. Over twenty trouble tickets
7 were received and the error took nearly three hours to correct.

8

9

10 Q. ARE THERE ANY OTHER EXAMPLES THAT WOULD ILLUSTRATE YOUR
11 CONCERN?

12

13 A. Yes. A particularly troublesome series of service interruptions has occurred since May
14 19, 1997 related to SMNI customers receiving calls through the BellSouth network.
15 On three separate occasions, translations errors made by BellSouth interrupted local
16 number portability functionality, such that SMNI customers could receive calls directly
17 to their Sprint numbers, but calls being call-forwarded through the BellSouth network
18 could not be completed.

19

20 Q. HAS THE PROBLEM BEEN CORRECTED?

21

22 A. The translations errors have been corrected, but the underlying permanent process
23 correction is still being addressed. BellSouth has advised Sprint that a system

1 modification is required to prevent inadvertent manual intervention with respect to
2 SMNI's translations tables. While we understand that BellSouth is working diligently
3 to prevent future errors, this is just one of many examples that could be shared
4 demonstrating that the fundamental processes to effectively support the provisioning
5 of unbundled network elements are in a highly developmental state and are currently
6 incapable of producing consistently acceptable performance levels. These examples
7 further illustrate the total dependence of even a facilities-based ALEC such as SMNI
8 on the integrity and accuracy of BellSouth's processes and systems in providing
9 quality service to its customers.

10

11 Q. WHAT HAVE BEEN THE CONSEQUENCES OF THESE PROBLEMS?

12

13 A. SMNI has suffered loss of revenue, loss of customers, a damaged reputation and
14 increased operating expenses.

15

16 Q. IN YOUR OPINION, DOES BELLSOUTH MEET THE COMPETITIVE
17 CHECKLIST?

18

19 A. No.

20

21 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

22

1 A. Yes, it does.

2

3

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6

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16

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Consideration of Bell South)	
Telecommunications, Inc.'s entry)	DOCKET NO. 960786-TL
into InterLATA services pursuant)	
to Section 271 of the Federal)	FILED: JULY 17, 1997
Telecommunications Act of 1996.)	

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the within and foregoing Direct Testimony of Melissa L. Cloz. filed on July 17, 1997 has been served upon the following parties of record, via Federal Express this 17th July, 1997.

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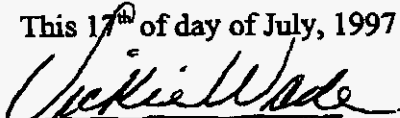
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Laura L. Wilson
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310 North Monroe Street
Tallahassee, FL 32301

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3625 Queen Palm Drive
Tampa, FL 33619-1309

This 17th of day of July, 1997


Vickie Wade



Melissa Cloz
Director, Local Market Development

Local Market Integration
151 Southball Lane, Suite 4048
Madison, AL 37151
Voice: 615 875 1142
Fax: 615 875 0956
melc@bellsouth.com

April 18, 1997

Ms. Carol Jarman
Director
BellSouth Interconnection
Suite 440
Two Chase Corporate Drive
Birmingham, Alabama 35244

Dear Carol:

While we were optimistic after our January 23 meeting with BellSouth's Account Team serving Sprint that service order and installation processes would improve, Sprint Metropolitan Networks (SMNI) continues to experience delays with the majority of its orders placed with BellSouth. I am writing to request your assistance in quickly addressing several issues associated with these delays which have resulted in missed SMNI service installation commitments on multiple occasions.

First, BellSouth continues to miss its commitment to SMNI to return Customer Service Record (CSR) requests and Firm Order Confirmations (FOCs) within 48 hours of receipt. It is the exception when a CSR or FOC is returned in 48 hours. Usually, a follow-up call must be placed by SMNI to inquire as to status and to escalate the request for CSR or FOC return. As an example, during the week of March 30, numerous orders were delayed or rescheduled because SMNI was unable to acquire vital information in order to properly provision service to its customers.

A second source of concern is that SMNI has been informed by the Birmingham LCSC that there are only three individuals in their office that are able to properly accept and process SMNI orders. At one point, of the three, two were out of the office, leaving only one person to handle the entire work load. Even when specific orders were escalated, the responses by BellSouth included, "I have found your ASRs and will have Nancy process them when she returns on Monday." This was an escalation on Thursday, 4/3 for an order due 4/10. (Nancy was returning on 4/7.) Another response provided to SMNI was, "I have ten of your (SMNI) orders on my desk. Which one do you want first?"

Carol, the clear impression of the SMNI team is that the LCSC is significantly under-resourced to effectively handle SMNI orders. In addition, poor workforce scheduling has frequently made a bad situation worse.

