John Gillmore
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OFFICIAL RECOGNITION LIST

Docket No. 980281-TP

Exhibit 1
admit

FLORIDA ORDERS

1. BellSouth/MCI - 960846-TP

   A. ORDER NO. PSC-96-1579-FOF-TP
   B. ORDER NO. PSC-96-1579A-FOF-TP
   C. ORDER NO. PSC-97-0298-FOF-TP
   D. ORDER NO. PSC-97-0309-FOF-TP
   E. ORDER NO. PSC-97-0602-FOF-TP
   F. ORDER NO. PSC-97-0723-FOF-TP
   G. ORDER NO. PSC-97-0723A-FOF-TP

2. BellSouth/MCI - 971140-TP

   A. PSC-98-0810-FOF-TP

FCC ORDERS

1. FCC ORDER NO. 96-325 (DN 96-98) - Interconnection Order
2. FCC ORDER NO. 96-394 (DN 96-98) - Order on Reconsideration

UNITED STATES COURT OF APPEALS FOR THE EIGHT CIRCUIT'S ORDERS

1. No. 96-3321 - Iowa Utilities Board, et al, Petitioners, v. Federal Communications Commission, et al, Respondents; Filed July 18, 1997 (Related to the FCC's Interconnection Order)
2. No. 96-3321 - Iowa Utilities Board, et al, Petitioners, v. Federal Communications Commission, et al, Respondents; Filed October 14, 1997 (Related to the FCC's Interconnection Order)

FLORIDA PUBLIC SERVICE COMMISSION
DOCKET NO. 980281-TP EXHIBIT NO. 1
COMPANY/ WITNESS: Staff
DATE: 8-5-98

MCI'S REQUEST FOR OFFICIAL RECOGNITION

Docket No. 960846-TP (MCI/BellSouth Arbitration)

1. Order No. PSC-96-1579-FOF-TP (Final Order on Arbitration)
2. Order No. PSC-96-1579A-FOF-TP (Amendatory Order)
3. Order No. PSC-97-0298-FOF-TP (Order on Reconsideration)
4. Order No. PSC-97-0309-FOF-TP (Order On Agreement)
5. Order No. PSC-97-0723-FOF-TP (Order Approving Agreement)
6. Order No. PSC-97-0723A-FOF-TP (Amendatory Order)

Docket No. 971140-TP (Recombination Docket)

7. Order No. PSC-98-0810-FOF-TP (Final Order)

Docket No. 960786-TL (271 Docket)

8. Order No. PSC-97-1459-FOF-TL (Final Order)

Exhibit _____ (RM-1)
MCI: Martinez
Docket 980281-TP

MCI/BST INTERCONNECTION AGREEMENT
effective June 19, 1997

(too voluminous to copy)

Date Invoice Received by Fiscal _____

Date Goods or Services Received _____

Date Goods or Services Inspected
and Approved as Acceptable _____

Approval for Payment _____ _____
(Initials) (Date)

Exhibit _____ (RM-2)
MCI: Ron Martinez
Docket 980281-TP

EXCERPTS FROM MCImetro/BST INTERCONNECTION AGREEMENT
effective June 19, 1997

MCImetro/BellSouth INTERCONNECTION AGREEMENT

This Interconnection Agreement (the "Agreement"), effective [insert date], 199__ (the "Effective Date"), is entered into by and between BellSouth Telecommunications, Inc. ("BellSouth"), a Florida corporation, and MCImetro Access Transmission Services, Inc. ("MCIm"), a Delaware corporation, and to establish the rates, terms and conditions for interconnection, local resale, ancillary services and purchase of unbundled network elements (individually referred to as the "service" or collectively as the "services").

WHEREAS, the parties wish to interconnect their local exchange networks in a technically and economically efficient manner for the transmission and termination of calls ("Interconnection"); and

WHEREAS, MCIm wishes to purchase Telecommunications Services for resale to others ("Local Resale" or "Services for Resale"), and BellSouth is willing to provide such service pursuant to the terms and conditions of this Agreement; and

WHEREAS, MCIm wishes to purchase on an unbundled basis Network Elements, and BellSouth is willing to provide such services; and

WHEREAS, MCIm wishes to purchase ancillary services such as access to poles, ducts conduits and rights of way and collocation of equipment at BellSouth's facilities on the terms and subject to the conditions of this Agreement; and

WHEREAS, the parties intend the rates, terms and conditions of this Agreement, and their performance of obligations thereunder, to comply with the Communications Act of 1934, as amended by the Telecommunications Act of 1996 (the "Act"), the applicable Rules and Regulations of the Federal Communications Commission ("FCC") in effect, and the orders, rules and regulations of the state regulatory body.

Now, therefore, in consideration of the terms and conditions contained herein, BellSouth and MCIm hereby mutually agree as follows:

Section 13. Continuing Obligations

13.1 Except as otherwise provided herein, each party shall perform its obligations hereunder at a performance level no less than the level which it uses for its own operations, or those of its Affiliates, but in no event shall a party use less than reasonable care in the performance of its duties hereunder.

13.2 BellSouth agrees that Interconnection will be provided in a competitively neutral fashion, at any technically feasible point within its network as stated in this Agreement and that such interconnection will contain all the same features, functions and capabilities, and be at least equal in quality to the level provided by BellSouth to itself or its Affiliates.

13.3 BellSouth agrees that it will provide to MCIm on a nondiscriminatory basis unbundled Network Elements and ancillary services as set forth in this Agreement and the operations support systems as set forth in this Agreement. BellSouth further agrees that these services, or their functional components, will contain all the same features, functions and capabilities and be provided at a level of quality at least equal to the level which it provides to itself or its Affiliates.

13.4. BellSouth agrees that it will provide to MCIm nondiscriminatory access to, poles, ducts, conduits, and rights of way owned or controlled by BellSouth in accordance with the requirements of Section 224 of the Act.

13.5 BellSouth Agrees that it will provide nondiscriminatory access to telephone numbers for as long as BellSouth remains the code administrator for the North American Numbering Plan.

13.6 BellSouth agrees that it will provide to MCIm, in a competitively neutral fashion, interim number portability as set forth herein and in accordance with the applicable rules, regulations and orders of the FCC and this Commission, including the First Report and Order, released July 2, 1996 in CC Docket No. 95-116, regarding Telephone Number Portability, in effect.

13.7 BellSouth agrees that it will provide to MCIm, in a competitively neutral fashion, dialing parity for local exchange service and interexchange service pursuant to the applicable rules, regulations and orders of the state regulatory body and the FCC in effect.

13.8 BellSouth agrees that order entry, provisioning, installation, trouble resolution, maintenance, billing, and service quality with respect to Local Resale will be provided at least as expeditiously as BellSouth provides for itself or for its own retail local service or to others, or to its Affiliates, and that it will provide such services to MCIm in a competitively neutral fashion.

PART B -- DEFINITIONS

"911 SITE ADMINISTRATOR" is a person assigned by MCIm to establish and maintain E911 service location information for its subscribers.

"911 SERVICE" means a universal telephone number which gives the public direct access to the Public Safety Answering Point (PSAP). Basic 911 service collects 911 calls from one or more local exchange switches that serve a geographic area. The calls are then sent to the correct authority designated to receive such calls.

"ASR" (ACCESS SERVICE REQUEST) means the industry standard forms and supporting documentation used for ordering Access Services. The ASR may be used to order trunking and facilities between MCIm and ILEC for Local Interconnection.

"ACCESS SERVICES" refers to interstate and intrastate switched access and private line transport services.

"ACT" means the Communications Act of 1934 as amended.

"AIN" (ADVANCED INTELLIGENT NETWORK) is a network functionality that permits specific conditions to be programmed into a switch which, when met, directs the switch to suspend call processing and to receive special instructions for further call handling instructions in order to enable carriers to offer advanced features and services.

"AFFILIATE" is a person that (directly or indirectly) owns or controls, is owned or controlled by, or is under common ownership or control with, another person. For the purposes of this paragraph, the term "own" means to own an equity interest (or the equivalent thereof) of more than 10 percent.

"ALI" (AUTOMATIC LOCATION IDENTIFICATION) is a proprietary database developed for E911 systems that provides for a visual display of the caller's telephone number, address and the names of the emergency response agencies that are responsible for that address. The Alternative Local Exchange Company will provide ALI record information in National Emergency Number Association (NENA) Version #2 format. The ALI also shows an Interim Number Portability (INP) number if applicable.

feature functionality, unless expressly agreed otherwise by MCIm.

7.2.1.5 BellSouth shall perform routine testing (e.g., Mechanized Loop Tests (MLT) and test calls such as 105, 107 and 108 type calls) and fault isolation on a schedule designated by MCIm.

7.2.1.6 BellSouth shall repair and restore any equipment or any other maintainable component that may adversely impact MCIm's use of unbundled Local Switching.

7.2.1.7 BellSouth shall control congestion points such as mass calling events, and network routing abnormalities, using capabilities such as Automatic Call Gapping, Automatic Congestion Control (e.g. choke trunk groups), and Network Routing Overflow. Application of such control shall be competitively neutral and not favor any user of unbundled switching or BellSouth.

7.2.1.8 BellSouth shall perform manual call trace as designated by MCIm and permit subscriber originated call trace.

7.2.1.9 BellSouth shall record all billable events, involving usage of the element, and send the appropriate recording data to MCIm as outlined in Attachment VIII.

7.2.1.10 For Local Switching used as 911 Tandems, BellSouth shall allow interconnection from MCIm local switching elements and BellSouth shall route the calls to the appropriate Public Safety Access Point (PSAP).

7.2.1.11 Where BellSouth provides the following special services, it shall provide to MCIm:

7.2.1.11.1 Essential Service Lines;

7.2.1.11.2 Telephone Service Prioritization;

7.2.1.11.3 Related services for handicapped;

7.2.1.11.4 Soft dial tone where required by law. Where BellSouth provides soft dial tone, it shall do so on a competitively-neutral basis.

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For resale purposes, BellSouth shall provide real time electronic interfaces ("EI") for transferring and receiving Service Orders and Provisioning data and materials (e.g., access to Street Address Guide ("SAG") and Telephone Number Assignment database). These interfaces shall be administered through a gateway that will serve as a point of contact for the transmission of such data from MCIm to BellSouth, and from BellSouth to MCIm. The implementation of such data transfer system shall be negotiated in good faith by the parties and be specified in a written agreement between MCIm and BellSouth that will be completed expeditiously after the Effective Date of this Agreement. MCIm and BellSouth agree to use best efforts to provide the Electronic Communications gateway described above as soon as practicable, but in no event later than April 1, 1997. In addition, (i) BellSouth agrees to use its best efforts to carry outs its responsibilities under this Section, and (ii) MCIm agrees to use its best efforts to carry out its responsibilities under this Section interfaces. BellSouth warrants that interim solutions shall provide MCIm Customers with the same level of service available to BellSouth customers.

2.1.2 Local Carrier Service Center (LCSC)/Single Point of Contact (SPOC)

BellSouth shall provide MCIm, twenty-four (24) hours a day, seven (7) days a week, with the capability of ordering via an electronic interface, except for scheduled electronic interface downtime and mutually agreed in advance electronic interface downtime. Provisioning shall be available during normal business hours. Downtime shall not be scheduled during normal business hours and shall occur during time where systems experience minimal usage. BellSouth shall provide a Single Point of Contact (SPOC) for all ordering and provisioning contacts and order flow involved in the purchase and provisioning of BellSouth's unbundled Elements, Combinations and Resale. BellSouth's SPOC shall provide to MCIm a toll-free nationwide telephone number (operational from 8:30 a.m. to 5:00 p.m., Monday through Friday, within each respective continental US time zone) which will be answered by capable staff trained to answer questions and resolve problems in connection with the ordering and provisioning of Elements or Combinations and resale services.

2.1.3 Street Address Guide (SAG)

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2.1.3.1 Within thirty (30) days after the Effective Date of this Agreement, BellSouth shall provide to MCIm the SAG data, or its equivalent, in electronic form. All changes to the SAG shall be made available to MCIm on the same day as the change to the data is made.

2.1.4 CLASS and Custom Features

2.1.4.1 For purchase of unbundled network elements, MCIm may order the entire set of CLASS and Custom features and functions, or, where Technically Feasible, a subset of any one or any combination of such features. For resale purposes, BellSouth shall provide MCIm with a list of features and functions available on an end office by end office basis.

2.1.5 Subscriber Payment History

2.1.5.1 To the extent each party has such information, MCIm and BellSouth agree to make available to each other such of the following subscriber information as the subscriber authorizes BellSouth or MCIm to release:

2.1.5.1.1 Applicant's name;

2.1.5.1.2 Applicant's address;

2.1.5.1.3 Applicant's previous phone number, if any;

2.1.5.1.4 Amount, if any, of unpaid balance in applicant's name;

2.1.5.1.5 Whether applicant is delinquent on payments;

2.1.5.1.6 Length of service with prior local or intraLATA toll provider;

2.1.5.1.7 Whether applicant had local or intraLATA toll service terminated or suspended within the last six months with an explanation of the reason therefor; and,

to BellSouth. MCIm shall provide any updates to the contact number list in writing to BellSouth.

2.1.7 Notification to Long Distance Carrier

2.1.7.1 BellSouth agrees to notify MCI using OBF-approved CARE transactions, whenever an MCI subscriber who is provided local service through services for resale or unbundled Network Elements changes MCI PIC status.

2.1.7.2 BellSouth shall support and implement new Transaction Code Status Indicators (TCSIs) defined by OBF in support of local resale to enable MCI to provide seamless subscriber service.

2.1.7.2.1 BellSouth shall implement TCSIs used in conjunction with the new Local Service Provider (LSP) Identification Code, where applicable, for handling Account Maintenance, Subscriber Service, and Trouble Administration issues. These TCSIs include 4001/02/05, 4201-4205, 4301, 2033, 2233, 3147, 3148, 3149, and others as OBF may define.

2.1.7.2.2 In addition, BellSouth shall implement TCSIs used in conjunction with the new Ported Telephone Number field to link "shadow" and ported telephone numbers in support of Interim Number Portability. These TCSIs may include 2231, 3150, 3151, and others as OBF may define.

2.1.7.3 Where available, BellSouth shall provide to MCI the Local Service Provider ID (LSP) on purchased lists of MCI PIC'd and non-PIC'd subscribers.

2.1.7.4 Where available, BellSouth shall provide the Ported Telephone Number (PTN) on purchased CARE lists of MCI PIC'd and non-MCI PIC'd subscribers.

2.1.7.5 Upon written notice from MCIm, BellSouth shall process IXC PIC changes for MCIm subscribers.

2.1.8 Number Administration/Number Reservations

2.1.8.1 Until Number Administration functions are assumed by a neutral third party in accordance with FCC Rules and

Regulations, BellSouth shall assign NXXs to MCIm on a non-discriminatory basis in accordance with national guidelines. BellSouth shall provide the same range of number choices allowing the assignment of numbers while the subscriber is on the phone to MCIm, including choice of exchange number, as BellSouth provides its own subscribers. Reservation and aging of numbers shall remain BellSouth's responsibility.

2.1.8.2 Where MCIm has not obtained its own NXX, BellSouth shall reserve up to 100 telephone numbers, per MCIm request, per NPA-NXX (where available), for large business subscribers in the same manner as for BellSouth's own large business subscribers. BellSouth shall provide additional numbers at MCIm's request as subscriber demand requires. Telephone numbers reserved in this manner may be released for other than MCIm use only in the same manner that BellSouth would release numbers reserved for its own subscribers. .

2.1.8.3 Where MCIm has obtained its own NXX, but has purchased BellSouth services for resale or Network Elements, BellSouth agrees to install the MCIm NXX in BellSouth's switch according to the local calling area defined by BellSouth and perform appropriate number administration functions. Where MCIm provides its own switching and obtains its own NXX code, BellSouth agrees to install the routing in its switches according to the local calling area defined by MCI.

2.1.8.4 BellSouth shall accept MCIm orders with assigned vanity numbers and blocks of numbers assigned for use with complex services including, but not limited to, DID, MULTISERV, and Hunting arrangements. Vanity numbers and numbers for use with complex services, DID and Hunting arrangements will be assigned by the LCSC on a case-by-case basis to meet the needs for specific service order activity.

2.1.8.5 Until the Electronic Interface exists for simple services number reservations, BellSouth shall use its best efforts to provide confirmation of a number reservation within twenty-four (24) hours of receiving a completed MCIm's request. For reservations associated with complex services see 2.1.8.4.

loss of feature capability and without loss of associated ancillary services, except those excluded from resale, partial migration of lines or services affected by the MCIm order which require common blocks of equipment or facilities (e.g. MULTISERV, Hunting, DID), and BellSouth Handicap Exemptions shall be retained. BellSouth shall not intentionally or unnecessarily interrupt feature capability including, but not limited to, Directory Assistance and 911/E911 capability.

2.2.2.5 For subscriber conversions requiring coordinated cut-over activities, on a per order basis, BellSouth and MCIm will agree on a scheduled conversion time.

2.2.2.5.1 BellSouth will coordinate activities of all BellSouth work groups involved.

2.2.2.5.2 BellSouth will notify MCIm when conversion is complete.

2.2.2.5.3 BellSouth will use its best efforts to minimize subscriber interruptions during conversions.

2.2.3 Intercept Treatment and Transfer of Service Announcements

2.2.3.1 BellSouth shall provide unbranded intercept treatment and transfer of service announcements to MCIm's subscribers on the same interval and basis as BellSouth provides to its own subscribers for resale and when BellSouth is providing the unbundled switch for MCIm. When MCIm supplies its own unbundled switch, MCIm will determine the service announcement interval.

2.2.4 Desired Due Date (DDD)

2.2.4.1 MCIm shall specify on each order the Desired Due Date (DDD). BellSouth shall not complete the order prior to DDD unless early turn-up is needed for testing purposes. BellSouth will provide services on the DDD, or on the earliest available installation date thereafter. BellSouth will notify MCIm if the DDD cannot be met.

2.2.4.2 If the DDD falls after the standard order completion interval provided by BellSouth, then BellSouth, where

facilities are available, shall complete the order on the Desired Due Date.

2.2.4.3 BellSouth shall supply MCIm with due date intervals to be used by MCIm personnel to determine service installation dates.

2.2.4.4 Subsequent to an initial order submission, MCIm may require a new/revised due date that is earlier than the original due date requested. BellSouth will make best effort to meet MCIm's requested due date, and applicable expedite charges set forth in Attachment I will apply.

2.2.4.5 Any special or preferred scheduling options available, internally or externally to BellSouth, for ordering and provisioning services shall also be available to MCIm.

2.2.5 Subscriber Premises Inspections and Installations -

2.2.5.1 MCIm shall perform or contract for all needs assessments, including equipment and installation requirements, at the subscriber premises on the subscriber's side of the demarcation point.

2.2.5.2 BellSouth shall provide MCIm with the ability to schedule subscriber premises installations.

2.2.5.3 In accordance with BellSouth's procedures and on parity with provision of such services to BellSouth's customers, BellSouth shall provide extended demarcation beyond the NID, at MCIm's request, using intrabuilding riser and lateral beyond the NID.

2.2.6 Firm Order Confirmation (FOC)

2.2.6.1 BellSouth shall provide to MCIm, via an electronic interface, a Firm Order Confirmation (FOC) for each MCIm order provided electronically. The FOC shall contain on a per line and/or trunk basis, where applicable, an enumeration of MCIm's ordered unbundled Network Elements (and the specific BellSouth naming convention applied to that element or combination), features, functions, resale services, options, physical interconnection, quantity, and BellSouth Committed Due Date for order completion.

BellSouth technician should notify MCIm in the presence of the MCIm Customer so that MCIm can negotiate authority to install the requested service directly with that customer and the technician and revise appropriate ordering documents as necessary.

2.2.9 Jeopardy Situations

2.2.9.1 BellSouth shall provide to MCIm notification of any jeopardy situations prior to the Committed Due Date, missed appointments and any other delay or problem in completing work specified on MCIm's service order as detailed on the FOC.

2.2.10 Cooperative Testing

2.2.10.1 Network Testing

2.2.10.1.1 BellSouth shall perform all pre-service testing prior to the completion of the order, including testing on local service facilities and switch translations, including, but not limited to, verification of features, functions, and services ordered by MCIm.

2.2.10.1.2 Within 24-hrs of MCIm's request for scheduled cooperative testing, BellSouth shall perform said testing with MCIm (including trouble shooting to isolate any problems) to test Network Elements purchased by MCIm in order to identify any problems.

2.2.10.2 Systems and Process Testing

2.2.10.2.1 LEC shall cooperate with MCIm upon request to test all operational interfaces and processes and thereby ensure that they are in place and functioning properly and efficiently.

2.2.11 Service Suspensions/Restorations

2.2.11.1 Upon MCIm's request through a Suspend/Restore Order, BellSouth shall suspend or restore the functionality of any Network Element, feature, function, or resale service. BellSouth shall use its best efforts to provide restoration

2.2.15.9 Each order for Network Elements will contain administration, bill, contact, and subscriber information, as defined by the OBF.

2.3 Systems Interfaces and Information Exchanges

2.3.0 BellSouth shall provide real-time and interactive access via electronic interfaces as detailed in this Agreement to perform pre-service ordering, service trouble reporting, service order processing and provisioning, customer usage data transfer and local account maintenance. If any of the processes require additional capabilities, BellSouth shall develop the additional capabilities by January 1, 1997. If BellSouth cannot meet that deadline, BellSouth shall file a report with the Commission that outlines why it cannot meet the deadline, the date by which such system will be implemented, and a description of the system or process which will be used in the interim. BellSouth and MCIm shall also establish a joint implementation team to assure the implementation of the real-time and interactive interfaces. These electronic interfaces shall conform to industry standards where such standards exist or are developed.

2.3.1 General Requirements

2.3.1.1 For pre-ordering and provisioning, the parties agree to implement the BellSouth approved and implemented EBI standard for Local Service Requests (LSR") within twelve (12) months of the implementation of the EBI interface for Access Service Request provisioning. MCIm further agrees to accept on an interim basis, until such time as EBI is implemented for LSR, the interfaces approved by BellSouth. These interim solutions described below address the Pre-ordering, Ordering and Provisioning interfaces.

2.3.1.1.1 Until such standards are completed, BellSouth and MCIm agree to use an interim order format and interface which will be defined by BellSouth and implementation negotiated between the Parties no later than sixty (60) days after the Effective Date of this Agreement.

2.3.1.2 BellSouth interfaces shall provide MCIm with the same process and system capabilities for both Residence and Business ordering and provisioning. MCIm shall not be

required to develop distinct processes or interfaces by class of service.

2.3.1.3 BellSouth and MCIm shall agree on and implement interim solutions for each interface within thirty (30) days after the Effective Date of this Agreement, unless otherwise specified in Exhibit A of this Attachment. The interim interface(s) shall, at a minimum, provide MCIm the same functionality and level of service as is currently provided by the electronic interfaces used by BellSouth for its own systems, users, or subscribers.

2.3.1.4 Interim interfaces or processes may be modified, if so agreed by MCIm and BellSouth, during the interim period.

2.3.1.5 Until the electronic interface is available, BellSouth agrees that the Local Carrier Service Center (LCSC) or similar function will accept MCIm orders. Orders will be transmitted to the LCSC via an interface or method agreed upon by MCIm and BellSouth.

2.3.1.6 BellSouth shall provide to MCIm a list of all CLASS and Custom features and functions within ten (10) days of the Effective Date of this Agreement and shall provide updates to such list at the time new features and functions become available.

2.3.2 Ordering and Provisioning for Resale Services

2.3.2.1 BellSouth shall make available to MCIm a list of all intraLATA and interLATA carriers available for subscriber selection on a central office level.

2.3.2.2 Left blank intentionally.

2.3.2.3 BellSouth shall provide MCIm with customer service records, including without limitation Customer Proprietary Network Information (CPNI), except such information as BellSouth is not authorized to release either by the customer or pursuant to applicable law, rule or regulation.

2.3.2.3.1 BellSouth shall provide to MCIm, on a restricted basis which will appropriately safeguard subscribers' privacy, a real-time, electronic interface to BellSouth's subscriber information systems which

will allow MCIm to obtain the subscriber profile information, including listed name, billing and service addresses, billed telephone number(s), and identification of features and services on the subscriber's account(s). The Parties shall mutually agree on restrictions that will appropriately safeguard subscribers' privacy.

2.3.2.3.1.1 Until access to CSRs is available via a real-time, electronic interface, BellSouth shall provide CSRs via a three-way call to a BellSouth service center or will fax a copy of the customer's record to MCIm with the customer's permission. BellSouth will also make available to MCIm the "switch-as-is" process. BellSouth will also provide information on an existing account in conjunction with issuing an LSR to convert the subscriber's service to MCIm.

2.3.2.3.1.2 BellSouth shall provide MCIm with CSR information, which may include CPNI, for preordering and ordering purposes, to the extent that BellSouth provides such information to other carriers, and upon the same terms and conditions that BellSouth uses for providing the same information to other carriers.

2.3.2.3.1.3 BellSouth shall not require MCIm to obtain prior written authorization from each customer before allowing access to the customer service records (CSRs). MCIm shall issue a blanket letter of authorization to BellSouth which states that it will obtain the customer's permission before accessing CSRs. Further BellSouth shall develop a real-time operational interface to deliver CSRs to MCIm, and the interface shall only provide the customer information necessary for MCIm to provide telecommunications service.

2.3.2.4 BellSouth shall provide to MCIm access to a list of all Telecommunications Services features and functions, including new services, trial offers, and promotions. At MCIm's option, BellSouth will provide MCIm access to

BellSouth's Products and Services Inventory Management System (P/SIMS) data via Network Data Mover file transfer. BellSouth shall update this data at least once a week from BellSouth's P/SIMS database. The data shall be available at all times and MCIm may retrieve the data at any time on a mutually agreed upon schedule which will allow MCIm to download the file once it is updated by BellSouth

2.3.2.5 At MCIm's option, BellSouth will provide MCIm the capability to validate addresses by access to BellSouth's Regional Street Address Guide (RSAG) via dial-up or LAN to WAN access. Implementation time frames will be negotiated between the parties.

2.3.2.6. BellSouth will provide MCIm on-line access to telephone number reservations by April 1, 1997. Until on-line access is available via electronic interface, BellSouth agrees to provide MCIm with a ready supply of telephone numbers as described in Section 2.1.8.2.

2.3.2.7 At MCIm's option , BellSouth will provide MCIm the capability to reserve telephone numbers electronically. Up to 100 telephone numbers per CLLI/Terminating Traffic Area may be reserved at MCIm's request, for MCIm's sole use. BellSouth will provide additional numbers manually at MCIm's request in order that MCIm will have sufficient numbers available to meet expected needs. In situations where there are limited numbers available, BellSouth may limit the number of telephone numbers that can be reserved for a particular CLLI/TTA. The telephone number reservations made in this manner are valid for MCIm's assignment for ninety (90) days from the reservation date. BellSouth will make the telephone number reservations available to MCIm via diskette or via electronic file transfer. BellSouth agrees to implement an electronic interface to allow MCIm to reserve telephone numbers via an on-line electronic interface no later than April 1, 1997.

2.3.2.8 BellSouth Local Carrier Service Center (LSCS) will assign vanity numbers and blocks of numbers for use with complex services including, but not limited to, DID and Hunting arrangements, as requested by MCIm, and documented in Work Center Interface agreements.

changes to the measurements and the standard shall be required or, if process improvements shall be required.

2.5.3 Provisioning Performance Standards

2.5.3.1 Installation functions performed by BellSouth will meet the following performance standards:

Product or Service	Interval Standards
INSTALLATION	
Lines/trunks with no premises visit:	
Business	
1-20 lines	98% met within 3 business days
21-40 lines	98% met within 7 business days
41-60 lines	98% met within 12 business days
Over 60 lines	To be negotiated
Residential	98% met within 24 hours of Service Order receipt by BellSouth
Lines/trunks with premises visit:	
Business	
1-20 lines	98% met within 5 business days
21-40 lines	98% rnet within 10 business days
41-60 lines	98% met within 14 business days
Over 60 lines	Individual case basis
Residential	98% met within 72 hours of Service Order receipt by BellSouth
Business lines/trunks; plant or other facilities not available	Individual case basis
Centrex station lines	
1-20 lines	98% met within 5 business days
21-50 lines	98% met within 8 business days
Over 50 lines	Individual case basis
Unbundled network elements	
Business or Residential	98% met within 2 days
Other unbundled elements	

Business or Residential	98% met within 5 days
FEATURE CHANGES	
Orders received before 12:00 p.m.	99% completed on day of receipt
Orders received after 12:00 p.m.	99% completed before 12:00 p.m. next Business Day

Product or Service	**Interval**
SERVICE DISCONNECTS	
With no premises visits	
Business or Residential	98% met within within 4 hours after receipt of Service Order
With CO change or subscriber premises visit	
Business or Residential	98% met within 24 hours after receipt of Service Order
Unbundled switching elements	
Business or Residential	98% met within 4 hours
Other unbundled elements	
Business or Residential	98% met within 24 hours

Committed Due Date
Resale:
Residence: >99% met
Business: >99.5% met
UNE: > 98% met

Service Orders Provisioned Correctly as Requested

Resale:
Residence: >99% met
Business: > 99.5% met

UNE: > 99% met

Missed Appointments
Residence: < 1%
Business: 0%

Firm Order Confirmation within:
Manual - within 24 hours 99% of the time
Electronic - within 4 hours 99% of the time

Notice of reject or error status within 1 hour of receipt 98% of the time

No trouble reports within 30 days of installation - 99% of the time

Time to complete any Suspend/Block/Restore order 4 hours > 99% after receipt by BellSouth

For expedited due date confirmation, BellSouth shall confirm to MCIm within two (2) Business Hours > 99% after BellSouth receipt of such request from MCIm whether BellSouth can complete an initially-submitted order within the expedited interval requested by MCIm. Confirmation may be provided by BellSouth via telephone call with follow up confirmation to be provided by BellSouth according to normal procedures and measurement intervals.

2.5.4 BellSouth shall implement the performance measurements indicated in section 2.5 within six (6) months of the Effective Date of this Agreement.

2.5.5 If MCIm requests, in writing, a higher level of performance than BellSouth provides to its own subscribers, BellSouth shall inform MCIm, in writing, of the amount MCIm's desired performance level exceeds that which BellSouth provides to its subscribers as well as a reasonable estimate of what it would cost BellSouth to meet, measure, and report these standards. If MCIm then communicates, in writing, to BellSouth that it desires such higher levels of performance, MCIm shall pay BellSouth for the costs incurred in providing such higher level of service. Moreover, MCIm shall pay all mechanisms necessary to capture and report data, required to measure, report or track any performance measurement that BellSouth does not, as of the Effective Date,

3.4.1.3 Completeness: There shall be no more than 20 omissions per one (1) million records.

3.4.2 If MCIm requests, in writing, a higher level of performance than BellSouth provides to its own subscribers, BellSouth shall inform MCIm, in writing, of the amount MCIm's desired performance level exceeds that which BellSouth provides to its subscribers as well as a reasonable estimate of what it would cost BellSouth to meet, measure, and report these standards. If MCIm then communicates, in writing, to BellSouth that it desires such higher levels of performance, MCIm shall pay BellSouth for the costs incurred in providing such higher level of service. Moreover, MCIm shall pay all mechanisms necessary to capture and report data, required to measure, report or track any performance measurement that BellSouth does not, as of the Effective Date, measure, report or track for itself or its own subscribers. In the event such system is not developed exclusively for MCIm, but rather is developed for use with other CLECs, as well as MCIm, BellSouth shall allocate to MCIm, on a competitively neutral basis, MCIm's share of the costs associated with such system.

Section 4 Provision Of Subscriber Usage Data

This Section 4 sets forth the terms and conditions for BellSouth's provision of Recorded Usage Data (as defined in this Attachment VIII) to MCIm and for information exchange regarding long distance billing.

4.1 Procedures

4.1.1 General

4.1.1.1 BellSouth shall comply with BellSouth EMR industry standards in delivering customer usage data to MCIm.

4.1.1.2 BellSouth shall provide MCIm with Recorded Usage Data in accordance with provisions of Section 4 of this document.

4.1.1.3 BellSouth shall provide MCIm with copies of detail usage on MCIm accounts. However, following execution of this Agreement, MCI, may submit and BellSouth will accept a PON for a time and cost estimate for development by BellSouth of the capability to provide copies of other detail

usage records for completed calls originating from lines purchased by MCIm for resale. Recorded Usage Data includes, but is not limited to, the following categories of information:

Completed Calls
Use of CLASS/LASS/Custom Features (under circumstances where BellSouth records activations for its own end user billing).
Calls To Information Providers Reached Via BellSouth Facilities And Contracted By BellSouth
Calls To Directory Assistance Where BellSouth Provides Such Service To An MCIm Subscriber
Calls Completed Via BellSouth-Provided Operator Services Where BellSouth Provides Such Service To MCIm's Local Service Subscriber and usage is billable to an MCIm account. For BellSouth-Provided MULTISERV Service, Station Level Detail Records Shall Include Complete Call Detail And Complete Timing Information where Technically Feasible.

4.1.1.4 Retention of Records: BellSouth shall maintain a machine readable back-up copy of the message detail provided to MCIm for a minimum of forty-five (45) calendar days. BellSouth shall provide any data back-up to MCIm upon the request of MCIm within the record retention interval and at the rates set forth in Attachment I.

4.1.1.5 BellSouth shall provide to MCIm Recorded Usage Data for MCIm subscribers. BellSouth shall not submit other carrier local usage data as part of the MCIm Recorded Usage Data.

4.1.1.6 BellSouth shall bill to MCIm any recurring or non-recurring charges appropriate based on the Local Service Requests submitted to the BellSouth by MCIm. BellSouth

4.1.1.7 MCIm shall negotiate with Information Service Providers (e.g. 976 and N11 service calls) for provision of such services to MCIm's end-users, including the billing of such services to its end-users.

4.1.1.8 BellSouth shall provide Recorded Usage Data to MCIm billing locations as designated by MCIm, segregated no lower than NXX level.

4.1.1.9 BellSouth shall establish a Local Carrier Service Center (LCSC) or similar function to serve as MCIm's single point of contact to respond to MCIm call usage, data error, and record transmission inquiries.

4.1.1.10 BellSouth shall provide MCIm with a single point of contact, Remote Identifiers (IDs), and assistance in resolving usage data volume fluctuations for each sending location.

4.1.1.11 MCIm shall provide a single point of contact responsible for receiving usage transmitted by BellSouth and receiving usage tapes from a courier service in the event of a facility outage.

4.1.1.12 BellSouth shall bill and MCIm shall pay the charges for Recorded Usage Data. Billing and payment shall be in accordance with the applicable terms and conditions set forth in this Agreement.

4.1.1.13 Without waiver of, and in addition to the Audit and Examination rights in the Section 22 (Audits and Examinations of Part A) of this Agreement, upon reasonable notice and at reasonable times MCIm or its authorized representatives may examine BellSouth's documents, systems, records and procedures which relate to the recording and transmission of the Usage data to MCIm under this Attachment.

4.1.2 Charges

4.1.2.1 BellSouth shall charge fees as delineated in Attachment I.

4.1.2.2 No charges shall be assessed for incomplete call attempts, nor will attempts be delivered to MCIm for calls which originate from lines purchased by MCIm for resale.

4.1.3 Central Clearinghouse & Settlement

4.1.3.1 In connection with CMDS hosting functions, BellSouth shall comply with Clearinghouse and Incollect/Outcollect procedures in accordance with CMDS standards.

BellSouth shall allocate to MCIm, on a competitively neutral basis, MCIm's share of the costs associated with such system.

4.5 Reporting

4.5.1 BellSouth shall agree to develop reports to be used for local usage and for PIC change data performance measurement within (sixty) 60 days of the Effective Date of this Agreement.

4.5.2 Left Blank Intentionally

4.5.2.1 Left Blank Intentionally

Section 5. Maintenance

5.1 General Requirements

For maintenance, the parties agree to implement the BellSouth approved EBI standard within 12 months of the signing of this Agreement. MCIm understands that within such 12 month period BellSouth may not be able to make full implementation of the approved EBI standard, and provided BellSouth uses its best efforts to fully implement such standard as soon as possible, MCI agrees to accept less than full implementation at the conclusion of the 12 month period. MCI further agrees to accept on an interim basis, until such time as EBI is implemented, the interfaces approved by BellSouth.

5.1.1 BellSouth shall provide repair, maintenance, testing, and surveillance for all Telecommunications Services and unbundled Network Elements and Combinations in accordance with the terms and conditions of this Agreement.

5.1.1.1 During the term of this Agreement, BellSouth shall provide necessary maintenance business process support as well as those technical and systems interfaces required to enable MCIm to provide at least the same level and quality of service for all services for resale, functions, features, capabilities and unbundled elements or combinations of elements as BellSouth provides itself, its subscribers any of its Affiliated or subsidiaries or any other entity. BellSouth shall provide MCIm with the same level of maintenance support as BellSouth provides itself in accordance with standards and performance measurements that are at least equal to the highest level of standards and/or performance measurements that BellSouth uses and/or which are

required by law, regulatory agency, or by BellSouth's own internal procedures, whichever are the most rigorous. These standards shall apply to the quality of the technology, equipment, facilities, processes, and techniques (including, but not limited to, such new architecture, equipment, facilities, and interfaces as BellSouth may deploy) that BellSouth provides to MCIm under this Agreement.

5.1.1.2 Until an Electronic Interface is available, BellSouth shall provide access numbers to the state specific TRC (Trouble Reporting Center) based on class of service for MCIm to report via telephone maintenance issues and trouble reports twenty-four (24) hours a day and seven (7) days a week.

5.1.1.3 BellSouth shall provide MCIm maintenance dispatch personnel on the same schedule that they provide their own subscribers.

5.1.2 MCIm shall handle all interaction with MCIm subscribers including all calls regarding service problems, establishing appointments pursuant to Section 5.1.11, and notifying the subscriber of trouble status and resolution, unless otherwise authorized by MCIm.

5.1.3 BellSouth shall cooperate with MCIm to meet maintenance standards set forth in this Attachment for all Telecommunications Services, unbundled network elements and Combinations ordered under this Agreement. Such maintenance standards shall include, without limitation, standards for testing, network management, call gapping, and notification of upgrades as they become available.

5.1.4 All BellSouth employees or contractors who perform repair service for MCIm subscribers shall follow at a minimum, procedures and protocols which ensure that: (1) BellSouth employees or contractors shall perform repair service that is at least equal in quality to that provided to BellSouth subscribers; (2) trouble calls from MCIm subscribers shall receive response time priority that is at least equal to that of BellSouth subscribers and shall be handled on a "first come first served" basis regardless of whether the subscriber is an MCIm subscriber or a BellSouth subscriber.

6.1.4.1.8 BellSouth shall not charge for storage of MCIm subscriber information in the DA and DL systems.

6.1.4.1.9 MCIm shall not charge for storage of BellSouth subscriber information in the DA and DL systems.

6.1.5 Left blank intentionally

6.1.6 Directory Assistance Data

6.1.6.1 BellSouth shall provide to MCIm, to the extent authorized, the residential, business, and government subscriber records used by BellSouth to create and maintain its Directory Assistance Data Base, in a non-discriminatory manner. MCIm may cornbine this element with any other Network Element for the provision of any Telecommunications Service.

6.1.6.2 Upon request, BellSouth shall provide an initial load of subscriber records via electronic data transfer for ILECS, CLECs and independent Telcos included in their Directory Assistance Database, to the extent authorized. The NPAs included shall represent the entire BellSouth operating territory. The initial load shall reflect all data that is current as of one business day prior to the provision date.

6.1.6.3 BellSouth shall provide MCIm, to the extent authorized, a complete list of ILECs, CLECs, and independent Telcos that provided data contained in the database.

6.1.6.4 All directory assistance data shall be provided in the format as specified in "Directory Assistance Data Information Exchanges and Interfaces" below or in Bellcore standard F20 format.

6.1.6.5 On a daily basis, BellSouth shall provide updates (end user and mass) to the Listing Information via electronic data transfer. Updates shall be current as of one business day prior to the date provided to MCIm.

