

ATTACHMENT C

BellSouth Telecommunications, Inc.  
FPSC Docket No. 010740-TP  
Request for Confidential Classification  
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9/10/01

REQUEST FOR CONFIDENTIAL CLASSIFICATION OF DIRECT TESTIMONY AND  
EXHIBIT OF KEN L. AINSWORTH AS FILED ON AUGUST 20, 2001 IN FLORIDA  
PUBLIC SERVICE COMMISSION DOCKET 010740-TP

One Highlighted Copy

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BELLSOUTH TELECOMMUNICATIONS, INC.  
TESTIMONY OF KEN L. AINSWORTH  
BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION  
DOCKET NO. 010740-TP  
AUGUST 20, 2001

Q. STATE YOUR NAME, YOUR BUSINESS ADDRESS, AND YOUR POSITION WITH BELLSOUTH TELECOMMUNICATIONS, INC. (“BELLSOUTH”).

A. My name is Ken L. Ainsworth. My business address is 675 W. Peachtree Street, Atlanta, Georgia 30305. I am a Director - Interconnection Operations for BellSouth. I have served in my present position since December 1997.

Q. HAVE YOU TESTIFIED PREVIOUSLY?

A. Yes. I have previously testified before state regulatory commissions concerning BellSouth’s 271 applications.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. The purpose of my testimony is to address certain allegations in the complaint against BellSouth made by IDS before this Commission.

PROPRIETARY

1 Q. IN HER TESTIMONY IN THIS PROCEEDING, BELLSOUTH'S WITNESS  
2 SANDRA HARRIS DISCUSSED PROCESS BELLSOUTH USES TO  
3 CONVERT RETAIL OR RESALE SERVICE TO UNE-P SERVICE.  
4 PLEASE BRIEFLY DESCRIBE THAT PROCESS?

5  
6 A. The BellSouth Unbundled Network Element-Platform ("UNE-P") project team  
7 developed a process for the conversion of service from BellSouth as a retail  
8 service or from the service provided by an Alternative Local Exchange Carrier  
9 ("ALEC") pursuant to resale provisions to service provided by an ALEC  
10 pursuant to UNE-P provisions. The UNE-P product team developed the  
11 process described in Ms. Harris' testimony to facilitate such a conversion. The  
12 UNE-P project team, led by Ms. Harris proved the best conversion process  
13 available. The project team made its decisions with a conscious effort to  
14 ensure efficient and effective manual and electronic handling of this conversion  
15 and thus avoid end user outages.

16  
17 Q HAS BELLSOUTH PERFORMED ANY ANALYSIS THAT SUPPORTS  
18 THE EFFECTIVENESS OF THAT PROCESS?

19  
20 A Yes. BellSouth has been conducting internal maintenance analysis on UNE-P  
21 conversions for all ALECs since June 22, 2001. Between June 22 and July 17,  
22 2001, BellSouth processed 34,601 UNE-P conversion orders. Out of these,  
23 only 77 (or 0.22%) resulted in disruption of service (that is, the customer had  
24 no dial tone) because of the conversion. In other words, BellSouth performed  
25 99.78% of these UNE-P conversions without a conversion-related service

1 disruption. Between July 7 and July 18, 2001, BellSouth incorporated  
2 additional service order edits to further improve manual processing. As a  
3 result, for the period between July 18 and August 6, 2001, out of 34,063 UNE-  
4 P orders, only 57 (or 0.17%) experienced a no dial tone disruption of service.  
5 In other words, BellSouth performed 99.83% of UNE-P conversions without  
6 conversion-related no dial tone service disruption.

7

8 Q. ARE YOU FAMILIAR WITH SERVICE ISSUES RELATED TO THE IDS  
9 BULK ORDERING UNE-P CONVERSION IN MAY OF 2000?

10

11 A. Yes. During May 2000, some IDS customers that were converted from resale  
12 to UNE-P using BellSouth's Local Exchange Navigation System ("LENS")  
13 Bulk-Ordering process experienced problems with their "hunting" feature. The  
14 problem was that the hunting feature was not being applied to the converted  
15 account. Said another way, the customer had the hunting feature on its lines  
16 before the conversion but did not have the hunting feature after the conversion.

17

18 Q. DID ALL OF IDS' CUSTOMERS INVOLVED IN THE MAY 2000 BULK  
19 ORDERING CONVERSION PROCESS EXPERIENCE A LOSS OF DIAL  
20 TONE?

21

22 A. No. There were very few instances of conversion-related loss of dial tone  
23 during the bulk ordering process. Only (4) four such instances could be  
24 verified through BellSouth's analysis of its trouble resolution logs kept during

25

1 this period. This reflects a very low incidence of loss of dial tone during the  
2 conversion.