To illustrate, by special arrangement with BellSouth, SMNI recently submitted ASRs on 4/3 for 143 lines for a large business customer with an FOC return commitment of 4/10. Correct FOCs were not been received until 4/16.

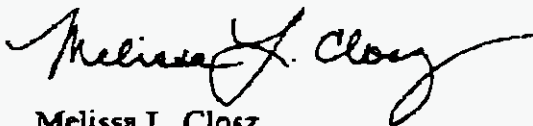
In another recent example, SMNI submitted ASRs on 3/17 with a 4/11 due date. Sprint had also sold this customer a PBX, and the customer requested that the service cut-over and PBX installation be handled concurrently. BellSouth was unable to locate the 3/17-dated ASR, was subsequently slow in responding, failing to return the FOC until 4/9, and on 4/10 determined that BellSouth would not be able to convert service on the requested due date. BellSouth requested an additional week to properly provision and prepare for the conversion. Needless to say, the entire cutover had to be postponed and the customer was furious.

Finally, three SMNI customer orders are currently delayed because of BellSouth's inability to properly provision an SMNI service order when the BellSouth service is provisioned utilizing a "DACS-mapped integrated SLC." For one of these customers, tests were performed while partnering with BellSouth to engineer service reusing the "DACS-mapped integrated SLC" facility. The tests were successful, SMNI special-ordered channel cards for its central office in order to provision the services and orders were subsequently submitted to BellSouth. BellSouth then informed SMNI that they were unable to process the orders and the conversions would be delayed until new facilities could be provisioned or until BellSouth could determine "how and if" they would provision this type of service request. The ASR for one of the three customers referenced was first submitted to BellSouth in September, 1996, and has been repeatedly scheduled, re-scheduled, and delayed.

Carol, I am asking for your assistance in addressing the above issues and would appreciate your response as to the nature and time-frames of the proposed resolutions.

Please contact me if you need additional detail. I look forward to your response.

Sincerely,



Melissa L. Cloz

cc: Joe Baker- BellSouth
George Head- Sprint
Richard Warner- Sprint
Bill Bolt- BellSouth



BellSouth Interconnection Services Fax 205 988-1688
Suite 440 205 988-1700
Two Chase Corporate Drive
Birmingham, Alabama 35244

Carol B. Jarman
Sales Assistant Vice President
Sprint Account Team

April 25, 1997

Ms. Melissa Closz
Director Local Market Development
Sprint Metropolitan Networks, Inc.
154 Southhall Lane Suite 4008
Maitland, FL 32751

Dear Melissa:

Thank you for your letter dated April 18. You expressed several concerns and I will address each of them.

The first issue in your letter was BellSouth's failure to meet the 48 hour commitment on Firm Order Confirmations (FOC). The primary reason for this has been a lack of resources. We have been working diligently to increase our personnel. Next week we will add 14 service representatives to our Birmingham office to handle Unbundled Network Element service requests. In approximately 2 weeks, 18 additional service representatives will complete their basic training. This represents an increase of more than 300 percent and will enable the LCSC to process your service requests in a more timely manner and meet our 48 hour FOC commitment.

We recently implemented new software to improve the automated delivery of Customer Service Records. In addition, a Project Manager has been charged with reviewing the process, documenting procedures and assigning responsibilities. There will also be an additional management person to supervise the clerical staff.

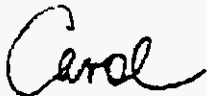
As you are aware, the account team is working diligently to transition SMNI to EXACT, which is a mechanized service ordering interface. We have scheduled a visit to your Orlando offices on May 7-9 to help facilitate that transition and will bring several subject matter experts to give hands on training to your personnel. This will also contribute to a more timely flow of information.

Ms. Melissa Cloz
Page 2
April 25, 1997

Your additional concerns also relate to a lack of resources. Once again, the increase in personnel should alleviate this problem. We are sorry that the responses you received when inquiring about your orders were not in keeping with your expectations or BellSouth's desire to provide you the best possible service. As set forth above, BellSouth is taking the necessary steps to make sure this does not happen again.

I am not in a position to give you a definite answer regarding "DACS-mapped integrated SLC." BellSouth does not have any Methods and Procedures (M&P's) in place for a DACS cutover. A change in company policy has to be made before we can provision these orders. However, this has been escalated and we will provide you with a status on this issue next week.