6.1.6.6 Left Blank Intentionally

25

Subscriber Information					
Business Function	**Long-Term Solution***	**Real-Time Access To Data****	**Real Time Transaction Processing**	**Frequency/ Time Interval**	**Interim Solution**
BellSouth provides all published Subscriber List Information	Electronic Interface - within 30 days of Agreement	N	N/A	One-time only	To be negotiated
BellSouth provides MCIm with changes to Subscriber List Information	Electronic Interface	N	N/A	same day as changes occurs	To be negotiated
BellSouth provides all Street Address Guide Information (SAG)	Electronic Interface	N	N/A	One-time only	To be negotiated
BellSouth provides changes to Street Address Guide Information (SAG)	Electronic Interface	N	N/A	same day as changes occur	To be negotiated

*To be implemented by January 1, 1997, or agreed upon timeframe. All system availability is operational 24 hours a day, 7 days a week unless otherwise specified.

** Real-Time access to real-time or most current available data, as opposed to real-time browsing of a database that may be outdated

BellSouth Interconnection Services **Memorandum**

File Code
Date June 10, 1997

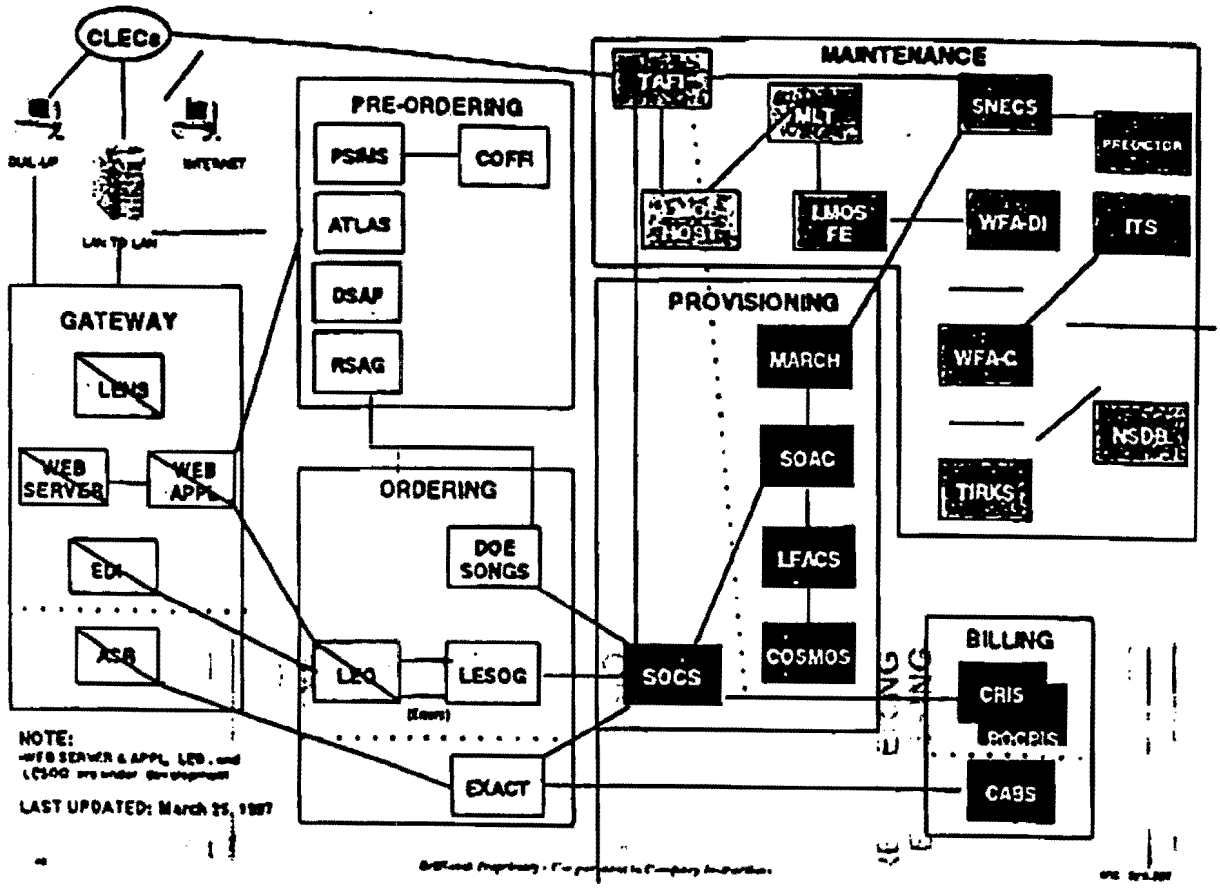
To Venetta Bridges
Telephone number 404-267-6517
Fax number

From Ilene Barnett
Telephone number 770-492-7525
Fax number

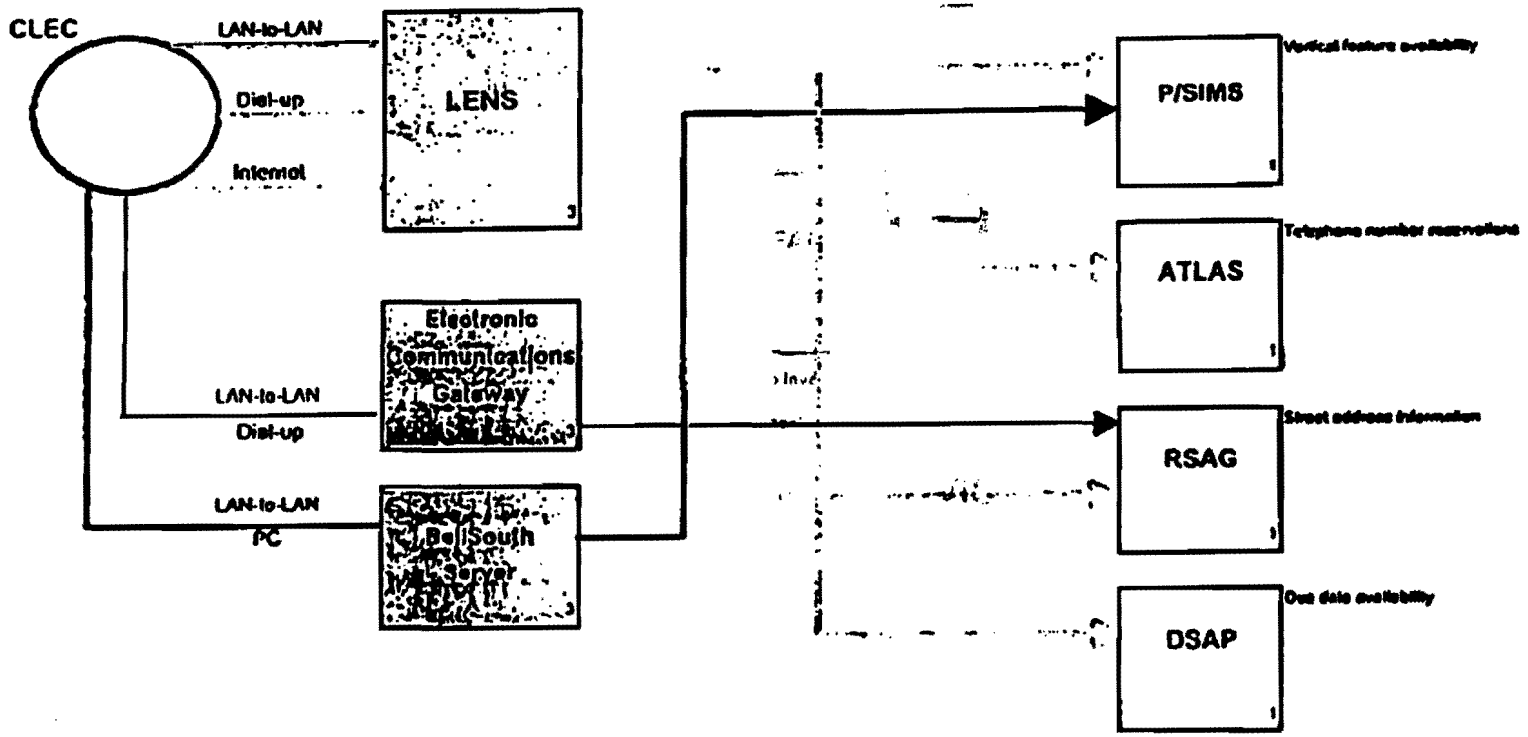
Subject Flow Charts

Attached to this memorandum are several flow charts depicting processes in BellSouth for CLEC activity and the mechanized system interfaces. After you review these documents, if you would like to further discuss the flows and ask questions, please call me.

Ilene


CLECs
DIAL UP
INTERNET
LAN TO LAN
GATEWAY
LENS
WEB SERVER
WEB APPL
EDI
ASR
NOTE:
LAST UPDATED: March 25, 1997
PRE-ORDERING
PSIMS
COFFI
ATLAS
DSAP
RSAG
ORDERING
DOE SONGS
LEO
LESOG
EXACT
MAINTENANCE
TAFI
MLT
SNECS
PREDICTOR
TOSS
LMOS FE
WFA-DI
ITS
PROVISIONING
MARCH
WFA-C
SOAC
NSDB
TIRKS
LFACS
COSMOS
SOCS
BILLING
CRIS
ROCRIS
CABS

MECHANIZED PREORDERING FLOW



1 Joint use (BOC and CLEC) system

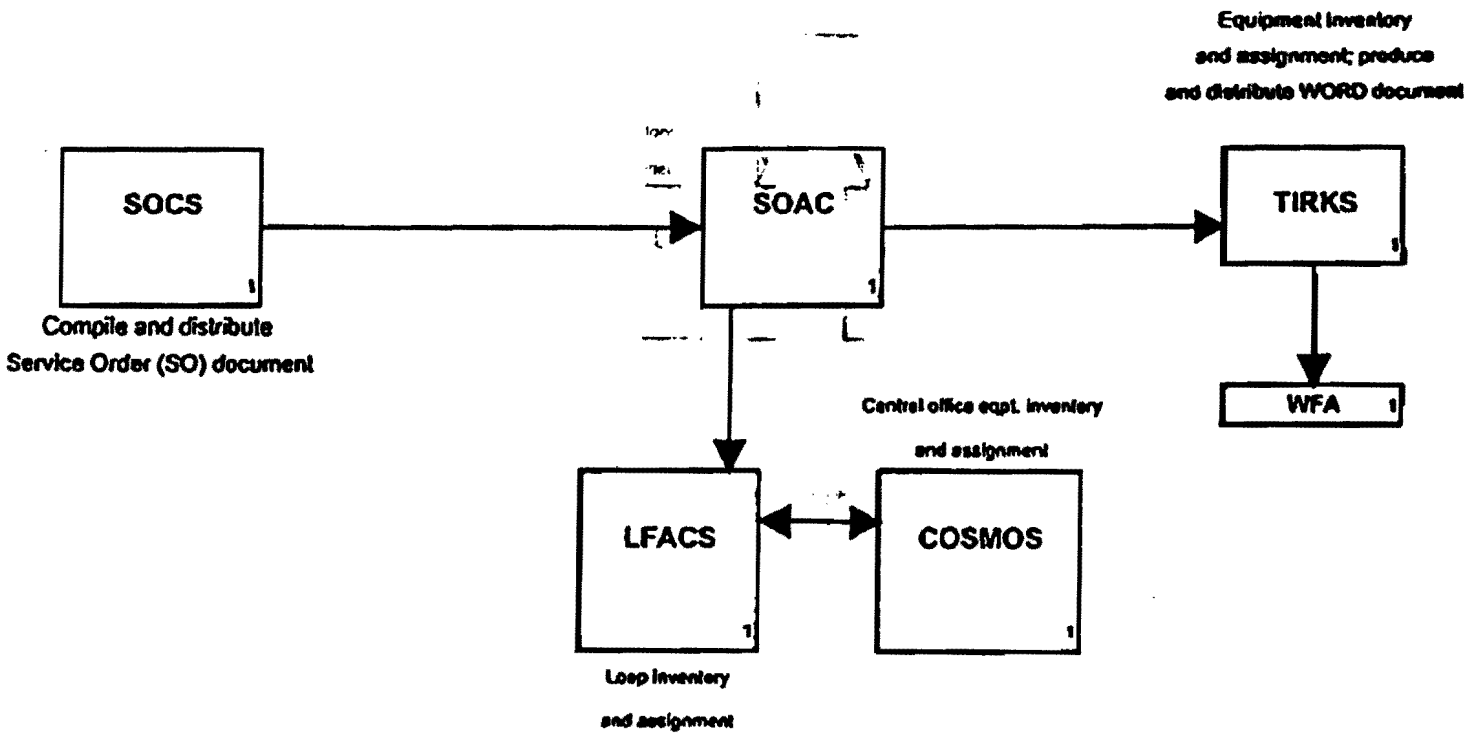
BOC-only system at present time - System being modified for joint BOC and CLEC use

CLEC-only system

4 BOC-only system

Exhibit RM-3
MCI: Martinez
Docket No. 980281-TP
Page 3 of 8

MECHANIZED DESIGN PROVISIONING FLOW



1 Joint use (BOC and CLEC) system

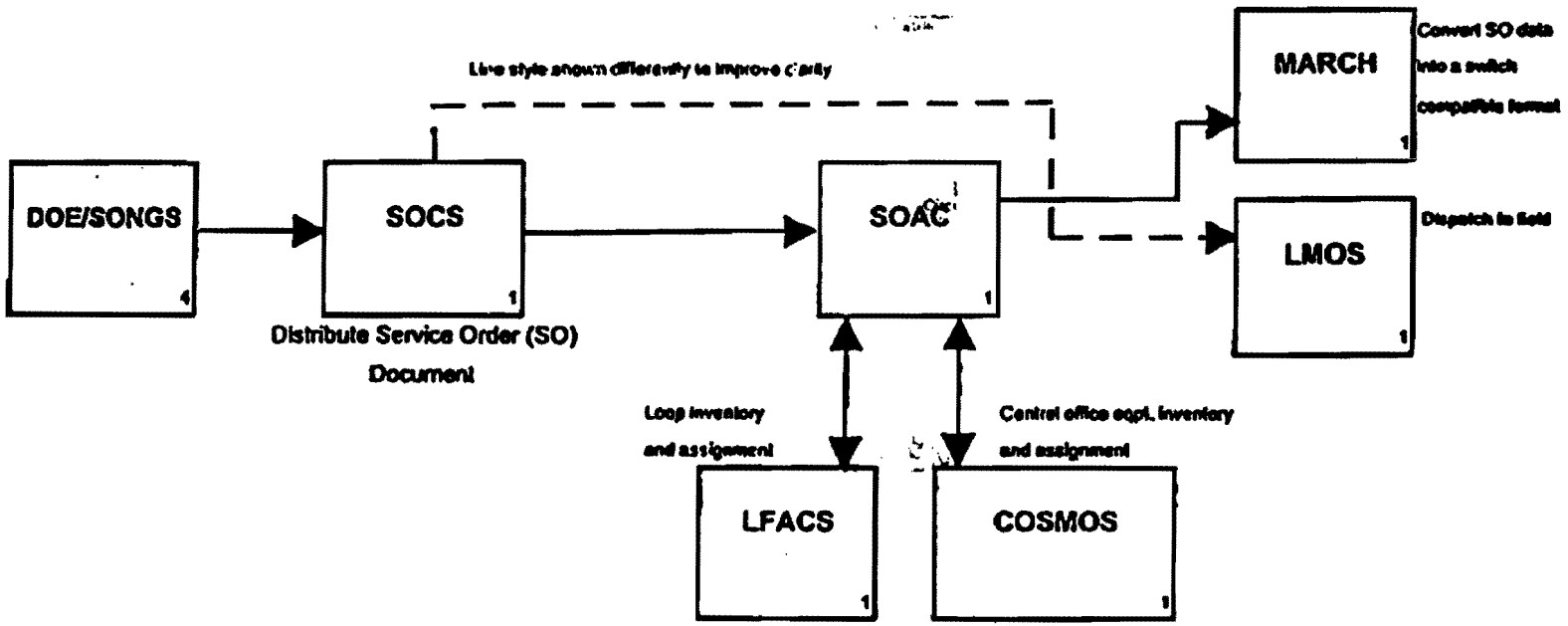
2 BOC-only system at present time - System being modified for joint BOC and CLEC use

3 CLEC-only system

4 BOC-only system

Exhibit RM-3
MCI: Martinez
Docket No. 980281-TP
Page 4 of 8

MECHANIZED NON-DESIGN PROVISIONING FLOW



1 Joint use (BOC and CLEC) system

BOC-only system at present time - System being modified for joint BOC and CLEC use

CLEC-only system

4 BOC-only system

ORIGINAL

Exhibit RM-3
MCI: Martinez
Docket No. 980281-TP
Page 5 of 8

MECHANIZED DESIGN MAINTENANCE FLOW

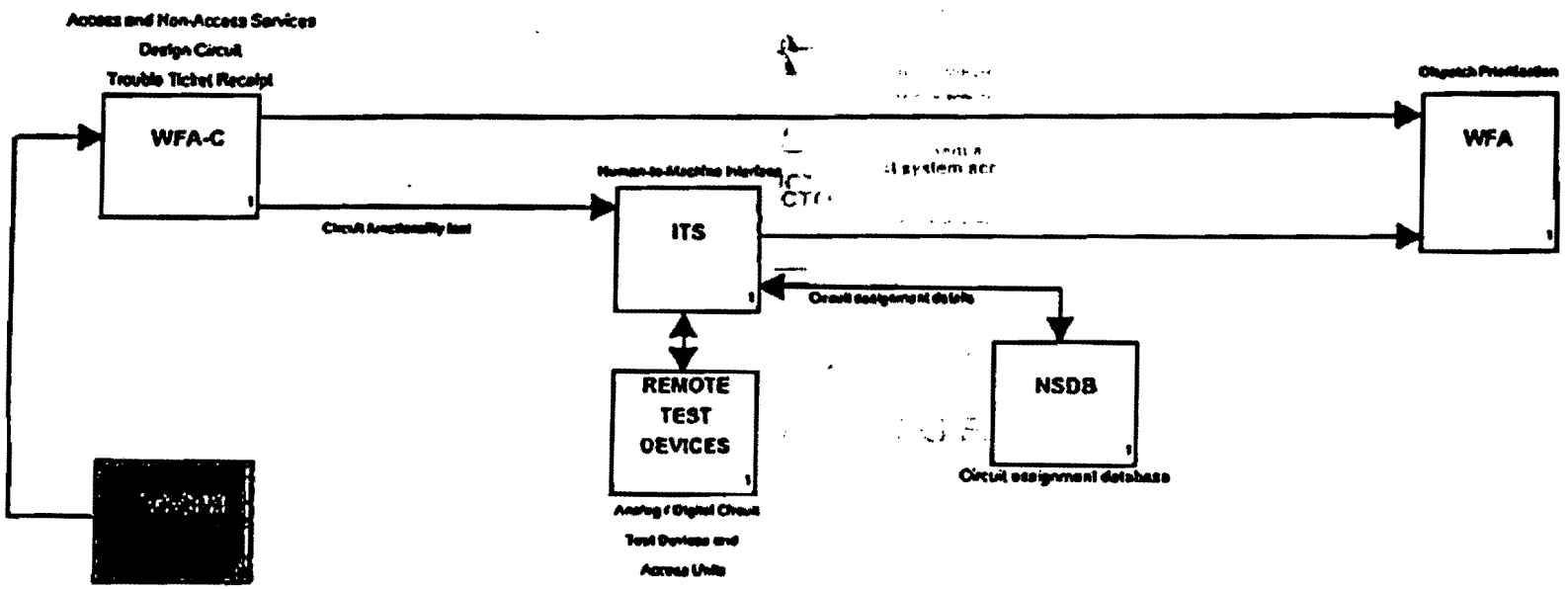
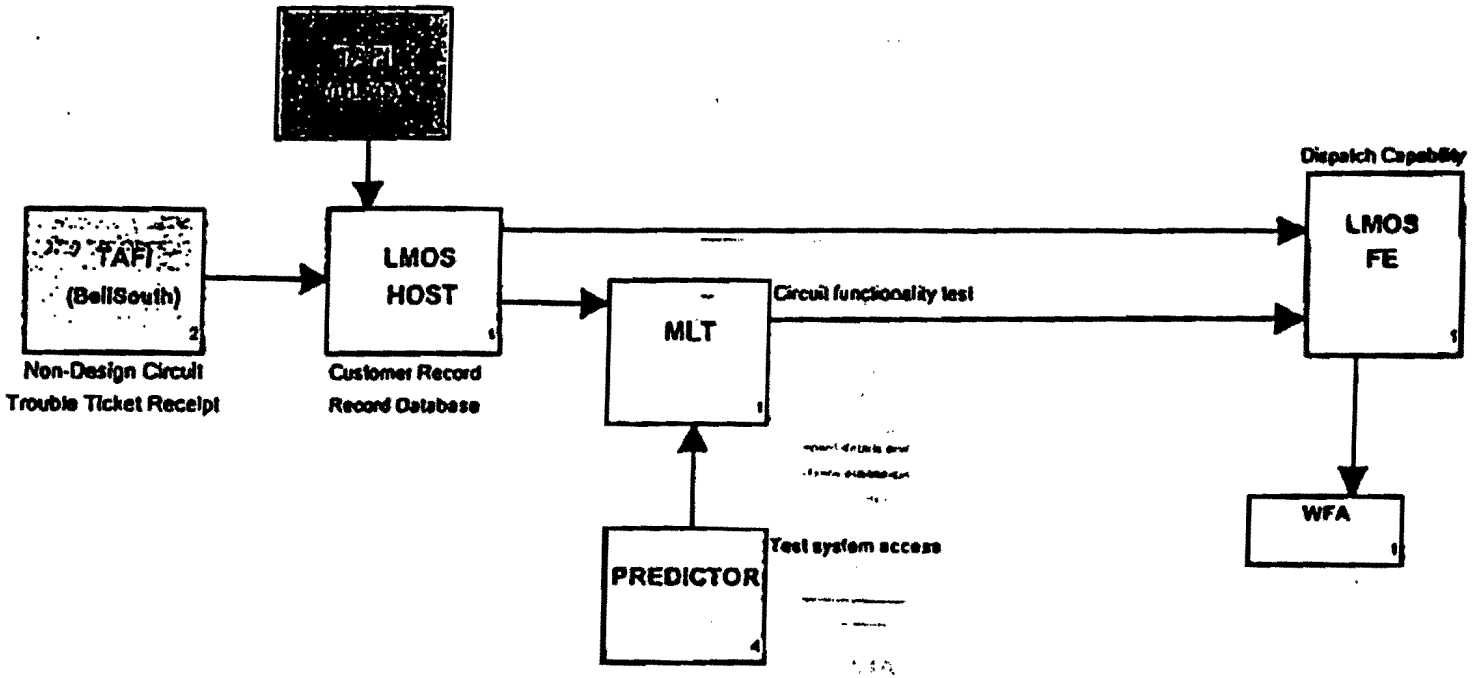


Exhibit RM-3
MCI: Martinez
Docket No. 980281-TP
Page 6 of 8

MECHANIZED NON-DESIGN MAINTENANCE FLOW



1 Joint use (BOC and CLEC) system

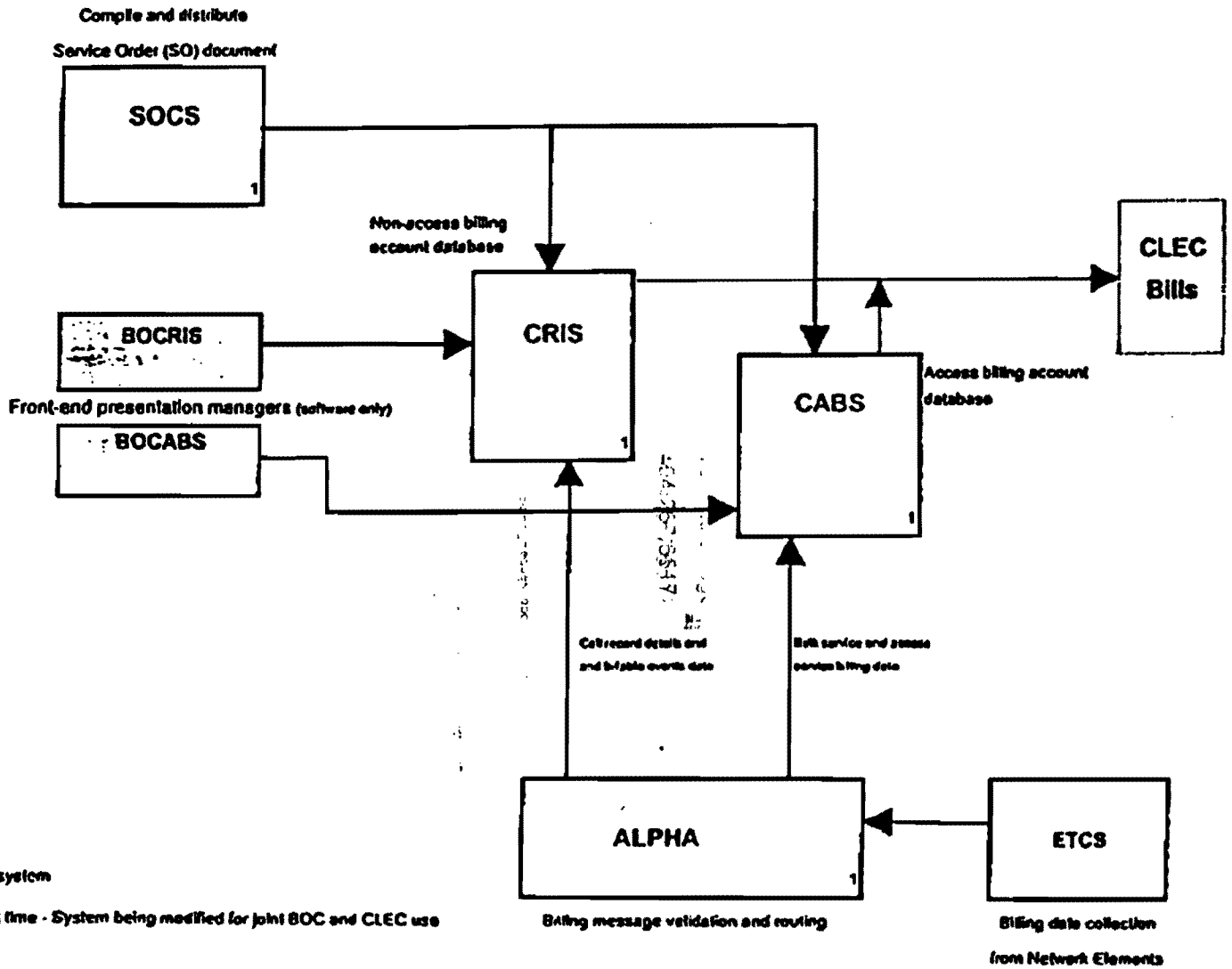
BOC-only system at present time - System being modified for joint BOC and CLEC use

CLEC-only system

BOC-only system

Exhibit RM-3
MCI: Martinez
Docket No. 980281-TP
Page 7 of 8

MECHANIZED BILLING FLOW



1 Joint use (BOC and CLEC) system

BOC-only system at present time - System being modified for joint BOC and CLEC use

CLEC-only system

4 BOC-only system

Exhibit RM-3
MCI: Martinez
Docket No. 980281-TP
Page 8 of 8

Simmons, Georjean (MCI)
From: Charlene Keys [Charlene.Keys@MCI.Com]
Sent: Wednesday, June 18, 1997 1:15 PM
To: Simmons, Georjean (MCI)
Subject: FW: Process Documentation Request

BellSouth documentation.

Charlene

-----Original Message-----

From: Venetta Bridges [SMTP:Venetta.Bridges@MCI.Com]
Sent: Wednesday, June 18, 1997 4:12 PM
To: 'ILENE BARNETT'
Cc: Charlene Keys
Subject: Process Documentation Request

Ilene,

Attached please find my request for additional process information. This is a Word 6.0 document. Let me know if you have trouble retrieving it.

Thanks,

Venetta Bridges

404.267.6517

BSPF_Request.doc

MCI Telecommunications Corporation

780 Johnson Ferry Road
Atlanta, GA 30342
404 267 5500

Date: June 18, 1997

From: Venetta Bridges

To: Ilene Barnett

cc: Charlene Keys

Subject: Flow Charts

Ilene, thanks for forwarding me the System Flowcharts dated 6/10/97. While this is good information, it does not satisfy my initial request. The specific information I need should address the following questions:

- What do BST representatives have available to provide customer due dates? What systems are used? What is the process?
- What do BST representatives have available to provide a new customer (new address with no pre-existing service) a telephone number? What systems are used? What is the process?
- What do BST representatives have available for insight into Pending Orders? What systems are used? What is the process?
- How do BST representatives access Directory Listings while processing orders? What systems are used? What is the process?
- How do BST representatives acquire Street Address information? What systems are used? What is the process?
- Is Street Address information available for download?
- What types of orders do the BST representatives process?
- Do BST representatives process orders with greater than 6 lines, or complex orders? If so, what is the process? If not, who processes the orders?

- How do BST representatives process UNE orders? What systems are used? What is the process?

- What do BST representatives do when the following systems are down: RSAG, P/SIMS, ATLAS, and DSAP? Describe contingency plans?

Any information you can provide is appreciated.

Venetta Bridges
(404) 267-6517

Attached to this memorandum are several flow charts depi

MCI Telecommunications Corporation

780 Johnson Ferry Road
Atlanta, GA 30342
404 267 5500

Date: July 3, 1997

From: Venetta Bridges

To: Ilene Barnett

cc: Charlene Keys

Subject: Follow-Up to Flow Chart Request

Ilene,

As a follow-up to my request dated 6/18, please respond no later than next Thursday, July 10, 1997. If this presents a problem, please advise.

Thanks,

Venetta Bridges
(404) 267-6517

Bridges, Venetta (MCI)

From: Ilene.M.Barnett@bridge.bellsouth.com
Sent: Friday, July 11, 1997 4:50 PM
To: Venetta.Bridges@MCI.com
Cc: Clifford.H.Bowers@bridge.bellsouth.com; Sharon.R.Daniels@bridge.bellsouth.com; Pamela.Lee@bridge.bellsouth.com; Judy.Rueblinger1@bridge.bellsouth.com; Kimara.Uhles@bridge.bellsouth.com
Subject: Process Documentation


Process


GC707F.doc

Venetta,

Attached is a WORD document which is the testimony of Gloria Calhoun before the Louisiana Public Service Commission. This document addresses the questions that you asked in your letter of 7/3/97 to me. For example, your question on provisioning a new customer is addressed on page 24.
You also asked what types of orders do the BST representatives process? They do process orders for any service which BST retails. Is there a more specific question that could provide me more insight?

Ilene Barnett (770)492-7525

Sutherland, Asbill & Brenn
ATLANTA • AUSTIN • NEW YORK • WASI

999 PEACHTREE STREET, N.E.
ATLANTA, GEORGIA 30309-3996

TEL: (404) 853-8000
FAX: (404) 853-8806

DAVID I. ADELMAN
DIRECT LINE: (404) 853-8206
Internet: diadelman@sablaw.com

July 16, 1997

RECEIVED
JUL 16 1997
EXECUTIVE SECRETARY
G.P.S.C.

BY HAND DELIVERY

Fred McCallum, Jr., Esq.
BellSouth Telecommunications, Inc.
Legal Department
Suite 376
125 Perimeter Center West
Atlanta, Georgia 30346

Re: Docket Nos. 6863-U and 7253-U: Competitive Local Exchange Carrier ("CLEC") Review of BellSouth Ordering and Pre-Ordering Systems

Dear Mr. McCallum:

On July 14, 1997, BellSouth witness Gloria Calhoun agreed to allow MCI and other CLECs the opportunity to review the operation of BellSouth's ordering and pre-ordering operational support systems on-site at BellSouth.

Please accept this letter as a formal request by MCI that the on-site review be conducted early next week. MCI personnel will be available for this review July 21-23, 1997.

I will contact you to set up the time and place for this review. As indicated during the proceedings yesterday, MCI will sign a satisfactory confidentiality agreement if requested by BellSouth.

Kind regards.

Sincerely,

David I. Adelman

cc: All Commissioners, Georgia Public Service Commission
All Parties of Record
Martha P. McMillin, Esq.

Sutherland, Asbill & Brennan
ATLANTA • AUSTIN • NEW YORK • WA

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DAVID I. ADELMAN
DIRECT LINE: (404) 853-8206
Internet: diadelman@sablaw.com

July 24, 1997

BY HAND DELIVERY

Fred McCallum, Jr., Esq.
BellSouth Telecommunications, Inc.
Legal Department
Suite 376
125 Perimeter Center West
Atlanta, Georgia 30346

Re: Docket No. 6863-U and 7253-U: Competitive Local Exchange Carrier ("CLEC") Review of BellSouth Ordering and Pre-Ordering Systems

Dear Mr. McCallum:

On July 16, 1997 MCI hand delivered to you a letter regarding BellSouth witness Gloria Calhoun's agreement to allow MCI and other CLECs the opportunity to review the operation of BellSouth's ordering and pre-ordering operational support systems on-site at BellSouth.

In the July 16, 1997 letter I suggested the on-site review be conducted before the hearings next week and stated that MCI would be available for the review July 21-23, 1997. I followed-up with you regarding the on-site inspection during one of the recess periods during the hearings on July 17, 1997. At that time you said you would follow-up with MCI the next day and help set up the on-site review.

More than a week has passed since you said you would follow-up and to my knowledge BellSouth has still not taken any steps to allow the on-site review. Of course, much of BellSouth's testimony in this proceeding alleges that pre-ordering and ordering systems offered to CLECs perform at parity with those BellSouth uses. **An on-site review by CLECs, in particular individuals who are experts in pre-ordering and ordering systems, is one way such claims can be critically considered.** For that reason, it was very important that the on-site review by CLECs be conducted before the hearings beginning on July 28, 1997 in order to provide any meaning to those hearings regarding the operational support systems issues.

Because of BellSouth's failure to follow-up on its agreement, it now seems impossible that such a review by MCI can be conducted in time for the next round of hearings. MCI continues to believe an on-site review by CLECs is one important way BellSouth can show the Commission that it is moving forward in good faith and that its assertions regarding parity are more than an exaggeration designed to prejudice the Commission. Although a critical time has passed for the review, MCI stands ready to conduct the on-site review and looks forward to BellSouth's response.

Kind regards.

Sincerely,

David I. Adelman

DIA/adl

cc: All Parties of Record
Martha P. McMillin

Fred McCallum Jr.
General Counsel - Georgia

BellSouth Telecommunications, Inc.
Legal Department - Suite 376
125 Perimeter Center West
Atlanta, Georgia 30346
Telephone 770-391-2416
Facsimile 770-391-2812

July 29, 1997

JUL 29 1997

David I. Adelman, Esq.
Sutherland, Asbill & Brennan
999 Peachtree Street, SW
Atlanta, GA 30309-3996

RE: Consideration of BellSouth Telecommunications, Inc's Services Pursuant to Section 271 of the Telecommunications Act of 1996; Docket No. 6863-U/7253-U

Dear Mr. Adelman:

This letter is in response to your letter of July 24, 1997. Frankly, I am very surprised at the importance MCI now places on an on-site demonstration of BellSouth's support systems. MCI never mentioned or made any sort of request to view these systems prior to July 16, 1997. It is only after Ms. Sommer, the attorney for Commission Staff, made such a request that you immediately stood up an issued a me-too request. To now contend, as you do in your letter, that "MCI continues to believe an on-site review by CLECs is one important way BellSouth can show the Commission that it is moving forward in good faith and that its assertions regarding parity are more than an exaggeration designed to prejudice the Commission" certainly rings hollow under the circumstances. The bottom line is that, based on its inaction, MCI must not have thought that such a review was necessary or important at all until the Commission Staff requested such a demonstration.

As you will recall, BellSouth notified all parties at the hearing that it had proprietary concerns about allowing competitors on-site access to its business offices. In addition, the substance of our "follow-up discussion" did not occur as you portray it in your letter. When you asked me on Thursday of the hearing week whether it was a good time to talk about the demonstration, my recollection is that I told you "no, it was not." As you well know, I, as well as several BellSouth witnesses who would be involved in setting up such a demonstration, had been involved in hearings all week long, and there simply was no further information to share on the subject. I do not recall telling you that

I would get back to you "the next day," and I certainly would not have volunteered to "help set up the on-site review" in light of our previous concerns that had been mentioned on the record.

As MCI is well aware, BellSouth's pre-ordering and ordering system is integrated into the RNS system , which also contains sales and marketing information used by BellSouth in the over-the-phone sales process. This sales and marketing information and the means by which it is used in the sales process is highly proprietary, and is the type of information that one competitor would never voluntarily share with another competitor. I am sure that MCI has the same type of system for selling local and long distance services here in Georgia. The systems have nothing to do with pre-ordering or ordering functions, and are simply not relevant at all to the issues in this docket.

Because of these issues, BellSouth does not plan on allowing an on-site demonstration of its RNS and DOE systems for competitors. BellSouth is in the process of putting together a limited demonstration of relevant functionalities of these pre-ordering and ordering systems that will protect the proprietary information, but this demonstration has not yet been completed.

To conclude, BellSouth made clear its concerns regarding competitors participating in an on-site demonstration of BellSouth's RNS and DOE systems at the hearing. I made no other agreement to allow MCI to view these systems on-site. Thus, there has been no "agreement" to allow MCI to view these highly proprietary systems, as implied in your letter. BellSouth is in the process of putting together a demonstration of these systems that will protect the proprietary information, but, given the short time since the request, and the upcoming hearings, it will not be possible to accomplish this prior to the hearings next week.

Very truly yours,

Fred McCallum Jr.

Fred McCallum Jr. /Beth

cc: Parties of Record

PARTIES OF RECORD

Mr. Jim Hurt, Director
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Consumers' Utility Counsel
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Atlanta, GA 30334

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Assistant Attorney General
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Atlanta, GA 30309-3996

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Senior Counsel
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Southern Region
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BELLSOUTH

BellSouth Telecommunications, Inc.
Room 34S91 BellSouth Center
675 West Peachtree Street, N.E.
Atlanta, Georgia 30375

May 13, 1997

Mr. Bryan Green
Senior Manager
Systems Implementation
MCI Telecommunications Corp.
Centurum Building
780 Johnson Ferry Road
Atlanta, Georgia 30342

Re: Call Detail for Flat Rate Service - Usage Report

Dear Bryan:

MCI has made several requests to BellSouth to include call detail for flat rate service in the daily usage report to MCI. BellSouth does not extract call detail for flat rate services for its own use at this time. Therefore, if it is essential that MCI obtain this information, please contact your account executive for instructions on using the BellSouth's Bona Fide Request Process to pursue this further.

Sincerely,

Cathy S. Forbes

Cathy S. Forbes
Compliance Manager
Interconnection Services

cc: Ilene Barnett
Jerry Hendrix

MCI Telecommunications Corporation
780 Johnson Ferry Road
Atlanta, GA 30342
404 267 5500

August 18, 1997

Ms. Ilene Barnett
Sales Director
BellSouth Interconnection Services
1960 West Exchange Place
Tucker, GA 30084

Dear Ms. Barnett:

This letter is in response to Cathy Forbes' May 13, 1997 letter to Bryan Green indicating that if MCIm wants call detail for flat rate service MCIm will need to use the Bona Fide Request Process. MCI and BellSouth have been discussing this subject and now MCI is putting its position in writing.

The MCImetro-BellSouth Interconnection Agreements provide that BellSouth shall provide MCIm with copies of detail usage for MCIm accounts. No distinction is made between flat rated calls and measured calls. Your insistence on reading measured calls into the contract sections dealing with usage data is inconsistent with the text of the agreements which makes no such distinction.