3

4 Q. HOW DID BELLSOUTH RESPOND TO THE HUNTING PROBLEMS  
5 THAT RESULTED FROM THE MAY 2000 BULK ORDER  
6 CONVERSION?

7

8 A. When the problem was initially identified, BellSouth's Operations Assistant  
9 Vice President over the Local Carrier Service Center (LCSC) acted as the  
10 point of contact to resolve any customer issues identified by IDS. Each end  
11 user customer account that had been converted was analyzed to determine if  
12 the hunting feature had inadvertently been dropped. Next, BellSouth set up a  
13 hotline in its Customer Wholesale Interconnection Services ("CWINS") center  
14 for IDS to call to report these problems and expedite resolution. This hotline  
15 was staffed seven days a week, twenty-four hours a day until all of the  
16 problems were resolved. BellSouth also proactively reviewed all converted  
17 accounts to assure the existing account translations matched the IDS  
18 conversion request. In cases where the hunting feature had inadvertently been  
19 dropped (whether determined by BellSouth's proactive work or in response to  
20 a call from IDS), BellSouth corrected the situation immediately. Additionally  
21 BellSouth turned off the Bulk-Ordering processor to prevent any further  
22 occurrences until the bulk ordering problem could be analyzed and resolved.  
23 To summarize, BellSouth implemented extra ordinary measures to resolve the  
24 situation, expedite any needed repairs, and BellSouth maintained that focus  
25 until all of IDS' problems were resolved.

1 Q. IF AN END USER EXPERIENCES PROBLEMS TODAY WHEN  
2 CONVERTING FROM BELLSOUTH TO AN ALEC PROVIDING UNE-P  
3 SERVICE, HOW SHOULD THAT END USER OBTAIN ASSISTANCE?

4

5 A. The end user should contact the ALEC providing service. The ALEC, in turn,  
6 should call the Maintenance Group in BellSouth's CWINS Center. The  
7 CWINS Center responds by analyzing the problem and determining what  
8 action must be taken to resolve the problem. BellSouth provides resources and  
9 processes that can be utilized by IDS, or any other ALEC, in such a  
10 circumstance.

11

12 Q ARE YOU AWARE OF ANY END USERS AFFECTED BY THE BULK  
13 ORDERING PROCESS WHO MAY HAVE RETURNED TO BELLSOUTH?

14

15 A. Not directly, but I have reviewed a report that indicates that IDS issued some  
16 disconnect orders during the May 2000 period. IDS used one of three  
17 disconnect reason codes on these orders. One of these reason codes was "CB".  
18 The CB code is used when BellSouth disconnects a UNE provided to an ALEC  
19 and then BellSouth provides service to the end user whose service was  
20 provided over that UNE. The second reason code IDS used in its orders was  
21 "RB" which means an end user to whom IDS had provided service under the  
22 resale provisions would now be provided service by BellSouth. The third code  
23 IDS used in its orders was "SE" which means the end user was converted in  
24 error.

25

1 Q. PLEASE PROVIDE BELLSOUTH'S DISCONNECT REASON CODE  
2 STATISTICS FOR IDS FOR MAY?

3

4 A. For May 2000, IDS issued 66 disconnect orders to BellSouth. Of these, four  
5 (4) orders carried the CB reason code, 51 carried the RB reason code and 11  
6 carried the SE reason code.

7

8 Q. ARE YOU INVOLVED WITH BELLSOUTH'S "WINBACK"  
9 INITIATIVES?

10

11 A. No.

12

13 Q. COULD THE DISCONNECT REASON DATA PREVIOUSLY DISCUSSED  
14 BE USED TO IDENTIFY IDS CUSTOMERS RETURNING TO  
15 BELLSOUTH VIA A DISCONNECT PROCESS?

16

17 A. Yes, this data can be requested specific to IDS by month to validate IDS  
18 disconnects for customers returning to BellSouth. All customers identified  
19 with the CB, RB and SE codes would have been existing IDS end user  
20 accounts. Exhibit KLA-1 is attached to my testimony and shows the quantity of  
21 end users who left IDS from January 2000 to August 2001. The most  
22 significant conclusion to be reached from a review of this information is that  
23 each and every one of these end users had to be disconnected from IDS before  
24 returning to BellSouth.

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1 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

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3 A. Yes.

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**IDS SERVICE ORDERS**

class\_service (All)

# ORDERS		ORD dcr			D Total	Grand Total
Years	issue_date	D				
		CB	RB	SE		
2000	Jan		30	7	37	37
	Feb		27	20	47	47
	Mar	1	30	12	43	43
	Apr	3	25	6	34	34
	May	4	51	11	66	66
	Jun	6	47	11	64	64
	Jul	4	59	14	77	77
	Aug	37	151	22	210	210
	Sep	70	277	33	380	380
	Oct	110	381	36	527	527
	Nov	181	349	65	595	595
	Dec	168	473	97	738	738
2001	Jan	263	1,167	228	1,658	1,658
	Feb	318	1,000	127	1,445	1,445
	Mar	443	1,288	133	1,864	1,864
	Apr	247	1,218	62	1,527	1,527
	May	207	946	73	1,226	1,226
	Jun	147	1,114	91	1,352	1,352
	Jul	175	1,561	122	1,858	1,858
	Aug	90	688	77	855	855
<b>Grand Total</b>		<b>2,474</b>	<b>10,882</b>	<b>1,247</b>	<b>14,603</b>	<b>14,603</b>