I sincerely apologize for any inconvenience we have caused your company. The account team is acutely aware of the importance of prompt response times for service and provisioning in today's local environment. Toward that end, we will continue champion your needs within BellSouth.



cc: George Head - Sprint
Joe Baker - BellSouth
Richard Warner - Sprint
Bill Bolt - BellSouth



George V. Head
Vice President
Local Market Integration
7301 College Blvd
Overland Park KS 66210
KSOPKV0203
Phone: 913-534-6102
Fax: 913-534-6304

May 1, 1997

BellSouth Telecommunications, Inc.
Mr. Joseph M. Baker
Vice President - Sales
Interconnection Services
675 West Peachtree Street, N. E.
Suite 4423
Atlanta, Georgia 30375

Dear Mr. Baker:

I am in receipt of Carol Jarman's letter to Melissa Closz dated April 27, 1997. I appreciate BellSouth meeting its Friday commitment with a response to the service difficulties we continue to experience. Carol and I also spoke briefly on Friday afternoon.

We agree with Carol's conclusion that BellSouth has not adequately staffed its LCSC. It has been our experience with other suppliers, however, that merely adding people, by itself, will not solve the service problem. Sprint recommends that a joint quality team be established that has the charter to mutually map the end-to-end process and identify opportunities for cycle time reduction and accuracy improvement. The team should also gain agreement on measurement metrics and metric calculation formulas and data sources.

Sprint also requests that, if not already in place, that BellSouth dedicate resources in its LCSC specifically to Sprint's account service needs. Sprint

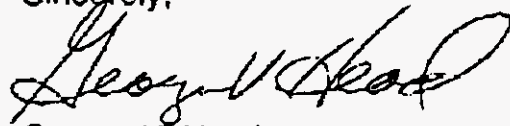
commits to provide timely forecasts to assist in appropriately sizing the group dedicated to Sprint's account.

We are hopeful that BellSouth's EXACT system will provide an acceptable interim interface for the local loop portion of SMNI service orders. The team that meets in Orlando next month should attempt to quantify the number and type of orders that may be processed through the EXACT automated interface.

With respect to BellSouth's 48 hour FOC commitment, it should be noted that Sprint does not consider 48 hour turn around to be an acceptable performance level. In a manual environment, Sprint believes that 24 hours is readily achievable. When automated processes are implemented, a 4 hour turnaround is expected and achievable. Absent this level of performance, BellSouth will be unable to meet its obligation to serve CLECs with the same speed and quality with which it serves its end user customers.

In our view, BellSouth has made no progress against its commitments made on January 23rd in Orlando. BellSouth's lack of performance has been harmful to Sprint's relationship with its customers, caused financial harm to Sprint and its customers, and is an impediment to the development of competition in Central Florida. As such, Sprint must regrettably insist that BellSouth fix its provisioning process, with demonstrated results, prior to 6-1-97. If not, Sprint will be forced to seek other remedies to achieve the service quality Sprint and its customers deserve and are legally entitled to receive.

Sincerely,



George V. Head

GVH:tit

c: John Cascio
Melissa Cloaz
Ellen D'Amato
Carol Jarman (BS)
Rich Morris
Bob Runke
Gary Owens



BellSouth Interconnection Services
Two Chaze Corporate Drive, Suite 440
Birmingham, Alabama 35244

May 2, 1997

Melissa Closz
Director Local Market Development
Sprint
151 Southhall Lane, Suite 400B
Maitland, FL 32751

Dear Melissa,

I would like to provide a status on an issue identified in your letter of April 18 regarding DACS mapped Integrated SLC. This issue has been escalated and appropriate resources assigned to study the issue. This is a non-standard procedure that involves manually provisioning circuits without a service order.

We do not want to use this method until we are convinced that we understand all of the impacts to your end user customer. We will continue to look at this issue to resolve these concerns and will update you as soon as possible.

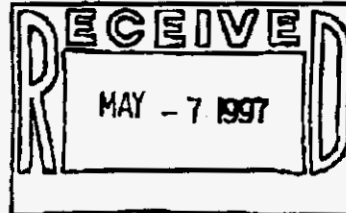
Carl



Bellsouth Telecommunications, Inc. 404 827-7140
 Suite 6423 Fax 404 529-0906
 875 West Peachtree Street, N.E.
 Atlanta, Georgia 30375

Joseph M. Baker
 Vice President - Sales
 Interconnection Services

May 5, 1997



Mr. George V. Head
 Vice President
 Local Market Integration
 Sprint
 7301 College Boulevard
 Overland Park, KS 66210

Dear George:

This letter is in reply to your correspondence of May 1, 1997. I hope you did not misunderstand Carol Jarman's explanation of what is being done to satisfy Sprint Metro's business requirements. BellSouth is committed to serving Sprint Metro in the best manner reasonably possible. I will, however, address the issues raised in order to prevent any misunderstanding concerning BellSouth's commitment to providing Sprint Metro and Sprint NIS with appropriate service levels.