Specifically, the agreements provide the following in Attachment VIII:

> 4.1.1.2 BellSouth shall provide MCIm with Recorded Usage Data in accordance with provision of Section 4 of this document.
>
> 4.1.1.3 **BellSouth shall provide MCIm with copies of detail usage on MCIm accounts.** However, following execution of this Agreement, MCI, may submit and BellSouth will accept a PON for a time and cost estimate for development by BellSouth of the capability to provide copies of other detail usage records for completed calls originating from lines purchased by MCIm for resale. **Recorded Usage Data includes, but is not limited to, the following categories of information:**
>
> **Completed Calls**
> Use of CLASS/LASS/Custom Features (under circumstances where BellSouth records activation's for its own end user billing).
> Calls To Information Providers Reached Via BellSouth Facilities And Contracted By BellSouth

Calls To Directory Assistance Where BellSouth Provides Such Service To An MCIm Subscriber
Calls Completed Via BellSouth-Provided Operator Services Where BellSouth Provides Such Service To MCIm's Local Service Subscriber and usage is billable to an MCIm account. For BellSouth-Provided Centrex Service, Station Level Detail Records Shall Include Complete Call Detail And Complete Timing Information where Technically Feasible.

4.1.1.5 BellSouth shall provide to MCIm Recorded Usage Data for MCIm subscribers. BellSouth shall not submit other carrier local usage data as part of the MCIm Recorded Usage Data.

As these sections indicate, BellSouth is required to provide MCIm with Recorded Usage Data. Section 4.1.1.3 specifically indicates that Recorded Usage Data includes completed calls. No distinction is made between flat rate and measured calls. Thus, there is no support in the contract for the distinction you have made. Clearly, MCIm is entitled to call detail for flat rate as well as for measured service under the terms of the interconnection agreement.

BellSouth's continued refusal to provide call detail for flat rate service in its daily usage report to MCIm will demonstrate BellSouth's lack of compliance with the explicit terms of the contract. The Bona Fide Request Process is inappropriate and not necessary in this instance.

Please confirm that BellSouth will provide MCIm with call detail for flat rate service by August 22, 1997. Thank you.

Sincerely,

Walter J. Schmidt

Walter J. Schmidt

cc: Marcel Henry - MCI
Charlene Keys - MCI
Daren Moore - MCI
Bryan Green - MCI
Jeremy Marcus - MCI
Joe Baker - BellSouth
Pam Lee - BellSouth

BellSouth Interconnection Services
Suite 420
1960 West Exchange Place
Tucker, Georgia 30084

770 492-7500
Fax 770 621-0632

MCI Account Team

August 22, 1997

Mr. Walter J. Schmidt
MCI Telecommunications Corporation
780 Johnson Ferry Road
Atlanta, Georgia 30342

Dear Wally,

This letter is in response to your letter dated August 18, 1997 regarding MCIm's request for call detail for flat rate service. As stated Cathy Forbe's letter dated May 13, 1997, call detail for flat rate service is not available as part of Recorded Usage Data. BellSouth's system is not set up to provide local call detail.

While Section 4.1.1.3 does set forth specific categories of data that will be included, Section 4.2.1.1 of Attachment VIII further clarifies which types of categories will be provided. Specifically, Section 4.2.1.1 states:

4.2.1.1 Core Billing Information

> 4.2.1.1. Recorded Usage Data all intraLATA toll and local usage. BellSouth shall provide MCIm with unrated EMR records associated with all billable intraLATA toll and local usage which they record on lines purchased by MCIm for resale. Any billable Category, Group and/or Record types approved in the future for BellSouth shall be included if they fall within the definition of local service resale. MCIm shall be given notification thirty (30) days prior to implementation of a new type, category and/or record.

As this section indicates, BellSouth agrees to provide usage data for billable usage. Local call detail is not a billable category and therefore is not included as usage data to be provided to MCIm by BellSouth.

Sincerely,

Ilene M. Barnett

Ilene M. Barnett

cc: External Response Team
Pamela Lee

EXHIBIT NO. 3

DOCKET NO.: 980281-TP

WITNESS: RONALD MARTINEZ

PARTY: MCI

DESCRIPTION:

1. July 23, 1998 DEPOSITION TRANSCRIPT

PROFFERING PARTY: BELLSOUTH TELECOMMUNICATIONS

ID# 3

FLORIDA PUBLIC SERVICE COMMISSION
DOCKET NO. 980281-TP EXHIBIT NO. 3
COMPANY/
WITNESS: Martinez
DATE: 8-5-98

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Complaint of MCImetro Access Transmission Services, Inc. against BellSouth Telecommunications, Inc. for breach of approved interconnection agreement.	DOCKET NO. 980281-TP

DEPOSITION OF: RONALD MARTINEZ

TAKEN AT THE INSTANCE OF: BellSouth

DATE: Thursday, July 23, 1998

TIME: Commenced at 1:30 p.m.
Concluded at 5:00 p.m.

PLACE: 2540 Shumard Oak Boulevard
Room 262
Tallahassee, Florida

REPORTED BY: NANCY S. METZKE, RPR, CCR

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JUL 27 1998
DIRECTOR, REG. RELATIONS
TALLAHASSEE, FL

APPEARANCES:

MARTHA CARTER-BROWN, ESQUIRE, FPSC, 2540 Shumard Oak Boulevard, Suite 370, Tallahassee, Florida 32399-0850.

DULANEY L. O'ROARK, III, ESQUIRE, MCImetro, Suite 700, 780 Johnson Ferry Road, Atlanta, Georgia 30346.

PHILLIP CARVER, ESQUIRE, BellSouth, Suite 4300, 675 West Peachtree Street, NE, Atlanta, Georgia 30375.

ALSO PRESENT:

STAN GREER, BellSouth.

WAYNE STAVANJA, FPSC Staff.

BRIAN MUSSELLWHITE, FPSC Staff.

* * * *

I N D E X

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* * * *

Whereupon,

RONALD MARTINEZ

was called as a witness by BellSouth and, after being first duly sworn, was examined and testified as follows:

DIRECT EXAMINATION

BY MR. CARVER:

Q Good afternoon, Mr. Martinez.

A Good afternoon.

Q A couple of preliminary questions I had. As to the division between your testimony and Mr. Green's, any questions that I have about the pertinent contract provisions in the Interconnection Agreement, those should be directed to you?

A That's correct.

Q And in terms of MCI's position that BellSouth has breached these provisions, Mr. Green addresses some of those and others you address?

A Yes.

Q Okay. Are there any in particular that you want to mention that I should address to you specifically, or should we just take them as they come?

A Just take them as they come.

Q Okay.

A I mean it's clear in the testimony. They usually

refer back to Bryan's testimony.

Q All right. Now let me ask you as to -- You weren't at the prehearing conference this morning, were you?

A Nope, saw you coming out.

Q Okay. I'm just going to ask you a couple of questions actually that relate to an issue that arose there. Each of the 13 issues, is it MCI's position that BellSouth has breached some aspect of the agreement between the parties that relates to that issue?

A Yes.

Q Other than these alleged breaches, is MCI claiming that BellSouth has violated the Act in any other way?

A Within this complaint?

Q Yes.

A No.

Q Okay. Because there was some discussion, the reason I asked, at the prehearing conference about whether you were claiming just that we breached the contract or that we had done something else that violated the Act outside of the contract, and my understanding was it was just the contract, so I wanted to make sure that was your position also?

A That's my position. I believe that's our

position.

Q Okay. Let's start with -- well, let me ask you, first of all, do you have a copy of the contract with you?

A Right here.

Q Okay.

A Never leave home without it.

Q Okay. Let's start with count number 1. Can you tell me generally -- and again, if you want to defer this one to Mr. Green, that's fine, but can you tell me generally what is the scope of the OSS information that MCI contends BellSouth should be required to provide?

A I think that's best left to Mr. Green; however, it would be data bases, what is contained in the data bases. It doesn't have to be totally line by line, but basically what are the systems and data bases surrounding those systems that your, either business or -- business office or business service reps have access to for writing orders.

Q Okay. And that would be for every OSS system that BellSouth uses in some way?

A Yes. Well, everyone that is tied to your ordering process in your OSS systems that are being proffered to be at parity.

Q Do you have any idea how many systems this would be?

A I would imagine it's -- it could be quite a few.
Q Hundreds? If you know.
A I don't know the numbers.
Q Okay. Now when you say for the systems you don't necessarily want every line, do you want every screen?
A No, basically the data layouts, what's in there, what physical information is available to your representatives to see that we are getting like treatment.
Q Okay. So when you say you want to know the physical information in there, would a summary suffice, or do you basically want to see everything that's in the data base?
A No, a summary would suffice, a summary that encompassed what the information was that's contained in there. How it's laid out is not necessarily important to us.
Q Okay. I take it it would have to be a fairly detailed summary for your purposes?
A Well, it would depend on the data base, I think.
Q Now are you requesting this only for the OSS systems that BellSouth utilizes to provide things comparable to what MCI is ordering?
A I think that's a question that is probably best left with Bryan Green, the OSS person.
Q Okay. So you don't really know from that

stand --

A Well, I don't know everything that we are ordering right now and whether that entails everything that we will ever order. I would think that would be left to the people that design those systems.

Q Well, I'm not so much looking to get into the specifics of what is being ordered and what is not as I am trying to understand your general position, so let me try to ask the question generally; and again, if you want to defer to him, that's fine. Let's say that MCI is ordering ten services for resale, and let's assume that that's all we are talking about, is just those ten resale services. Would you want just the analogous OSS -- well, I should say the OSS systems that support analogous offerings by BellSouth, or would it go beyond that?

A Well, it would go beyond because, if we are only ordering ten services, we would only be scratching the surface of what we would ultimately be ordering from you once we get in full swing. So, you know, I can't draw that parallel to a finite number of services because, again, I don't know what we are designing in our systems; and that's why I say it would be best left for Bryan.

Q That's why I am just trying to understand this as a conceptual basis of it because I know you don't know the individual services; but I mean let's say, again,

hypothetically that you were offering ten services, and let's say that you projected that you would offer ten more and you knew that those 20 were all you were going to need. Would you still want BellSouth's OSS systems that related to analogous offerings beyond those 20?

A I don't believe so, no.

Q Okay. Now to your knowledge, has MCI limited its request for OSS information in that way or based on some notion of what you may or may not offer?

A I do not know.

Q Okay. Do you know if --

A I'd have to be getting into Bryan's head to --

Q Yeah, I'll do that. I'll save all those for him. In fact, I've got a number here to run through because I think they are probably questions for him.

Let's turn to the language of the contract. In your testimony on page 3, and I believe it goes into page 4 and page 5, you cite the provisions that you believe entitle MCI to this information; is that correct?

A Yes.

Q Now can we agree that there is nothing in the language that you've cited here that expressly says that MCI shall have access to BellSouth's OSS systems?

A That is correct. Each one addresses parity.

Q Okay. So in general, what all these provisions

say is that the parties should have parity?

A That's correct.

Q Okay. But it's your contention, beyond what the language of the contract is, that you can't have parity unless you have access to all of these OSS systems?

A Yes, unless you know what the systems are that you are supposed to have parity with, you'll never be able to know whether you ever had parity to begin with.

Q Okay. Do you believe that performance measurements can be utilized to show parity or lack of parity?

A I believe they can be used to show parity for the systems or services that are being rendered; but again, not knowing what systems or services I don't have access to, I don't know whether the totality is parity.

Q Okay. Well, then just sticking with the ones that you have ordered, let's say you've ordered five services -- Let's make it simple. Let's talk about one service, you've ordered one service, and the performance measurements indicate that the performance that BellSouth gives to itself, in effect, and the performance MCI is receiving is reasonably comparable, they are at parity. Would there then be any need to see the particular OSS systems that relate to that service?

A Yes, I would still need to see that the services

that the representative had access to were, in fact, the same types of services and the same plane that we are gauging that. Typically, the parity measures are speed of entry, speed of something, but they don't really address in my mind the totality of what systems you have access to.

Q And why would you need to know that for this one particular service that we are talking about?

A Just to ensure that the measurements were giving me a true measure of that parity.

Q So that you really -- and I'm not necessarily talking about the current performance measurements. Conceptually you can't think of any performance measurements that would be adequate for your purposes standing alone?

A Standing alone, no, I can't.

Q Okay. So no matter how extensive they are or how much information they have, you believe you would still have to have access to the OSS systems?

A I believe so. I would need to understand the data bases and the information that's available. Now if those measures of parity also measured the information available, which I've never heard of one, but in essence, it had two white page directories, a measure that you might say is they are both three hundred pages; but unless I saw that they were both inside the data, that they both had the

data arranged in a comparable fashion so that I could have access to it, I still would not necessarily know that from three hundred pages I had parity. I only know that I had, from a weight or a volume perspective I had parity.

Q Okay. The contract, again, talks about parity. Were you personally involved in negotiating this contract?

A Yes, I was the key negotiator for MCI. I took over in September of the year before it was signed from a gentleman who had started it initially. I think he got into about maybe 50 or 60 paragraphs or so.

Q Okay. And again, I want to be clear on what your position is. Are you saying that the contract requires parity, and independent of the contract, MCI believes you can only have that by having access to OSS, or are you saying that the contract, the way the parties contemplated it, actually contemplated that OSS information would be turned over?

A I didn't understand the first part of the question.

Q Okay. Let me approach it this way. There are about three pages in your testimony, provisions from the contract.

A Right.

Q And all of them refer to parity.

A Right.

Q None of them specifically say MCI shall have access to BellSouth's OSS systems in so many words.

A Okay.

Q Now can we agree on that? I think you had told me yes the first time I asked that.

A All right.

Q So my question is you negotiated this?

A That's right.

Q Is that what MCI wanted at the time? Is that what you're claiming that they had in mind, that they specifically wanted OSS systems when they were negotiating it?

A We specifically -- we always specifically wanted specific OSS systems. Those were electronic bonding systems, maintenance to be established within 12 months of the contract signing, as I recall, and ordering, preordering and provisioning to be one year after you accepted electronic bonding from an interexchange carrier perspective. That was our number one goal, which is in the contract.

Second to that were the interim solutions that we were willing to accept given that we, those systems gave us parity; and that's parity not only with itself, but its affiliates or any third party. That was negotiated into everyone of those clauses.

Q Okay. But question is that to ensure this contention of MCI that to ensure parity you need to have access to BellSouth's OSS systems, was that the approach you took at the time that you had negotiated the contract?

A I guess I'm not understanding the access to the OSS systems.

Q Right. Let me ask it this way. Again, your contention is, is that you should have access to BellSouth's OSS systems, but the contract doesn't say that specifically. So my question is, if that's what you wanted, why didn't you just put it in the contract?

A When you say access, access to understanding what is in your systems?

Q Yes.

A Okay, because we have access to your systems.

Q Right. Right.

A That's what I'm having a problem with.

Q Well, when I say access, I'm just not talking about the ones that are offered to MCI for purchases of UNEs or resale. I'm talking about the claim that you made in count 1 that you should have the ability to look at, as I understand it, all of BellSouth's OSS systems.

A All systems that your service reps or business office reps have access to and utilize in the five functions associated with the Act. Now did we envision

going in and making this request when we negotiated? No, because you, in fact, warranted that your systems would be at parity in one of the paragraphs in here. It was only after we had the opportunity to see your systems at work that we realized that we did not believe that we were getting parity.

Q Okay. So then this requirement that you believe there should be for us to show you what is in our OSS systems, that was really not contemplated at all then at the time the contract was entered into?

A When we entered into the contract, we both believed that --

Q If I could just have a yes or no for clarity sake.

A Well, it's not an easy yes or no. I believed when I negotiated that contract that all aspects of the contract would be lived up to with respect to BellSouth, as I would have hoped that BellSouth would have had that same belief. If that were the case, we would have never had this because we would have had parity with respect to those interim solutions.

Q And how would you have determined if there was parity?

A When I went to that show and tell of your systems, I would have actually seen people functioning in

the same vein as my people would have been functioning in.

Q Okay. So performance measurements you've told me can't demonstrate parity but a live demonstration could?

A A live demonstration represented to me lack of parity.

Q Well, let's assume that you had viewed the demonstration differently. Do you think it's conceivable that you could have seen it and come away from that feeling comfortable that there was parity?

A I was hoping to.

Q Okay. So then this, whatever you want to call it, request or demand that we provide the information about our OSS systems, that only -- I guess your position would be that the need for that only arose sometime after the contract was executed?

A I still think you need to address this also with Bryan Green who worked very closely with your insiders. I'm talking about my own personal understanding.

Q Sure. But the reason I'm asking you is because you negotiated the contract.

A That's correct.

Q And so my question, again, was that MCI's belief that your need to have access to our OSS systems, that belief only developed sometime after the contract was executed, correct?

A That's correct.

Q Okay. And I know you've told us that performance measurements can't demonstrate parity. Would it be -- And I'm sorry if you've answered this already; but other than having complete and total access to our OSS systems, is there anything else you can think of that would be a less burdensome way to show parity that you would accept?

A I think that would have to be addressed to Bryan Green.

Q Okay. On count 2 of the SAG or the RSAG data -- Is it SAG or RSAG? Which is the way that should be?

A Actually the official name is SAG, street address guide, and you separated based on your two operating companies of the past, so there were regional street address guides. There are two of them.

Q Okay. Looking at your testimony and that of Mr. Hendrix, it would appear that you agree on what are the controlling provisions of the contract. You just disagree as to how they should be interpreted; is that accurate?

A I don't believe that he references the chart which appears at the end of attachment 8, which was unchanged from the original chart that was presented in the draft agreement. Other than that, you're absolutely correct, we would differ on the interpretation.

Q Okay. Could you show me the chart that you are talking about?

A Sure. The end of attachment 8. It sets certain expectations. It attempted to, in my mind, set in concrete what this basic chapter was all about, which was one of the most important; and I believe at the end it makes such a statement.

(WITNESS REVIEWS DOCUMENT)

A Yes, MCIm, "This exhibit specifies for each information exchanged between MCI and BellSouth the type of interface, whether real-time accessing processing required. Frequency of information exchanged: This information is required to ensure that both parties are in agreement on each other's interface requirements."

Q Now does this chart basically summarize what appears in other portions of attachment 8?

A That's correct.

Q Okay. And basically what we are talking about here are sections -- and again, in attachment 8 -- section 2.1.3.1 and 2.3.2.5; is that correct?

A I believe so. 2.3.1 dot?

Q Let's see, the two -- I'm just looking at page 9 and 10 of your direct testimony. I've got 2.1.3.1 and 2.3.2.5.

A 2.1, that should be the general terms of SAG.

Where was that quote again? Yeah, it's under the specific heading "Street Address Guide," 2.1.3.

Q Okay. In your direct testimony, page 9, you refer to 2.1.3.1?

A That's correct.

Q Is that the only part of 2.1.3 that you believe to be pertinent here?

A There is only one paragraph in 2.1.3. It deals only with SAG. I didn't develop the numbering system either.

Q I guess I assumed there was going to be a sub part.

A No, only deals with SAG.

Q Okay. All right. Now -- okay, looking at this provision, as I understand your position, the access to the SAG data electronically by way of LENS you contend relates to 2.3.2.5?

A That is correct.

Q And the requirement to down load the data you believe arises from 2.1.3.1?

A That's correct.

Q Okay. Now looking at 2.1.3.1, there is no express reference to down loading data there, is there?

A No.

Q Okay. And it says that, "BellSouth shall provide

to MCIm the SAG data or its equivalent in electronic form," correct?

A That's correct.

Q Now if the data is available by way of LENS, that would be an electronic form, wouldn't it?

A Yeah, but it wouldn't be specified. That wouldn't be specified under this section.

Q Well, let's take them one at a time. That would be electronic, correct?

A What, LENS?

Q If you could access -- Yeah.

A Yes.

Q Okay. But your contention is when they use the word "electronic form" here they mean a different electronic form than LENS?

A That's a down load.

Q Okay.

A Even though it's not specifically specified.

Q Okay. And what language in this is that based on?

A Go back to the table. The frequency and time of occurrence, BellSouth provides all street address guide information. Long-term solution is electronic interface, real-time. There is no real-time. Transaction processing, not applicable. Frequency and time interval, one time

only.

Q Okay. Tell me where. You've lost me.

A I'm sorry, it's page 93.

Q Okay.

A It's under SAG. It has its own.

Q Okay.

A That's the third one down. The business function, long-term solution, real-time access, real-time transaction processing and then frequency and time interval.

Q Now this, the chart, I guess what you're talking about is on the fifth column over, fourth column down. It's got the words "One Time Only" written in.

A That's right.

Q And I think you told me that the chart is based on the contract?

A Yes.

Q Does this one-time-only language appear in 2.1.3.1?

A No.

Q Does it appear anywhere else?

A No.

Q Okay. So then your position is not based so much on the language of the contract as on the chart summarizing?

A No, this is the contract as well. And again, I read back to the beginning -- at the end of this where it says we put this chart together so that we would both have an understanding of the types of interfaces and the frequencies that these things would be delivered to us.

Q Okay. But the one-time only language doesn't appear in the text?

A Not in the text.

Q So where did that come from?

A The down load, you only need one down load. You don't need multiple down loads.

Q Well, again, you know, sort of going back to the negotiation process because I'm trying to understand.

A Okay.

Q If the chart has one time only and the chart is based on the text and the text doesn't have one time only, doesn't that seem inconsistent?

A No, it's a clarification really. It's really -- it says that, in fact, you would want us to be limited to the number of times we could request an entire down load of your data base.

Q Okay. Let's just look at the language in 2.1.3.1.

A Okay.

Q Again, aside from the chart. Assume for a moment

that the chart doesn't exist, or we are going to act like it doesn't exist. Would making all the data available by LENS comply with the language in 2.1.3.1 aside from --

A No.

Q Okay.

A The intent, when we negotiated this, and this was negotiated as a data base down load, the second occurrence, the one that we talked about at our option where we could have access to some form of a LAN LAN type of an interface was a request by me to put it in there. The reason being is to be able to take this data base and make use of it would take in my estimation somewhere between six to nine months, at which we would have no ability to validate addresses. So at our option, we had the ability to use the other system that was there.

Your lawyer suggested that that language was unnecessary because we were using a data base. We were getting a data base. And we had a long discussion about options and the need for options, and the need for options at least in the interim period until we were up and running on our systems.

Q And when you say our lawyer, who are you talking about specifically?

A Klimacek, Steve Klimacek.

Q Okay.

A It was also Steve Klimacek that reviewed the table at the end, and the only issue that he had with the table at the end had to do with FOCs and that of a four-hour interval, and he basically said, That sounds like BMOQs and you know our position on that. And I reiterated what his own people had told us, that on an electronic interface we would get them within four hours. He remembered that and said, You're right, and the table was left intact.

Q Let me ask you the same question about this that I asked about one. First a preliminary question, down loading the information and providing it by way of LENS, those are both electronic formats, correct?

A Well, the down load need not be electronic. The down load could, in fact, be on a MAG tape. Our preference is to have NDM, network data mover, used to transfer the data. Anytime you have data of a mass volume, you would prefer to have it loaded electronically.

Q Well, the reference in 2.1.3.1 is to electronic form, correct?

A That's correct.

Q And it's your testimony that by that you meant down loading?

A That's correct.

Q Okay. That's why I asked the question that way.

Electronic could apply to either?

A Electronic, if -- In that context, yes.

Q Okay. So, again, my question is, if you had a specific type of electronic down loading in mind, why didn't you just put BellSouth shall be required to down load the data one time only and just say it in that many words?

A Well, we had the table. This was a noncontested element in a negotiation process, just as the MSAG was a noncontested element. It was almost like fait d'accompli. You want it this way. The reason you want it is you want to do your own -- bring your own systems up as much as you can.

Q So you just didn't see any need to use the term "down loading" in the contract itself?

A Not when we had -- We had the table back there that says one-time occurrence, and the one-time occurrence was to stop us from asking for repeated down loads, which is expensive.

Q And if this is Mr. Green's question, just let me know; but from a practical standpoint what difference does it make whether you are accessing the information by LENS or whether it's been down loaded?

A I think it's a Mr. Green question.

Q Okay. There is no difference that you're aware

of?

A There is no difference? Yeah, there is plenty of difference.

Q From a practical standpoint.

A From a practical standpoint, there is plenty of difference. The data in a resident data base is there for my system people to design the interface to make it work with our systems. It's totally under our control, all the design.

Q So you're basically saying if it were down loaded then you could do more with it to make it usable in whatever your format is?

A User friendly from our perspective with our backend systems.

Q Do you -- again, a practical question. Is this issue moot at this point?

A Is it moot?

Q Moot.

A Not as far as I'm concerned.

Q Well, is this the one where the Georgia PSC ordered us to down load it for the region?

A Did they finally come out with an order?

MR. O'ROARK: Testify to the best of your knowledge.

BY MR. CARVER (Continuing):

Q I don't know personally either, but I mean there has been some discussion over the last couple of days that maybe -- regardless of what the contract says or doesn't say, that we've been ordered to do it. I don't know if that's true or not.

A If it is true, it would make it moot here because the regional base for Georgia would, in fact, include in my mind Florida.

Q Okay. So you're not involved currently in negotiating any sort of down load?

A No, negotiations I left behind about a year ago.

Q Okay. Because I'm just kind of just grinning here as I'm thinking, you're not negotiating but you are witnessing. I'm not sure which is worse.

A I don't want to comment on that.

Q I understand. I guess it's better than having to do both.

A I spent many, many a long hour of the day on this thing.

Q Who at MCI would have knowledge of that, of the status of any current negotiations?

A Of current negotiations?

Q Sure. Regarding down loading.

A I would imagine Bryan would, but I'm not aware of a Georgia order. It doesn't mean there is not one. I'd be

very glad to hear it, that there was one.

Q Okay. Does --

A I'm not sure what you mean by negotiation.

Q Well, I hate to -- well, let me put it this way. Let me ask the question this way. Assuming that, if we assume for purposes of this question that we have a duty to down load, is it contemplated between the parties that there would be some payment for that?

A No.

Q Okay. Do you have any idea what kind of costs would be involved in down loading?

A No. Bryan may.

Q Okay. And there was no discussion at all about paying for that?

A No, same as for MSAG, which we didn't pay for the down load.

Q Okay. Let's move on to issues 3 and 4. You had very little testimony on those two. Are those completely Mr. Green's?

A Yes, I'm just quoting the -- in three I'm quoting the contract language. USOCs, although I don't specifically reference the actual contractual, when we were negotiating on the contract, I realized that the universal language, universal service order code language, the term was missing, and it is in the contract. It was under

connectivity billing. It was a place that both parties feel that it should be in.

Q We are talking about count five now?

A Yeah, that would be --

MR. O'ROARK: You skipped a count.

Q You are talking about USOCs. I think that's five.

A What did I do, skip a page?

Q Yeah.

A What was four then?

Q Four was parity of access to telephone numbers and telephone number information.

A Yes, again, I quote the contract in that regard.

Q Okay. So on three and four, other than -- Basically I should address my questions to Mr. Green on those two?

A Unless you have some questions on the contract language or what I felt the intent was when we negotiated it.

Q Okay. Let's go to number 5 then. USOCs, the provisions that you've cited here, do they make any specific reference to USOCs?

A No, they don't. We talk about business processes.

Q Okay. And if you would, point me to the specific

language of the contract that you believe requires USOCs in order to be compliant?

A Well, actually I wrote it down. I copied it out. All right, 3.2.5. It should be under connectivity billing.

Q Which part of this, which --

A Nearly all of this is under attachment 8.

Q Okay.

A There was a discussion when we got to connectivity billing with respect to both parties having a say as to what codes or what language would be used. Having been an old Bell person, knowing that USOCs were the universal language of orders, it was noticeably missing from this contract, so we agreed that we would put it into 3.2.5. BellSouth says, "Separately identify, via USOCs, business charges from residential charges appropriate and shall assign a specific adjustment and reference number." We needed someplace in the contract to bring attention to USOCs and the need for USOCs for proper billing and proper ordering.

Q Okay. And tell me again where you are reading from.

A Attachment 8, page 36.

Q I'm on the wrong attachment. Page 36?

A Yes.

Q Okay. Now this provision isn't cited in your testimony I believe, is it?

A No, and the reason being I never thought that there was a question as to whether or not USOCs were going to be used. And when I was reading the rebuttals where they mention -- we don't even mention in the contract, I thought, well, I should have really mentioned 3.2.5 because that was the place holder that we selected -- we, BellSouth and myself -- to identify the need for USOCs.

Q What do you mean by "place holder?"

A Well, rather than go through and change every paragraph where USOCs would be used, we needed only to have a reference to it to show the importance of it. There was a fear on BellSouth's part in that the language that we had requested in there was that we had to jointly agree, and that's still in this contract. We had to jointly agree to what language would be used with respect to these -- well, orders or payments of bills.

Now the intent of that was to follow the OBF guideline where they were trying to reestablish universal -- in a truer sense -- universal service order codes; but it was vague in the sense that it didn't reference that. So as a safety we've put it in saying USOCs would be the prime driver and not some artificial language or some artificial codes that would drive these

orders and these payments of bills.

We recognized -- I recognized also that USOCs, while the word "universal" is the lead word, stopped being universal with the breakup of the Bell System as people went their own way and used their new services that went in with totally different USOC codes. That was being addressed at the OBF as well, but it's still the language of orders and still the language not only for creating an order, but the language necessary to pay for some service or function rendered because a USOC has a clear definition of what that service or function is.

MR. CARVER: I want to take about a ten-minute break if that's okay.

MR. O'ROARK: That's fine.

(BRIEF RECESS)

BY MR. CARVER (Continuing):

Q Okay. We were talking about issue number 5, access to USOCs. As a general question, what type of access to USOCs does MCI contend it's entitled to?

A I think that's a question for Bryan and the OSS people.

Q Okay. Well, do you know if you're asking for information about every one of our USOCs or some subset of them?

A I believe it would be all your USOCs, any USOC

that could be used in an order. As to what "all" means, I don't know.

Q Okay. Well, if this obligation comes from the contract and you negotiated the contract, then I guess I'm assuming that you would know what USOC information you had in mind.

A Well, when I did it, it was all USOCs that were pertinent to the ordering and provisioning of the services, and that is a fairly healthy list.

Q Pertinent to ordering and provisioning of all services by MCI or by BellSouth?

A Well, that MCI would want to order. To my mind that would be all of the USOCs associated with -- well, not only your GSST, but your -- if there were separate and distinct USOCs for, that were used on contracts, because USOCs drive billing; and you can have the same USOC apply to two different functions. The only difference being that the function defined by a contract drives a different price.

THE COURT REPORTER: I'm sorry, when that door slammed, I didn't hear what you said. "The only difference being that the function defined by a contract --"

THE WITNESS: By a USOC defines the price.

THE COURT REPORTER: Defines the price, thank

you.

BY MR. CARVER (Continuing):

Q Okay. So when you were negotiating, they were the ones you were interested and were the ones that had to do with services MCI might potentially order?

A Yes.

Q Okay. Not necessarily all of them?

A No, I would imagine there are some in there that -- Because USOCs drive just about everything. They drive even your interexchange carrier. We wouldn't be interested in the access side of the USOCs.

Q Okay. Now as to MCI's demand in this particular case, Mr. Green would be the one I would ask specifically about what you want currently?

A Yes.

Q Okay. Now other than the contractual provisions that are mentioned in your testimony and the one that you told me about a minute ago, is there anything else in the contract anywhere that you can cite us to that you believe gives MCI the right to have these USOCs?

A No. No, the only other provision was that one I talked about where we jointly would define what these codes would be which, in my mind, was the OBF; and because it was vague, we felt that we needed to put something in; and that doesn't address the USOCs. That's the only spot in the

contract that actually names the USOCs.

Q The one that you referred us to earlier?

A Yeah.

Q Okay. Now you mentioned it's the only one that names USOCs. We look at part A -- this is from your testimony on page 12 -- as the authority, if you will, for the proposition that you are entitled to this information you cite to. Part A, 13.1, 13.3 and 13.8, correct?

A Right.

Q Now 13.1 -- could you turn to those pages, please. It's on part A, page 8.

A Yes.

Q Now 13.1, would it be fair to characterize that as saying generally they should be in parity with performance?

A Yes.

Q Now there is no specific mention there of USOCs, is there?

A No. But, again, the only reference, specific reference to USOC is the one I gave you.

Q Okay. And 13.3 has to do with provision of unbundled network elements on a nondiscriminatory basis?

A That's correct.

Q So as I understand your contention -- Well, let me ask you. Why is 13.3 cited in your testimony?

A There would be a USOC associated with an unbundled network element.

Q Okay. So standing alone, you say that this general provision here gives you the right to the USOCs?

A Gives us a right to the business process in my mind. Again, a USOC is a universal language of an order. I can't order something from you unless I know exactly what it is I have to represent to you to get what it is I want. That is a USOC. So it's more of going after the business processes, the language of the order, the actual language that I must use to order something from you. It would be -- it would be paramount to my mind going into the Service Merchandise catalog and not having the order number there and just trying to define, well, it's that watch on page 55. There might be 55 watches on page 55.

Q Now 13.8, that is sort of a general parity provision also?

A Yes.

Q Specific contacts, I guess, of resale?

A Yes.

Q And it's your position that this couldn't be carried out unless you had USOCs?

A Again, that's the way, if I were going to order something, I would have to have a USOC to put on the order.

Q The USOC for the particular thing you are

ordering?

A That's right.

Q You wouldn't necessarily need other USOCs beyond the one for which you're ordering?

A At the time that I'm placing the order, I need only the USOCs for the functions that I'm ordering.

Q Okay. Now I'm still on page 12 of your testimony. You refer to attachment 8, 2.1.2, so let's take a look at that. In this one, 2.1.2 says, "MCI shall be provided by BellSouth the ability to order electronically 24 hours a day, seven days a week?"

A Uh-huh.

Q And there is no reference to USOCs there, is there?

A No.

Q Okay. And 2.3.1.3, the other one you list, just says basically that BellSouth and MCI shall agree on interim solutions for each interface within 30 days?

A Uh-huh.

Q And that's pretty much the substance of it, isn't it?

A That's right.

Q Now the one part of the agreement that refers to USOCs, 3.2.5, could you read that, please?

A I thought I had already, but I will read it

again. "BellSouth shall separately identify, via USOCs, business charges and residence charges, as appropriate, and shall assign a specific adjustment or reference number provided by MCIm to each adjustment credit included on the connectivity bill."

Q Now what is the connectivity bill?

A Connectivity bill is the bill that we would pay for services that we had ordered in the event of -- well, unbundled network elements, the usage associated with that. Anything that you felt we owed you money for is on the connectivity bill, ports, lines.

Q So what this section says is that BellSouth shall use USOCs to designate business charges and residence charges on the connectivity bill that is rendered?

A That's correct.

Q So this is basically limiting the -- this particular provision is limiting the provision of USOCs to placing them on a bill that is rendered to you to charge you for the things that you have ordered and that have been used?

A Right, and the idea there, the reason it was put there --

Q I'm sorry, was that a yes?

A Yes.

Q Okay.

A The reason it was put there was that for you to have rendered me that bill I had to render you an order, and that order would have had the USOC that would have been carried forward on the connectivity bill. Again, in our collective wisdom, that was the simplest place to put it so they both understood that we were using USOCs.

Q Okay. Let's jump ahead to issue number 8. The term "FOC," what does that mean to you?

A Firm order confirmation.

Q And what does that mean?

A From an MCIT perspective, it means a commitment to do some functional work on a specific date.

Q Okay. So it would not be a firm order commitment unless there was a time frame associated with it?

A No, I didn't say there would be a date associated. A date -- Time frames are normally negotiated.

Q Okay. So then a firm order commitment would be a commitment to do a particular, I guess, agreed-upon task upon a particular date?

A That's correct. I gave you an order, asked for a specific date. Your FOC back to me either confirms the date that I requested or sets a different date. That date would never be closer; it would always be further out.

Q We talked a little bit earlier about you had been

personally involved in and what you were currently personally involved in. Are you personally involved in any aspect of the ordering?

A No.

Q And have you been in the past?

A No.

Q Okay. Do you know if the FOC process or requirement applies to things ordered from tariffs by MCI as opposed to things ordered under the Interconnection Agreement?

A There is a -- obviously you saw there's a tariff requirement. FOC really is a, was a negotiated item at the OBF. In fact --

Q Tell me again what the OBF is.

A Order and billing forum.

Q Okay. Thank you.

A It's part of the CLC, carrier liaison committee, part of ATIS. Well, you have ATIS, and then you have CLC, and then you have the OBF. Approximately two years ago we attempted to on the MCIT side reduce the time element from the time that we sent an order to the time we got an FOC back from the operating company. We wanted it down, initially, at 48 hours. We wanted to reduce that to 24.

At the time at the OBF the single most deterrent to that were that the ILECs all had tariffed a five-day

file, and I'll go into my speech about the 11th command. No, I won't. And we simply said the easy way to correct that is to remove the time frame from the tariff and then negotiate.

To my knowledge, we have commitments -- And the OBF has had -- The OBF does not set standards. The OBF is a consensus of all parties that they will perform that function. And that is at 48 hours, and our personal commitments that we have from the ILECs is 24 hours. With the idea of being, driving the FOC closer and closer to the order intervals on the MCIT side. However, when we negotiated this, we have -- and another thing I didn't realize that thought should be contentious, there is a stipulation in here that you agree you will abide by the OBF.

Q In the contract?

A Yes.

Q Would you point that out to me, please?

A I certainly will. Let me see if I can find it here.

(WITNESS REVIEWED DOCUMENTS)

A Which one are we on, eight?

Q Uh-huh.

A Okay, it's entitled "OBF Compliance." It's 2.2.1. It's under service order process requirements.

It's on page 12 of attachment 8. And it says, "In accordance with OBF standards, BellSouth and MCI shall follow the OBF developed ordering and provisioning process standards. These processes include preordering, service inquiry, pre-order service inquiry response, firm order acknowledgement, rejection, firm order confirmation, delay notification and completion notification. BellSouth agrees to work cooperatively to implement future OBF developed processes related to ordering and provisioning." And that was due to the ever-changing functionality both in the ASR and LSR.

Q Okay. This provision would basically relate to services ordered under the Interconnection Agreement, correct?

A That's correct, and there are two provisions in attachment 8 where we use the ASR. They are in the network elements section. Well, let's go to the 5.2 first and find that other one later.

Q I tell you what, you've gone a little bit beyond my question, so if I may, let me ask you a couple questions --

A Well, both functions, ASR and LSR, are covered by the OBF.

Q ASR?

A LSR. And both the ASR and LSR are specifically

referenced as means by which we can buy -- and especially in the ASR functionality of network elements, recognizing that the ASR would still be around, and also under the resale, not only did I have the option of using the ASR, but it would be through an electronic gateway.

Q Okay. Let's back up. My question was, this provision having to do with OBF compliance would only apply to things ordered under the Interconnection Agreement?

A That's correct.

Q If something was ordered, say, out of a tariff, as opposed to it being encompassed within the Interconnection Agreement, then the terms and conditions of the Interconnection Agreement wouldn't apply to that order, would it?

A We took a stance very early on that tariffs didn't apply, period, when we ordered something, that they would always be under the Interconnection Agreement. I understand that we have ordered and paid for services out of a tariff. My own personal interpretation of what we negotiated in here was that everything is included in here, so those rates, even though they were ordered under an ASR, should have been the rates that were established in this contract.

Q Okay. So your position is that anything MCI orders from BellSouth, period, is under the Interconnection

Agreement?

A If it's under the Interconnection Agreement.

Q Well, that's it. I'm trying to get to the if.

A Right.

Q And I want to make sure I understand what you said because you made a statement, I believe something to the effect of we made a decision, or when we took a stance early on that we weren't ordering under tariffs or something like that, so that's what I'm trying to clarify.

Is it your position that absolutely anything that MCI orders from BellSouth in any context whatsoever is included under the Interconnection Agreement?

A If it's included under the Interconnection Agreement.

Q Okay. So then some things would be included under the Interconnection Agreement and other things would not be?

A I could conceivably think of some things that we might order from you that wouldn't be covered under the Interconnection Agreement.

Q Like, for example, if MCI generally were ordering access services from BellSouth, that wouldn't be under the Agreement, would it necessarily?

A If MCIm did it on an ASR and it was associated with a service, either local, resale or a network element,

it would be covered under here, even though it was on an ASR, an access service request.

Q Okay. You're really not answering my question.

A Okay.

Q I think I kind of understand your position, but you're not answering my question.

A All right.

Q Okay. So what you've said is that if it's ordered under an ASR and it's ordered by MCIm and it has to do with local resale or interconnection, then as far as you're concerned it's covered by the Interconnection Agreement, correct?

A That's correct.

Q Okay. So MCIm could order things from BellSouth that would not be under the Agreement?

A Yes. I thought I said that, yes.

Q Okay. If MCIm ordered something under the Access Tariff, that would not be covered under the Interconnection Agreement, would it?

A Well, again, I don't -- I guess I don't understand the question because I thought I had answered that one before. There is no tariff references -- all of the rates were supposed to be defined in here. So if I needed to reach out and order something, the fact that I ordered it under an ASR, which is an access service

request, or an LSR, both elements are covered under here as far as an ordering process.

Q We haven't gotten to ASRs and LSRs yet. We are just talking about services. Okay. And I --

A Well, an ASR, I would assume, would be something that was in your Access Tariff.

Q Okay. So your assumption then is that anything in the tariff could be ordered under an ASR, correct?

A Access Tariff.

Q Access Tariff. And anything ordered through an ASR would be covered by the Agreement?

A That's correct.

Q So then in effect, anything ordered out of the Access Tariff is covered by the Agreement, that's your position?

A If it's ordered under an access service request and the rates are covered in here -- Now we may have to develop rates for things that we hadn't envisioned.

Q So then basically as far as MCIm is concerned, the Access Tariff just doesn't exist any more, everything is under the Agreement now?

A That was the position going in. There is only one reference to a tariff in this entire document.

Q I'm just asking is that your position now?

A It would be mine. That's what we negotiated.

Q Okay. So basically the contract and the Interconnection Agreement covers the waterfront, it covers everything?

A That was the intent, to have everything under two covers, a back and a forward.

Q Now you've told me you're not involved in the ordering process, but do you know how, if one were going to order something under the Interconnection Agreement, how they would do it?

A How they would do it?

Q Uh-huh.

A They have a multitude of ways. Which way do you --

Q Tell me about all the ones you know about.

A Well, you've got the EDI interface which we have been co-developing. That would be, in essence -- and Bryan could do much more justice to this -- but the LSR personified. It's really those services and functionalities that are generally defined in your general exchange tariff, your GSST, that have been put on to the LSR. That would still work off of our back system which is NETPRO and COMS. COMS would take the order from our business rep. Our NETPRO, which is comparable to your TIRKS, would then interpret that and send it to the proper interface to do the ordering. In this case we talked EDI,

so it would send it through an EDI interface and interface across that gateway.

That same system is used on the ASR functionality. Place the order in COMS. COMS goes to NETPRO. NETPRO recognizes that it needs an access service request, and the access service request goes through your gateway to your EXACT system.

Q Okay. If you order using the EDI interface, where does the order go after it goes through the gateway?

A Well, if everything is working the way it is supposed to, it just goes into your back systems, and it's interpreted by your systems. An order is cut without discriminatory reflecting that it's from an ALEC, and out at the terminal someplace an installer gets an order that says put X,Y,Z into JDK.

Q Okay. You were here during Mr. Milner's deposition, were you not?

A Yes, I was.

Q Do you recall the discussion recalling the LCSC, and I can't remember the comparable acronym --

A ICSC.

Q -- but the interexchange service center?

A The ICSC.

Q Okay. Would you order different ways to have the order go to one as opposed to having the order go to the

other?

A We direct from the ASR perspective to your EXACT gateway. It's a defined element. On the EDI side, we at the same token direct it toward the interface for your EDI system. Now what your internal systems do with it is your internal systems. I know in EXACT system that it's actually reinterpreted, so that reinterpretation normally did occur at the ICSC to which we have a dedicated ICSC staff.

Q Is it your position that MCIm orders something and it goes to the ICSC, then it would still be covered by the Interconnection Agreement even though it's sent there?

A When you say "sent there," our system only sends it to your gateway. We don't send it to the ICSC.

Q What determines whether it goes one place or the other?

A I would imagine your system.

Q Okay. So your testimony is that you have no control over whether an order goes to the ICSC or the LCSC?

A Not in the electronic mode.

Q Okay.

A We send it to a gateway.

Q And your testimony is that either way, regardless of where it goes, it is still covered by the Interconnection Agreement?

A That's correct.

Q Okay. The next issue is trunk blockage. Now you had a little more in your testimony about this one. Are you the person I should talk to about this one as opposed to Mr. Green?

A No, you should talk to me. I baby-sat this for years.

Q All right. Let me just begin with a general -- Well, are you still babysitting this one?

A No.

Q Okay. Are you aware of what BellSouth is providing currently? And by currently I mean now.

A To?

Q MCI, in terms of trunk blockage or --

A MCI by this contract is MCIT.

Q What is MCI -- I've been using MCIm. What is the difference in MCIm and MCIT?

A MCIm is MCImetro. MCIT is MCI Telecommunications.

Q Okay.

A MCI should have been MCI Corp. Somebody else defined that.

Q Okay. I'll tell you what, I'm just going to say MCI, but you'll know that I'm talking about the one that entered into this contract.

A Metro?
Q Whoever entered into the contract.
A Okay, Metro.
Q Okay. All right.
A Because they do receive different things.
Q Okay. Well, let me ask you this, in order to comply with the contract, to whom should the information be sent?
A Actually it goes, literally, to the same person that takes the MCIT information, and that's the RAM organization in Richardson, Texas.
Q Okay. And do you know what is currently being sent to them?
A To my knowledge, the MCIT side gets total usage on all common transport trunk groups, and that is total usage, any trunk group that experiences any form of blockage whatsoever. And on the MCIm side, the last that I heard you still hadn't provided other than you may have provided the elements that you talked about in the SGAT, which I --
Q Okay. Let me ask it this way. In his testimony Mr. Stacy says that BST is currently providing the comparative trunk group service summary. Do you know if that is true or not?
A The summary?

Q Uh-huh.

A Yes.

Q And do you know what that includes?

A It's a summary roll up of the state for our trunk groups. So if we had five hundred trunk groups, it would be -- a roll-up summary would say X-number we are blocking.

Q Okay.

A Now you also provide a, what I call an exception report; and I call it an exception report because you report trunk groups that only are in violation of the T1, M1 committee's recommendation on report blockage; and that is, anything that exceeds a specific threshold is at this time judged to be a trunk that is in trouble and that has to be serviced immediately.

Q Let's back up. Again, Mr. Stacy says that this report is being provided currently. Do you know whether or not that is true?

A I have not seen the MCI report.

Q Okay. The trunk group service report, Mr. Stacy says that this report is being provided. Do you know whether that statement is true or not?

A I do not.

Q And do you know what is in that report?

A I do know what is in the reports.

Q Okay. The trunk group service detail report, he

says that that report is being provided currently also. Do you know if that is true or not?

A I don't know if it's true.

Q And do you know what's in it?

A Yes.

Q Okay. Assuming -- assume for purposes of this question that his testimony is truthful and accurate and that BellSouth is currently providing all three of these reports to MCI. What else do you want? I mean what is it that you want that is not included in those three reports?

A There is a major difference between the reports that are provided on the long distance side versus the reports that are reported on the local side. On the reports provided on the long distance side, all blockage is reported regardless of how small. And the reason being, as blockage occurs, it starts to grow. It could be an anomaly. It doesn't mean that it's a trunk in trouble, but somebody has made an engineering judgment that says I don't need to fix it. The problem is if it happens a second time it's no longer an anomaly, and there has been a gentlemen's agreement between our two companies that you provide the total detail to the MCIT side.

That same type of reporting is necessary on the local side, more so on the local side; and there are two specific reasons for that. One, we have no visibility from

a local perspective back into those trunk groups. The common transport is only that transport between your end offices and your tandems. Whatever is happening between the tandems and my trunk groups, while I have the right by this contract to put it into your common -- into your IC 100 report, which is the report that I was referring to, it's a competitive piece and would not be put in for at least the foreseeable future.

Someone could take those reports and literally by doing some averaging figure out how many calls we got, equate that to customers and backtrack into it, versus a known entity such as a Bell that has all those customers. Eventually those reports will go in there, but in the meantime those reports have to come to us. They have to be there in a timely fashion so that we can help you in your engineering of those trunk groups.

The contract is very specific. BellSouth is responsible for all traffic engineering on its side of the interface point. MCI is responsible for all on its side. The problem is we have provided you forecasts which you have agreed to as far as trunks are concerned. As per the contract, 30 days after we have given you forecasts you were supposed to give us forecasts; these forecasts have not been coming. We do not know what is happening, and to find a report that says I have three percent blocking,

which is the critical level at which an immediate action must be taken, is the wrong time to discover that you've got blocking on your trunk groups. You want to see that, be able to discuss that with the engineers and correct those problems.

Q Okay. Let's back up. These three reports, is your complaint that they don't contain all the information you need, or is your compliant when you get the information?

A They don't contain the information we need.

Q Okay. Now tell me again, and you have to do it in simpler terms because I didn't understand part of what you said, what specifically do you want? Do you want more detail about the amount of blockage, or is it particular, is it --

A We spelled it out actually in the Florida letter that we sent to you. It's basically all blockage that occurs on trunks that have any impact whatsoever to do with us and a comparative view of that same, those same trunk groups that would handle your traffic.

Q Okay. So you want all blockage on every trunk group that carries what, that carries MCI local traffic?

A That's correct. That would be comparable to the IC 100 report as it's provided to the MCIT side today, plus those trunk groups that emanate from your end offices or

tandems and come to us.

Q Okay. Comparable to the what report?

A It's called the IC 100 report.

Q Okay. Now in terms of the comparable information for BellSouth, what are you looking for there, the same trunks, comparable trunks, different trunks?

A The comparable trunks that carry your local traffic to show that, in fact, you are using the same care on our trunk groups as you are using on yours.

Q So you want that for every trunk or group of trunks that carries any BellSouth traffic?

A Local.

Q Local traffic?

A Yes, you basically have defined in your network, which was a total surprise to us as mentioned in the local tandems, two networks, a local network and a toll network. The IC 100 report merely reports the traffic that is happening, that should be one plus traffic, but it is all one plus traffic plus CLEC traffic. Your network is totally diverse of any reporting with respect to the IC 100 report, so we'd like to see the comparable. The IC 100 report, as it's reported to MCI, which is total blocking, and your network, as it happens, total blocking; and what that will show is basically if we see trunk groups that go on forever and don't get fixed on one side and trunk groups

that are getting fixed, in other words, the blocking goes away and the normal intervals are followed, the engineers are following their jobs, it would become quite apparent whether or not we had some sort of a problem with respect to the way you're engineering our traffic versus their traffic.

Q Well, when you say you want this for local traffic for BellSouth, I mean do you want it for all trunk groups in the State of Florida?

A Yes.

Q That carry local traffic?

A Yes.

Q So you wouldn't only -- you wouldn't want it only for the areas -- Okay. Well, you already answered my question, everywhere.

A You do it once. Why would you piecemeal it?

Q Well, let's say MCI is providing local service in Miami and it's not providing local service in Tallahassee. Why would you want to know the blockage in -- well, we don't provide local service here either. That's a bad example. Let's say Jacksonville. Why would you want it for Jacksonville if you're not providing service there?

A I wouldn't necessarily be interested in it at that time, but why have separate reports where you have to worry about which area of the state someone is operating

in. I mean you give me all of the IC 100 -- Your IC 100 report is comprehensive on every single trunk group that carries toll traffic on your network. You don't worry about whether I'm operating, and I do operate in all states, but you give it to all parties. Whether they operate in that state or not, they get one report. It's a diskette. It could be on the Web for all we care, just so it's posted and there so that we can pull the information and do some comparisons.

Q And how would you measure parity with that information?

A Time to repair, time to fix blockage. Actually the T1, M1 committee set out, and there was a BellCore study that, while we both took exception to, was the best thing that was happening at that time. That set certain parameters of what happens, and there was always a question, because of the number of days that you study something, as to whether you met -- When you design something, you design it at a half a percent on toll, and you design it at one percent on local.

That's an objective that you set, that you want to visit and make sure it doesn't get violated. The fact that something goes over, that doesn't necessarily mean that your forecast was wrong. It could have rained. Nobody knows what the conditions of the particular office

were that day. There could have been a hurricane blowing through. It could have been Mother's Day or some special holiday that happened there.

So you measure for 21 days, and you judge according to the traffic. Well, the rules state that if it happens a second time, in other words, you as an engineer say that that was Mother's Day, that was the Louisiana Mother's Day so, therefore, I don't have to worry about it. It really wasn't a violation; it was an anomaly.

If it happens a second time, the rules say that is not an anomaly. And now you have wasted two months in a three-month interval to fix the trunks, so now you have one month to fix. The same thing happens if you carry over to the third month, it's an expedite. You must fix those trunk groups immediately, take immediate action to resolve the problem.

Well, it comes to the problem, if you are only studying for 21 days, was it really a half a percent, or was it an anomaly associated with the number of days that you were studying? That's taken into consideration with the extreme limit or the upper limit.

What that basically said -- and there was a curve, and we disagree a little because we say it's about two and a half percent and you say it's three percent. But there is a number, a finite number, over which blocking

occurs that you can no longer dispel and say it's an anomaly associated with Mother's Day, or it's an anomaly associated with the number of days that I studied. It is blocking, and it must be fixed immediately.

The problem with the reports that you are giving is that's the number. The level that you've set it at is at the immediate action limit, which means that everyone of those trunk groups that appears on there immediate action should be taken, where you don't want to get to that in an embryonic environment, such as the local environment is to us. It's a hundred years to you, but it's embryonic to us.

What we learned from our days in the long distance world, we never knew that the customers were experiencing blockage, they never called us. They got a fast busy tone. Well, guess what, most people don't know the difference between normal busy and fast busy; they just thought the party was busy. And we started losing customers. We had churn rates that were somewhat high. When we started to fix the problem, working together with BellSouth and fixed the problem -- We worked across the nation actually. We established the need for the IC 100 report and the need for standardization of traffic flows. That churn started to go down, down dramatically.

Well, we don't want to get -- this is like deja

vu to us. We do not want to get into the same games again where all of a sudden this traffic just blows apart at the seams and we don't know about it because it's invisible to us. It's happening well below our switch. We cannot see it. So we need more than ever to have access to data.

I would prefer to have real-time access into your collection devices so I can pull the information myself, but I recognize that that is probably not something that is going to happen. So in the meantime, I've got to ask then for reports, reports that are meaningful, reports that I can track to make sure the same things that happen, the deja vu doesn't happen.

Q And it's your contention that reports to this level are required by the language of the contract in Section 13.2?

A I believe from a parity perspective and the cites that I made in the requirements section where you were supposed to be giving us forecasts and you're not that there is an obligation on your part to maintain that network. I do not, and as a company, MCI does not want to get in the position of we're losing customers for not our reason but for somebody else's; and the only way we are going to be able to control that is to get information and information at parity. Your switches are pulled daily, in fact, hourly, with information that your traffic engineers

have access to. Again, I stop short of saying that's what I want.

In the meantime, what I need are timely reports, once a month reporting. Now that's about a -- your IC 100 report is posted 15 days after the end of the month, and you are very good at it, BellSouth, in getting that to us. We need that to continue, but we need it on the local side as well.

Q So as to the BellSouth information then, you want blockage information as to every BellSouth trunk in the state every month?

A Yes, on a diskette.

Q And you would agree, wouldn't you, that that's not expressly required by this section that you've cited?

A Well, I would go to the argument of parity again. I could be arguing --

Q By expressly I mean there are no words in that --

A There are no words in here.

Q -- in that paragraph that sets forth --

A That's right.

Q -- with specificity what type of information about blockage is required, correct?

A That's correct.

Q Okay. So really what the issue comes down to is

not what is required by the specific language but generally what is required to ensure parity?

A That's correct.

Q And you have your version, and BellSouth has its version?

A That's correct.

Q Have you looked at any of the reports that BellSouth does, I guess published would be the word, on its Web site?

A Yes. The ones that are attached to the SGAT filings in all of the states, I've seen them.

Q Okay. And the information included there is not adequate?

A No, that's the very reports that I'm talking about, the summary report and the common transport blockage report. That common transport blockage does not provide all blockage. It provides it at the action limit, that limit that I talked about, that limit where you are basically telling me I screwed up on these trunk groups and I've got to fix them. I don't want you to screw up. I want the information so I can help you not do that.

Q Okay. Let's go to issue 10. Let me back up a little bit. There is something I wanted to ask you about an earlier issue. The discussion we had about -- Well, no, never mind. I'll come back to this later. Never

mind. Let's go ahead with issue 10.

At this juncture, what information on local tandem interconnection do you claim that you're not getting? And the reason I say at this juncture is without going into the history of letters last year or last month or six months ago. Right now what is it that you want that you claim you are still not getting?

A Let's go back one week, how is that?

Q That's pretty good.

A We are -- and we are going to go forward anyway in the State of Georgia, and the reason we are going forth in the State of Georgia is we have some planned tandem moves anyway due to some physical constraints that you have in ports. We are going to move to the local tandems. Simple question, what are the CLLI codes associated with the local tandems?

I couldn't have agreed more with Keith this morning when he talked about a CLLI code for a local tandem is different than the CLLI code for an access tandem, and yet as late as last week we were told that they are the same with a couple of exceptions. We are going on blind faith in Georgia, but as far as I'm concerned the CLLI code on a local tandem is not the access tandem CLLI code and that by providing me with the access CLLI code you are basically waving a red flag saying I'm really not giving

you the local tandem interconnection, I'm just shifting your trunks around in the same access tandem.

Q Okay. So right now --

A The other thing that's -- Two things.

Q Okay.

A Keith this morning talked about the LERG. The LERG is really not the ideal spot, although there is a slot in the six hundred bite of information that identifies the end office to the local tandem. That's done on a company specific basis, as he mentioned. The problem is that in the LERG not a single ITC had been identified, and we assumed from that that even though you are the LERG administrator for these ITCs, you are only responsible for identifying a local tandem associated with your codes.

So while you have provided in the handout here those CLLI codes, there is no way for anybody, other than getting that testimony, to identify to the local tandem, first, what is the CLLI code for the local tandem? And then, secondly, what are the independents that subtend that local tandem? And as I said, we are going forward in Georgia on blind faith that the NC, network codes, network code interface for the ASRs will, in fact, work and bring us to a local tandem that, by your people's definition, has the same CLLI code as the access tandem. And as an engineer, I just do not believe that the local tandem has

the same CLLI code, and apparently -- I agree totally with what Keith Milner said this morning, they are different. They should be different. Even though they are the same switch, they are functionally serving something different.

Q Have you reviewed the document that's attached to Mr. Milner's rebuttal testimony as WKM-8?

A Yes.

Q Now are these CLLI codes?

A Yes.

Q Okay.

A I'm sorry, no.

Q They are not?

A Those are not.

Q What are those?

A These are the CLLI codes. I thought you were pointing -- That's the name of the switch. These are the CLLI codes. These are actually your axis tandem CLLI codes.

Q Okay. So it's your contention that for the particular tandems in each of these places there is a different code for the local?

A Yes. Well, let's -- and I agree with what Keith said this morning, that there is a different code; and I was pleasantly surprised to hear somebody finally agree with me.

Q Okay. Now the second thing you want is you said the independents that subtend the tandems?

A Right.

Q Can you explain what that means, please?

A Those independents that actually have trunks and facilities that are on your local tandem to which you pass local and EAS traffic to.

Q Okay. So by "independents" you mean independent carrier?

A Telephone companies, CLECs, cell cos.

Q So you want the identities of the carriers that basically have traffic on those same tandems?

A Their CLLIs will do the same for us.

Q So you want their CLLI codes?

A Yeah, those are the ones down below. Those are CLLI codes for offices.

Q Right.

A We need an updated list that shows all of the ITCs, cell cos that subtend those local tandem CLLI codes.

Q And why do you need that?

A Routing information for our switches, to route the traffic. Just as Mr. Milner said this morning, if I send you the wrong code, I don't think you'll put an announcement. I think that you'll -- we would have found it out in the test, but if I did send that code to you, I'm

not sure what you'd would give me. I think you'd give me a fast busy because you couldn't identify it in your switch, and you had no place to go with it. I need that to load it into my switches so that I can point that traffic to the right trunk groups.

Now I don't put any CLLI codes -- In the LERG I can take every CLLI code that's there and equate it to the NXX -- NPA and NXXs that are associated with that CLLI, and I do this -- we work off the LERG from an engineering perspective. So if I load it into a switch and say I want to change routing and I put them in an actual engineering device, the computer we have goes out, researches the NXXs, and actually inputs into the switch the actual NXX NPAs that have to go in there.

It does another thing, it also keeps it up to date. Every time the LERG comes in it looks to see what changes, what new codes are being added so it can add it to the route.

Q Okay. In your testimony you say that you want to have available to MCImetro traffic -- all existing independent telephone company local and EAS traffic routes served by BellSouth. As I understand what you're saying now, you want not only the routes upon which BellSouth serves those independents, you want the independents identified also by name?

A Yeah. Well, it doesn't have to be by name. I need the office code, the actual CLLI code of the office that subtends the local tandems. If I know what the CLLI code is, I know who the independent is. I know who the cell co is. I know who the CLEC is because that CLLI code is almost like a fingerprint. It points exactly to the switch location, the B and H coordinates of that switch.

Q Can you think of any reason why the independent telephone companies might not want this information released to MCI?

A No.

Q Okay. Let me ask the other way. BellSouth, as you know, has interconnection agreements with many ALECs. If another ALEC asks for this information for MCI, would you have any objection to that?

A No. In fact, we put -- ours are located in the LERG, identified to the tandems that that traffic is coming to. Obviously, we want to be able to collect terminating access and interconnect predators, so why would we not want people to know where our switch was.

Q Could you get this information -- All of the information you want, could you get it from the LERG?

A No, on the local, the local tandems -- Local tandems were done away with when I was in the Bell system, and it was a shocker to me to find out that BellSouth

actually had a network, local network; it just was a shocker to me.

The LERG has an identifier. It's in a field, and I'm trying to remember the field number. There is a particular field that every end office -- Every end office has about six hundred bites. In that one field it says this is my local tandem, this is my access tandem.

Q Before you go on -- I'm sorry to interrupt -- did you start by saying, no, the information is not in the LERG?

A That's right. The point to put it in the LERG is there, but no one has ever used the local side of the LERG. The LERG has always been a document for interexchange carriers, so the fact that you had a local tandem was never represented in the LERG. It was something that you added about -- it was last year sometime. Nobody else in the industry has done that. The independents don't know it. In fact, many of the independents can't -- don't get copies of it. You do a lot of the administration yourself for these people.

Those codes have got to be amended as well, or as a simpler matter, somehow or another just posting what those CLLI codes are. I mean it doesn't have to be in the LERG. It can be -- We would prefer it from our engineer perspective, but lists of all of your local tandems and

your CLLI codes. But they have to be all inclusive because what we are doing is redefining the traffic which we normally would have sent to a single point and sending it to -- well, actually, in Atlanta we have three access tandems and we have three local tandems, so we end up with the same number of tandems and the same number of groups.

The other thing he mentioned is that there are probably 10 to 20 local tandems in the State of Florida, this morning. I don't know if you recall that. There are only five listed on there, that are all the access tandems. So there is a question in our mind as to whether we really have been given the information we need to go and interface at that local tandem.

Q Well, let me ask you this. You say you've been told that you've got the information?

A Yes.

Q Okay. What would satisfy you that you have the information?

A Consistent stories, consistent in the sense that an old engineer -- Keith and I probably go back the same number of years -- sits there and says to me there are different CLLIs. It's consistent with my knowledge base. Not to have someone tell me they are the same as the access tandem, have him sit there and say 10 to 20 local tandems exist, and there are only five listed in even the document

he presented. Maybe what we need is to take a look at your network diagrams. I don't know.

Q Well, you said that in Georgia you are proceeding with the information you had been given. If you do that and it works, will that satisfy you?

A I hope so. Because what we are going to be asking for is once we get traffic, traffic up there, we are going to establish some resale and some port combinations, and we are going to track to see -- We are going to ask for detailed records -- now whether they will give them to us or not, I don't know -- that show specifically in your traffic usage recorders, you record the trunk group that you went out on. So I want to see a direct call. I want to see a call from that end office directly to this other end office, not through an access tandem.

I want to see that its following paths that are parallel, that are the same paths that your traffic travels. That's a critical piece in the sense of knowing that our traffic is altogether and a blocked call means as much to you as it means to me because right now I'm traveling on the one plus trunk group. Katie bar the door if we get a lot of local traffic moving over there. We could start impacting our core business as well as our local business. I'd much rather have one plus taking care of itself and local taking care of itself so that when you

have the probability of a blocked call on your local network and my calls are there, it's the same probability for me as it is for you.

Q Okay. But to go back to my question, was just if the information that you had been given in Georgia works, it proves to be sufficient, that would satisfy you?

A Well, again, after hearing Keith reiterate to me this morning the same knowledge that I have, is that they should be different CLLI codes, I'm going to have them go back and say, Look, we, again, got the message that these CLLI codes should be unique and separate for a local tandem.

Q Okay. So then even if the information -- You say you are proceeding in Georgia with the information you have been given?

A Yes, the orders are going to go forward.

Q So even if it works, that still wouldn't satisfy you?

A Well, if it works -- what I believe is happening is that you are moving the trunks based on these NC/NCI codes. You are going through gyrations, and I think only because at one time you gave us the access tandems and you really should have been giving us local tandem, by error or whatever, and you are trapped. You know, forget it. Just give me the -- you know, if there are local CLLI

codes for the local tandems, give them to me, and this issue will go away; and we know exactly how to order, what the independents are that are there, and we'll start placing the augments that can move traffic.

Q I'm going to ask my question again because you really haven't gotten to the question I'm asking.

Okay. You said that you have been told before that there are no separate CLLI codes for the local tandems?

A That's correct.

Q Okay. And I'm -- Mr. Milner is not here right now so, you know, I'm not able to accept your characterization of what he said, okay? So aside from what he said, you say that you have been told that there aren't separate CLLI codes. If --

MR. O'ROARK: Let me enter -- I'm sorry, continue.

BY MR. CARVER (Continuing):

Q If you take the information that you have been given in Georgia and you use it and it works, then will you be satisfied on this issue that you've got the CLLI codes you need?

MR. O'ROARK: I need to interpose an objection. I think you've unintentionally mischaracterized Mr. Martinez's testimony. I don't believe he

testified that he talked to Mr. Milner a week ago.

MR. CARVER: I didn't mean to say that. If I did, I --

MR. O'ROARK: You said that Mr. Milner wasn't sitting there. Anyway --

BY MR. CARVER (Continuing):

Q No, Mr. Milner is not sitting here so it's probably not productive for me to ask you questions in which you tell me what he said.

MR. O'ROARK: All he has described so far is what he testified earlier.

MR. CARVER: No, he also said earlier in the deposition that he had been told in Georgia there were no straight codes.

THE WITNESS: That's right, not by Mr. Milner.

MR. CARVER: And that they were -- Yes, not by Mr. Milner. And they were going forward in implementing.

BY MR. CARVER (Continuing):

Q So my question is -- okay, let's leave Mr. Milner and your understanding of his testimony out of it.

A If it works, if it works, we'll be removing this issue.

Q Okay. And when will you know in your view? When will you be able to make that judgment?

A When we move down -- It will be state by state. We know Atlanta. We know what the locals -- The reason we know where the local tandems are is we had a problem there, and they were identified to us. That was the first one. I don't know where the local tandems are in Florida.

Q Well, let's stick with Georgia. Do you know when you'll know in Georgia?

A Well, when we cut over the Atlanta LATA.

Q Can you give me a time frame?

A Well, it will mostly be re-homes (phonetics), so it would be 30 days -- 30 to 60 days.

Q Okay.

A Because the meeting is occurring, I believe, next week where they are going to discuss how they move their trunks and what, you know, time of day they would move them; and that should be a relatively simple task. But it's writing the orders and giving everybody enough time to do it because it will be during the wee hours of the morning when we move this traffic.

Q Okay. Let's go to issue 12. I've just got a couple of questions on these last two. Let me try and understand MCI's position on issue 12. You heard Mr. Milner testify about this one also?

A Uh-huh.

Q And would you agree that he said that the reason BellSouth can't give you the information for the independents is because we have contracts, interconnection agreements that we believe prohibit us from doing that without their permission and that they won't -- at least four of them won't give us their permission; is that the way you heard it?

A Yes.

Q Okay. Do you have any reason to believe that's not true?

A No.

Q Okay. Assuming it is true, is it your position that BellSouth has to breach its agreements with the independents and give you the information anyway?

A No, and I believe BellSouth has one other option that they failed to want to take. Parity of the data base says that I have access to all the records that you have access to. You also have the option of telling these people, I'm not allowing you in my data base and, thereby, resolving that issue. And anytime that BellSouth came back and told a smaller carrier, as the market power that you have, that they are not going to honor it because you won't allow free access to that data, I believe that those requests would be forthcoming.

So you have another option. You have the option

of physically removing those customers from your data base. Now you are at parity with us.

Now, is that good business sense and good customer service? No. We still feel that the Act is above your contracts.

Q Wouldn't removing them from the data base violate our interconnection agreements with them also?

A Don't know.

Q So we might have a different violation than the one --

A Well, but --

Q Okay. All right. You've answered my question. You don't know whether that would violate the interconnection agreements also?

A I have not read your interconnection agreements.

Q Okay. So when you say the Act is above our contracts, you believe -- and I don't mean to ask you for a legal opinion, but I think you have kind of offered one, so I have to follow up. Basically in your view we can just disregard that provision in the contract because the Act, in effect, voids it?

A Now I am not a lawyer, but that is my understanding of our position, that the Act is the law and that the law supersedes any contracts that were in effect. And I believe I said that same thing on the stand down here

in the 271 proceeding.

Q Could MCI get this same information from the independents directly?

A They could.

Q Has MCI tried to get it from them?

A Yes.

Q In Florida?

A Yes.

Q And what happened?

A In fact, many of the contracts and the independents are there today because of our contacts with them. In many instances we had to read them the Act. In other -- The problem with independents, and CLECs just multiplies that problem, you have a data base which we have a right to be at parity with, or we have this ability to chase 12 hundred ITCs, which is, I believe, the count that it goes from a national perspective, and God knows how many CLECs, because of a provision in a contract that somehow or another restricts us from that information which we feel we are entitled to. So while we have still tried, you know, we are still trying to get the other way, we still believe -- and I believe that BellSouth believes that they would prefer to have it this way, that they would want that information in the data base and they would want to have the ability to provide that to other providers.

Q Well, in Florida you just have to negotiate with four, right, because all the others are already on the data base?

A Right, and there are talks going on now to try to understand why some of these carriers feel that they are not included in that statement in the Act which says all LECs, not ILECs, not CLECs, but all LECs must make this information available.

Q And at this juncture, is that going to get worked out, do you think? Do you think you'll get it from those four?

A I believe we will -- I believe we will win it other ways before we get all of the CLECs and all of the ITCs involved. Whether these four crumble, I don't know. I believe they will. One of the questions that BellSouth or AT&T had in their response was with regard to revenues associated with the sale of this, and we have another position on that as well; and that is, that from a parity perspective, information that you are provided because of your market dominance free of charge should come free of charge to us. So from AT&T's perspective there would be no monies coming to them because they didn't pay you anything, or nor did you pay them anything -- in my mind put it in there -- so, therefore, we shouldn't have to pay anything for it; but that's a fight for another day.

Q Okay. And let's, one or two questions about 13. This is the soft dial tone issue. Let's assume that, just to make up a hypothetical, that MCI is serving a customer with its switch and with an unbundled loop from BellSouth and the customer discontinues service. MCI could continue to pay for the loop from BellSouth in order to have, in effect, control of that number and of that line, correct?

A Yes, we are the customer of record.

Q And if you did that, then you could put any kind of message on it you wanted to, correct?

A Yes.

Q Now when the service is disconnected, under the current -- I mean with that not occurring, in other words, under the current situation, MCI doesn't incur any further charges, does it? Or any further costs I should say.

A No, once the service is terminated and we give you the order of terminating our service because we are the customer, at that point in time we would not expect you to bill us for those services.

Q Okay. So the cost of maintaining the line with the soft dial tone, that would be BellSouth's cost, correct?

A That's correct.

Q And MCI wouldn't contribute to that at all?

A We probably contribute in some way, shape or form via access payments or something. It probably shows up somewhere in a bill.

Q Well, at least in a direct sense you are not paying for it?

A In a direct sense, no.

Q Okay.

MR. CARVER: That's all I have.

MS. CARTER-BROWN: Okay. Let's go off the record.

(BRIEF RECESS TAKEN)

CROSS EXAMINATION

BY MS. CARTER-BROWN:

Q Mr. Martinez, I'm Martha Carter-Brown.

A Hi.

Q I'm going to have some questions from staff. You've answered most of them. I have a couple of follow-ups from some of Mr. Carver's questions I want to ask you first, if I could. In your first discussions about the language, specific verbiage in the agreement versus attachment 8, which includes your chart, all right, which is your business performance section of the contract, is it your understanding that your chart that you were referring to and all of the attachments in -- to the contract are incorporated in the agreement that you reached?

A No, that chart deals only with attachment 8.

Q Right. And the chart is part of attachment 8, correct?

A Right.

Q And attachment 8 is part of the agreement that you reached with BellSouth?

A That's right. Right.

Q Okay. And you've got a copy -- just to make sure that we are on the same wavelength, you've got your agreement with you, don't you?

A Yes.

Q Part A, page 2, general terms and conditions, scope of this agreement; do you see that section?

A Yes.

Q All right. I'm going to paraphrase it so I don't have to read it all, but you and BellSouth have described the scope of the agreement as part A, part B and part C. Do you see that there?

A Yes.

Q And part C, as you state, sets forth, among other things, descriptions of the services, pricing technical and business requirements and physical and network security requirements.

A Right.

Q Is your attachment 8 and the charts associated

with that incorporated in that part C?

A Yes.

Q Okay. So it is your understanding, is it not, that your chart is part and parcel of the agreement that you and BellSouth reached?

A Yes.

Q Okay. You were talking a little bit about OSS at the beginning, and you said when you came to Florida and BellSouth, I guess it was -- I guess it was in the 271 proceeding. Was that when you had the opportunity to see BellSouth's OSS systems?

A Yes.

Q All right. And let me make sure I understand. What you're asking for here is the opportunity to see everything that BellSouth has with respect to OSS in order that you will know what's there, if you want it or if you need it, and also to know that you are getting parity in what you require?

A That's correct.

Q Okay. When you had the opportunity to see BellSouth's OSS systems, you said we realized we weren't at parity. Can you give me a specific example of what you meant there?

A Well, first, we didn't see their physical systems. It was in a controlled environment in a training

room, and they had the RNS terminal as well as a DOE terminal situated, and they went through some basic order functionality as far as resale was concerned through RNS, and through DOE they placed, I believe, a primary rate interface order through their terminal.

Well, one of the things that I had been espousing in 271 was that there were no similar business functions, you know, that I could order through the systems that we had. The other thing, on the RNS -- because there was a whole host of things that just jumped out at us. One, they didn't have to log off. We had a discussion on numbers, and they really had a -- basically, there was an artificial limitation. I say artificial, there was a business decision that they weren't to assign more than I think it was 25 or 50 numbers, and we were sitting back there those days with the six-number constraints. There were just a host of things that were different compared to the systems that had been proffered as being at parity.

Q Well, since the 271 proceeding, have you worked out a lot of those differences with Bell?

A Well, that would be the function of Bryan Green and probably a question that is best --

(WHEREUPON, THE PHONE RANG)

Q Okay. Go ahead.

A His primary function in life, as far as I know,

is to do just that, negotiate interfaces for MCI for OSS.

Q When you talk in your testimony at page 8 on line 23 of wanting to see the -- have the opportunity to see the technical specs of Bell's OSS, do you see that?

A Uh-huh.

Q You got there before I did. What do you mean exactly by that?

A Well, to me the technical specs are similar to those that are published in the standards arena. The most noteworthy that comes to mind, EMR specs where the physical record is laid out in detail as to what's there. And by looking at a physical record or a layout of a record, the technical specs of that, how it's interfaced, what type of an interface does it use as well as those technical specs of what's in it, you could immediately sense you can do something with it or can't do something with it, but everything is there in front of you. And that's, in essence, what I would be referring to, is just the record layouts and short descriptions of the physical linkage between those systems, what happens, how it occurs, how their gateways function, to understand how those interfaces could be used in a parity sense, if they are at parity.

Q So your interest in gathering complete information on all of BellSouth's OSS systems, which I think is what you're looking for, is more as a reality

check with respect to parity rather than what you might really need for any services you're asking for at the present time; is that --

A I would think that is a good characterization to make.

Q Okay. You talked a while with Mr. Carver about SAG, and there was -- Mr. Carver was talking about perhaps there has been a very recent Georgia decision on your requests there?

A We had an enforcement case in Georgia with a lot of similar issues. SAG, I know, was definitely in there; and if, in fact, we have a decision that renders that information coming to us, then this would, in fact, be moot because that would be access to the SAG. They would down load it to us.

Q And the sections of your agreement in Georgia that address the SAG, and I think you laid -- at least for this agreement in Florida you laid it out, your opinion of what sections, and it was that chart. Are they exactly the same?

A They are exactly the same. They were not --

Q Exactly the same.

A These were not contended or contentious issues. These were issues that were negotiated and agreed to across all nine states, even the states that followed afterwards,

which I did not -- I started the negotiations with the four states. We didn't get involved with the 251 and 252 proceedings. Those contracts in those provisions were identical. The only issues that were ever contentious are the same issues that we filed in Georgia, are the ones we filed in Florida. Every other contract, stipulation that we have is the same. There were, in fact, 60 paragraphs that we couldn't reach agreement on. Those are the same 60 across the five states that we arbitrated in.

Q Okay.

MR. O'ROARK: If I may, can I interject something that I think may help counsel just to keep from confusing things? Mr. Carver examined Mr. Martinez and asked him, I believe, about an OSS order that has been issued in Georgia that came after OSS workshops. There is a separate action that MCI has brought against BellSouth kind of similar to this one. I'm a lawyer on that case. To my knowledge, an order has not come down on it yet, just so the record is clear.

MS. CARTER-BROWN: Okay.

THE WITNESS: The OSS?

MR. DULANEY: I'm not trying to testify for what --

MR. CARVER: Just for the record, I wasn't asking about either one specifically because I don't know

enough about what has been issued in Georgia. I just heard a rumor that it may be something that happened there that would resolve this, but I don't think -- Apparently neither the witness nor I know much about it.

MS. CARTER-BROWN: Let's go off for a second.

(DISCUSSION OFF THE RECORD)

BY MS. CARTER-BROWN (Continuing):

Q OBF, you talked about that with Mr. Carver too, and that is?

A Order billing forum.

Q Order billing forum?

A Ordering and billing forum.

Q Ordering and billing forum. I think in prior proceedings that has been described, but would you briefly describe that and also describe its relationship to your agreement?

A Well, the ordering and billing forum is a -- I keep wanting to call it a standards body. It is not a standards body. It is representatives from all of the ILECs -- ILECs and tier one LECs and all IXCs that get together to discuss issues associated with -- it originally was to discuss issues associated with getting ordering and billing for interexchange traffic. It was expanded to include local at the onset of -- with the passing of the

Act, I believe. It was a movement to bring that in knowing that the same systems problems would pop up.

It defines the forms. It defines the elements that go on the forms that you send. There are other subcommittees that work on the interfaces associated with the transmittal of those forms so that you end up with a standard, but it's not a standard, and we keep saying that. It's a commitment by all parties to abide by the outcome of the OBF. And I say abide by because you don't always win, and you don't always lose. There is a lot of comprise to work systems together and to get multiple ideas consecrated in a fashion that everybody can use it. So that's the whole idea behind the OBF.

And the idea of FOC, which is where that came in, the OBF undertook, it was a couple of years ago, as a request from the interexchange carriers. It could come as a request from the ILECs or a tier one. This one came as a request, I believe, from the interexchange carriers to reduce the time limit for FOCs. The rationale given for not being able to do that was that the tariffs dictated because in their tariff they had -- I believe in BellSouth's case they had five days, and we said that is an easy remedy, go and remove it from the tariff. And we came down to the 48-hour interval, and as always, when you negotiate down something, you negotiate to a point where

everybody is comfortable, and then you try to push the envelope to understand what is causing -- you know, you got it this far. Why can't you get it this far and this far? And we are at -- we, MCI, are at a 24-hour interval on the most part but no later than 48 hours on the FOCs back.