As you know, BellSouth has already taken substantial steps to ensure that Sprint NIS receives an appropriate level of service. Sprint NIS's interface with BellSouth is through a dedicated account team. Moreover, a portion of this team is assigned to work with both Sprint NIS and Sprint Metro to facilitate their working relationships with BellSouth as they enter local markets in the Southeast. Further, a project manager and a newly appointed customer support manager have been added to the LCSC to provide additional support in processing orders and addressing service needs. We are in the process of establishing an implementation team of subject matter experts to facilitate our CLEC customer's start up operation. As soon as this team is in place and properly trained, we will set up a series of meetings with Sprint to review end-to-end processes and to look for ongoing improvements.

These managers and Sprint's account team are in daily contact with their counterparts at Sprint NIS, Sprint Metro, and the LCSC. BellSouth account management for Sprint Metro was transitioned to the Sprint Account Team in January in order to provide dedicated support that is experienced in dealing with Sprint and its requirements.

As Carol pointed out in her letter to Melissa Clowz, additional service representatives to handle service requests for unbundled network elements were added to the LCSC the week of April 28, and more representatives will complete training and join the LCSC staff the week of May 12. Though Sprint NIS has currently issued no orders for service, I believe, assuming BellSouth is provided reasonable forecasts from Sprint NIS in a timely fashion, the LCSC and the Sprint dedicated account team will be able to provide Sprint NIS with the proper level of service once Sprint NIS begins to place orders.

BellSouth has asked Sprint NIS for forecasts of the number of expected orders since December 1996. We appreciate that forecasting can be difficult, but to date the information BellSouth has received is too general to be useful for planning and staffing purposes. In order to be of value, BellSouth will need specific forecast information by month, state, number/type of lines (e.g., residence, business, trunks, ESSX/MultiServ, etc.), UNEs and number/type of service orders (new, disconnect, move, record only, change, etc.).

George V. Road
Sprint

Page 2
5/5/97

It was mentioned in your letter that Sprint does not consider the 48 hour FOC commitment acceptable; however, the 48 hour FOC commitment is recognized as the standard by Sprint Metro in Ms. Cloer's April 18 letter. BellSouth intends to fulfill its commitment to Sprint Metro in this regard. While the 48 hour FOC commitment is at issue between Sprint NIS and BellSouth in current contract negotiations, this disagreement does not support the observation that a 48 hour FOC commitment on the part of BellSouth is somehow improper or inappropriate.

Lastly, BellSouth will provide hands-on training to Sprint Metro on the EXACT system on May 8. This system should minimize manual intervention and streamline order flows. As you know, the account team and BellSouth's subject matter experts have worked extensively with Sprint NIS to set forth fully the options for electronic interfaces and to determine the best applications for Sprint NIS's use.

George, BellSouth values Sprint as a long term customer, and it is our desire to maintain a relationship with Sprint that is based upon mutual respect, trust and commitment. I can assure you BellSouth is committed to do what it can to promote a positive and productive business relationship with Sprint.

Sincerely,



J. M. Baker

Copy: Ellen D'Amato
Carol Jarman
Gary Owens
Bob Runke



Melissa Cloz
Director-Local Market Development

Local Market Integration
151 South Hall Lane, Suite 400B
Maitland, FL 32751
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mailto:melcloz@worldnet.att.net

May 19, 1997

Ms. Carol Jarman
Director- Sprint Account Team
BellSouth Interconnection Services
Suite 440
Two Chase Corporate Drive
Birmingham, AL 35244

Dear Carol:

Thank you for your May 2 letter following up on the status of the "DACS-mapped integrated SLC" provisioning issue which has delayed the installation of several Sprint Metropolitan Networks (SMNI) customer orders. My response is for the purpose of providing clarification as to what the issue is and why its resolution is critical.

SMNI has placed unbundled loop service orders with BellSouth for several customers where the customer is currently provisioned by BellSouth utilizing a DACS-mapped integrated SLC-- essentially a "pair gain" device employed by BellSouth to maximize facility utilization. In attempting to provision unbundled loops for SMNI, BellSouth discovered that its systems and procedures did not support re-use of the existing facilities. Further, BellSouth did not have additional facilities available to turn up the unbundled loops ordered by SMNI. BellSouth then chose not to construct additional facilities in lieu of resolving the underlying systems and procedural issues in order to turn up the unbundled loops for SMNI. The result is that of the three service orders referenced in my 4/18 letter, two SMNI service installations were significantly delayed. The third installation was completed without the use of the SLC.

We have been advised by BellSouth personnel that these installations were completed for testing purposes only and that no additional installations of this type will be completed until BellSouth's procedural issues have been resolved. Moreover, we have been told that DACS-mapped integrated SLC provisioning configurations are widely-deployed throughout BellSouth meaning that SMNI will likely continue to encounter customers whose provisioning raises the same issues.

Sprint appreciates BellSouth's desire to seek long term systems and process solutions for provisioning these services. However, our request is that future unbundled loop orders under this provisioning scenario be installed utilizing whatever interim procedures are necessary to complete the service order installations within mutually established intervals. This will enable BellSouth and Sprint to make progress toward our mutual goal of on-time service installations.

Carol, we would appreciate BellSouth's response to the request outlined above by Friday, May 30. Thanks again for your update, and I look forward to your response.

Sincerely,



Melissa L. Cloz

Director - Local Market Development

cc: George Head- Sprint
Richard Warner- Sprint
Joe Baker- BellSouth



BellSouth Interconnection Services Fax 205 944-1888
Suite 440 205 988-1700
Two Chase Corporate Drive
Birmingham, Alabama 35244

Carol E. Jordan
Sales Assistant Vice President
Sprint Account Team

May 23, 1997

Ms. Melissa Ciosz
Director - Local Market Development
Sprint Metropolitan Networks, Inc.
151 Southhall Lane Suite 400B
Maitland, FL 32751

Dear Melissa:

Thank you for your letter dated May 19, expressing concerns with regard to provisioning unbundled loop service via DACS-mapped IDLC.

As a point of clarification, the State of Florida has the largest concentration of DACS facilities in our service region. BellSouth has therefore been keenly aware of the impacts of this service in serving our CLEC customers, and in particular, Sprint Metro.

BellSouth intends to use a two-step procedure for meeting service requirements where facilities have been depleted. The first step will involve using "side door porting" and/or "hairpins" as a procedure to meet your service requirements. Essentially "side door porting" is the same procedure as cutting over a circuit from a DACS. We are developing new procedures to improve coordination between the various network departments that are involved in this complex procedure. We expect these new procedures to be in place by June 21, 1997. We have notified our internal departments of these changes. Prior to the availability of the new procedures, we will work to process any new or existing orders where such provisioning is involved.

The second step occurs after we have added new facilities where there were previously none. BellSouth may, at its discretion, convert the customer to the new facilities, thus requiring a second cutover for customers provisioned through the "side door porting" arrangement. We would like for you and to be aware of this possibility and to advise your end user customers as well.

Ms. Melissa Closz

Page 2

May 23, 1997

We believe that this solution will resolve your concerns on provisioning circuits through DACS facilities. If you have additional questions or concerns, please let me know so that we can address them fully.

Sincerely,



cc: George Head
Richard Warner
Joe Baker



BellSouth Interconnection Services
Suite 440
Two Chase Corporate Drive
Birmingham, Alabama 35244

Fax 205 988-1668
205 988-1700

Carol B. Jarman
Sales Assistant Vice President
Sprint Account Team

June 12, 1997

Melissa Cloz
Director
Local Market Development
Sprint
151 Southhall Lane #400B
Maitland, Florida 32571

Subject: Sprint Metro Outage In Orlando Magnolia IAESS

Dear Melissa:

This letter is to provide the details of the service outage to Sprint Metro in the Orlando Magnolia IAESS office and to outline the steps BellSouth has taken to guard against a recurrence.

On June 4, 1997, BellSouth Project Manager Daryl Ducote received a call from Lori Doherty with Sprint Metro. Lori requested that two telephone numbers be added to a service order providing Remote Call Forwarding (RCF). This could not be done because the service order had been issued to complete on June 3. The Local Carrier Service Center (LCSC) did accept, however, a verbal request from Sprint Metro to place an order for RCF on the two lines. A new (N) service order (NY8FFPY5) was issued on June 6, 1997 at 1:26 PM. This N order was issued to remote call forward telephone numbers 407-481-2376 and 404-843-4817 to 407-206-2106 and 404-206-2105 respectively.

After the N service order was issued, the Service Representative realized that a change (C) service order should have been issued instead. She then canceled the N service order and issued a C service order. The C service order, (CY93T5D1), was issued to provide RCF for these lines. When the canceled N service order was received by the Recent Change Memory Assistance Group (RCMAG), the Line Translation Specialist (LTS) removed the numbers from the translations as well as the associated Simulated Facilities Group (SFG). Removal of the SFG resulted in the blocking of all incoming traffic for Sprint Metro from the RCF numbers in the Orlando Magnolia IAESS switch.

A trouble report was received at 5:00 PM EDT from Sprint Metro. The Electronic Technician (ET) at the Unbundled Network Element Center (UNEC) called RCMAG to rebuild the SFG.

-2-

The SFG was successfully restored at approximately 6:15 PM EDT and the blocking of the existing Sprint Metro customers was cleared at that time.

Because the SFG had been removed, the original project for Mid Florida Pools had to be rebuilt and flowed back through the switch. This was accomplished by 7:00 PM EDT.