FOC is an automatic in today's world. Actually the systems are designed because the FOC does carry more than just the date that you are confirming. It is also a billing date. It's when I will start receiving bills associated with this. There are some, a whole bunch -- There is an actual mechanized spec about two and a half inches that describe the actual process.

So OBF was a very important element to us, and in the contract, we have the stand-alone, the one that I read which was on OBF in general, on ordering, preordering, firm order confirmation, that they would abide by that. The other two references that we made to it, and I didn't realize that the use of ASRs was so contentious because there are two specific references in the attachment 8, one to the resale process -- and that is the one I was going to go to, which was 5.1, I believe -- and the other one was on network elements, where network elements were recognized as being something that would probably remain on the ASR format for sometime, certain elements.

Q Why?

A Only because they weren't going to be able to get around to redefining the elements onto an LSR, and it made sense because it's -- Remember it's -- We don't want to call it a standards body, but it is a body that tries to minimize the amount of work effort that groups have to do when they prioritize. Well, if you've got some capability of doing it today and you don't have capability to do this, then you prioritize and you do that, all right? So ultimately our desire was to get everything moved to the EDI interface in the LSR, but as a realist we knew that the ASR was going to be around for sometime because there were certain functions and features and things that you could do with the ASR that you didn't have to supplant the work that they were doing on these other things.

Q Can I stop you? Is that why MCI is using T1s for access -- ordering T1s through the ASR?

A Well, a DS-1 to our minds is nothing but a digital loop.

Q Yes, sir.

A You have a PBX out there that has trunks. You have to draw down from them some place. I have an option, I can run 24 copper pairs out to there, or I can put them on a digital interface, plug a digital card into their switch and a digital card into my switch, and now the 24 loops are done in an electronic fashion rather than on

analog copper pairs. And there are a lot of benefits to that, especially if you now think that most of the DS-1s or T1s today are provisioned even in the local side on fiber versus copper, then you -- in areas where you're lightening prone, you no longer have concerns about not necessarily hits; but lightening hitting anywhere near a copper cable will induce voltages and current into that cable even though it wasn't hit. So, you know, you've got outages that are associated with that. Well, glass is an insulator so, you know, it's --

Q Well, let me get back to the question though. Something that concerned us or confused us when we were reading your testimony was that MCI is purchasing DS-1s or T1s out of BellSouth's ASR, and we want to know why, and we wanted to know if it had something to do with the OBF or why you were doing that.

A No, there is a couple of things. One, it's a totally mechanized system, as far as we are concerned anyway, today.

Q The ASR?

A The ASR is.

Q As opposed?

A To the LSR.

Q To the LSR which is not --

A Which is being developed through the EDI

interface So from day one we have the ability to use our NETPRO and our -- or COMS for ordering NETPRO to convert that and send an ASR in a -- We are still -- Even at that time we were faxing a lot of them, but it was just some minor changes that had to be done to allow that to go into a mechanized fashion.

And the contract allowed it, and that's the point I was trying to bring up. In the systems interface and information exchanges in 5.2, the last element says, "For a local service provisioned via the access service request, the electronic communications gateway interface may be used." So we had already established that we could use the ASR functionality through a gateway for local services. In a previous section here, and the only two parts that I felt pertinent at the time we were negotiating, was network elements that was -- at the time the LSR wasn't going to carry everything so that the ASR had to be one of the principal modes by which you order things. So there are a number of business reasons why you would continue doing something that you've always done because the other systems weren't up, you had no confidence in them, there really was nothing through the business process that they had to enable us to buy the DS-1s.

Q But if it were not for the interconnection agreement, you would pay the tariffed, BellSouth's tariffed

rates for DS-1s?

A Yeah. Well, we are paying their tariffed rates. It's a bone of contention with me and my internal people because, as I said, we took great pains to make this document an all-inclusive document, such that collocation is in here, your EMR records are in here, your services that you want are in here; and there are statements to the effect that all prices associated with these are located in here. The fact that we order it one way shouldn't have made any difference.

Q Okay. Let me go back. You are ordering T1s --

A Right.

Q -- from the ASR at BellSouth's tariffed rates?

A Right, access tariffed rates.

Q Accessed tariffed rates. But you want to have available to you all of the other provisions of the Interconnection Agreement in your ordering of those lines and in anything else that has to do with the T1s, and Bell's position -- correct me if I'm wrong here -- Bell's position is that because you were ordering through their tariff you were not entitled to the provisions of the Interconnection Agreement; do I have that right?

A I think their position, and I don't want to speak for them, but I think their position was that because we were using the access service request, which is a vehicle

normally used to purchase elements out of an access tariff, that we, therefore, were issued the access tariff responses.

Q And point to me, again, to the provision in the Interconnection Agreement that contradicts that.

A In section 5.2, attachment 8. It's actually 5.2.12, the last paragraph. It's a series of elements that talk about resold local services, how we would do it, the capabilities we would have, and it was in here that we added the last paragraph, which was for local service provision via the access service request, electronic communications gateway interface may be used. That whole idea for us was to basically say it was just another ordering vehicle as far as we were concerned. It was a vehicle that was there that was available that we should be able to order the elements that we needed.

Q Now let me ask you another question. If tomorrow you ordered another T1, could you do it under the LSR?

A The LSR still, to my mind, is not ready yet.

Q Still not ready yet?

A I think we are going up in September with -- and Bryan would be a good one to ask that question to, but I believe that September is when we turn up on seven.

Q What do you mean you turn up on seven?

A It's issue 7 of the EDI interface.

Q Okay.

A Which has the start, I believe, of the business functions.

Q Okay. Is it true that MCIm has tried to order 4-wire loops in combination with the T1s and that BellSouth refuses to provide those combinations?

A That's my understanding.

Q Where do you get that understanding?

A Again, I was going to say that you're probably best to ask Bryan because Bryan was part and parcel, I believe, of those negotiations; or at least the group he represents, which is the financial organization. And there were, as I understand it, discussions back almost a year ago to provide this, and that the fact that they were combining the elements, they were reconstituting a resale service which I personally don't understand. That would be comparable to saying I can't buy an unbundled loop because I sell unbundled loops in the tariff to security people who only want pure copper so, therefore, it's replicating a resale service for that loop, so I can't sell a loop. It is a digital loop. It is literally providing dial tone to that PBX, so it should be covered under that. And again, our contract clearly states that they can't undo anything. I think that is what the order came out and -- If we don't say to undo it, they can't undo it. If it is there and

combined, we have every right to keep it that way.

Q Okay. You were talking about the OBF and the decisions that it makes in sort of a consensus fashion. Do all carriers also agree to abide by the electronic interface that's proposed by the ECIC committee or the ATIS?

A Yes.

Q Okay. ECIC?

A ECIC, yes. We are active members in all of those committees, and we take our lumps and we take our victories.

Q Okay. Local tandem interconnection, you all talked a lot about that earlier. I'm not sure we fully understand why you want your traffic to be carried over the same trunk groups as BellSouth's.

A One has to look at the alternatives. In negotiating this agreement, not knowing that there was such a thing as a local network, we assumed that an end office had but one path to a tandem and that on that tandem was a common trunk group which all traffic rode on, their local, our toll. Times changed, CLECs come in, our local, their local, our toll.

When you look at it in terms of a totality of traffic, it's not new traffic; so when I win a customer on the local side, it shouldn't have made any difference to

that trunk group that it was traveling up that tandem because it always went that way. What we discovered was that there were two separate networks, that all the local traffic went to this local tandem; and all one plus, almost a mirror of what they had, went to the access tandem.

Now I take that one traffic, it's an unknown. We don't know how many local calls and how many minutes customers make. It's an impossibility to determine. It's even harder -- you know, at least in the access billing arena, you can go back and you can take a look at an access bill, look at their toll charges, and where did they call and understand a little bit about what the usage is on that. But on local it's all flat rated. You don't know where they call, who they call, when they call.

So you take that information that was on what we thought was a common group that everybody was on and you dump it on to carriers. It has different busy hours. It has different characteristics to it, from the length of the holding time on calls. It has the possibility of a detrimental impact to our core business when we could see no reason for moving the traffic. It should have remained all local, local and mine traveling the same path as theirs.

So that's why we made the requirements or we wanted the requirements in the local tandem to be just

that. Not only did we want it to go to the local tandem, but we didn't want to go there unless we had access to all of the network facilities that we had, which were the ITCs that interconnected with cell cos and I would assume some CLECs, and that the trunks that were used to carry that traffic were the exact same trunks that were carrying that traffic today. So hence, any change of ownership of traffic didn't impact the traffic characteristics. I've still got the same probability of blocking today that I had yesterday on that traffic. The only difference is that that's now my minute versus their minute. It's not the same when you pass that traffic on to a totally different trunk group.

Q Okay. You just mentioned about flat rated traffic and local traffic. Do you know -- We are talking now about issue 11 and the subscriber usage data.

A Right.

Q -- what kind of usage data BellSouth records?

A Well, there is actually -- during the negotiations was the point of contention that we couldn't get it, but they claimed that they did not record local traffic. Having been an old telephone engineer, I knew that that was erroneous, that the switch or the recording device records all traffic. In fact, how could you get nuisance calls and do traps on calls if you didn't record

it?

So the whole contention as far as negotiations were concerned was I don't record it. And I said, But you do. So we comprised, and we set that language around completed calls such that if, in fact, they did record the traffic, then they were supposed to record it for us and give it to us. If they didn't, then I could create a BFR and ask them to create the interface or the recording --

Q BFR?

A Bona fide request.

Q Okay.

A I could create a bona fide request and ask them to put in the equipment necessary to record.

Q Right.

A Now from that it has changed dramatically, as I've heard, you know, and seen testimony that said they would never do this, you know, it would take billions of calls and everything else. That was never discussed. The only thing that was ever discussed was did I record it or not. And it was -- and I like Steve, but it was Steve Klimacek that came to me and proffered this paragraph that said this is the way it's structured. And I called my paralegal because I'm not a legal person, and I said, Is what he is telling me correct? You know, if, in fact, they do record, do I get the traffic? And he said, For the most

part, that's what you have there. And if you don't, then you have to write the BFR. I said, That's fine. Because in my mind -- It was a way of resolving an issue that from my perspective said, of course, you record it, you can't not record it; and their people saying, No, I don't record. That was a way around it, you know, and create an impasse where, you know, whoever was right won the issue. And if Bell was right, then I had to issue a BFR and I had to pay for the equipment to go in there.

Q An EMR is the record?

A Yes.

Q Okay. And that's what you want?

A Yes.

Q For all local traffic?

A All local traffic.

Q Why?

A There are two reasons. One, from a perspective of switch buildup, this is traffic that never hit my switch. We are talking now in the resale mode and the use of unbundled network elements where I don't see the traffic. So if I ever build up enough of these customers out there and I need to bring it into my switch, I need to have an understanding of what capacity I'm asking that switch to now perform based on what that traffic is going to be.

The second thing, and probably equally important, if not more so, we are a great believer, and we learned this the hard way, in the long distance world, but you must keep your customers happy. And if a customer should be on a measured service when they are on a flat service, if you don't tell them, your competitor will and take the business from you. So from a marketing perspective we wanted to judge the usage to see if there wasn't some way that someone should be on a lesser paying account, in other words, a measured rate for that service rate and save money.

And there are countless examples of this in the long distance world where we were very successful in our early days by being able to not only, one, win customers that way but to retain them, proactively calling them back when we saw their usage had changed to a different level or dropped down, saying you really should be on this plan, we'll change you right away if it's all right with you, and you'll save X-number of dollars or whatever. Because if we didn't do that, there were a hundred IXEs coming behind me that were willing to take a look at those toll records and take a look and say, I can save you money. And it would have been saving money artificially. It would have been saving money that we could have saved them had we just switched them to a plan, so from a marketing aspect it's

also necessary.

Q Okay. You want this -- Just which subscriber usage data do you want? Do you want it for customers that you won, right?

A All of our customers.

Q All of your customers?

A Right.

Q Okay.

A Yeah, I'm not looking for information. If they are willing to give it to me --

Q Okay. Attachment 8 on -- dash 40, section 4.1.1.3 of your agreement, okay, it starts -- Can you explain the second sentence there that begins with, "However, following execution of this agreement?" Would you just read it for the record and then --

A "However, following execution of this agreement, MCI may submit and BellSouth will accept a PON for a time and cost estimate, the development by BellSouth, of the capability to provide copies of other G sales (phonetics), usage records for completed calls originating from lines purchased by MCI for resale."

It is this sentence that Steve Klimacek had proffered to us that said you got the completed calls. If we, in fact, do record, then you don't have a problem here, we will record the calls and give them to you. If we

don't, then there is the PON number. The PON number is really the start of a BFR. It is a purchase order number. It says I am going to pay for whatever it takes to develop the necessary mechanism in your switch to perform that function.

Q Okay. All right. On page 41 of that section, there is a list that is not all inclusive of categories of usage data information. Can you explain why the category "Completed Calls" would include --

A It's not a category. It's a separate item.

Q Okay. All right. So why is it separate?

A Because completed calls was our ability to get the information if they recorded it.

Q Okay. All right. Got you.

Okay. Still in attachment 8, now on page 47 and 48, section 4.2.1.1, talks about, says that, "BellSouth shall provide MCIm with unrated EMR records," et cetera, et cetera, "which they record on lines purchased by MCImetro for resale." And as we understand it, BellSouth believes that it only is required to provide records associated with billable usage and that on lines purchased by MCI and for resale, but we are wondering if "lines" in this subsection refers to unbundled loops or to a complete service. What does "lines" refer to?

A The, we never discussed the meaning of "lines."

I can tell you what I would interpret, and that would be anything from a resale perspective or any combinations that I purchased, whether they reconstituted resale or didn't reconstitute resale. In other words, they were unbundled and properly unbundled in the sense of -- not unbundled, but I provided the necessary whatever to make this not a same service; or if I did, then it would just be resale. So it's either resale or unbundled lines.

Q So it's both, in your opinion?

A That would -- although, quite honest, we never discussed what lines represented in that.

Q Okay. I'm not sure we fully understand the disagreement between you and BellSouth about recording. You say as an engineer you believe that BellSouth records all of their flat rate usage data?

A They record all -- All traffic goes through their station.

Q You know this for a fact?

A That's my belief as an engineer to be fact. There may be an odd switch that for whatever reason the, what I would call station message detail recording device doesn't record some attribute.

Q Now I want you to use the acronym, so I don't have to --

A SMDR. But those particular switches, we would

basically wait until they upgraded. What they have been saying to me, if they said there was, was they had an outdated switch with some outdated recording devices on it, and I would simply wait until they modi -- you know, whatever reason they did, updated it to, you know, I would say almost three years ago switching technology, and they would have recorded that. But that, the subject of -- the only subject they had was they said they don't record, and I don't know if we've provided the letter where it came back which blew my top off that they said, Oh, yeah, we do record, but we don't strip the traffic for ourselves and, therefore, we are not going to strip it for you.

Q What does that mean?

A You've got it on a storage device, whether it be a disk or a tape, and you need to extract the data from that device and send it. That's a whole different issue that was never discussed in negotiations. The fact that they do or do not do something for themselves is of little interest to me, quite frankly.

Q Well, if they don't do it for themselves, does the Act require them to do it for you under the various interpretations that we've had?

A The contract.

Q And the contract. All right. Where does the contract, again, say that they have to strip the traffic if

they do it?

A They have to provide it. Even when they send me the calls that they talked about that they would send the billable calls, they have to strip that traffic off of the same device, whether it be a tape or a storage device. They don't send me everybody's traffic. In fact, in here I tell them, You will not send me anybody's traffic but mine because there is, you know, in my mind a legal implication of having somebody else's traffic sent to you. I bill the wrong party, you know, on infinitum.

Q Okay. And that's in attachment 8 as well?

A Yes.

Q Okay. That's all I've got. Wait, no it's not. Just a clarification. You were talking -- When you were talking about SAG, you mentioned MSAG. Tell us what MSAG is.

A MSAG is the data base used for 911.

Q Okay.

A In my mind it's an extract of SAG only that it carries ranges. It has -- when I go in and validate that I do have MSAG and there was no charge for the down loading of the entire MSAG for their universe --

Q When did you get that?

A Within 30 days of the contract signing.

Q Okay. Did you have to pay for it?

A No.

Q Okay.

A I go in and on a 911 record I bounce it, and what that does is validate that it's a valid address. SAG allows me to validate the specific address. The fact of -- I can put a person's name in there, and the address comes up. I put a telephone number, and the address comes up. In the MSAG I'm providing a specific address, and all that is coming back is a yes or no, it's a valid address or it's not. That's because the MSAG itself is a range, and it has all the numbers of the streets, Peachtree, blah, blah, blah, blah, blah, you know, all the numbers. If I hit one of those numbers, it's valid, not that that is where the person is, but it's valid; so if the fire department came, it would go to a valid address, not a vacant lot.

Q Okay.

MS. CARTER-BROWN: All right. That's all that I have.

MR. CARVER: Nothing else.

MS. CARTER-BROWN: Nothing else?

MR. O'ROARK: Nothing for us.

MS. CARTER-BROWN: Okay. Wonderful.

(WHEREUPON, THE DEPOSITION WAS CONCLUDED)

* * * *

ERRATA SHEET

DOCKET NUMBER 980281-TP
RONALD MARTINEZ
JULY 23, 1998

STATE OF FLORIDA)
: CERTIFICATE OF OATH
COUNTY OF LEON)

I, the undersigned authority, certify that RONALD MARTINEZ personally appeared before me and was duly sworn.

WITNESS my hand and official seal this 26th day of July, 1998.

NANCY S. METZKE
Notary Public - State of Florida

CERTIFICATE OF DEPONENT

This is to certify that I, RONALD MARTINEZ, have read the foregoing transcription of my testimony, Page 1 through 109, given on July 23, 1998 in Docket Number 980281-TP, and find the same to be true and correct, with the exceptions, and/or corrections, if any, as shown on the errata sheet attached hereto.

_____

RONALD MARTINEZ

Sworn to and subscribed before me this
_____ day of _____, 19_____

_____
NOTARY PUBLIC
State of _____
My Commission Expires:

REPORTER'S DEPOSITION CERTIFICATE

STATE OF FLORIDA)
COUNTY OF LEON)

I, NANCY S. METZKE, Certified Shorthand Reporter and Registered Professional Reporter, certify that I was authorized to and did stenographically report the deposition of RONALD MARTINEZ; that a review of the transcript was requested; and that the transcript is a true and complete record of my stenographic notes.

I FURTHER CERTIFY that I am not a relative, employee, attorney or counsel of any of the parties, nor am I a relative or employee of any of the parties' attorney or counsel connected with the action, nor am I financially interested in the action.

DATED this 26th day of July, 1998.

NANCY S. METZKE, RPR, CCR

ERRATA SHEET

DOCKET NUMBER 980281-TP
RONALD MARTINEZ
JULY 23, 1998

REFERENCE PAGE 24 - LINE 5; CHANGE BMOQ TO DMOQ

REFERENCE PAGE 101 - LINE 23; CHANGE PARALEGAL TO ATTORNEY

CORRECTIONS

Corrections to the deposition of BRYAN GREEN, taken in the case of BellSouth Telecommunications, Inc., Docket No. 980281-TP, taken on July 28th, 1998.

Page-Line	Correction
25 - 17	Change NSX to NXX
30 - 6	Change AOTT to EDI
32 - 16	Change ALEC to ILEC
33 - 20	Change LSOC to LESOG
33 - 21	" SOC to SOCS
41 - 21	" fit to FID
42 - 24	" date to data
42 - 25	" air to error
44 - 16	" fit to fID
44 - 23	" R4 to an
71 - 16	" payer to pairs
73 - 15	" Result to resold
73 - 18	" Partner to SERVICE
Date	Signature
99 - 23	delete not necessarily
108 - 5	delete entire Answer (we are not ordering USOC

AS TO SIGNATURE ONLY

IN WITNESS WHEREOF, I have set my hand and affixed my seal this _____ day of _____, 1998; said instrument was acknowledged before me by _____ who is personally known or identified himself to me.

Notary Public

Bryan Green
Docket No. 980281-TP

LATE FILED DEPOSITION EXHIBITS 1 & 2

REQUEST: Provide a list of BellSouth OSS systems or databases which MCIm has identified and to which it may want access.

RESPONSE: As a result of the Florida RNS/DOE demonstration and subsequent information from a variety of sources, MCIm has identified the following OSS systems or databases which it believes are used by BellSouth. MCIm does not know the details of these systems or databases. MCIm therefore cannot determine which ones are necessary to provide parity in access to OSS functions. In addition, MCIm learned during the deposition of Mr. Stacy that there are 60-70 OSS systems and one hundred or more databases used by BellSouth to perform the five basic OSS functions. MCIm has no additional information about these systems and databases and therefore cannot determine which ones are necessary to provide parity in access to OSS functions.

RSAG
DSAP
LFAC
RCMAC
CRIS
COSMOS
MARCH
HAL
BOCRIS
ATLAS
COFFI
OASIS1
LMOS
SOCS
DLETH
DLR
JMOS
LMOSupd
ORION
MELD
SECURITY
MOBI
COFFEE
COFFEE/TLAS
BRIS

Bryan Green
Docket No. 980281-TP

LATE FILED DEPOSITION EXHIBIT 3

REQUEST: Provide a list of information in the CSR which BellSouth does not make available to MCIm.

RESPONSE: See attachment for a list of information that MCIm has been advised is contained in the CSR.

BELLSOUTH

BellSouth Interconnection Services **Memorandum**

RECEIVED
AUG 4 1998
Hopping, Green, Sams & Smith

File Code	000 000 000
Date	May 20, 1997
To	Bryan Green
Telephone number	404-267-5515
Fax number	
From	Ilene Barnett
Telephone number	770-492-7525
Fax number	
Subject	Customer Record Bill Screen

Attached is a list detailing the major fields on a Customer Record Information System (CRIS) Bill screen and the BellSouth CLEC Access to Records Proposal. This information was furnished to me by Jim Childress.

Our conference call will be Tuesday, May 20, 3:00 p.m. EDT - 4:00 p.m. The conference bridge number is 205-970-3742, access code 4675.

Please call me if you have any questions or comments.

Jim C.
(404) 420.0031 - Fax
404 529.6191 - Ofc

Customer Record Information System (CRIS) Bill Screen

N 1. Account number including area code and customer code.
u 2. Screen Name
u 3. Date of the Bill (Bill cycle)
u 4. Status of Account. (Live or final)
u 5. Account Status Indicator
u 6. Four digit abbreviation for the exchange (Calling Exchange)
N 7. Class of Service
u 8. Rate Group Identification
N 9. Billing Name and Address
P 10. Pay By Date - Date bill is considered past due
P 11. Start Treatment Amount - Amount of money a customer must owe before treatment action is appropriate.
u 12. Four digit code indicating the federal, state, local, etc. tax states of the account.
P 13. Credit Classification
P 14. Months in Credit Class - This is the umber of months that an account has been in its present credit class
u 15. RAO number (the first 3 numbers) for the customer's account as well as the customer's check digit (the last number).
P 16. Refer Account Date - Date notice is mailed to a customer when a treatable amount is due
P 17. Remove from Treatment Amount - The dollar amount an account must be reduced below to no longer be considered treatable.
u 18. Taxing Area Code - Indicates the city, county, franchise, or surcharge tax rat on an account
N 19. Toll Billing Exception - This code represents a restriction from certain types of calls (Should show up under prod & SVC
N 20. Primary Interexchange Carrier Code
P 21. Date of Installation - Date svc installed
P 22. Refer to Business Office - The date a referral is sent to the Collection Center/Account Center on a treatable amount
23. No Treatment - An indicator to stop computerized treatment of an account.
24. Toll Credit Limit
25. Deposit - An amount of money obtained to secure an account.
P 26. Write Off Date
u 27. Preferred Payment Date
P 28. Calling Card Holder – indicator to that they have a calling card.

1

Customer Record Information System (CRIS) Bill Screen

29. Amount Due - The current amount due on the account.
30. Old Telephone Number/New Telephone Number
31. Credit Information
32. Credit Information Verified
33. Bill Summary
34. Features - A code indicating the available central office services in a customer's area to which the customer does NOT subscribe
35. Itemized Calls - The total dollar amount of toll charges from all entities which appeared on each of the three preceding bills.
36. Treatment History (12 months)
37. Return Check History (12 months)
38. Social Security Number
39. Unregulated Billing
40. Last Bill - The amount of the last bill
41. Payments and Adjustments posted since the last bill
42. Transfer - Amount of money transferred from another account with the telephone number indicating where the balance originated.
43. Balance - Balance after last bill plus/minus any payments and adjustments
44. Late Payment Charge
45. Current month's total charges for charges incurred since last month's bill
46. Total of current charges and any unpaid charges from previous bills.
47. BellSouth Charges
48. Interexchange Charges
49. Payments and Adjustments Through Bill
50. Payments and adjustments posted during the current billing cycle
51. Memo Screen for making customer notations

Bryan Green
Docket No. 980281-TP

LATE FILED DEPOSITION EXHIBIT 4

REQUEST: Provide documentation of any requests for electronic notification of service jeopardies.

RESPONSE: MCIm has been unable to locate any documentation beyond that contained in the exhibits to Mr. Green's prefiled testimony. MCIm believes that there are some e-mails between MCIm and BST relating to this topic, but has been unable to locate them in the time available for preparation of this response.

Cross of Martinez - Section 271 Exhibit 4

TENNESSEE REGULATORY AUTHORITY - DOCKET NO. 97-00309

May 27, 1998 - Volume X D

Page 201 to Page 278

CONDENSED TRANSCRIPT AND CONCORDANCE
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FLORIDA PUBLIC SERVICE COMMISSION
DOCKET NO. 980281-TP EXHIBIT NO. 4
COMPANY/
WITNESS: Martinez
DATE: 8-5-98

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BellSouth for physical interval for that service.
Q. And that makes the time longer?
A. Well, it's an unknown, for a start. You can't quote a date. But even in the case of five days, we feel that that's -- that should be no more than a day where the material -- the loops are all prewired to begin with. It's a matter of where we haven't taken the port and we're just going with the loop, we viewed it as a PIC change. It's just a matter of changing the identity, taking that and wiring it to the collo space.
Q. Now, again on the same subject of installation of loops and the time it takes, on page 27 you state that, "I would contend that installation of a 2-wire analog voice grade loop is nothing more than installation of a basic POTS line for a residential or business customer."
Do you know if BellSouth provides same-day or next-day service to its retail customers in Tennessee?
A. At least I know in Florida, because we had a presentation down there of their RNS center where that question was asked. And they actually can perform that service within four hours.
And same-day is a very typical response for someone who calls and wants -- and they also stated

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that they have a standard interval that they like to quote. I don't remember what that was -- whether it was two or three days. But if the customer at all says, "I would like it today," then as long as they've called in before twelve, they can have it.
Q. And just to make this clear, how long would it take if MCI requested that, just the one-to-five-day interval?
A. Well, according to this on the loop, it would be -- the minimum would be five days. I mean, if we're just ordering one loop, it would be five days.
Q. Now, do you know the targeted install interval for a 2-wire analog voice grade service provided by BellSouth's retail operation when the customer orders more than five lines?
A. No, I don't.
MR. BROEMEL: I have no further questions.
DIRECTOR MALONE: Mr. Baltimore.
MR. BALTIMORE: No questions.
DIRECTOR MALONE: Ms. Sanders.
MS. SANDERS: I have no questions.
MR. WALKER: No questions.
MR. THORNTON: No questions.
MR. ROSS: Thank you, Director.

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CROSS-EXAMINATION
BY MR. ROSS:
Q. Mr. Martinez, good afternoon.
A. Good afternoon.
Q. I thought I saw that you were present in the room when Mr. Green was testifying. Were you actually here during his testimony?
A. Yeah, for the most part.
Q. Mr. Green mentioned something about a resale trial that went on in Tennessee, and I thought I understood him to mention it occurred sometime in July of 1997, or the summer of 1997. Do you recall that?
A. Yes.
Q. Are you familiar with the details of that trial?
A. Only that there was a trial. It was run out of the national center up in Virginia, I believe, where they ordered loops and port combinations.
Q. And -- well, ordered loops and port combinations and BellSouth treated those as resale. Is that your --
A. That's correct.
Q. This was not a case where MCI was actually placing orders for resale?
A. No. No, we -- the orders should have been

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loops and ports.
The only resale trial I knew of was LENS, and I don't know if any in LENS were turned up in Tennessee. You'd have to rest with whatever Mr. Green said.
Q. And I understood Mr. Green to testify that at least some customers of MCI are still being served -- residential customers of MCI are being served through resale here in Tennessee as a result of that trial; is that correct?
A. He would know best. I don't recall any notice going out. I do know that we started to take them down. Obviously, it was an expense on our part. We were paying all the tab, so it was something that we wanted to get in and -- we were testing something. And for the most part, you can learn as much undoing as you can learn doing -- the physical removal of the order. In other words, the transfer from a CLEC to an ILEC that would transpire.
Q. How many customers was MCI serving in Tennessee on a resale basis pursuant to this trial at any given time?
A. I believe the numbers are proprietary, but I don't believe that we had any physical customers up -- other than the trial customers -- for resale.

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Q. Well, and that's all asking about -- the number of customers?
A. No, I don't believe any commercial customers were up. We were still testing the systems as they went along. We tested LENS first, and then we were testing loops and port combinations. And I believe all of those were done -- faxed, to the best of my knowledge.
Q. Maybe my question isn't clear, Mr. Martinez.
I understand this was a test, and I understand that Mr. Green referred to it as a trial of resale.
A. Right.
Q. And my question is relatively straightforward. At any given time during this trial, how many residential customers was MCI providing service by means of resale in Tennessee?
A. I thought I answered. I don't know. I don't know the number.
Q. Okay. How many customers does MCI currently serve today, both residential and business?
MR. O'ROARK: Let me interpose an objection. I believe we have submitted the number of customers in proprietary discovery responses. If

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Mr. Martinez's response is subject to the confidentiality order, I suppose I don't have a problem if the witness knows. But I want to be clear that that is proprietary information.
CHAIRMAN GREER: Mr. Ross, are you looking for information that was separate and apart from the other proprietary information that we've already looked at?
MR. ROSS: Well, just two points, Mr. Chairman. I'm looking at a response of MCI to the CAD's discovery request that is not marked as proprietary, which gives a number of customers. And it gives customers as of December 1997. Well, today is obviously May --
CHAIRMAN GREER: Mr. O'Roark, do you want to look at that?
(Document passed.)
MR. ROSS: And I certainly don't want to get -- I mean, if we want to talk in ranges and approximate, that's fine. You know, I certainly don't want to -- I don't think we need to go to the trouble of having things separated under seal for the purposes of the transcript.
CHAIRMAN GREER: Well, back to my question. Are you looking for something other than

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what was already submitted in the previous document? We looked last week -- or the week before last -- at a number of numbers that we all determined that were propriety that showed how many customers each of the different CLECs had.
MR. ROSS: I think the number that we looked at were the numbers that BellSouth had estimated that CLECs were providing. I think now is a chance for the company to tell us -- to give us an approximate number.
CHAIRMAN GREER: If, in fact, these numbers are proprietary, can you show him that chart and ask him to confirm whether those numbers are approximately correct or not, to the best of his knowledge? Would that solve the problem? And that way we don't have to put a number on the record.
MR. O'ROARK: That would be fine. You might lay a foundation and find out whether he even knows. But I don't have any problem with that procedure.
CHAIRMAN GREER: Well, let's do that.
MR. ROSS: Let me back up. I think the number -- we didn't -- on our exhibit, we did not estimate the number of customers. We estimated the number of access lines.

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CHAIRMAN GREER: Exactly.
MR. ROSS: And so there's nothing I can show Mr. Martinez that would confirm that number.
CHAIRMAN GREER: Okay. I think you're correct. I think you're right.
MR. ROSS: And, again -- well --
BY MR. ROSS:
Q. Mr. Martinez, do you know today how -- approximately -- and I don't want to get into any proprietary information -- how many customers MCI is serving in Tennessee? Residential and business customers?
A. I have a guesstimate. I don't have firsthand knowledge. I don't know, no. But I can give you a range, if you want --
Q. Can you just give an approximate range?
A. Let's --
MR. O'ROARK: I guess I've got the same objection. I think what has happened, let me just say for the record, is that MCI submitted proprietary and nonproprietary responses to the discovery requests. And I believe the distinction was noted in the cover letter. And in the document that's been provided to me, there is no cover letter. And I'm trying to sort it out. But --

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MR. ROSS: I'll move on to something else, Mr. Chairman. I don't want to belabor the point.

CHAIRMAN GREER: Well, we could put the discovery response into the record, and that would solve the problem, I believe.

MR. ROSS: I'd like to do that, if I could. And I don't know -- I wasn't here this morning, and I'm not sure to what extent MCI has committed to providing the information that Director Malone had asked the other CLECs to provide, and that may moot this entire discussion.

DIRECTOR MALONE: Would that?

MR. ROSS: I think it would, Director Malone.

DIRECTOR MALONE: I've been wondering all day, I thought all of the CLECs agreed to provide the requested information in the format requested.

MR. O'ROARK: Director Malone, we are in the process of getting that information together. And we plan to provide it to the Authority.

DIRECTOR MALONE: Is there a CLEC here that's a party to this proceeding that has not agreed, at the Authority's request, to submit the information?

MR. WALKER: Jim Falvey is going to be on the stand in the morning, and I had anticipated that

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he would make that commitment at that time. I haven't talked to him about it.

CHAIRMAN GREER: Mr. Baltimore.

MR. BALTIMORE: Just a point of clarification. Are we talking about the two-page sheet that was the proprietary?

My clients certainly -- which would be LCI, Intermedia, and WorldCom -- can provide that, I don't know, now or later, perhaps sometime. But to discuss with the Authority some clarification, they have absolutely no objection to providing it to the directors and the staff but are concerned about providing it to other parties since it is proprietary information.

And, secondly, what about those who are not CLECs who are not parties to this proceeding, either who may not have to answer it or, from what I remember of discussions earlier, the Authority may ask it from other CLECs. If they're not parties to this hearing, does that mean that they do not have to furnish it to the other parties?

CHAIRMAN GREER: Director Malone.

DIRECTOR MALONE: Did you say you have discussed this with your client?

MR. BALTIMORE: Yes.

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DIRECTOR MALONE: The Authority will take -- the Authority recognizes its 271 responsibilities. And the Authority will act in a manner consistent with that. And I think that would mean within our capabilities gathering information from CLECs who are not parties to this proceeding.

So it is our hope, at least I don't -- I can't speak for Director Kyle and Chairman Greer. But I think it's our hope to gather the information from CLECs that are not a party to this docket in the same format as we are requesting to get from the parties that are in this docket.

With respect to your other objection about providing it to the Authority but not to the parties to this docket, the other CLECs have agreed to do that. And while I think it's probably not something that the Authority would request be provided to the parties of record in this docket on an indefinite basis, I think for what we're trying to do under 271, and your clients having intervened in this proceeding to fully participate, you know, I'm a little reluctant to be any more sympathetic than I've already been.

I think we have a proprietary agreement in place. All parties have agreed to be bound by that protective order. And for the limited

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time and for the limited purpose I just think the Authority needs the information.

MR. BALTIMORE: Let me make it absolutely clear, if I didn't. My clients have no problem whatsoever with providing it to the directors and the staff. There was just some concern with the other parties getting that information.

DIRECTOR MALONE: Are you stating that as a concern, or are you saying your clients won't do it?

MR. BALTIMORE: Just a concern. They will comply.

DIRECTOR MALONE: Well, then I think we can move on.

CHAIRMAN GREER: Yeah, let's move on then.

MR. ROSS: Mr. Chairman, I'd like to go ahead and mark as an exhibit MCI's response to the Consumer Advocate's discovery request. And we will treat that as proprietary, because it does have a number of customers.

CHAIRMAN GREER: Without objection, this will be Exhibit 102.

(Exhibit 102 marked.)

///

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BY MR. ROSS:

Q. Mr. Martinez, if I understand your testimony, the purpose of your testimony is to go through basically the 14-point checklist and offer your critique, if you will, of BellSouth's compliance or noncompliance with those various checklist items. Is that a fair characterization?

A. No. It would be with respect to the SGAT. But prior to the SGAT, it would be to provide concerns that we have on operational issues, non-OSS. It's oftentimes forgotten it's those procedures, it's the ability to have full access to the BellSouth network, et cetera.

Q. Well, and don't those operational issues, non-OSS operational issues, relate to checklist items?

A. Yes.

Q. And, in fact, you mentioned in some cases the same issues two, if not three, times in your testimony?

A. Yes.

Q. Let's talk a little bit about checklist item 1, which is interconnection. And this gets back to something you mentioned in your summary about BellSouth's alleged refusal to provide new entrants interconnection at the local tandem. And I'm at page

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22 of your testimony.

Which new entrants has BellSouth refused to allow interconnection at the local tandem?

A. MCI.

Q. Can you give me the -- provide me a copy or give me a date when MCI specifically placed an order for interconnection at the local tandem?

A. I can. I can provide it at a future date. We actually literally ordered, on the ASR, in the Georgia tandem, local tandems. And if you so want, we will get you copies of that ASR.

Q. You don't have that?

A. With me?

Q. Do you know when the date was?

A. It would have been -- let's see. The scenario went --

Q. I'm just looking for a date.

A. -- in May we found out we couldn't do it. And then you reversed your decision and said we could do it and we would find out in September. In September, you got the work cleared up. So it would have been the September or October time frame.

Q. September or October of 1997?

A. That's correct.

Q. And this was in Georgia?

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A. That's correct.

Q. Has MCI ordered interconnection at the local tandem anywhere outside of Georgia?

A. No. The reason we haven't is that we ran into more stumbling blocks. And that is we could not get BellSouth to, one, confirm that our traffic would traverse the same routes that their traffic traversed. And, two, that we would have access -- in fact, we were denied access to any independent or any other CLEC that's attended that local tandem. And the whole point of going to the local tandem was to create those paths in a cost-effective manner.

Q. Now, MCI has filed complaints in Georgia and in other states; is that correct?

A. That's correct.

Q. Has MCI ever raised a complaint with a state commission about BellSouth's alleged refusal to allow interconnection at the local tandem?

A. Yes.

Q. In a complaint proceeding?

A. Yes.

Q. Which one would that be?

A. I thought it was Florida. I thought it was Georgia as well. Well, that's my understanding. You know, I --

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Q. You testified --

A. It would have been in my testimony.

Q. You testified in the Georgia complaint proceeding, as I recall.

A. That's correct.

Q. And do you remember testifying about interconnection at the local access tandem in Georgia?

A. That's why I think it wasn't in Georgia. But I was -- you know, in Florida it may have been the 271 proceeding in my testimony, because I get confused with this.

Q. Yeah, and I'm focusing solely on complaint proceedings.

A. Okay.

Q. As you sit there today under oath, can you state with certainty --

A. No, I can't with certainty.

Q. Are you aware that there are two CLECs in Kentucky who are interconnected at BellSouth's local tandem?

A. No, I'm not.

Q. Were you present when Mr. Land testified on behalf of NEXTLINK where he indicated that BellSouth had offered interconnection at the local tandem in Tennessee?

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A. No, I was not. I would add, though, I would hope that they got the same guarantees that their traffic was going to traverse the same routes as BellSouth's, and they would have access to the independents for the local exchange -- the exchange of local and EA traffic.

Q. Have you read Mr. Milner's rebuttal testimony in this proceeding?

A. Yes.

Q. And have you read Mr. Milner's discussion of the two interconnection offerings that BellSouth makes at the local tandem, basic and enhanced?

A. Well, I --

Q. That's a "yes" or "no."

A. I'm afraid the characterization of "makes" would make me say no.

Yes, I have read that there is now an offering, but to characterize it as "makes" suggests that it's been ongoing.

Q. So you read about BellSouth's interconnection at the local tandem in Mr. Milner's testimony, but you're not clear as to what it is Mr. Milner was actually offering in terms of what BellSouth makes available?

A. Yes, it's the enhanced.

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There are two elements of this enhanced. One clearly makes it sound like there's a rate that would be different and that we need clarification on.

But more importantly, I need more clarification on those tandems. And I'm not sure whether Mr. Milner was talking about tandem recording or end office recording capabilities, if that's significant.

In other words, if the majority of BellSouth's local tandems are not capable of recording, then I would have a problem with that, because I don't believe that lacking recording capability is enough to say it's technically unfeasible. However, if it's a few isolated end offices, some old or end offices which are being passed out, then I would have no objection, and we could go forward.

It was a very -- quite frankly, when you changed your response to right here in Tennessee and said that this was now going to be available, that's a step in the right direction. This is the first time we had ever heard that now we at least had the clarification of a simple question, "Will our traffic travel the same routes?" And, two, "Will we have the capability of connecting our local and EA traffic through that tandem?" This is the first time that

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those statements have ever been made.

Q. So you've been told by BellSouth that that availability -- that the issues that you're concerned about are no longer an issue and that you can have what it is that you want. Is that --

A. No. What I've said is that I've read in testimony. I still need some information as to what does an enhanced tandem mean, and where are these offices and/or tandems that don't have this recording capability? Are we talking a significant number of tandems, in which case then I still have a problem. If it's a minor number of tandems or end offices that are affected, then I wouldn't have a problem.

I have said -- what I have said is that this is a step in the right direction. This is the first time that we've taken a positive move toward the type of interconnection that I think that you should be offering.

Q. Mr. Martinez, did you read in Mr. Milner's rebuttal testimony where he identified the three tandem switches in Tennessee that don't have the enhanced capability?

A. Three out of how many?

Q. Did you read where he identified the three that don't?

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A. No, I didn't see that specifically.

But even three tandems -- if three tandems all -- was that all in the Memphis territory?

Q. Did you read his testimony, Mr. Martinez?

A. Yes, I did.

Q. The testimony will speak for itself.

Do you have a copy of the letters that you have written to BellSouth requesting whatever additional information you need in the way of technical details for interconnecting at the local tandem?

A. Again, we just learned about this in testimony. We will be requesting this information from BellSouth.

Q. Well, Mr. Milner's testimony was filed on April 9, 1998. It's almost June; is that correct?

A. That's correct. But there was still a conflict in that the response back from a data request was contradicting that particular statement that he was making.

Q. Let's talk a little bit about blocking, which is also related to interconnection.

You make the statement -- and I'm on page 12 of your testimony -- that BellSouth is simply not maintaining trunk groups handling IXC and CLEC local traffic with the same care as they maintain their own

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trunk groups; is that correct?
A. That's correct.
Q. Now, when we're talking about trunk groups, there are common trunk groups; is that correct?
A. That's correct.
Q. And a common trunk group would carry traffic of an IXC. It would carry traffic of BellSouth. It would carry a CLEC's traffic; is that correct?
A. In today's environment it would have the CLEC local. And it was normally designed for one-plus traffic from IXCs.
Q. Is that a "yes" or a "no"?
A. I'm sorry?
Q. Is that a "yes" or a "no" to my question?
A. What was your question again?
Q. My question is, In a common trunk group would it not carry traffic of an IXC, carry traffic of BellSouth, carry traffic of a CLEC?
A. No. Your common transport trunk groups do not carry BellSouth traffic. You have your own common transport. But the common transport that we're talking about here is strictly IXC traffic -- was strictly IXC traffic and now became IXC traffic and CLEC local traffic.

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Q. And where are the CLEC common trunk groups connecting? What are they connecting, exactly?
A. End office and tandem.
Q. And you make the statement that BellSouth doesn't provide any blocking detail; is that correct?
A. That's correct -- not sufficient to show that there is a problem.
Q. I'm going to hand you, Mr. Martinez, a response to MCI's Data Request Item No. 6. (Document passed.)
Mr. Martinez, have you seen this response before?
A. I have.
MR. ROSS: Mr. Chairman, I'd like to have this marked as the next exhibit, which I believe would be 103.
CHAIRMAN GREER: That's correct. Without objection, so ordered.
(Exhibit 103 marked.)
BY MR. ROSS:
Q. This data response provides blocking detail for BellSouth's common transport trunk groups, or at least some information about the blocking on those trunk groups; is that correct?
A. Some information.

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Q. And it also states that detailed blockage data for all trunk groups is furnished monthly to Wally Sparks and Tara Burke of MCI by BellSouth's MCI Account Team.
A. That's correct.
Q. Do you review those blocking reports monthly?
A. Not monthly. But I have -- I have taken the time to review the data that was provided with Mr. Moore's testimony on the common transport and the actual reports that we got. And I only compared two states, Georgia and Tennessee, and could find no correlation for at least the month of November, where you said blockage had occurred. The report -- there was only one instance where a trunk group in Georgia had a .01 blocking factor, where you were presented at -- I think it was at 3.19 percent.
Those discrepancies -- when I get back, we'll go back out to that group, and we will ask to find out why this -- the majority of those trunk groups were not showing up on the IC100 report they gave us.
Q. I'm sorry. Maybe my question wasn't clear. My question was simply, Do you review the monthly reports that BellSouth furnishes to MCI about blocking?
A. Monthly, no.

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Q. When was the last time that you looked at a monthly report, and for what month did it pertain?
A. It was -- I requested the November of '97 -- actually, the October and November of '97 data -- to correlate it to the twelve months -- I just picked two out at random, the last two -- where I looked at your reports.
Q. Is there any information that BellSouth provides to MCI -- that BellSouth is not providing to MCI with respect to blockage data that MCI wants?
A. Well --
Q. That's a "yes" or "no," and then you can explain.
A. With respect to the common transport trunk group, which is what we're talking about, the IC100 report, no, and then I'll explain.
We have an agreement between BellSouth and ourselves, because of some problems that had occurred way back when -- and, quite frankly, they are probably one of the best in the industry of getting us that information now and providing it in a timely manner.
They provide trunk group blockage on all blockage on all trunk groups. And this is critical for us to watch a trunk group to make sure that design blocking objectives aren't being violated and we

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talk -- and the groups out there talk regularly about a number of groups that do violate and get beyond the action limit criteria, and what action was taken immediately to resolve that.

Because this is an agreement between us, when I looked at the testimony that was provided by Mr. Moore that was suggesting that all they were going to be providing was the action limit items, it made the reports that we get today fragile. We want to continue getting all data on all trunk groups. From our perspective, it's imperative that we are able to look at that to see that they are maintaining those trunk groups in an efficient manner.

Q. Just so I'm clear as to what your answer to my question was, MCI is getting all of the blockage data that it wants from BellSouth with respect to common transport trunk groups?

A. Yes.

Q. And in this response BellSouth also provides blockage data on MCI's local interconnection trunks; is that correct?

A. The MCI-ordered and the BellSouth-ordered, is that what you're talking about there?

Q. Yes.

A. Obviously, it's not detailed down to

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trunks. We would prefer to have all trunks in the same format that you give as the IC100 report, not only the exceptions but all traffic data.

Q. Have you requested that from BellSouth?

A. Yes.

Q. Do you have a copy of that letter where MCI made that request?

A. I can get that, but I may even have it here. It was a letter that was submitted in Florida for all blocking in all trunk groups.

Q. Has MCI made that similar request for Tennessee?

A. It was an all-inclusive. When we did the letter in Florida, we wanted it to be regional.

Q. In any of MCI's complaint cases has MCI raised an issue about failure to receive any kind of data on trunk blockage?

A. Not to my knowledge.

Q. Now, your testimony indicates a blockage problem in Georgia, as I recall; is that correct?

A. That's correct.

Q. Can you tell us -- tell the TRA when this blockage occurred?

A. I can get you the date.

Q. Can you give me just --

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A. Just an estimate?

Q. Yeah.

A. It was -- it would have been I believe late '97.

Q. And as I understand your testimony, you acknowledge that MCI was at least partially responsible for the blockage because it had forgotten to request overflow on a high-usage trunk group?

A. Yes. And, you know, it goes to the issue that I really -- I'm trying to raise and perhaps I didn't raise it well in the testimony -- is that who is responsible.

On trunk groups where you're ordering or you feel as a CLEC you need additional capacity to carry some suspected customers or customers that you have, because you order the trunk group or it's two-way, most of the traffic will be coming from the BellSouth switch, the responsibility of forecasting and measuring this becomes your responsibility. The problem is you have no visibility into this. You really cannot see this blockage. And when you institute a new trunk group or an augment to an existing trunk group, one of the things as a traffic engineer you want to do is to watch it. You want to see that what you've done has taken care of the

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problem.

The incident that is brought to mind -- because the way we found out was the technician's wife was trying to call the technician at our switch and then complained that she was always getting busys. Well, the busy she was getting was a fast-busy, an all-trunks-busy 120 IPM.

The technician went home. He said, "No, I haven't been on the phone." He called back to the office, and he realized immediately, being a technician, that this was not just a busy signal; this was an all-trunks-busy. And he created this loop back through to determine -- first, to determine it wasn't our blockage problem, and they isolated it. And when they responded to him and said, "Oh, yeah, we saw that, and we saw that you hadn't put an overflow on the high-U group." Well, nobody puts a high-U group in without an overflow. The whole intent of it is to take the bulk of your traffic and overflow. We traditionally engineer it about 140 to 150 percent, so -- as BellSouth would do on a direct end office connection; they would overflow to their own common.

And it brings to mind, if they noticed it, why didn't they talk to us about it? Had they been monitoring the trunk group as they would have had they,

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you know, initiated the trunk group on their own part? And we came to the conclusion that they hadn't; that it really created this blocking problem that had to be discovered through some technician being cursed out by his wife for not being at his phone when he was supposed to be, to bring that to attention.

That's not, in my mind, parity with respect to monitoring. And trunk engineers or traffic engineers have responsibilities for trunks, and they're supposed to baby-sit them the first couple of weeks, take a look at them and see what's happening. And then understand when that order went in there should have perhaps been a conversation saying, "Why didn't you put overflow on the trunk group?" So that's the issue that we're getting to.

Who is responsible? If it's the responsibility of MCI to, in fact, administer these trunk groups and augment them when they're necessary, then we need the tools to do that. And the ideal tool is to have access into their system so we can actually pull the data as we need it. That's exactly what we do; we pull our switches and our trunks to determine, you know, what's happening on those trunk groups so that we can constantly add the trunks as we need them. On the other side, we have to wait for some accident to

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happen, which we don't want to happen.

So the ideal solution would be give us access. Lacking that, it's to give us good reports that show all blocking. And, obviously, even I would ask that in the first week that they do a spot study and just take a snapshot, as they would if they had their own trunk groups up.

Q. Are you through? Okay.

Just so I'm clear here, the trunks that we're talking about in this instance are trunks from BellSouth's switch to MCI's switch?

A. That's correct.

Q. And these are common trunks --

A. No. These are --

Q. -- or dedicated?

A. These are dedicated.

Q. Dedicated trunks.

A. So they would be what we consider a high-U group. They would be designed to carry traffic 24 hours a day.

Q. And I think you indicated that most of the traffic would be coming from the BellSouth switch; is that correct?

A. That's correct.

Q. And these would be calls from BellSouth

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customers to the BellSouth switch to MCI's customers to the MCI switch; is that correct?

A. Yes.

Q. So that would be BellSouth traffic going over these dedicated trunks?

A. That's correct.

Q. But your testimony is that on common trunk groups BellSouth doesn't have any traffic going over those groups. Is that your testimony?

A. On the common transport that we talk about for IXCs, that is strictly one-plus traffic from IXCs and was added to it, the traffic for CLECs was dumped on top of that.

You know, this is an interesting dilemma that we face here in the local environment, as far as blocking is concerned.

I got involved in common transport blocking with BellSouth when they weren't as good as they are today. And what we rationalized through those proceedings was that traffic migration from AT&T, which was a hundred percent dedicated trunked to the common transport was an unknown and that we somehow or another had to forecast what that traffic was. Well, that's almost an impossibility to even understand what the salesman is going to sell, never mind to be able to

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forecast that ahead of time.

And this dilemma came -- came to a -- we came to a common conclusion back in about I think it was '89 or '90 that the only way around this really was to take an offering which BellSouth actually made, because they didn't have that capability to do this, is to offer direct trunk groups as a replacement. If you had so many tandem trunk groups, they would replace them with directs for you at no charge for the installation.

Well, here we are back again. This is traffic that's being moved off of basically end office dedicated trunk groups of BellSouth's onto an IXC trunk group. It's an unknown. It's almost impossible to forecast. You don't know where the customers are. And then when you do, you do try to augment and relieve that traffic condition.

So what we're afraid of is we've got the dilemma that we faced back in the mid-'80s, that as competition builds up and that traffic really starts to migrate, nobody's watching the store. So we want to make sure that they're watching the store, and we want to make sure that the reports that we get adequately show that, in fact, that traffic is moving.

And the second was also the concern of

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moving our traffic from a local -- from an access tandem to a local tandem to ensure that if there was a probability of blockage, it happened to everybody. I mean, the problem that you have on a common transport, I don't know if any of my calls are blocked. You could be up at the 30 percent or the 13, or whatever I saw some numbers up there. It doesn't necessarily mean it was my traffic. It was just that 13 percent of that traffic didn't get through on that time-consistent hour. And there were other hours that were probably heavier than that.

In this embryonic marketplace you've got to be able to make sure that your customer traffic gets through. That was the same dilemma we were facing when we started up in the long distance business. How do I ensure that my traffic gets to me? Because I don't make any money unless that traffic gets through.

And that's why we went through -- and we started out weekly -- weekly meetings, to get around a lot of the issues that I see regurgitating back here in testimony, about 2 percent and 3 percent blocking action limit. Those are action limits. That says you -- all right, you made a mistake. Now you've gotta take some immediate action and do something. The action has to be taken by reasonable people back at the

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beginning when that forecast starts to exceed what they thought the forecast was.

And we've also gotten to the point that on the local side we don't know what the busy season is, and that's what an engineer engineers to is the busy season. We don't know what it is. So that's the type of information that we need from the incumbent. We need to understand when these busy seasons are with respect to local traffic and the times of the year, so that we can -- we can judge our engineering capabilities based on that knowledge. Otherwise, we just have to skate along without the tools to do it.

Q. Let me see if I can bring this point to closure, Mr. Martinez.

As I understood what you're saying is you feel you need more information from BellSouth as far as traffic usage and blockage; is that correct?

A. That's correct.

Q. But you've already testified that the data that BellSouth is giving you is sufficient; is that correct?

A. On the common transport trunk group. And we would like the guarantee that going forward we will always get a hundred percent of the blockage that occurs; that it won't be simply the extremes. And

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that's all in the Moore testimony that we saw were the action limits. Everything in there required immediate action. That's not the time, in a business, to understand that you might have problems. You want to understand it coming forward.

Q. Do you have any reason to believe that BellSouth is going to stop giving MCI the blockage data reports that it's giving them now?

A. If it was going to be consistent with the industry and it says this is what they're going to provide, then, yeah, there's a reason to believe.

Now, I believe that we have a great rapport with the traffic engineers and that they would do everything to continue getting us that information, barring any kind of a policy decision that said, no, you know, you get this, and that's what you get. We want to make sure that that doesn't happen. We want to make sure that we continue getting at least -- we want that information, but we also need that same type of information on the other trunk groups.

Q. Has anything happened -- has BellSouth done anything to lead MCI to believe that it's not going to continue to get the blockage data that it's currently getting today?

A. Well, in the request we made --

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Q. "Yes" or "no" -- "yes" or "no," and then you can explain.

CHAIRMAN GREER: Can you answer that "yes" or "no"?

THE WITNESS: Yes. In the Florida response we got back, they said that what we were given in the SGAT or the -- tied to their DMOQs was sufficient. Well, it's not sufficient.

BY MR. ROSS:

Q. When was the Florida -- so BellSouth has stopped giving the monthly data reports?

A. No, no. That still goes to MCIT.

Q. How many trunk groups does MCIMetro local have in place in BellSouth's region, approximately? And these are trunks from BellSouth's network to MCI's.

A. I wouldn't even begin to guess at that number. I would think that we have the majority of your trunks.

Q. Thousands? Hundreds? How many?

A. I would say it's in the thousands.

Q. And in your testimony you give one instance of a blockage; is that correct?

A. Yes, I use as an example that order.

Q. Now, you also discuss the issue of usage detail on flat-rated business calls; is that correct?

A. Yes, I do.
Q. And this is a contract issue that MCI has raised in several of the complaint cases across the region; is that correct?
A. Yes, this is in the complaints. I know that.
Q. To date, has any state commission found that MCI is entitled to that usage data as a matter of its contract?
A. To date, I don't think any has ruled on it.
MR. ROSS: I'll keep going if you'll let me.
CHAIRMAN GREER: How much longer?
MR. ROSS: I will stop at 5:30 regardless of where I am.
CHAIRMAN GREER: I think we'll just see you in the morning. See you in the morning at nine o'clock.
(Proceedings adjourned at 5:05 p.m. Conclusion of Volume X D.)

REPORTER'S CERTIFICATE

STATE OF TENNESSEE)
COUNTY OF DAVIDSON)

I, PATRICIA W. SMITH, Registered Professional Reporter, and Notary Public for the State of Tennessee at Large,

DO HEREBY CERTIFY that the foregoing proceedings were taken at the time and place set forth in the caption thereof; that the proceedings were stenographically reported by me in machine shorthand; and that the foregoing proceedings constitute a true and correct transcript of said proceedings, pages 201 through 278, to the best of my ability.

I FURTHER CERTIFY that I am not related to any of the parties named herein, nor their counsel, and have no interest, financial or otherwise, in the outcome or events of this action.

IN WITNESS WHEREOF, I have hereunto affixed my official signature and seal of office this 28th day of May, 1998.

PATRICIA W. SMITH
Registered Professional Reporter
and Notary Public in and for the
State of Tennessee at Large

My Commission Expires:
September 23, 2000

~~3.3.7 ILEC agrees that in order to ensure the proper performance and integrity of the entire Connectivity Billing process, ILEC shall be responsible and accountable for transmitting to MCIm an accurate and current bill. ILEC agrees to implement control mechanisms and procedures to render a bill that accurately reflects the services ordered and used by MCIm.~~ Within 120 days of the execution of this agreement, MCIm and BellSouth will agree upon a CRIS billing quality assurance program that will eliminate the need for post-billing reconciliation. Appropriate terms for access to any BellSouth documents, systems, records and procedures for the billing, recording of charges will be part of that program. In the event the parties are unable to reach agreement on such a program, the matter will be resolved pursuant to the disputes process provided in Section 23.

~~3.4 Performance Measurements & Reporting~~

~~3.4.1 ILEC shall meet the following performance measurements for the provision of EMR records:~~

~~3.4.1.1 Timeliness: 99.94% of all records recorded each day shall be received by MCIm within one (1) calendar day of their recording. 100% of all such records should be received within five (5) calendar days of their recording.~~

~~3.4.1.2 Accuracy: No more than 60 errors per one (1) million records transmitted~~

~~3.4.1.3 Completeness: There shall be no more than 20 omissions per one (1) million records.~~

Section 4. Provision Of Customer Usage Data

This Section 4 sets forth the terms and conditions for ILEC's provision of Recorded Usage Data (as defined in this Attachment VIII) to MCIm and for information exchange regarding long distance billing.

4.1 Procedures

4.1.1 General

4.1.1.1 ILEC shall comply with various industry, OBF, and other standards referred to throughout this Agreement. To satisfy these requirements ILEC shall adhere to MCIm's interpretation of all standards referred to in this Agreement.

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DATE: 8-5-98

4.1.1.2 ILEC shall comply with OBF standards and the additional standards outlined in this agreement when recording and transmitting Usage Data.

4.1.1.3 ILEC shall record all usage originating from MCIm subscribers using services ordered by MCIm. Recorded Usage Data includes, but is not limited to, the following categories of information:

Call Attempts
Completed Calls
Use of CLASS/LASS/Custom Features
Calls To Information Providers Reached Via ILEC Facilities And Contracted By ILEC
Calls To Directory Assistance Where ILEC Provides Such Service To An MCIm Customer
Calls Completed Via ILEC-Provided Operator Services Where ILEC Provides Such Service To MCIm's Local Service Customer. For ILEC-Provided Centrex Service, Station Level Detail Records Shall Include Complete Call Detail And Complete Timing Information
Recording Of Completed Calls Which ILEC Does Not Record For Its Own Service Offerings (e.g., Flat Rate Free Calling Area Service)

4.1.1.4 Retention of Records: ILEC shall maintain a machine readable back-up copy of the message detail provided to MCIm for a minimum of forty-five (45) calendar days. ILEC shall provide any data back-up to MCIm upon the request of MCIm.

4.1.1.5 ILEC shall provide to MCIm Recorded Usage Data for MCIm subscribers. ILEC shall not submit other carrier local usage data as part of the MCIm Recorded Usage Data.

4.1.1.6 ILEC shall not bill to MCIm subscribers any recurring or non-recurring charges except where explicitly permitted to do so within a written agreement between ILEC and MCIm.

DLS/ye

4.1.1.7 ILEC shall record and rate all calls to Information Service Providers (900 service calls) and shall bill such calls directly to the subscriber. Customer billing name and address information may be purchased from MCIm.

4.1.1.8 ILEC shall provide Recorded Usage Data to MCIm billing locations as designated by MCIm.

4.1.1.9 ILEC shall establish a Local Carrier Service Center (LCSC) or similar function to serve as MCIm's single point of contact to respond to MCIm call usage, data error, and record transmission inquiries.

4.1.1.10 ILEC shall provide MCIm with a single point of contact, Remote Identifiers (IDs), and expected usage data volumes for each sending location.

4.1.1.11 MCIm shall provide a single point of contact responsible for receiving usage transmitted by ILEC and receiving usage tapes from a courier service in the event of a facility outage.

4.1.1.12 ILEC shall bill and MCIm shall pay the charges for Recorded Usage Data. Billing and payment shall be in accordance with the applicable terms and conditions set forth in Connectivity Billing and Recording Section of this Attachment VIII Bill, Usage Appendix

4.1.1.13 Without waiver of, and in addition to the Audit and Examination rights in the Section 22 (Audits and Examinations of Part A) of this Agreement, upon reasonable notice and at reasonable times MCIm or its authorized representatives may examine ILEC's documents, systems, records and procedures which relate to the recording and transmission of the Usage data to MCIm under this Attachment.

4.1.2 Charges

4.1.2.1 ILEC shall not charge any fees for recording, rating or transmitting usage data.

4.1.2.2 No charges shall be assessed for incomplete call attempts.

4.1.3 Central Clearinghouse & Settlement

4.1.3.1 ILEC shall comply with Clearinghouse and Incollect/Outcollect procedures to be determined by MCIm.

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Marcel Henry
Regional Vice President
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12/24 - FEDEX
800847264167

December 24, 1997

Mr. Mark L. Feidler
President - Interconnection Services
BellSouth Telecommunications, Inc.
Suite 4511
675 West Peachtree Street
Atlanta, GA 30375

Dear Mr. Feidler:

As we have discussed, there are a number of open issues between our companies concerning BellSouth's provision of local service capabilities to MCI. Some of those issues were addressed in the Florida Public Service Commission's November 19, 1997 order rejecting BellSouth's Section 271 application and clarifying the obligations BellSouth must meet as a prerequisite to entering the in-region long distance market. The Commission addressed deficiencies in BellSouth's systems relating to Operations Support Systems ("OSS"), interconnection, unbundled network elements ("UNEs"), directory assistance, reciprocal compensation, resold services and performance measures. Although MCI does not agree with all of the conclusions reached in the order, the order provides a useful starting point in addressing some (but certainly not all) of the issues that have arisen under our Interconnection Agreement.

A discussion of the issues identified in the Florida Commission order follows. Although this discussion necessarily focuses on changes we wish to be made in Florida, we request that these changes be made outside Florida on a regionwide basis as well. Please respond to this letter by January 8, 1998. In your response, please state in detail BellSouth's plan for addressing each of the problems discussed below and confirm that these solutions will be implemented no later than January 31, 1998 (unless otherwise specified below). If it is BellSouth's position that a solution for a particular problem cannot be put in place by January 31, please provide a detailed explanation why and state when the problem will be remedied.

1. OSS

A. General requirements

The Florida Commission required BellSouth to demonstrate that its interfaces provide nondiscriminatory access to OSS functions. The Commission identified four characteristics of a nondiscriminatory interface:

1) The interface must be electronic: The interface must require no more human or manual intervention than is necessarily involved for BellSouth to perform a similar transaction itself.

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DATE: 8-3-98

2) The interface must provide the capabilities necessary to perform functions with the same level of quality, efficiency, and effectiveness as BellSouth provides to itself.

3) The interface must have adequate documentation to allow an ALEC to develop and deploy systems and processes, and to provide adequate training to its employees.

4) The interface must be able to meet the ordering demand of all ALECs, with response times equal to that which BellSouth provides itself.

Order, pp. 97, 174. The Commission concluded that none of the OSS functions provided by BellSouth meet these criteria. As a first step in moving toward compliance, MCI requests that BellSouth provide a detailed listing of all OSS systems that BellSouth uses, along with technical specifications for each system, and a detailed listing of each of the data bases that are used by BellSouth's OSS systems, along with a description of each data base (including data base layouts). That information will enable MCI to determine the capabilities that BellSouth provides itself and thus what is required for parity of service.

B. Pre-ordering

The Commission determined that BellSouth must provide a pre-ordering interface that is integrated with the EDI ordering interface. Order, pp. 92, 167. As you know, MCI has sought to meet with BellSouth to discuss the implementation of an interface for pre-ordering using EDI TCP/IP SSL3 that would be integrated with the EDI ordering interface. We now repeat our request that our companies meet and begin discussing how to implement an interface using this protocol.

The Commission also noted deficiencies in the following areas:

1) LENS requires multiple address validations for the same fields in different screens. In accordance with the Commission's order, MCI requests that any pre-ordering interfaces offered by BellSouth not require multiple address validations. On a related point, MCI previously has requested that BellSouth provide a download of the RSAG, as required by our Interconnection Agreement, so that we may remedy other address validation problems we have encountered. In response, BellSouth has offered to sell MCI an extract from the RSAG for an amount exceeding $500,000 plus recurring charges. Under our interconnection agreement, MCI is entitled to obtain a download of the RSAG at no additional cost, and we repeat our request that it be provided on that basis.

MCI

2) No on-line customer credit checking capability and limited availability of customer service records. In addition to the problems identified by the Commission, MCI notes that BellSouth's system is deficient in that BellSouth refuses to provide CSR data that it unilaterally deems to be proprietary or unnecessary. Further, CSR access is limited to fifty pages of data and CSR information is not fielded, which means that MCI cannot load and edit CSR data and use the data to generate orders. Please redress these problems.

3) BellSouth can reserve more telephone numbers than ALECs. BellSouth's RNS system permits it to reserve up to twenty-five numbers per order, as compared to six for ALECs. Moreover, unlike the system afforded to ALECs, RNS automatically assigns numbers for its customers and provides BellSouth representatives with lists of available NXXs. In addition, BellSouth has a list of available vanity numbers that it does not provide to ALECs. We request BellSouth afford these same capabilities to MCI.

4) Cumbersome and inefficient methods of locating long distance company, and product and service information selected by customer. In addition to addressing the problems specifically identified by the Commission, MCI requests that BellSouth provide via fixed format NDM a description or definition of each of its USOCs, including the required field identifiers and their descriptions and the states in which the USOCs are valid. This information should be updated on a biweekly basis and should give notice of the implementation or deactivation of a USOC forty-five days in advance.

5) LENS does not provide access to calculated due dates in the inquiry mode. BellSouth should provide in a system-to-system interface the capability to determine due dates efficiently and to expedite those due dates when appropriate.

C. Ordering and provisioning

The Commission ruled that a number of problems in BellSouth's ordering and provisioning systems require improvement. Order, pp. 83-94, 158-68. These problems are discussed below:

1) EDI does not have electronic edit capability at parity with BellSouth's RNS and DOE systems. Because we intend to order via EDI, we are particularly concerned with the functionality of that interface. We request that BellSouth provide the same on-line editing capability in EDI that BellSouth has for itself. On a related point, please provide a detailed description of how order rejections are handled and a list of all reasons that both fatal and non-fatal errors occur, including descriptions and error codes.

2) No order summary screen exists in EDI as in RNS. BellSouth should provide access to pending orders in its systems, a recap of the services ordered on the FOC and a recap of the services installed on the completion notice.

3) ALECs cannot access or make changes to pending orders. We request that BellSouth provide the capability to change pending orders at parity with what BellSouth provides itself. Further, please (i) provide the business rules for making changes to existing orders; (ii) the circumstances that will cause due dates to be changed on a pending order when a change is submitted; and (iii) a detailed description of the process used to make changes to pending orders.

4) BellSouth has not provided requesting carriers with the technical specifications of the interfaces. We have requested CGI specifications before and twice BellSouth has provided outdated specifications that are of little use. BellSouth recently has provided another set of CGI specifications that we are now reviewing. Once we have completed our review, we will inform you if further action is necessary.

5) Interfaces are not fully electronic or integrated, and require manual intervention. Measures needed to integrate BellSouth's and MCI's systems include (but are not limited to) the following: (i) supplemental orders should be processed mechanically without human intervention; (ii) ordering for complex services should be automated; (iii) ALECs should have systems available that allow ALECs to determine if loops and lines are ISDN capable; (iv) service orders for all unbundled loops, unbundled ports, transport and loop/port combinations should be mechanically generated and should flow through BellSouth's systems without manual intervention; and (v) the percentage of POTS resale orders processed mechanically for ALECs should be increased to equal the percentage of BellSouth POTS orders processed mechanically. Please provide MCI with these capabilities.

(6) Sufficient capacity to meet demand. MCI concurs with the Commission's conclusion that BellSouth's system lacks sufficient capacity and requests that sufficient capacity be provided.

(7) Installation intervals not at parity with BellSouth. Performance measures and standards are discussed below.

D. Maintenance and repair

The Florida Commission concluded that BellSouth must provide ALECs with the technical specifications of TAFI so that ALECs can integrate their OSS with BellSouth's OSS for maintenance and repair. Order, pp. 94-96, 168-69. Please comply with this requirement.

E. Billing

The Commission concluded that BellSouth cannot render accurate bills for resold services. Order, p. 171. Please remedy this problem, or, if it already has been fixed, provide the date on which it was fixed.

Because the Commission dealt with UNE billing issues together with other UNE issues, we will follow suit and deal with those issues under the UNE heading below.

2. Interconnection

1. Collocation

The Commission notes that "in Docket No. 960846-TP, we specifically allowed MCI to interconnect with other collocators who are interconnected with BellSouth in the same central office; to purchase unbundled dedicated transport from BellSouth between the collocation facility and MCI's network; to collocate subscriber loop electronics in a BellSouth central office; and to select virtual over physical collocation, where space and other considerations permit." Order, p. 44. Please provide the methods and procedures necessary to perform these functions.

2. Network blockage and End Office Trunking

The Commission required BellSouth to "provide ALECs with more frequent and better data on their traffic over BellSouth's network"; "to demonstrate that any blockages experienced by ALECs are not excessive in comparison to the blockages experienced by BellSouth"; to work together with ALECs to improve intercompany communications; and to "provide data sufficient to show that blockage levels are comparable between BellSouth and ALEC traffic." Order, p. 59. Accordingly, please provide the most recent three months of blockage data on all common trunk groups utilized for ALEC traffic that experienced blockage; for the same three month period, blockage data on all of MCI's interconnection trunk groups from your end offices and tandems to our points of termination that experienced blockage; for the same three month period, blockage data on all ALEC interconnection trunk groups from your end offices and tandems to ALEC points of termination that experienced blockage; and for the same three month period, similar blockage data on all trunks carrying BellSouth local traffic. Please provide the same information on a month-to-month basis going forward.

3. Local Tandem Interconnection

The Commission made clear that BellSouth must provide interconnection at its local tandems without requiring a BFR. Order, p. 60. Previously, BellSouth had made inconsistent statements as to whether it would allow such interconnection. Please confirm that BellSouth will permit MCI to interconnect at BellSouth's local tandems, and please provide all information necessary to permit us to do so. Further, please confirm that, once MCI is interconnected at the BellSouth local tandem, MCI's traffic will travel on the same trunk groups as BellSouth's local traffic and that all existing independent telephone company local and EAS traffic routes served by the local tandem will be identified and made available to MCI traffic.

3. Unbundled Network Elements

The Commission required BellSouth to provide mechanized billing statements for usage sensitive UNEs in a CABS formatted billing statement. Order, pp. 76-77. Please begin providing UNE bills in a CABS format.

The Commission further required BellSouth to provide access usage detail to requesting carriers. Order, p. 77. As you know, this issue is already the subject of a pending action. In light of the Commission's order, however, we again request that BellSouth provide this information on a going-forward basis and provide the historical data that should have been provided on all UNEs from the time of installation.

4. Directory Assistance

The Florida Commission determined that BellSouth is not providing all directory listings to requesting carriers, specifically listings from other local exchange companies. Order, pp. 117, 119. Our agreement provides that "BellSouth shall provide to MCIm, to the extent authorized, the residential, business and government subscriber records used by BellSouth to create and maintain its Directory Assistance Data Base, in a non-discriminatory manner." Interconnection Agreement, Attachment VIII, § 6.1.6.1. Under the Federal Act, BellSouth not only is authorized but is required to provide the directory listings it has for the customers of other telephone companies. MCI requests that BellSouth provide these listings as required by our agreement.

5. Reciprocal Compensation

In its discussion of the reciprocal compensation issue, the Commission acknowledged the dispute that has arisen concerning ISP traffic – that is whether MCI and other ALECs are entitled to compensation for traffic originating from BellSouth customers and routed to an ALEC's ISP customer. The Commission did not resolve this dispute, although it did express concern over the allegations that BellSouth failed to comply with contractual dispute resolution procedures.

For several months, BellSouth has been withholding funds that should have been paid to MCI in reciprocal compensation for the termination of local traffic. Please pay all amounts due by December 31, 1997 and confirm that BellSouth will pay all amounts due for reciprocal compensation (including amounts due for ISP traffic) in the future.

6. Resale Services

The Commission addressed the following resale issues, in addition to the OSS issues discussed above:

A. Services not being provided on an a branded or unbranded basis to MCI

The Commission noted that the Interconnection Agreement provides that BellSouth will brand all services at every point of customer contact exclusively as MCI services unless MCI requests that the services be unbranded. Order, pp. 171-72. Please confirm that BellSouth is prepared to provide voice mail, operator services and directory assistance on an MCI branded basis. In this connection, please note compliance with the agreement should not require the use of selective routing, because these calls already are routed to the BellSouth operator platform.

The branding or unbranding requirement of the Interconnection Agreement also applies to BellSouth's softdial product known as QuickService. As you know, this product permits a customer whose telephone line has been disconnected to call 911. If the customer dials any other three digits, QuickService provides a recording informing the customer that he or she should call BellSouth or another local service provider. This recording should be unbranded so that there is no reference to BellSouth.

BellSouth also is required to provide its 611 service on an unbranded basis as provided in our Interconnection Agreement, but to date has not done so. (See Attachment VIII, § 5.1.14.) MCI requests that BellSouth begin complying with this requirement.

B. Parity in conversions

The Commission ruled that BellSouth is not providing parity with respect to customer conversions. Order, p. 175. Please rectify this problem.

MCI

7. Performance Measurements

The Commission found that "BellSouth should provide performance measures that are clearly defined, permit comparison with BellSouth retail operations, and are sufficiently disaggregated to permit meaningful comparison." BellSouth was required to provide statistically valid commercial usage data showing:

A. average installation intervals for resale;
B. average installation intervals for loops;
C. comparative performance information for unbundled network elements;
D. service order accuracy and percent flow through;
E. held orders and provisioning accuracy;
F. bill quality and accuracy; and
G. repeat trouble reports for unbundled network elements.

Order, pp. 185-86.

The Commission also required BellSouth to "provide the necessary historical data to facilitate the establishment of initial benchmarks" that "should, at a minimum, address all of the functions listed in the LCUG." Order, p. 185. Please begin providing the performance measures and standards information required by the Commission. We request that BellSouth disaggregate this information in accordance with the LCUG Service Quality Measures report, including geographic disaggregation by state, city and wire center. In addition, we request that BellSouth provide the performance measures and standards information required by the Interconnection Agreement in a mutually agreed upon format.

We look forward to your response specifying how BellSouth plans to address these concerns, must be resolved in order for MCI to enter the local market in an effective manner.

Sincerely,

Marcel Henry

Marcel Henry

MLH/mle

W. Scott Schaefer
President Interconnection Services
Suite 4511
675 West Peachtree Street, N.E.
Atlanta, Georgia 30375

February 11, 1998

Marcel Henry
Regional Vice President
Southern Financial Operations
Two Northwinds Center - 5th Floor
2520 Northwinds Parkway
Alpharetta, GA 30004

Dear Mr. Henry:

This is a follow-up to Mark Feidler's January 8, 1998 letter in which he stated that BellSouth would provide a point-by-point response to the issues raised in your December 24, 1997 letter. As he mentioned in his initial response, BellSouth strongly disagrees with MCIm's assertion that BellSouth's position on these issues in any way affects MCIm's entry into the local market.

BellSouth's response to each of the issues raised in your letter are set forth below. Please note, however, that by responding to the issues as posed, BellSouth is not consenting to MCI's characterization of the November 19, 1997 Order of the Florida Public Service Commission in BellSouth's Section 271 proceeding (the "Florida Order").

BellSouth strongly disagrees with MCI's characterization that BellSouth's electronic interface product line contains deficiencies. The electronic interfaces were developed and implemented pursuant to BellSouth's contractual obligations, existing industry standards, the technical capabilities then available to BellSouth. BellSouth is proud of the development it has done in this area.

Issue 1 OSS:

A. General Requirements

BellSouth has provided access to the ordering, pre-ordering, and repair databases required by the Florida Commission in the MCIm arbitration proceeding and has met the requirements imposed by the Interconnection Agreement. Therefore, there is no legal obligation to comply with the overly broad and burdensome request stated in MCI's December 24, 1997 letter. The obligation regarding access to BellSouth's operating support systems through electronic interfaces is found in Attachment VIII, Section 2.1.1.1. BellSouth is in compliance with that section. BellSouth is continually planning, as standards become available, upgrades, refinements and additions to its electronic interface product line. Both the API/Corba gateway and EDI/SSL3 interface have been conditionally recommended by the ECIC with an indication that API/Corba will be the long-term recommendation. BellSouth is advancing in its development of API/Corba and would be delighted to discuss its plans with MCI.

B. Pre-ordering

1) LENS requires multiple address validations for the same fields in different screens

This is not the case in the firm order mode. Address validation is a necessary input for other pre-ordering functions and can be accomplished in a matter of seconds. For example, the list of telephone numbers that can be offered to a particular customer is driven by the set of available numbers in the central office serving that customer's address, which is determined during the course of address validation. The inquiry mode includes address validation for telephone number selection, product and service availability, and due date information, because associating a central office with an address is a prerequisite for each of these functions, and in the inquiry mode, each of these functions can be performed independently. This does not have a negative impact on the CLECs' ability to obtain pre-ordering information; rather, it allows CLECs to choose which particular pre-ordering functions they desire without having to go through all available options.

In a continuing effort to be responsive to CLECs' requests and suggestions, BellSouth, as of February 2, 1998, provided a modified inquiry mode that eliminates multiple address validations.

With respect to your request for a download of the RSAG database, BellSouth disagrees with MCI's assertion that the BellSouth-MCIm Interconnection Agreement entitles MCI to a download of RSAG. MCI is entitled to electronic access to the RSAG database and BellSouth provides that access via LENS. BellSouth will provide access through the API gateway when API becomes available. BellSouth provided a proposal to MCI for extracts of the RSAG on a daily basis for a fee. MCI rejected that proposal and raised this issue in a complaint to the Georgia PSC. This issue is now being addressed in that proceeding for the Georgia Interconnection Agreement.

2) No on-line customer credit checking capability and limited availability of customer service records

BellSouth currently meets all contractual obligations regarding access to customer service records including credit history. The obligation regarding credit history is contained in Attachment VIII of the Interconnection Agreement.