The following steps are being taken to guard against a recurrence of the problem discussed above:

1. Prepare and send a memo to NISC /RCMAG Directors by Friday, June 13th, to contain:
 - A. Account of the CLEC trunk outage in the Orlando Magnolia Central Office which occurred on June 6, 1997.
 - B. Require mandatory coverage for all CTG electronic technicians on Translation Bulletin No. 97-TB-46, issued May 23, 1997 and provide positive report to staff by June 20, 1997.
2. Re-transmit the Translation Bulletin 97-TB-46 to all NISC personnel by Friday, June 13th.
3. On June 11th, 1997, a second SFG was built in the IAESS switch in the Orlando Magnolia Central Office to establish a hunt group arrangement that will provide "overflow" for CLEC trunk access.
4. Develop and deliver a package for quick restoral of the SFG in case of future outage to the RCMAG by June 20th, 1997

We trust that the above information satisfies your request regarding the outage in the Orlando Magnolia Central Office. If you should have additional questions or concerns surrounding the outage, please let me know.



cc: Joe Baker
Richard Warner



George V. Head
Vice President
Local Market Integration
7301 College Blvd.
Overland Park KS 66210
KSOPKV0104
Phone: 913-534-6102
Fax: 913-534-6237

June 18, 1997

Mr. Joseph M. Baker
Vice President - Sales
BellSouth Telecommunications, Inc.
Interconnection Services
675 West Peachtree Street, N. E.
Suite 443
Atlanta, Georgia 30375

Dear Joe:

I am writing to again express serious concern regarding recent service problems in Orlando, Florida, and to request BellSouth's review and analysis of the situation in our meeting in Birmingham on June 24th. As you know, our teams have met many times to discuss service related difficulties being encountered by Sprint Metropolitan Networks, Inc. (SMNI), and yet they continue to occur.

During a three week period from May 19 to June 6, 1997, SMNI's customers encountered three significant service interruptions related to receiving calls through the BellSouth network. In each case, Sprint's customers could receive calls directly to their Sprint numbers but calls being call-forwarded through the BellSouth network could not be completed.

In the first occurrence, an "all circuits busy" condition was created on Monday morning, May 19, when interoffice traffic was reversed in error by Bell South in conjunction with trunk additions BellSouth was installing. Customers were impacted for 3 hours and over 20 trouble tickets were received.

The second incident, on May 30, revealed a translations problem in a BellSouth local switch whereby calls processed via the primary route were completed but the secondary route returned "no longer in service" or "can't be completed as dialed" messages. This service problem occurred for at least seven hours before it could be isolated and resolved by BellSouth.

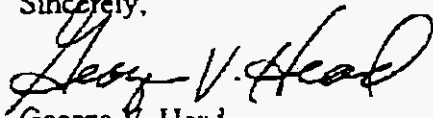
Most recently, on June 6, a simulated facilities group was removed from translations in error by BellSouth, again resulting in calls to SMNI customers being blocked for over two hours.

Attached for your review are the outage reports provided to Sprint by your account team after the first and third event. Each describes "human error" occurring in the translations support team. The second event, for which Sprint did not request a written report, occurred on May 31, 1997 and was also attributed to a translations error.

These errors by BellSouth have resulted in service deficiencies that have damaged Sprint's relationships with its end user customers and are impeding Sprint's ability to establish itself as a local service competitor in Central Florida. Even more disturbing is that these events occurred during a timeframe within which Sprint had requested, and BellSouth had agreed, to provide measurable and specific improvements in the service it provides to SMNI.

I look forward to seeing you and the BellSouth team on the 24th in Birmingham. I trust that BellSouth will have identified the irreversible corrective action on its translations process.

Sincerely,



George V. Head

cc: Melissa Closz - Sprint
Carol Jarman - Bell South

**Bellsouth Interconnection Services****Memorandum**

Date May 21, 1997
To Linda McGrue
Jerry Johnson
From Gretchen Wilson
Telephone Number 205 888-1878
Fax Number 205 888-7003
Subject Sprint Metro Net routing problems

Linda:

Per your request, following are details relative to the traffic overflow problem in Orlando -

The problem occurred during the provisioning of the new IT groups. The routing in the Colonial Main and Tandem office was reversed on the turn up of the new group. The traffic was rerouted through the tandem and most of the overflows cleared. We had several conversations with Steve (Sprint Metro Net) to verify he was seeing the traffic. He indicated that he was still seeing some overflows. The ACAC verified all of Sprint Metro Net's NNXs in the nine offices where we established direct trunk groups. We found overflow routing problems in 4 offices. The ACAC obtained copies of the routing requests and proceeded to get the traffic rerouted, one office at a time, to insure that we did not cause Sprint Metro Net any additional problems.

To keep this same problem from reoccurring a copy of the routing request will be sent to the project manager to be included in the package for switched access. A copy of this same routing request will be provided to the switched access supervisor to be retained for the maintenance group. Switched access will verify the routing upon turn-up of any new IT group.