EC-Lite and LENS provide CLECs with on-line access to view and print customer service record information in substantially the same time and manner as BellSouth retail service representatives. The CLEC can obtain, via the EC-Lite and LENS pre-ordering interfaces, Customer Service Record (CSR) information. Using this capability and with the same condition regarding page limitations as experienced by BellSouth retail operations, the CLEC can obtain account information on-line for customers. The LCSC will continue its customer support function of providing account information where conditions impose page limitations.

3) BellSouth can reserve more telephone numbers than ALEC's

The 100 telephone number limit was removed effective January 15, 1998.

4) Cumbersome and insufficient methods of locating long distance company, and product and service information selected by customer.

The Local Exchange Ordering Implementation Guide contains the required products and services USOCs/ordering codes and valid combinations that constitute business rules. Additionally, BellSouth is providing interested CLECs an electronic copy of the extensive edits used by SOCS. Further, effective January 20th, CLECs can access via the Internet the entire non-proprietary list of USOCs. PIC codes are shown randomly per a regulatory equal access requirement.

5) LENS does not provide access to calculated due dates in the inquiry mode

The use of the due date calendar in the inquiry mode is in compliance with BellSouth's contractual and parity obligations.

LENS calculates a due date as part of a firm order, which is the same situation in which BellSouth's retail systems actually calculate a due date. The installation calendar tables used to calculate the due date are shown in the inquiry mode as well. The installation calendar also is accessed separately by BellSouth's retail service representatives to respond to retail customer inquiries.

C. Ordering and Provisioning

1) EDI does not have electronic edit capability at parity with BellSouth's RNS and DOE systems.

BellSouth will handle all rejects mechanically by March, 1998. This capability will be based on BellSouth requirements developed in advance of the national standards. BellSouth can currently perform 68% of all mechanized rejects as of November, 1997.

2) No order summary screen exists in EDI as in RNS

BellSouth does make a summary screen available in EDI.

3) ALECs cannot access or make changes to pending orders.

CLECs currently have the capability to do a single "C" (change) order. As of January 30, 1998, the extensive SOER edits were distributed on disk, and copies of the LEO and LESOG edits were given to the CLECs.

CLECs can submit supplemental orders, or changes to pending orders, via the 860 transaction. Currently, 860s are handled manually in substantially the same time and manner as 860s are handled for BellSouth's retail customers. As of March 16, 1998, 860s will be handled mechanically.

4) BellSouth has not provided requesting carriers with the technical specifications of the interfaces

To the best of BellSouth's knowledge and belief, BellSouth has, to date, provided MCI with all technical specifications for requested interfaces. As MCI indicated, BellSouth provided MCI the updated CGI specification on December 15, 1997. Apparently, these are still under review by MCI.

5) Interfaces are not fully electronic or integrated, and require manual interventions

(i) As stated previously, BellSouth has met the contractual obligations regarding electronic interfaces as set forth in Attachment VIII. MCI requested supplemental orders be processed mechanically and EDI can process supplemental orders mechanically.

(ii) With respect to your request for the automation of ordering complex services, that is an Ordering and Billing Forum (OBF) issue. BellSouth does not have the capability for mechanical ordering of complex services itself. There are no industry standard for MCI's request. MCI can take this issue to the OBF for resolution.

(iii) BellSouth currently does not determine if a loop or line is Basic Rate ISDN capable prior to issuing a service order. BellSouth makes the determination on BRISDN compatibility after the service order is received. If a loop or line is not compatible the order drops out and will be evaluated by the local outside engineering plant district. Normal service order coordination occurs subsequent to this.

(iv) BellSouth does offer mechanized ordering and mechanized order generation for loops and ports. BellSouth is progressing on the development of the necessary ordering and provisioning capabilities for loop/port combinations in accordance with applicable state regulatory requirements and the terms of the interconnection agreement with MCI. However, there is no industry standard available.

(v) As for the mechanical processing of POTS resale orders, BellSouth has submitted evidence in OSS and Performance Measurements affidavits and exhibits filed with PSCs and the FCC demonstrating that CLECs can achieve flow-through rates exceeding 95% - if they use the systems correctly. This success rate is dependent on how well the CLEC's service representatives are trained.

6) Sufficient capacity to meet demand

The capacity requirements for BellSouth's interfaces were established by incorporating CLECs' forecasts in BellSouth's aggregated forecasts. The aggregate forecast was then used to set the capacity requirements for the interfaces. BellSouth also has undertaken capacity testing to insure that the interfaces are capable of supporting the planned volumes. This testing process has been documented in several different venues, including the recent Section 271 FCC filings for South Caroline and Louisiana. BellSouth has the capacity to handle pre-ordering transactions for more than 10,000 orders per day, and has appropriate capacity plans in place to increase capacity as the CLECs' volume increases. At present, however, there is significant excess capacity, as the highest individual day's electronic pre-ordering and ordering volume for 1997 reached approximately 3,300 orders, with associated pre-ordering transactions, which is only one-third of the initial capacity for which BellSouth planned and has tested.

7) Installation intervals not at parity with BellSouth

BellSouth responds to this issue in Issue No. 7 below.

D. Maintenance and repair

The TAFI specifications were sent to MCI again on January 30, 1998.

E. Billing

BellSouth is currently billing the appropriate resale discount rates for MCIm. This capability was implemented in Florida on September 20, 1997. In addition, BellSouth implemented the discounting of nonrecurring charges in Florida on September 11, 1997.

Issue 2 Interconnection:

1. Collocation

You have requested the methods and procedures necessary "to interconnect with other collocators who are interconnected with BellSouth in the same central office; to purchase unbundled dedicated transport from BellSouth between the collocation facility and MCIm's network; to collocate subscriber loop electronics in a BellSouth central office; and to select virtual over physical collocation, where space and other considerations permit".

The requested procedures have already been made available to MCIm. The procedures to purchase unbundled dedicated transport between the collocation facility and MCIm's network reside in the Local Exchange Ordering (LEO) Implementation Guide which is on the BellSouth website, and in the BellSouth Collocation Handbook. BellSouth has always permitted the placement of digital loop carrier (DLC) equipment as part of a collocation arrangement given that specific DLC is considered transmission equipment. BellSouth offers CLECs both virtual and physical collocation.

2. Network blockage and End Office Trunking

BellSouth responds to this issue in Issue No. 7 below.

3. Local Tandem Interconnection

Consistent with the Florida Order and the BellSouth-MCIm Interconnection Agreement, BellSouth will allow a CLEC to interconnect with BellSouth at a local tandem. MCI's issue, and the issue not addressed by the contract, is whether BellSouth will terminate MCI's traffic to an independent telephone company or another CLEC at the local tandem.

Issue 3 Unbundled Network Elements

There are no national standards for record layouts and data elements for billing UNEs in a CABS Billing Data Tape [BDT] format. However, BellSouth will implement an interim process during April, 1998 to provide a CABS formatted UNE bill.

Although national standards for this UNE billing do not exist, BellSouth is nevertheless prepared to meet the needs of its CLEC customers. In addition, BellSouth will work cooperatively with the CLEC industry to develop the national standards through the OBF, and pursue other means of providing to all CLECs billing data that is useful.

BellSouth has the capability to provide the interstate access records to CLECs to enable them to bill interexchange carriers for the provision of interstate access. As stated on page 74 of the Florida Order, this file is provided to "requesting CLECs". BellSouth requires contract provisions (either in the form of the Access Daily Usage File (ADUF) contract or as part of or an amendment to the existing interconnection agreement) before the ADUF will be provided.

With the files that have been generated through this process thus far, according to BellSouth's knowledge and belief, MCIm has had no interstate access records that would have been provided for December, 1997, or January, 1998.

Issue 4 Directory Assistance

As you indicated, the BellSouth-MCIm Interconnection Agreement states: "BellSouth shall provide to MCIm, to the extent authorized, the residential, business and government subscriber records used by BellSouth to create and maintain its Directory Assistance Data Base, in a non-discriminatory manner." Attachment VIII, Section 6.1.6.1. The words "to the extent authorized" were not in the original language initially proposed by MCI. Rather, they were proposed by BellSouth, and agreed to by MCI, in recognition of the fact that certain agreements with CLECs and independent telephone companies restrict BellSouth's ability to provide this information to MCI.

BellSouth has not changed its position and believes that MCI should honor its contractual obligation.

Issue 5 Reciprocal Compensation

On January 23, 1998, BellSouth sent to MCI via overnight delivery checks totaling $695,569.91 representing the amount claimed due for the termination of intraLATA minutes and local reciprocal compensation less the amount representing Internet Service Provider [ISP] traffic. BellSouth and MCI agreed to an additional amount of $199,012.61, which is associated with the usage cap under the agreement that was in effect until May, 1997.

With respect to your request that BellSouth will in the future pay for ISP traffic, BellSouth's position has been made clear on this point time and time again. Internet-bound traffic is not local traffic and is therefore not eligible for reciprocal compensation. BellSouth's position has not changed.

Issue 6 Resale Services

A. Services not being provided on a branded or unbranded basis to MCIm

Voice Mail

BellSouth voluntarily agreed to offer to CLECs the ability to resell BellSouth's MemoryCall® service, even though this service is not a telecommunications service. BellSouth agreed to do so but did not agree to change the service offering. BellSouth is willing to discuss and assess the development of a MemoryCall® service to include MCI custom branding.

Operator Services and Directory Assistance

BellSouth is prepared to provide operator services and directory assistance on an MCIm branded basis. The interconnection agreement in Attachment VIII does, however, require selective routing.

QUICKService

BellSouth is currently in the process of changing its present QUICKService recording to:

> "You can only dial '911' from this line. To reach BellSouth or another local service provider, you must call from another location."

Due to the number of BellSouth's main central offices affected by this change (approximately 600), BellSouth estimates that, barring any unforeseen obstacles, the change will be completed by February 27, 1998. BellSouth is providing QUICKService on a competitively neutral basis. Competitive neutrality does not mean BellSouth is restricted from mentioning itself on its QUICKService recording. BellSouth's QUICKService recording strikes a balance by stating that other local service providers are available while continuing to allow BellSouth an opportunity to market its services provided through its own facilities.

611 Service

BellSouth will attempt to work with MCI in reaching a mutually acceptable resolution of this issue.

B. Parity in conversions

BellSouth believes it is in compliance with "switched-as-is" customer conversions. The due date for MCIm customers is calculated in the same manner as the due date for BellSouth's own retail customers.

Issue 7 Performance Measurements

MCI stated that BellSouth was required to provide statistically valid commercial usage data showing:

A. average installation intervals for resale;
B. average installation intervals for loops;
C. comparative performance information for unbundled network elements;
D. service order accuracy and percent flow through;
E. held orders and provisioning accuracy;
F. bill quality and accuracy; and
G. repeat trouble reports for unbundled network elements.

The seven specific items (A-G) above will be provided as part of a larger set of service quality measurements currently under development by BellSouth. These forthcoming measurements are in response to the recent requirements set forth by the Georgia Public Service Commission in Docket No. 7892-U and will meet and/or exceed the needs of all BellSouth's CLEC customers, including MCIm. These measurements will provide a standard basis for comparison across the region. A complete list of the standard data to be collected and reported is set forth in the table below. BellSouth expects to have this regional data available in report format by the end of March, 1998.

The BellSouth MCIm account team is currently working with representatives from MCI to develop a methodology for reporting Performance Measurements as called for in the Florida Interconnection Agreement.

Standard CLEC/ILEC Measurements:

CATEGORY	FUNCTION
Pre-Ordering	1. Average Response Interval 2. OSS Interface Availability
Ordering	1. Firm Order Confirmation Timeliness 2. Reject Interval 3. Percent Rejected Service Requests 4. Percent Flow-through Service Requests 5. Total Service Order Cycle Time 6. Service Request Submissions per Request 7. Speed of Answer in Ordering Center
Provisioning	Order Completion Intervals 1. Average Completion Interval 2. Order Completion Interval Distribution Held Orders 3. Mean Held Order Interval Installation Timeliness, Quality & Accuracy 4. Percent Missed Installation Appointments 5. Percent Provisioning Troubles within 30 days 6. Percent Order Accuracy
Maintenance & Repair	1. Customer Trouble Report Rate 2. Missed Repair Appointments Quality of Repair & Time to Restore 3. Out of Service > 24 Hours 4. Percent Repeat Troubles within 30 days 5. Maintenance Average Duration 6. Average Answer Time - Repair Center
Billing	Invoice Accuracy & Timeliness 1. Invoice Accuracy 2. Mean Time to Deliver Invoices
Operator Services and Directory Assistance	Directory Assistance 1. Average Speed to Answer 2. Mean Time to Answer Operator Services 3. Average Speed to Answer 4. Mean Time to Answer
E911	1. Timeliness 2. Accuracy
Trunking	1. CLEC Trunk Group Service Report 2. BellSouth CTTG Blocking Report 3. Local Network Trunk Group Service Report 4. BellSouth Local Network Blocking Report

Other:

1. BST will provide state level reports only.
2. These quality measurement reports are designed to meet the requirements of the Interconnection Agreement and will be delivered in either electronic or printed format to the CLEC(s).

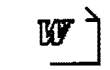
I trust the above answers the issues raised in your letter. BellSouth, as it has consistently done in the past, is prepared to discuss any and all issues with MCIm. To the extent you have any further questions or comments regarding BellSouth's policies or issues concerning implementation of the MCIm/BellSouth Interconnection Agreement, your BellSouth Account Team Representative can assist you.

Sincerely,

Scott Schaefer

Beverly Gordon

From: Arthur, Helen (MCI) [Helen.Arthur@mci.com]
Sent: Wednesday, September 17, 1997 1:28 PM
To: 'Beverly Gordon'
Subject: FW: Technical Specifications


Excerpts for SAG data.doc


Technical

Helen Arthur
V825-6580
404-267-6580
1-888-866-2376 pager

-----Original Message-----
From: Bryan Green [SMTP:Bryan.Green@MCI.Com]
Sent: Saturday, June 14, 1997 2:59 PM
To: Kathy Pounds [Kathy.Pounds@MCI.Com] (E-mail); Marsha Ward (E-mail); Martha McMillin (E-mail); Ron Martinez (E-mail)
Cc: Helen Arthur [Helen.Arthur@MCI.Com] (E-mail); Charlene Keys (E-mail); Daren Moore (E-mail); Debra A. Henson (E-mail); Marcel Henry [E-mail] (E-mail); 'Thomas O Seitz' (E-mail); Wally Schmidt (E-mail)
Subject: FW: Technical Specifications

-----Original Message-----
From: Ilene.M.Barnett [SMTP:Ilene.M.Barnett@bridge.bellsouth.com]
Sent: Friday, June 13, 1997 2:03 PM
To: Bryan Green
Cc: Helen Arthur; Lee_Pamela_K/AL_BRHM07
Subject: Technical Specifications

Bryan,

On May 30, 1997, I provided to you the Atlas Design Document. Based on your 6/5/97 e-mail, either you are not in receipt of the document or the material was not sufficient for your purposes. If you did not receive it along with the LENS Applications User Guide, let me know and I will send another copy. The document that was sent, is the only specifications available.

I have requested the ICREF technical specifications; to date I have not received the document. I followed up on my request today and it is being worked. I will immediately notify you when I receive this and have it delivered to you.

ATLAS was not a temporary solution that would be replaced with LENS. The NDM connection to ATLAS was the temporary

solution which was replaced with LENS connection. ATLAS remains the same, the connection vehicle changed.

You also requested a download of the RSAG database. In today's environment, MCI has two methods to access the data in that database - ICREF and LENS. I currently send your organization a weekly report of the hits by MCI on ICREF. Scott Brown was the recipient of this information. In discussing this request with Linda Tate (BST), Linda said that BellSouth at this time is not in a position to provide a download of this database due to the following:

1) The database size is massive and not manageable with the daily activity and

2) MCI and other CLECs currently have access to the data through LENS and ICREF.

If you would like to discuss this further, please call me on (770)492-7525.

MCI Telecommunications Corporation
780 Johnson Ferry Road
Suite 500
Atlanta, GA 30342

June 16, 1997

Ilene M. Barnett
Sales Director
MCI Account Team
BellSouth Interconnection Services
Suite 420
1960 West Exchange Place
Tucker, Georgia

Dear Ilene,
Thanks for the prompt response regarding the Regional Street Address Guide. For your reference, I have included in this letter an excerpt from the MCImetro – BellSouth Georgia Interconnection Agreement, Attachment VIII, Section 2.1.3:

> "2.1.3 Street Address Guide (SAG)
> 2.1.3.1 Within thirty (30) days after the Effective Date of this Agreement, BellSouth shall provide to MCIm the SAG data, or its equivalent, in electronic form. All changes to the SAG shall be made available to MCIm on the same day as the change to the data is made".

It is my understanding that the SAG data is to be provided to MCI, not simply the access to the data. As per the Interconnection Agreement, MCI is requesting the Regional SAG data be provided for the states of Georgia, Tennessee and North Carolina. Please respond in writing by June 25, 1997.

If you have any questions, please contact me on 404-267-6580. Thanks again for your assistance in this matter.

Helen Arthur

Cc: Bryan Green
Georjean Simmons

BELLSOUTH

BellSouth Telecommunications, Inc.
Room 34S91 BellSouth Center
675 West Peachtree Street, N.E.
Atlanta, Georgia 30375

June 26, 1997

Ms. Helen Arthur
MCI Telecommunications Corporation
Suite 500
780 Johnson Ferry Road
Atlanta, Georgia 30342

RE: MCIm/BellSouth-GA Interconnection Agreement - Attach VIII, Sect 2.1.3

Dear Ms. Arthur:

This letter is in response to your inquiry of June 16, 1997 in reference to the following stipulation in the MCIm/BellSouth Interconnection Agreement:

Attachment VIII
2.1.3 .1 Street Address Guide (SAG)

> Within thirty (30) days after the Effective Date of this Agreement, BellSouth shall provide to MCIm the SAG data, or its equivalent, in electronic form. All changes to the SAG shall be made available to MCIm on the same day as the change to the data is made.

Your interpretation of the above stipulation is that BellSouth will provide the Street Address Data, not online access, to MCIm . However, the stipulation states that BellSouth is to provide the SAG data to MCI or its equivalent in electronic form. Since, BellSouth is unable to provide the initial SAG data and daily updates in batch form the only available equivalent would be using online access.

Sincerely,

Cathy Forbes

Cathy Forbes
Compliance Manager
Interconnection Services

cc: Ilene Barnett

MCI Telecommunications Corporation
780 Johnson Ferry Road
Atlanta, GA 30342
404 267 5500

August 18, 1997

Ms. Ilene Barnett
Sales Director
BellSouth Interconnection Services
1960 West Exchange Place
Tucker, GA 30084

Dear Ms. Barnett:

This letter is in response to Cathy Forbes' June 26 letter, which replied to Helen Arthur's June 16, 1997 inquiry in reference to the following section in the MCImetro-BellSouth Interconnection Agreement:

Attachment VIII
2.1.3 Street Address Guide (SAG)
2.1.3.1 Within thirty (30) days after the Effective Date of this Agreement, BellSouth shall provide to MCIm the SAG data, or its equivalent, in electronic form. All changes to the SAG shall be made available to MCIm on the same day as the change to the data is made.

This section clearly requires BellSouth to provide to MCIm in electronic form either the SAG data or its equivalent. As it is more than thirty (30) days since the interconnection agreements became effective in Georgia, Florida, Tennessee, and North Carolina, BellSouth is overdue in providing to MCIm in electronic form the SAG data.

Ms. Forbes letter states, and I quote, " Since, BellSouth is unable to provide the initial SAG data and daily updates in batch form the only available equivalent would be using online access". MCIm is capable of accepting an electronic download of this data via NDM until a regular mechanized daily batch process can be implemented to accommodate daily updates.

MCIm insists that BellSouth comply with the terms of its interconnection agreements with MCIm and provide MCIm in electronic form with the SAG data no later than August 29, 1997. Failure to do so will significantly hamper MCIm's entry into the local market by forcing MCIm to continue to contend with manual intervention in the pre-ordering/ordering process to verify customer street address information, and, will demonstrate BellSouth's continued lack of compliance with the contracts.

Please reply to this letter no later than August 22, 1997.

Sincerely,

Walter J. Schmidt

cc: Marcel Henry - MCI
Charlene Keys - MCI
Bryan Green - MCI
Jeremy Marcus - MCI
Joe Baker - BellSouth
Pam Lee - BellSouth

BELLSOUTH

BellSouth Interconnection Services
Suite 420
1960 West Exchange Place
Tucker, Georgia 30084

770 492-7500
Fax 770 621-0632

MCI Account Team

August 20, 1997

Mr. Walter J. Schmidt
MCI Telecommunications Corporation
780 Johnson Ferry Road
Atlanta, Georgia 30342

Dear Wally,

This is in response to Bryan Green's verbal request to provide MCIm with a copy of BellSouth's Regional Street Address Guide (RSAG) database files and RSAG record layouts and to your letter dated August 18, 1997, regarding the same subject. In accordance with the MCIm/BST Interconnection Agreement, MCIm can access BellSouth's RSAG database through the Local Exchange Navigation System (LENS) and/or via Interexchange Carrier Reference Validation (ICREF) service.

The RSAG database files are extremely voluminous for downloading and the fact is that the database changes so rapidly it would be outdated by the time MCIm would be in receipt of the database files. The RSAG technical specifications are proprietary.

MCIm may pursue receipt of the RSAG database files in a form other than that described in the Interconnection Agreement through the Agreement's Bona Fide Request (BFR) process. I trust that the above provides you with the desired information.

Sincerely,

Cliff Bowers

for Pam Lee
Sales Assistant Vice President

cc: Joe Baker - BST
Marcel Henry- MCI
Charlene Keys - MCI
Bryan Green - MCI
Jeremy Marcus - MCI

MCI Telecommunications Corporation
Three Ravinia Drive
Atlanta, GA 30346
770 280 7840
Fax 770 280 7849
Internet: 2161607@MCIMail.Com

Marcel Henry
Regional Vice President
Southern Financial Operations

September 18, 1997

Mr. Joe Baker, Vice President – Sales
Interconnection Services
BellSouth Telecommunications, Inc.
Suite 4423
675 West Peachtree Street
Atlanta, Georgia 30375

Dear Joe:

This is a follow-up to our breakfast meeting on August 29th. These are issues that have been brought to my attention that have yet to be resolved. As a result, I am asking for BellSouth executive involvement (yours specifically) to get these issues resolved.

1) CARE Processing
2) Regional Street Address Guide
3) EDI Transactions (Jeopardies/Rejects/Loss Notification)

In the case of the first two items, BellSouth states that it is not obligated to provide the service. However, while not addressing this claim, I would note that the absence of these items affects our ability to either process orders or keep accurate records. In either case lack of a workable solution will create more work for both companies in the form of longer order processing intervals and/or manual processing.

Regarding the last item: I do not understand why BellSouth would provide notification of jeopardies, rejects, or losses via fax. It is an inefficient way to do business, especially when electronic communications exist between our two companies.

In my opinion, the resolution of these issues should be based on what makes good business sense, rather than taking the stance that it doesn't get done unless BellSouth is ordered to do so. This is particularly true in cases, such as these three, where BellSouth has the ability to provide what MCI is requesting, and where MCI's requests advance the goal of true competition in the local exchange market. I trust that in your review you will agree and your involvement will bring these issues to closure.

Please call me if you have any questions about these issues. I have additional details if needed.

Regards,

Marcel Henry

MH/mle
Sfo0797ltr

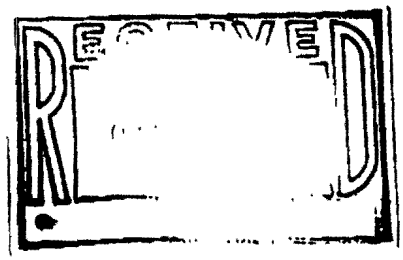
BellSouth Interconnection Services
Suite 420
1960 West Exchange Place
Tucker, Georgia 30084

770 492-7510
Fax 770 621-0632
MCI ID 361-2846

Pam Lee
Sales Assistant Vice President
MCI Account Team

October 10, 1997

Mr. Marcel Henry
Regional Vice President
Southern Financial Operations
MCI Telecommunications, Inc.
Three Ravinia Drive
Atlanta, Georgia 30346



Dear Marcel:

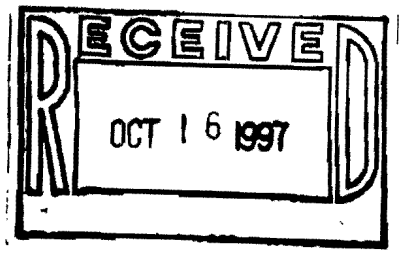
This is in response to your September 18, 1997, letter to Joe Baker regarding the three issues you asked him to review and to assist in a resolution for each issue. We value our relationship with MCI and are continuously striving to meet your needs whenever and wherever we can. However, we are not always able to meet MCI's requests in the specific manner requested. Unfortunately, with the exception of our plans for handling rejects through EDI, this is the case with the issues you have brought to our attention. The following is a summary of BellSouth's position on each of the three issues:

1) CARE Processing:

Our position is still the same as that described in the September 19, 1997, email from Kim Uhles of BellSouth to Phyllis Maslia of MCI and the July, 1997, letter from Susan Arrington of BellSouth to Helen Arthur of MCI. BellSouth has not yet established a process for advising CLECs when their customers change their PIC. However, BellSouth will work with MCI to document your requirements and develop a time and price estimate to deliver this enhancement if you desire.

2) Regional Street Address Guide (RSAG):

BellSouth is open to working with MCI to understand the information that MCI needs out of RSAG and to develop the time and costs required to develop this enhancement.



3) EDI Transactions:

* Jeopardies: As explained verbally to MCI on several occasions, BellSouth's position is generally to adhere to national standards for EDI. To date, national standards have not been established for jeopardies.

* Rejects: This will be addressed in Release 2.0 as part of our upgrade to TCIF Issue 7, which is tentatively scheduled for January 30, 1998.

* Loss Notification: As described in Cliff Bowers', BellSouth, August 8, 1997, letter to Helen Arthur, MCI, BellSouth does not have the capability at this time to offer the EDI 836 transaction set for loss notification nor does BellSouth have plans to develop that capability. However, BellSouth will work with MCI to document your requirements and to develop a time and price estimate to deliver this enhancement if you desire.

Although we are unable to commit to addressing all of the issues in the manner MCI originally requested, BellSouth's Account Team and Product Team representatives met on September 30, 1997, with Bryan Green, MCI, and members of his staff to discuss these issues as well as other topics. In the meeting both companies agreed to investigate and seek other mutually satisfactory means of addressing each issue. I will keep you informed as to our progress, and in the meantime, please let me know if you have any questions or need additional information.

Sincerely,

Pamela K Lee

FILE COPY

DISTRIBUTED
11/20

Exhibit BG-10
MCI: Green
Docket No. 980281-TP
Page 1 of 2

BellSouth Telecommunications, Inc.
Suite 4511
675 West Peachtree Street, N.E.
Atlanta, Georgia 30375

404 927-7020
Fax 404 521-2311

Mark L. Feidler
President – Interconnection Services



November 13, 1997

Mr. Marcel Henry
Regional Vice President
Southern Financial Operations
MCI Telecommunications
Three Ravinia Drive
Atlanta, Georgia 30346

Dear Marcel:

Recently, you brought to the attention of the BellSouth MCI Account Team your concerns over MCImetro's ("MCI") perceived lack of progress on several MCImetro OSS issues, including Change Management, Loss Notification/NDM, RSAG, and Common Graphical Interface (CGI). We then discussed these items on the phone last week. I am now in a position to provide you with an update.

At present, BellSouth is in compliance with the interface obligations and interface duties set forth in the MCImetro/BellSouth Interconnection agreements. The OSS requirements were negotiated between the parties and are contained within Attachment VIII of the Interconnection Agreements. In that Attachment you will find that MCI agreed to accept, on an interim basis, the interfaces approved by BellSouth.

I want to assure you that BellSouth has been very focused in its quest to meet the additional requests from MCI. The outstanding MCI requests are complex and BellSouth must make sure that the responses are fully researched and as correct and current as possible. To ensure MCI understands where BellSouth stands on these issues, I have summarized below their current status and BellSouth's plans for addressing each one.

- Change Management: BellSouth is in the process of developing a change management plan. BellSouth appreciates and will consider MCI's input, including MCI's proposal entitled "BellSouth/MCI Change Management Process for OSS Interfaces" that you provided recently. BellSouth's goal is present the plans to you by mid December.

  As information, our plans will address BellSouth's support of dual OSS platforms. At this time, BellSouth will support dual platforms associated with EDI releases for 60 days. When technically feasible, the CLECs will have the opportunity to negotiate longer periods for the dual platforms, however, due to the potentially significant expenses associated with supporting multiple platforms, there will likely be additional charges to the CLECs should BellSouth agree to extending the dual platforms beyond 60 days. We will address dual platforms for LENS and other systems as part of our change notification plan that should be finalized in early December.

- Loss Notification/NDM: Currently MCI is receiving information regarding disconnections via paper. Pursuant to Attachment VIII, section 2.2.12, MCI has agreed, in a September 10, 1997 letter to Cliff Bowers of BellSouth, to an interim method of notification via Network Data Mover. BellSouth can provide such data via Network Data Mover in June 1998. We understand your desire that we implement this arrangement by the end of the year. This possibility is being reviewed by appropriate BellSouth management. The account team will notify the appropriate MCI representatives by Friday, November 21, 1997, as to whether this delivery date can be moved up.

- RSAG: Within the next two weeks, BellSouth will be able to provide you cost estimates and the time and price for developing the detailed design, project plan, and a firm quote for the overall delivery. Please note that BellSouth is exploring the development of an Application Programming Interface (API) that may better suit your needs. It is my understanding that five MCI employees will be at a BellSouth meeting on November 14, 1997 to discuss this interface. At present, BellSouth is meeting its contractual obligations regarding MCI's access to SAG data.

- Common Graphical Interface (CGI): CGI specifications were sent to you by the account team on November 7, 1997. These specifications will allow MCI to build its Common Graphical Interface. The next release of specifications is in development. This will be a supplement to the existing specifications and will allow MCI to add some fields that are not represented in the current specifications. MCI does not have to wait for the next release to begin building its Common Graphical Interface since the next release will simply be an extension of the existing specifications. Once MCI has reviewed the specifications, BellSouth can establish a Joint Implementation Team (JIT) with MCI to begin developing plans, including timelines, to implement CGI.

We will keep you apprised as to our progress on each of these important issues. Meanwhile, if you have any questions or need additional information, please call me at 404-927-7530.

Sincerely,

M. R. Feidler

Mark Feidler

BELLSOUTH

BellSouth Interconnection Services
Room 34A35
675 West Peachtree Street, N.E.
Atlanta, Georgia 30375

12/02/97

Bryan Green
Sr. Manager - Systems Implementation
MCI Telecommunications
780 Johnson Ferry Road
Suite 500
Atlanta, Ga. 30342

Dear Bryan:

This letter is a response to your request that BellSouth provide MCI extracts from our Regional Street Address Guide (RSAG) database of the information necessary to perform address validations.. The cost estimate has been developed based on your stated need of submitting Local Service Requests with valid address. Your objective is to use the RSAG data to support your front end edits.

The proposal is for two extract files to be produced and sent to MCI every night. Please note that these are complete files and not updates. The data will be sent via Connect:Direct. MCI will be responsible for the cost of the circuit and modem equipment to connect to BellSouth as well as all hardware and software at your location needed to receive and process the data. The cost for that connection is not included here.

The following is a preliminary estimate of the costs to build and maintain the RSAG data delivery system. The final price for this project will be within +- 15% of this estimate. In order to proceed, BellSouth must put a project team in place, develop a project plan and timelines for this work in conjunction with MCI, and develop a final price for the project. The cost for this initial phase is $30,000 which will count toward the overall price. You will be asked to approve the project plan and final price before we move into the development phase.

Project plan, timeline, and final proposal	$30,000
Total Startup costs for the new connection	$538,030
Monthly recurring charge	$8,650

Please sign below and return this letter to me if you accept this estimate and agree to pay the $30,000 cost for the development of the project plan, timelines, and final price. Upon completion of the project plan, timelines, and final proposal, you will be asked to approve the project plan and final price before proceeding with the implementation of this arrangement. Your signature below will authorize BellSouth to proceed with final costs and a project plan for this work.

Bob Siegel - BellSouth	Authorized Signature - MCI
Date	Date

BellSouth Interconnection Services

BELLSOUTH

BELLSOUTH INTERCONNECTION SERVICES

MARCOM GROUP

34p70 BellSouth Center
675 West Peachtree Street, N.E.
Atlanta, Georgia 30375

FAX NUMBER
(404) ~~927-8577~~
~~927~~ 529-7074

FROM:		
	☐ TOM MOQUIN	(404) 927-7382
	☐ ANN SMITH	(404) 927-7599
	☐ JOELLYN SARGENT	(404) 927-7199
	☐ PATTI BAUERNFEIND	(404) 927-7927
	☐ SHERYL CHAPMAN	(404) 927-7996
	☐ MARION DYE	(404) 927-7928
	☐ AMY MERSHON	(404) 927-7557
	☐ BRIAN FAIN	(404) 927-7553
	☐ TEMPLE MCDANIEL	(404) 927-7565
	☐ JIM JACKSON	(404) 927-7516
	☐ KIM DICKIE	(404) 927-8639
	☑ Bob Siegel	(404) 267-6556

TO: Bryan Green

PHONE NUMBER: _____

FAX NUMBER: 404-267-6556

NUMBER OF PAGES INCLUDING COVER SHEET 3

Private/Proprietary: No disclosure outside BellSouth except by written agreement.

MCI Telecommunications Corporation
780 Johnson Ferry Road
Atlanta, GA 30342
404 267 5500

December 16, 1997

Bob Siegel
Product Manager
BellSouth Interconnection Services
Room 34A35
675 W. Peachtree Street, N.E.
Atlanta, Georgia 30375

Bob,

This letter is in response to the proposal provided to MCI on 12/04/97 relative to the cost to provide an extract of your RSAG database.

As you know, for several months we have been requesting that BellSouth provide MCI with a download of the RSAG database. The RSAG database is necessary to allow MCI to validate addresses in our own front end system prior to submitting an order to BellSouth. This capability will improve order processing time, reduce the amount of rework for both companies due to errors and decrease the cost of doing business. As you are aware, the RSAG issue is now pending before the Georgia Public Service Commission.

As an interim measure pending the outcome of the PSC proceeding, you have proposed that BellSouth provide an extract of the RSAG database based on the following cost structure:

- $30,000 – Project plan, timeline, and final proposal
- $538,030 – Total Start of costs for the new connections; and
- $8,650 – Monthly recurring charge

MCI rejects this offer because our Interconnection Agreement entitles us to receive a download of the entire RSAG at no cost. MCI again requests BellSouth to comply with the agreement by providing a complete RSAG download to MCI immediately.

Respectfully,

Bryan K. Green
Sr. Manager –OSS Implementation
404-267-5515

cc: Marcel Henry
Pam Lee
Charlene Keys
Joe Baker

elen Arthur
25-6580
4-267-6580
888-866-2376 pager

-----Original Message-----
From: Rueblinger_Judy/AL_BRHM05@bridge.bellsouth.com
SMTP:Rueblinger_Judy/AL_BRHM05@bridge.bellsouth.com]
Sent: Monday, August 18, 1997 3:56 PM
To: helen.arthur@mci.com
Cc: Bowers_Clifford_H/AL_BRHM07@a1244034
Subject: Jeopardies/ Rejects/836 Transaction

Helen,

Per our conversation today this is what I have been able
o find out on the above.
Jeopardies - The capability is there in EDI today.
Rejects - BST is working on this now. No standards in
lace. Will do in phases, late Nov/Dec. I have a call into Linda to
ee what we see the implementation date being.
836 Transaction - BST is working on this. We are
hecking with Bob Siegel to see if he can provide us an implmentation
ate.
Looking forward to seeing you tomorrow.
Judy

Message-ID: <01BCAE0C.A04135C0@infolink-204.189.237.158.Chicago.mci.net>
From: Helen Arthur <helen.arthur@mci.com>
To: "'Clifford H. Bowers'" <Clifford.H.Bowers@bridge.bst.bls.com>,
"'Judy Rueblinger'" <Judy.Rueblinger1@bridge.bellsouth.com>
Cc: "'Bryan Green'" <Bryan.Green@mci.com>
Subject: Jeopardy Notification
Date: Thu, 21 Aug 1997 08:31:29 -0400

Cliff,
Prior to our 8/19 meeting, it was BST's position that jeopardy notices would be handled manually. In the 8/19 meeting we discussed BellSouth's position that mechanized jeopardy notices are supported today. Specifications for mechanized jeopardies are not included in the LEO Guide. Please provide specifications and sample transactions for mechanized jeopardy notices by 8/22. This information is required in order to continue development.

Thanks,
Helen Arthur

MCI Telecommunications
Corporation
780 Johnson Ferry Road
Suite 500
Atlanta, GA 30342

August 27, 1997

Pamela Lee
Sales Assistant Vice President
BellSouth
1960 West Exchange Place, Suite 420
Tucker, Georgia 30084

Dear Pam,

On August 8, 1997 BellSouth confirmed that they would support mechanized loss notification via an EDI 836 transaction, and jeopardy and reject notifications manually. During a meeting on 8/19/97, MCI was informed that BellSouth would support mechanized jeopardies but rejects and loss notifications would be manual. Not only are we bothered by the lack of support for automated processes, but also by the fact that each time a meeting was held, BellSouth changed its position. In order to expedite this process, MCI has offered specifications in response to the manual processes (see attachment).

In response to our request BellSouth committed to get back to MCI with an answer to our specifications by 8/22/97. On 8/25/97 we received the following comments from Judy Rueblinger; "According to our staff this will take additional time to research. They have advised they will pursue further and provide me a status on their progress on Friday, 8/29. We want to make sure the staff has time to do the appropriate research before giving us an answer."

I need your support to help bring closure to this issue. What we need on or before 8/29 is a response to our request not just status. A delay would only further delay our ability to enter the local market. Your assistance in resolving this matter would be greatly appreciated.

Please provide a response by August 29, 1997 detailing whether BellSouth will support the manual process proposed by MCI or an alternative process.

Sincerely,

Helen H. Arthur
Local Systems Implementation Specialist
Enclosure (1)

cc: Bryan Green
Joe Baker
Cliff Bowers
Marcel Henry

MCI Telecommunications
Corporation
780 Johnson Ferry Road
Suite 500
Atlanta, GA 30342
404 267 5727

January 28, 1998

Ms. Pam Lee
BellSouth Interconnection services
1960 West Exchange Place
Tucker, GA 30084

Re: Late Firm Order Confirmations

Dear Pam:

I am writing concerning the excessive time periods associated with "returned FOCs" after MCI submits an ASR for local service to BellSouth. On average it is taking in excess of seven days for BellSouth to return a FOC.

MCI's expectations are that BellSouth provide Firm Order Confirmations (FOCs) for each order MCI places for local service. The Florida Interconnection Agreement requires BellSouth to provide FOCs for orders submitted electronically within four (4) hours and for manual orders within twenty-four (24) hours (Attachment VIII, section 2.5.3); the Tennessee Interconnection Agreement requires BellSouth to provide MCI with FOCs within twenty-four (24) hours. It is MCI's expectation that BellSouth will comply. Also, because BellSouth uses the same Operations Support Systems throughout its region, if BellSouth is capable of meeting the time frames for Florida, BellSouth therefore should be capable of meeting these time frames region wide.

In analyzing the time it takes BellSouth to provide MCI with an FOC for ASRs submitted for OFF-NET T1's we found that BellSouth exceeded the times specified in the Florida contract by a wide margin. During June through December 1997, MCI submitted 1,037 ASRs for which the average return FOC was seven days.

MON.	JUN	JUL	AUG	SEPT	OCT	NOV	DEC
DAYS	3.75	4.02	5.82	8.52	8.18	8.21	7.12

This delay significantly impedes MCI's ability to turn up customers in a reasonable time period. Therefore, MCI requests that BellSouth adopt the Florida FOC Intervals region wide.

Please respond by February 9, 1998, with the steps you are taking to substantially lessen the time it takes BellSouth to provide MCI with FOCs, and to bring BellSouth into compliance with the Florida and Tennessee contracts.