Bellsouth Interconnection Services Fax 205 988-1688
Suite 600 205 988-1700
Tom Chaza Corporate Office
Birmingham, Alabama 35244

Carol B. Jarman
Sales Assistant Vice President
Sprint Account Team

June 12, 1997

Melissa Cloz
Director
Local Market Development
Sprint
151 Southhall Lane #400B
Maitland, Florida 32571

Subject: Sprint Metro Outage In Orlando Magnolia IAESS

Dear Melissa:

This letter is to provide the details of the service outage to Sprint Metro in the Orlando Magnolia IAESS office and to outline the steps BellSouth has taken to guard against a recurrence.

On June 4, 1997, BellSouth Project Manager Daryl Ducote received a call from Lori Doherty with Sprint Metro. Lori requested that two telephone numbers be added to a service order providing Remote Call Forwarding (RCF). This could not be done because the service order had been issued to complete on June 3. The Local Carrier Service Center (LCSC) did accept, however, a verbal request from Sprint Metro to place an order for RCF on the two lines. A new (N) service order (NY8FFPYS) was issued on June 6, 1997 at 1:26 PM. This N order was issued to remote call forward telephone numbers 407-481-2376 and 404-843-4817 to 407-206-2106 and 404-206-2105 respectively.

After the N service order was issued, the Service Representative realized that a change (C) service order should have been issued instead. She then canceled the N service order and issued a C service order. The C service order, (CY93TSD1), was issued to provide RCF for these lines. When the canceled N service order was received by the Recent Change Memory Assistance Group (RCMAG), the Line Translation Specialist (LTS) removed the numbers from the translations as well as the associated Simulated Facilities Group (SFG). Removal of the SFG resulted in the blocking of all incoming traffic for Sprint Metro from the RCF numbers in the Orlando Magnolia IAESS switch.

A trouble report was received at 5:00 PM EDT from Sprint Metro. The Electronic Technician (ET) at the Unbundled Network Element Center (UNEC) called RCMAG to rebuild the SFG.

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The SFG was successfully restored at approximately 6:15 PM EDT and the blocking of the existing Sprint Metro customers was cleared at that time.

Because the SFG had been removed, the original project for Mid Florida Pools had to be rebuilt and flowed back through the switch. This was accomplished by 7:00 PM EDT.

The following steps are being taken to guard against a recurrence of the problem discussed above:

1. Prepare and send a memo to NISC /RCMAG Directors by Friday, June 13th, to contain:
 - A. Account of the CLEC trunk outage in the Orlando Magnolia Central Office which occurred on June 6, 1997.
 - B. Require mandatory coverage for all CTG electronic technicians on Translation Bulletin No. 97-TB-46, issued May 23, 1997 and provide positive report to staff by June 20, 1997.
2. Re-transmit the Translation Bulletin 97-TB-46 to all NISC personnel by Friday, June 13th.
3. On June 11th, 1997, a second SFG was built in the IAESS switch in the Orlando Magnolia Central Office to establish a hunt group arrangement that will provide "overflow" for CLEC trunk access.
4. Develop and deliver a package for quick restoration of the SFG in case of future outage to the RCMAG by June 20th, 1997.

We trust that the above information satisfies your request regarding the outage in the Orlando Magnolia Central Office. If you should have additional questions or concerns surrounding the outage, please let me know.



cc: Joe Baker
Richard Warner



BellSouth Telecommunications, Inc. 404 827-7140
Suite 4423 Fax 404 823-0348
675 West Peachtree Street, N.E.
Atlanta, Georgia 30375

Joseph M. Baker
Vice President - Sales
Interconnection Services

July 1, 1997

Mr. John Cascio
Vice President
Sprint
555 Lake Border Drive
Apopka, Florida 32703

Dear John:

On behalf of BellSouth, I would like to apologize for the recent service interruption experienced by Sprint and its local exchange customers. We value our relationship with Sprint as one of BellSouth's largest wholesale customers, and it is always our intention to provide you with service that meets your standard for customer satisfaction.

This service interruption, which occurred at 5:21pm EDT on June 24, 1997 in BellSouth's Magnolia Central Office, was caused by a work error in our RCMAG (Recent Change Memory Assignment Group), the group responsible for handling translation software. As you know, BellSouth has put into place action plans to help prevent the error from happening again. These plans include short term measures such as the requirement for supervisory approval in these situations. We are also investigating with our vendors long term measures that include enhancing the software involved. Additionally, we have made changes to our methods and procedures to reduce the likelihood of these outages.

Again, BellSouth regrets any inconvenience this service interruption caused Sprint and its customers. We are committed to work cooperatively with Sprint throughout the nine state region to provide the level of service expected by you and your customers.

Yours truly,



J. M. Baker

Copy: George Head, Vice President - National Market Integration, Sprint
Carol Jarman, Sales Assistant Vice President - Sprint, BST
Krista Tillman, Vice President - Operations, BST

Ms. Melissa Cloz
Page 2
July 7, 1997

The following guidelines have been implemented to prevent future removal of SFGs in error:

1. Small Business Specialists have been retrained on the proper guidelines to use when issuing future orders.
2. On June 25, 1997, all employees in our Recent Change Memory Administration Group (RCMAG) were re-covered regarding the issues that encompass SFG usage for CLEC services in IAESS offices.
3. Effective immediately, all SFG removals must require written approval from a translations supervisor. Additionally, our staff is currently working with Lucent Technologies to provide a permanent solution which will prevent SFG removal without complex translations involvement and we will status you on that as soon as possible.

In addition to these measures, plans are also underway to reserve SFG numbers 1 through 9 exclusively for the CLEC community. We will notify you in advance of our plans to migrate SMNI to a specific SFG and will again cover our employees regarding our policy not to disconnect that range of SFGs in general and SMNI's in particular.

Let me reiterate that BellSouth regrets any inconvenience this service interruption caused. Further, we are working diligently to identify and implement corrective actions that involve not only our translations processes, but all service issues that ultimately affect Sprint and its end users customers as well.

Sincerely,





BellSouth Interconnection Services Fax 205 988-1688
Suite 440 205 988-1700
Two Chase Corporate Drive
Birmingham, Alabama 35244

Carol B. Jansen
Sales Assistant Vice President
Sprint Account Team

July 8, 1997

Ms. Melissa Cloz
Director - Local Market Development
Sprint
151 Southhall Lane Suite 400B
Maitland, FL 32751

Dear Melissa:

I would like to follow up and provide you with a more detailed description of the events that led to the outage in the Magnolia office on June 24. The situation originated when Magna Computer called BellSouth's Small Business Services Center on June 20 to convert their service from SMNI back to BellSouth. A BellSouth representative in that office issued a disconnect (D) and new (N) order to initiate that process.

Due to that disconnect order, the office equipment for Magna Computer's telephone number was reassigned to another customer when a subsequent order flowed through our systems. When that order was processed, the service for Magna Computer as well as the entire Simulated Facility Group (SFG) was manually deleted from the switch in error. This prevented all of the customers that utilized Service Provider Number Portability (SPNP) in the Orlando Magnolia IAESS Central Office from receiving incoming calls.

The duration of the outage was approximately 2.5 hours, and our time to repair after the trouble was reported to the UNE center was approximately one hour. The SFG was reprogrammed and the service re-established at 7:40 P.M.



D. Wayne Peterson
President

National Integrated Services
7301 College Boulevard
Overland Park, KS 66210
Telephone: (913) 534-6100
Fax: (913) 534-6300

July 9, 1997

Mr. Jere Drummond
President and Chief Executive Officer
Bell South Telecommunications
6575 W. Peachtree, Suite 4500
Atlanta, GA 30375

Dear Jere:

If you haven't already discovered it, let me be the first to tell you that going into the local telephone business in a new territory is no easy task. Until I experienced these problems, I didn't know how to appreciate the infrastructure and underlying support systems we enjoyed as an ILEC.

I know you are familiar with our CLEC entry into the Orlando market. We have been getting our feet wet by serving primarily business customers through a combination of Bell South unbundled elements and Sprint provided local switching and transport.

Your account and service teams supporting Sprint as a wholesale customer have been courteous and tried to be responsive when we encounter problems. BUT, there are usually so many people involved behind the scenes in a telephone company it is sometimes difficult for an account team to isolate problems that affect the customer.

Following are a couple of paragraphs taken from a memo prepared by our Florida CLEC organization. The tone shows some frustrations as could be expected from someone having to face unhappy customers.

"The level of service provided to Sprint by Bell South has been unacceptable and has created harm to our image, marketing efforts, and most importantly to our customers. This is particularly concerning in view of Bell South's concurrent competitive entry into Sprint's local division territory in the Orlando market.

Our Sprint Metro customers have experienced several problems caused by Bell South. These problems include delayed and missed installation due dates, incidents of trunk outages during customer conversions and most recently, repeated translation errors in Bell South switches. These translation errors have caused four separate blockages of incoming telephone calls to Sprint Metro customers."

We would like to enter the residential market as soon as possible, but the volume we anticipate precludes us from doing so on a large scale basis prior to working out the difficulties that affect the end user.

I would appreciate any help you could give us in correcting and avoiding situations that make both our companies look bad to the customer. If you should have any similar problems in our LTD territory, please let us know.

Very truly yours,

Wayne