Sincerely,

Charlene Keys
Director of Carrier Markets
MCI Southern Financial Operations

cc: Wally Schmidt
Andri Weathersby
De O'Roark
Jeremy Marcus

Exhibit BG-17
MCI: Green
Docket No 980281-TP

May 16, 1997

Ms. Ilene Barnett
BellSouth
1960 west Exchange Place Ste. 420
Tucker, GA 30084

Ilene,

I have recently had an opportunity to review the LENS material BST provided MCI on 5/12//97. While going through the material, I noticed that the USER guide was the only documentation provided. Two vital pieces of information are still missing: documentation on how to connect to LENS (i.e. the steps necessary and the forms required to physically gain connectivity to LENS) and the technical specifications that would allow MCI to build an interface to LENS.

These documents are necessary for MCI to complete its assessment of LENS. Please provide me with an idea of when I can expect to receive these documents.

I will follow this email up with a letter addressed to you.

Bryan Green
Sr. Manager
Systems Implementation
404-267-5515

FLORIDA PUBLIC SERVICE COMMISSION
DOCKET NO. 980281-TP EXHIBIT NO. 2
COMPANY/ WITNESS: Green
DATE: 8-3-98

DOCUMENT NUMBER-DATE
06815 JUN 29 98
FPSC-RECORDS/REPORTING

780 Johnson Ferry Road
Suite 500
Atlanta, GA 30342

Exhibit BG-18
MCI: Green
Docket NO. 980281-TP

June 4, 1997

Ms. Ilene Barnett
BellSouth
1960 west Exchange Place Ste. 420
Tucker, GA 30084

Ilene,

I recently received a certified letter from you stating that MCI was working with BST to pursue the technical specifications that would allow MCI to build an interface to LENS. Per our conversation this afternoon, this is not correct. The discussions underway between MCI and BST are to facilitate the provisioning of connection between our gateways to allow MCI to access LENS via our LAN.

Since writing the original request on May 16, 1997, I have not received a response or any status on the availability of the documentation. Again, the longer the delay on receiving this information the greater the impact on our ability to develop the interfaces in a timely manner.

We are awaiting your response on this matter.

Bryan Green
Sr. Manager
Systems Implementation
404-267-5515

MCI Telecommunications
Corporation
780 Johnson Ferry Road
Suite 500
Atlanta, GA 30342

Exhibit BG-19
MCI: Green
Docket No. 980281-TP

June 26, 1997

Ms. Ilene Barnett
BellSouth Interconnection
1960 West Exchange Place Ste. 420
Tucker, GA 30084

Ilene,

This letter is to request status of the LENS technical specifications that MCI requested in writing on May 16, 1997.

Based on the lack of response from BST on this issue, we will assume that the technical specifications are not available. The lack of technical specifications has caused MCI significant delay with respect to interface development.

Please provide status on the LENS technical specifications by Wednesday, July 2, 1997. Your prompt response to this matter will be greatly appreciated.

Bryan Green
Sr. Manager
Systems Implementation
404-267-5515

cc: Pam Lee
Marcel Henry
Georjean Simmons

Rec'd 7/9/97

BELLSOUTH

BellSouth Interconnection Services **Memorandum**

Exhibit BG-20
MCI: Green
Docket No 980281-TP

File Code
Date July 8, 1997

To Bryan Green
Telephone number 404-267-5515
Fax number

From Ilene Barnett
Telephone number 770-492-7525
Fax number

Subject LENS Access Technical Specification

Enclosed is the document you requested beginning on May 16, 1997. This document was provided to me with the caveat that it had not been updated to match the current LENS application. I will work with Linda Tate to provide you an updated copy as soon as it is available.

I apologize for the length of time in responding to your request. Please don't hesitate to call me if you have additional questions or would like to have more discussions on this subject.

cc: Linda Tate (w/o attachment)
Don Stewart (w/o attachment)

Exhibit BG-21
MCI: Green
Docket No. 980281-TP

MCI Telecommunications Corporation
780 Johnson Ferry Road
Suite 500
Atlanta, GA 30342

September 5,1997

Mr. Cliff Bowers, Sales Director
BellSouth Telecommunications
1960 West Exchange Place, Ste. 420
Tucker, GA 30084

Cliff,

Per the LENS Access Technical Specification, the LENS application can be accessed directly by other computer systems. Based on that fact, MCI would like to meet with BellSouth and develop the interface that would provide us with that access. The specifications we have are dated 9/5 and per the documentation it supports the 4/22/97 release of LENS. In order to develop this interface we need the latest technical specification which includes all the LENS upgrades (eg csr). We'd like an updated copy to review prior to the meeting.

We will be available to meet via conference call on September 15, 17, or 18. Please let me know which date is best for you and your technical SME. You may direct your questions to me on 404-267-6593.

Sincerely,

Anna Hopkins
Local Systems Implementation Specialist

Date: Thu Nov 13, 1997 02:47 pm EST
Source-Date: Thu, 13 Nov 1997 14:43:40 -0500
From: "Bryan.Green@mci.com"
EMS: INNERMAIL / MCI ID: 208-7612
MBX: Bryan.Green@mci.com

TO: "'Clifford.H.Bowers'"
EMS: INNERMAIL / MCI ID: 208-7612
MBX: Clifford.H.Bowers@bridge.bellsouth.com
CC: "Pamela.Lee"
EMS: INNERMAIL / MCI ID: 208-7612
MBX: Pamela.Lee@bridge.bellsouth.com
CC: "Judy.Rueblinger1"
EMS: INNERMAIL / MCI ID: 208-7612
MBX: Judy.Rueblinger1@bridge.bellsouth.com
CC: "Bob.Siegel"
EMS: INNERMAIL / MCI ID: 208-7612
MBX: Bob.Siegel@bridge.bellsouth.com
CC: "'Alan Anglyn [Alan.Anglyn@MCI.Com] [E-mail]
EMS: INNERMAIL / MCI ID: 208-7612
MBX: Alan.Anglyn@mci.com
CC: "'Anna Hopkins [Anna.Hopkins@MCI.Com] [E-mai
EMS: INNERMAIL / MCI ID: 208-7612
MBX: Anna.Hopkins@mci.com
BCC: * Ron Martinez / MCI ID: 357-0919
Subject: RE: CGI
Message-Id: 97111319470933/INTERNETGWDI1IG
Source-Msg-Id: <01BCF042.89552E20.Bryan.Green@mci.com>
U-Organization: MCI

Cliff,

After reviewing the attached CGI specifications, we have determined that they are the same specifications that we received on 9/5/97. Your note mentions that release 1.1 will be available in the next four weeks or so. In order for our developers to evaluate the specs as quickly as possible, we would need a more accurate availability date as well as a list of the enhancements release 1.1 will support.

Please let me know if you will be able to provide me with the requested information by 11/20/97. If you are unable to meet this date, please let me know when I can expect to receive.

Bryan

-----Original Message-----
From: Clifford.H.Bowers [SMTP:Clifford.H.Bowers@bridge.bellsouth.com]
Sent: Friday, November 07, 1997 5:24 PM
To: Bryan Green
Cc: Pamela.Lee; Judy.Rueblinger1; Bob.Siegel
Subject: CGI

<< Message: CGI >> Bryan,

Attached are the release 1.0 CGI specifications. These should give your folks

something they can begin working with. Also notice that Bob should have release 1.1 specifications in around four weeks.

Thanks,

Cliff

MCI Telecommunications Corporation
Two Northwinds Center
2520 Northwinds Parkway
Alpharetta, GA 30004

June 1, 1998

Ms. Pam Lee
Sales Assistant Vice President, MCI Account Team
BellSouth Interconnection Services
1960 W. Exchange Place
Suite 420
Tucker, Georgia 30084

Re: Notice that MCIm will be ordering Interconnection T-1s pursuant to the MCIm/BellSouth Interconnection Agreement and demand for credit.

Dear Ms. Lee:

As you know, on November 10, 1997, MCIm requested that BellSouth provide to MCIm combinations of unbundled network elements (UNEs) generally consisting of the following elements: 4-wire DS-1 local loop and DS-1 dedicated transport per mile and per termination. For convenience purposes, I will refer to such combinations as Interconnection T-1s. MCIm made this request pursuant to the provisions of the MCIm/BellSouth Interconnection Agreement which require BellSouth to provide to MCIm UNE combinations at UNE rates. Despite the plain language contained in the Agreement, BellSouth refused to provide these UNE combinations to MCIm. Because MCIm had no other way to order these loops, and thus serve our customers, MCIm had to resort to ordering T-1s from BellSouth's Interstate Access Tariff.

As you may be aware, the Florida Public Service Commission has recently affirmed MCIm's interpretation of the Agreement on this point, i.e., BellSouth is under an obligation to provide UNE combinations to MCIm at the sum of the stand alone UNE rates contained in the Agreement. See FPSC Docket No. 971140-TP. Indeed, the Commission ruled that the rates for combinations could be less than the sum of the rates of the component elements since duplicate charges and charges for services not needed should be removed from the combination rates.

Based on the above, this is to officially notify BellSouth that MCIm will be migrating our local T-1s currently ordered from the Interstate Access Tariff to UNE combinations from the Florida Interconnection Agreement. Further, BellSouth should treat all T-1 orders currently being processed as requests for Interconnection T-1s at the interconnection rates. BellSouth should also convert the billing of the existing T-

June 1, 1998

1s from the access rate to the Florida interconnection rates. Finally, MCIm is requesting credits for all T-1s ordered from November 10, 1997 to the present. This credit will be the difference between the pricing of the T-1 access rate and the price of the component UNEs at the interconnection prices. (e.g. During this time period, the recurring rates for DS-1 local loops was $80.00 per month. For DS-1 Dedicated Transport it was $1.60 per mile and $59.75 per termination.)

MCIm would like to schedule a meeting to discuss in more detail the processes involved in migrating the existing T-1s to UNEs and ordering Interconnection T-1s in the future. MCIm requests this meeting no later than June 10, 1998.

If you have any questions regarding MCIm's position on this matter please give me a call to discuss. I can be reached at (770) 625-6849.

Sincerely,

Walter J. Schmidt
Senior Manager
Southern Financial Operations – Carrier Agreements

cc: Ilene Barnett
Charlene Keys
Daren Moore
Daniel Fry
Andri Weathersby
Vernon Starr

MCI Telecommunications Corporation
780 Johnson Ferry Road
Atlanta, GA 30342
404 267 5500

Sharon Daniels
Sales Director
BellSouth
Interconnection Services
Suite 420
1960 W. Exchange Place
Tucker, GA 30084

November 5, 1997

Dear Sharon:

There are two outstanding issues that MCI wants escalated to the executive level within BellSouth. These two issues seriously impact MCI's ability to successfully enter and compete in the local market. Although, these two issues have been discussed in several meetings between MCI and BellSouth, they have not yet been resolved. Therefore, MCI needs BellSouth to expeditiously bring these issues to closure.

1. Loss of Dial Tone: MCI customers continue to experience loss of dial tone after transitioning to MCI local service. MCI's resale product customers have reported these incidents of loss of dial tone. As we understand, BellSouth is in a trial mode for implementing a new process that should eliminate the probability of MCI's customers from losing dial tone. The new BellSouth process will be to make billing changes only and eliminate the present install/disconnect process. Please refer to Attachment VIII, Section 2.2.2.2 in the Interconnection Agreement concerning loss dial tone.

MCI has made several requests to BellSouth on the progress of the trial and a specific date for implementation of the new process. To date MCI has not received a satisfactory response and request this issue is escalated to within BellSouth. The escalation response should include statistical data from the trial so MCI can set our expectations and a specific implementation and date for the new process.

2. FOCs: Per the last discussion between MCI and BellSouth, MCI understands that FOCs for access circuits will be received within forty-eight (48) hours. For these received FOCs, BellSouth will perform the necessary engineering specs for facilities, which will eliminate missing installation dates for "no facilities". However, BellSouth will not commit to the same performance standards for local service. MCI understands that FOCs for local service will be received within twenty-four (24) hours however, BellSouth may not have done the necessary provisioning check for facility availability. This solution is inadequate because it will result in BellSouth missing installation dates

because of "no facilities," such a result would seriously jeopardize MCI's relationship with our customers.

MCI is requesting this issue also be escalated within BellSouth. The escalation response should include process definition and action plan for ensuring FOCs are facility checked and also lowering FOCs intervals for access circuits.

Please review the above two (2) issues and provide MCI with a response be COB 11/17/97.

Sincerely,

Andri P. Weathersby
Sr. Manager

cc: Charlene Keys

BellSouth Interconnection Services
1960 West Exchange Place
Suite 420
Tucker, Georgia 30084

(770) 429-7540
Fax: (770) 496-1998

December 15, 1997

Andri Weathersby
Sr. Manager
MCI Telecommunications
780 Johnson Ferry Road
Suite 500
Atlanta, GA 30342

Dear Andri:

This is in response to your letter dated November 5, 1997, requesting that two outstanding issues, "loss of dial tone" and Firm Order Confirmations (FOCs) be escalated for resolution. We have escalated these issues to our Real Time Resolution Group and have the following status.

Loss of Dial Tone: It is BellSouth's understanding that MCI is referring to resale customers that have lost dial tone as a result of BellSouth's process of issuing New (N) orders and Disconnect (D) orders on "Migrate as Is" and "Migrate with Change" requests. BellSouth uses both a disconnect service order and a reconnect service order to transfer end user service to a CLEC. Both orders are necessary based upon existing billing system requirements for disconnecting the existing account and rendering a final bill. BellSouth has devoted considerable resources and incurred substantial expense in developing new systems that obviate the need for a disconnect service order for many types of resale orders. Currently being tested in the production environment, BellSouth anticipates that such systems will be implemented for most CLECs, including MCIm, during the first quarter of 1998.

FOCs: The BellSouth Ordering Guide for CLECs states "The FOC does not constitute, and is not a guarantee that facilities are available. The committed due date is based on an assumption that facilities are available. If there is a post FOC facility problem, the CLEC will be informed of the estimated service date." This policy is the same for BellSouth customers. MCI is correct in its understanding that a tariff was filed that provides a Pending Order Confirmation that acknowledges receipt of an Access Service Order and a Firm Order Confirmation that is released after verifying facility availability. Transmittal No. 424 for FCC Tariff No. 1, Access Service, was filed with the FCC on September 29, 1997 with an effective date of October 14, 1997. As I have indicated to you, there are currently no plans to implement a similar process in the local service arena.

Please call me if you have questions or want to discuss further.

Sincerely,

Sharon R. Daniels

Sharon R. Daniels
Sales Director

EXHIBIT NO. 8

DOCKET NO.: 980281-TP

WITNESS: BRYAN GREEN

PARTY: MCI

DESCRIPTION:

1. **July 28, 1998 DEPOSITION TRANSCRIPT**
2. **LATE FILED EXHIBIT**

PROFFERING PARTY: BELLSOUTH TELECOMMUNICATIONS

ID#_____

FLORIDA PUBLIC SERVICE COMMISSION
DOCKET NO. 980281-TP EXHIBIT NO. 8
COMPANY/ WITNESS: Green
DATE: 8-5-98

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Complaint of MCImetro Access Transmission Services, Inc., against BellSouth Telecommunications, Inc. for breach of approved interconnection agreement.) DOC NO.980281-TP

DEPOSITION OF:	BRYAN GREEN
TAKEN AT THE INSTANCE OF:	BellSouth
DATE:	Tuesday, July 28, 1998
TIME:	Commenced at 2:00 p.m. Concluded at 4:50 p.m.
REPORTED BY:	Debra Krick

PREMIER REPORTING
6753 THOMASVILLE ROAD
SUITE 108
TALLAHASSEE, FL 32312
(850) 894-0828

COPY

APPEARANCE:

CATHERINE BEDELL, ESQUIRE, FPSC, 2540 Shumard Oak Boulevard, Suite 370, Tallahassee, Florida 32399-0850

DULANEY L. O'ROARK, III, ESQUIRE, MCImetro, Suite 700, 780 Johnson Ferry Road, Atlanta, Georgia 30346

PHILLIP CARVER, ESQUIRE, BellSouth, Suite 4300, 675 West Peachtree Street, NE, Atlanta, Georgia 30375

ALSO PRESENT:

WAYNE STAVANJA, FPSC Staff
BRIAN MUSSELLWHITE, FPSC Staff

* * * *

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* * * *

EXHIBITS

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1	List of MCI requests refused by BellSouth (Late-filed)	22
2	List of information discovered by MCI in OSS process not offered to MCI by BellSouth (Late-filed)	22
3	List of items MCI wants from BellSouth not currently receiving (Late-filed)	49

DEPOSITION

Whereupon,

BRYAN GREEN

was called as a witness, having been first duly sworn to speak the truth, the whole truth, and nothing but the truth, was examined and testified as follows:

EXAMINATION

BY MR. CARVER:

Q Good afternoon, Mr. Green. My name is Phil Carver, and I represent BellSouth.

A Good afternoon, Phil.

Q Just a couple of preliminary matters; would it be fair to call you the technical witness on issues one through eight or counts one through eight?

A Yes.

Q Okay. Now, you are not testifying regarding contract dispute issues, per se, are you?

A That's correct.

Q And that would be entirely Mr. Martinez who would address those?

A Yes.

Q Okay. In your testimony, there was some references to various commission rulings, both by this commission and other commissions in other states. Those were all in the context of 271 proceedings or OSS

proceedings spun off from 271s; is that correct?

A That's accurate.

Q Okay. So at this juncture, no commission has ruled on an MCI complaint against BellSouth, of the type that is at issue in this proceeding?

A That's true, no commission has.

Q Okay. So by these references in your testimony, then, is it fair to say you are not contending that some commission has found BellSouth to be in breach of the contract?

A No.

Q No, they have not?

A No, I am not contesting that a commission has found that.

Q Okay. And currently, the other states where this complaint is pending are Georgia, North Carolina, and where else, or is that it?

A I believe that is it, besides Florida.

Q Okay. Now, this may not be your issue, and if so just tell me. But there is an issue here regarding the ordering of T1s and whether FOCs apply to those or not.

A Uh-huh.

Q That count was not filed in North Carolina, was it?

A Subject to check, I don't have those notes here. I don't believe that it was filed in North Carolina.

Q Okay. And the North Carolina complaint was filed after the complaint here?

A Yes, it was.

Q Can you tell me why it was not filed in North Carolina?

MR. ROARK: I want to object to the question as potentially calling for work product information. You're inquiring into MCI's litigation strategy.

MR. CARVER: No. I am inquiring as to whether there are different facts there or whether it's been resolved or circumstances have changed or why the difference.

So let me suggest this, if you can answer it in that way, without divulging any work product or attorney-client information, that I would like for you to. But if you can't, then we will move on.

MR. O'ROARK: That's fine.

THE WITNESS: Okay. Restate the question, if you would, please.

BY MR. CARVER:

Q Okay. The question is the aspect of the complaint, the count of the complaint that deals with T1s and form order commitments. I think we have agreed that

that was filed here, it was not filed in North Carolina. And I am just wondering, again, without divulging any privileged information, if you could tell me why that is.

A Let me think about that one for a minute. I believe that the reason that that was not filed in North Carolina was primarily because I did not have data relevant to affirm order confirmation dates being missed in that state as opposed to states such as Florida and Georgia.

Q Okay. Any other reason?

A No.

Q As far as you know, the contractual obligations, whatever they are, would be the same in both states on that issue?

A That goes to the interconnection agreements, which vary slightly, but I believe that they are, for that particular matter, the same across most states. So I believe North Carolina would be the same as Florida.

Q Okay. Now, a specific question I wanted to ask in reference to count one. In count one -- and I apologize if this is repetitive. But you are testifying specifically about what the contract requires in terms of access to OSS systems.

A That's accurate.

Q Now, have you had any role -- did you have any

role in negotiating the contract at all?

A No, I did not.

Q The OSS information that you have requested, which I believe is set forth on page three, are you the one who decided that this information is what's required in MCI's view?

A No, I am not the one that decided that this information was necessary. This was decided by our internal technical people in an effort to try to design systems and understand what systems we needed to have interfaces built to or to build interfaces for, as well as what functionality existed.

This goes back to our continued request from BellSouth to try to get information, and that information being disseminated to us in piece parts.

Q Now, do you know when the technical people made the decision that this was the information that they wanted?

A I don't have a date here with me. I believe -- as a matter of fact, I know for a fact that it's been at least a year. And this -- in our first complaint, which I believe was filed in Georgia, this was also count one there.

Q Okay. And I want to make sure I understand this, what you're requesting is access to every OSS

system that BellSouth uses for itself of every type?

A Yes.

Q And how many would that be; do you know?

A I only know based on reading the deposition from Bill Stacy, and I think he alluded to anywhere between 1,000 and 5,000, and ultimately broke that down to be within the realm of both characteristics relative to OSS 60 to 70.

Q Okay. Now, what's the difference -- you have used two numbers, 5,000 and 60 to 70. Can you explain?

A I am only reciting information that I was -- that was provided to me as a result of the deposition of Bill Stacy.

Q Okay. Well, my recollection from his deposition was that he said that there were about 400 BellSouth systems altogether. And I am just trying to get clear on your understanding of what the 60 and 70 is.

A I believe what I recall reading out of Mr. Stacy's deposition was that there were either 60 to 70 systems or 60 to 70 databases that were used by BellSouth with respect to the five OSS functions defined as ordering, preordering, provisioning, billing and maintenance.

Q Okay. Ordering, preordering, billing?

A Provisioning and maintenance.

Q Okay. If -- let's assume -- and the numbers are not important. We will just use hypothetical numbers. Let's just assume that there were 400 and that only 60 relate to these five functions. Do you still want the other 340?

A What MCI is interested in is having the information available to us such that we can build the necessary systems to give us a meaningful opportunity to compete.

It's been our experience with BellSouth that, unless you ask for the specific information or piece of information that you need, then you won't get anything above and beyond that. Because we don't know or have experience with BellSouth systems, the databases they use, the systems they use; and so for the record, we took the approach of asking for everything in hopes that we would be able to identify those things that were critical in order to operate the business.

Q Okay. I don't think you gave me an answer to my question. So let me try again.

If we -- if it were established that these 60 systems were the only ones that relate to the five functions, would you be satisfied just with those, or do you want all 400?

A If through some means we establish that just 60

were those that were necessary for the functionality relative to the five functions under OSS, then I would believe that those 60 would be sufficient.

Q Okay. Now, if, for example, an OSS system had to do with some retail function of BellSouth, so it didn't really relate to anything that MCI would be ordering, that's one that you wouldn't need?

A I don't know if you could explain kind of the retail piece to me. It's really difficult to answer a generic question like that, because there is no detail behind it. But I don't know. Assuming that it was not a functionality that was within the scope of the five OSS functions, then I would agree with you.

Q Okay. So do you have any idea how many -- well, let's see, the 60 that would relate -- let me ask you this way, the 60 that would relate to the five functions, I assume that's going to be more than the number that are analogous to whatever MCI is using for these functions now, correct?

A From BellSouth?

Q Yes.

A Yes.

Q Okay.

A Or in addition to, I should say.

Q And if it could be established that you weren't

going to order a particular thing for BellSouth, you wouldn't have a need for that analogous system, would you?

A Well, I guess the way I would answer that question is, no, because today while I may not have any plans to order --

Q No, you wouldn't have a need for it?

A I guess -- okay. I disagree with that.

Q Okay. So, yes, you would have a need for it?

A If it's a yes or no, then I would say, yes, I may potentially have a need for it.

Q Okay. So if it's something that MCI has no intention of ordering whatsoever today, you would still want that, too?

A And it would only be based on --

Q I need a yes or a no, before you explain, if you could.

A Okay. I would say the answer to the question is yes.

Q Okay.

A And the reason that it's yes is because today there is a business model that we are working from. And that business model may not be the same across all nine BellSouth regions to date or in the future. So I don't believe that we are smart enough to know two years from

now, 18 months from now just exactly what retail functionality we need.

We are smart enough to know what we need at this moment. But it doesn't make sense to build a system today precluding potentially functionality that you may need in the future.

Q Do you know how many -- and I understand your business is a little bit different. But do you know how many OSS systems MCI employs for its own use?

A I don't have that number readily available today.

Q Okay. Does MCI make those publicly available?

A Make what publicly available?

Q It's OSS systems.

A I don't think we have had any reason to make them publicly available.

Q Well, if someone requested them, would you make them publicly available, or is that something that you, for whatever reason, might believe should be kept?

A I would say that that's probably going to be a business decision, one that I can't make here today. Mine would be nothing more than a guess, so I can't answer that question.

Q Okay. And you are aware that from BellSouth's perspective these OSS systems -- I am having trouble

getting this question out -- contain proprietary business information?

A I think that's been shared with me that there is the potential that some of them may have proprietary information in them.

And, again, what you need to keep in mind is that we are not specifically asking for the data that is contained within the databases -- which I believe is what's proprietary, but the functionality of the system, technical specifications relative to the databases; not necessarily, but if there is proprietary data, the data within each of those systems or databases.

Q Okay. So you don't think the descriptions or the functionalities or any of that would be proprietary?

A Absolutely not.

Q Okay. And what do you base that on?

A I base that on the fact that technical specifications, such as database layouts, for example, only define the fields that are contained with the database, not the data. And the data itself is what's defined as proprietary.

Q So the systems themselves and the way that they are structured and the way that they are operated, you can't concede that that might be proprietary?

A Not in the sense of proprietary marketing data.

Q Okay. Assume for purposes of this question that there is proprietary information here. And I just want to understand your position.

If that were the case, why wouldn't it be reasonable for MCI to ask for this on a need to know, as opposed to just asking for all of it?

A Well, the expect -- well, let me answer the question the way you asked it.

If BellSouth was forthcoming with the information relative to what we needed, as opposed to us stumbling upon different pieces of information that are necessary in order to build interfaces, we probably could operate in that mode. But it's been our experience, since we have entered into this process, that information is not forthcoming, and there is often significant delays in receiving information that is necessary.

And I think an example of that would be the SOER edit that BellSouth ultimately provided in December, after we had been into this process for over a year. And come to find out that those edits are necessary in order for you to continue building the interfaces that you have been trying to build for over a year.

Q Okay. So just so I understand your position, you're basically saying that asking for this on a need to know as opposed to asking for everything would be

reasonable if you believed that your requests were going to be responded to in a way that you deem appropriate.

A Yes.

Q Other than the SOER edit situation you just talked about, is there anything else that you can point to as a situation where there was some OSS system or functionality that you needed that you didn't know about until you found out about it later?

A Well, there is a number of databases out there that we have stumbled upon, a few of which are a result of a Florida demonstration that was held, I believe, in this building or another building sometime last year, where we identified other databases, such as coffee databases, and a list of others that I don't have here with me, that are related to BellSouth's operation relative to RNS, that we had no familiarity with.

Q Okay. Can you tell me anything more specifically about what they are?

A Not here today I can't, no.

Q Okay. Once you found out about them, did MCI request them or undertake to utilize them in some way?

A MCI requested similar functionality, which you read in our cases here, which you read in 271 cases going forward. And you get back from BellSouth the fact that those things are not available.

Some of the things that we asked for are as simple as a record layout relative to customer service records which was deemed proprietary at one point, and then at another point unavailable. So you get different stories from BellSouth.

Q Okay. I want to be very specific. In the demonstration, I think -- if I understand you correctly, you are saying that you became aware that BellSouth had available to it databases or functionalities that you didn't know about previously.

A Uh-huh.

Q Okay. Can you tell us specifically, other than the customer layout that you have referred to, anything else that you became aware of that MCI has since put in a request for or obtained or that it plans to use?

A Let me think about that one. Let me make sure I can answer your question.

To the best of my recollection, relative to that demonstration -- I am trying to think through all of the systems right now that I know about, and a list that I didn't bring with me. I can't specifically answer your question relative to that, because I don't have that data here in front of me today.

Q Okay. Now, when you say, this demonstration, are you talking about a demonstration here in Florida?

A Yes.

Q And that's the only demonstration that you are discussing. You are not talking about, for example, workshops in other states.

A Well, the demonstrations are the same for the OSS regionwide. So be it here in Florida, be it in Georgia, or I believe I saw a demonstration in Louisiana as well, they were basically the same demonstrations across the board.

Q Okay. That list that you can't recall today, are you going to review that and refresh your recollection before the hearing next week?

A Yes.

Q Okay. Then in that case, I would like to get a copy of it before the hearing.

MR. O'ROARK: So just so we are clear on the record --

MR. CARVER: As I understand it, tell me if I am wrong, it's a list of BellSouth functionalities or databases that he became aware of through the OSS demonstration in Florida. I guess this would be the one last September that was part of the 271 hearing?

THE WITNESS: I believe so.

MR. CARVER: Yes. Anything he became aware of then that MCI wants or has requested and been refused

or has asked for and gotten and actually uses, basically anything he saw there that MCI believes would be of use to it.

MR. O'ROARK: Mr. Carver, I will say the same thing that you said back in Atlanta last week; that we will make an effort to find that document, if there is one.

We are, as you pointed out, toward the end of the discovery period. So we are not necessarily going to produce a whole host of late-filed exhibits. But in this case, we will see what we can find. I can't tell you that there is such a document.

MR. CARVER: Yes.

MR. O'ROARK: If there is one, we will provide it for you.

MR. CARVER: Okay. And if you want to answer it in the form of an interrogatory, that's fine, too, because all I am really getting to -- I am not trying to shift any sort of huge discovery burden onto you. But I get the impression from the way that the witness is testifying is that by the time we come to hearing, he is going to have some clear, crisp examples. So to the extent he does, obviously, he will know that. So if you will just provide me with that information, so that we can have it in discovery

before the hearing begins.

MR. O'ROARK: Okay. We will take a look at that and get back to you on it.

MR. CARVER: Okay. That's fine.

(Whereupon, Exhibit Nos. 1 and 2 were marked for identification as late-filed exhibits.)

BY MR. CARVER:

Q Now, since that demonstration in September, is there anything else -- basically, the same question on any intervening events or any subsequent events. Since September, has it come to MCI's attention that BellSouth has available to it some system of functionality that MCI wants and hasn't been able to get?

A And I guess I will answer the question this way. I know of a number of databases that are in operation with BellSouth. What I am not familiar with are the functionalities of each of those databases.

BellSouth, while I don't believe that we have asked for them in a specific written request to BellSouth other than through our complaints here as well as, I believe, we asked for it in our -- let me check -- in our November 24th letter relative to general OSS requirements where we asked for this information, as well, back in December from BellSouth. And our response at that stage of the game was -- I believe BellSouth either ignored

that response and gave us no answer or basically said they are not obligated to provide such information. And I am referring to Exhibits 1 and 2 of my direct testimony.

Q So Exhibits 1 and 2 would have all the databases that you are referring to listed there?

A It doesn't list all of the databases. Again, it's a broad general request that BellSouth demonstrate to us those interfaces.

Q Okay. Well, my question is, you said there is some databases, if I understand you correctly, that may have functionalities or information in them that MCI might want. Can you give me a list of those databases?

A I believe that's what we just went through here, so am I back to the same point?

Q No. It's a little bit different. Then we were talking specifically about things that you discovered during the OSS demonstration. Now I am talking about anything that you became aware of at any later time.

A I guess I would have to refer that back to this list that we will either provide to you if it exists -- I don't have that list off the top of my head. I believe it's the same set of lists in the same set of examples, whether I was exposed to them in a regulatory event or demonstration. It's the same grouping.

So what I don't have today, I don't have for what I was informed of in September nor throughout the course of my dealings with BellSouth.

Q Okay. So after September, you can't think of any particular event or time where you became aware of a functionality and said, wait a minute, we want that, or we could use that, or why weren't we told about that? You can't think of any event like that occurring since September?

A You asked the question around databases, and I guess I am going to refer you back to just generic systems functionalities, which was more of the issue there.

When you start to build systems, you're looking for functionality. Functionality is driven by databases or systems that your vendor, BellSouth, has available to you.

So we have identified a number of functionalities that we would want. Now, have we identified them down to a specific database, I guess the answer to that question would be no.

But if you want me to answer the question relative to functionality, I can certainly do that. I mean, they are listed throughout this complaint as well as the other 271 filings.

Q Okay. So these are functionalities that BellSouth has available to it that MCI does not have available to it?

A Correct.

Q Okay. And can you just give me a list of those?

A Telephone number reservations greater than six, access to DID numbers and access to DID trunk information, access to UNE provider status, the individual company that's providing the UNE to a particular customer. We will look for information relative to USOCs. We are looking for information relative to customer service records. We are looking for information that would give us the capability of utilizing information we get from BellSouth systems, which I believe would come from the CRIS database, but maybe it comes from the PSIMS database. I am not sure where it comes from. There is a whole host of functionalities that are there. Integration capability between preorder and order.

Q How do you define the term functionality?

A I define the term functionality as our ability to gain access and utilize information.

Q Okay. So you are not just limiting it to a situation where, let's say, BellSouth ordering system can do something and the analogous MCI system can't. When

you say functionality, you're going beyond that?

A Not really. I think that's encompassed in functionality as well.

Q Okay. Maybe I am just not understanding, because when I asked you about what functionalities, you start telling me about types of information. So are you looking for access to information, is that what it is, that you have become aware of that you don't believe you have, is that things our system will do that the systems made available to you won't? I am just trying to get a handle on what it is we are talking about.

A And what we are looking for is a clear delineation between system and database. And I don't think that that is appropriate, but I will take a shot.

And I will give one example. Your RNS system, I believe, has the capability of providing for your customer service rep particular NSX that is available in a neighborhood or an area.

Now, where that functionality comes from, I believe, from testimony from Mr. Stacy, it comes from the LER or the local exchange routing guide. That's an example of some functionality there that BellSouth has not built into the interfaces it provides to the CLECs, specifically not built or excluded from the development of LENS.

Q Okay. I am trying to think about how to move through this as quickly as possible.

Is there any -- so let me ask the question this way, is there any information or functionality that you believe that BellSouth has that MCI hasn't been given that you don't talk about in your testimony?

A Not specifically, no.

Q Okay. Let's move to count two or issue two. I will ask you a little bit about the SAG data.

Do you know what the current status of the SAG data issue is?

A The current data of SAG, as far as Georgia is concerned, is that BellSouth was ordered as a result of the OSS workshop to provide our SAG downloads to CLECs.

Q Okay. Now, assume that BellSouth complies with that order, is there anything left here for the commission to do?

A Assuming that they provid it to us for regionwide in a format that we wanted, I would believe that there would be nothing left here for the commission to do. However, I will note that BellSouth has not provided MCI with any information relative to the what and the when as to the providing of the RSAG data. There have been no meetings relative to RSAG between MCI and BellSouth.

Q Okay. Now, there is still a payment issue, correct?

A According to BellSouth, there is still a payment issue, yes.

Q Well, we think you should pay, and you don't think you should. So that's what I am calling an issue.

A Then that's the issue.

Q Okay.

A To us, there is no payment issue. To you, there is. But you are right, the way you characterize it.

Q Okay. And your position is that you don't owe anything for it, because it's something we were obligated to do under the contract?

A Yes.

Q And our position -- tell me if this has been articulated to you differently by anybody at BellSouth. But is it your understanding that our position is it was not included under the contract? So if we are going to undertake to provide that, then you need to pay us something to cover the cost of doing so?

A It's never been articulated to me that way. What has been articulated to me by BellSouth and BellSouth account teams is that I believe your interpretation of the contract is that you were provided to -- you're obligated, rather, to provide it to me in an

electronic format and LENS suffices.

Now, since the order relative to Georgia, there is this payment issue, but no one has articulated it the way that you did.

Q Okay. You heard Mr. Stacy's testimony this morning, earlier?

A Yes, I did.

Q Did you hear him say that he believes that the Georgia commission has provided a mechanism to work out the payment issue?

A Yes, I did.

Q Would you agree with him?

A I believe there is a cost docket in Georgia. Cost was never addressed in the OSS workshop. I did -- I do recall them referring to a cost docket, but that's the only information I have. I don't get involved with the cost issues relative to systems development and whether or not MCI should be obligated to pay or not.

Q Okay. So assuming that BellSouth provides the information, and assuming that cost gets worked out some way that the Georgia commission approves, then is there anything left here to do for count two in this proceeding?

A No. There would be nothing left to do.

Q Okay. One thing I wanted to follow up on just

for completeness sake.

Exactly what is it that you could do with a download that you can't do by accessing the information through an electronic interface?

A If that electronic interface, which is the one that's available to date is LENS, the issue with accessing RSAG or address validation information through LENS is that, first of all, LENS is a proprietary interface, which requires me to have LENS on every desk top for all of my customer service representatives, which now means they have two systems that they need to utilize in order to complete a customer order.

One, they have to validate an address, and I would go through the LENS screen to do that. And then I would have to retype that information or rekey it into our order system in order to get that information into our order.

By having to download that information, MCI is now able to incorporate that information into their own front-end systems and integrate it into our preorder and ordering functionality, such that now that information could be prepopulated on a screen similarly to how it happens in your system today. So that we don't, number one, have to access a different system; and number two, rekey that information into the order.

Q Now, would this integrated functionality be included in the -- and I can't remember the letters, but in the sort of national standard system that MCI advocates?

A You want me to help you with the letters, TCP/IP/SSL3, ADIT TCP/IP/SSL3.

Q I thinkg the fourth or the fifth letters were reversed.

A Is that the one?

Q Yes, that's the one.

A Conceivably.

Q Okay.

A Absolutely conceivably address validation. First of all, address validation is a part of the specifications for preorder. And it makes sense to be able to do that in an integrated manner as opposed to having to have that downloaded.

What we need to think about here is really timing and our efforts to get RSAG data. It's been -- without having the dates right here before me, it has been at least a year that we have been addressing this issue with BellSouth, trying to get them to download to us the RSAG database, because we identified earlier on that LENS was too cumbersome, imposed too many hurdles for us to use in a true production environment.

So from a timing vantage point, it is conceivable that you may make the transition from a download to utilizing the information through a true interface that is integratible between preorder and order.

Q Okay. I am just going through the notes here, because some of these things we have covered already.

A Okay.

Q On page 13 in discussing RSAG, you say that access in the database on a transaction by transaction basis causes the ALECs to remain completely dependent on BellSouth for access to the information.

A Is that direct?

Q Yes. I believe. Yes, it's direct.

A Okay. I am sorry, what lines again?

Q It begins -- let's see, it's on page 13, actually, I think the sentence probably starts on 12.

A Okay.

Q You say LENS and ICREF provide on-line access to RSAG data, only on a transaction by transaction basis, and ALECs remain completely dependent on BellSouth for access.

A Uh-huh.

Q And then you go on to talk about an outage, a scheduled outage situation. Other than what's listed

here, this scheduled outage, and other than what you told me about today, does this dependency create any other problems, or is that basically it?

A This dependency on either LENS or ICREF having to utilize a totally separate system to do a single function, and the fact that it's a proprietary interface are the primary reasons.

In addition -- well, you know, there is a number of reasons. I have to go through multiple screens in order to get to address information every time I want to do it. So if I had to list the issues relative to LENS, it would be response time relative to LENS, the fact that LENS is proprietary, the fact that LENS requires me to have my service reps utilize multiple systems and multiple interfaces, not only from BellSouth, which would be one, but potentially from other ALECs as well; having to rekey that information in, and having to go through LENS and do sign on and do address validation to get to that information. And address validation is truly accomplished in LENS with a phone number.

Q Okay. Aside from the LENS specific issues, though, is it fair to say that accessing the BellSouth database on a transaction by transaction basis, in and of itself, isn't a problem?

A Outside of the LENS front-end?

Q Right.

A Today, it's a problem. The anticipation in the future with BellSouth moving to a standard EDI TCP/IP interface should not pose an issue for us.

Q Okay. The schedule, the outage issue here, I think, is independent -- well, we will get into the substance of it in a second. Now, let me ask you, first of all, that's independent of LENS, correct?

A Actually, this 42 hours a week, I think, is not 100 percent accurate relative to the address validation portion, itself. This 42 hours worth of downtime per week is the total amount of downtime for all systems available by BellSouth that we would have been required to go through at the time in utilizing LENS to submit an order.

So this downtime total represents weekly downtime of LENS, weekly downtime of DSAP, weekly downtime of RSAG, weekly downtime of I believe it's called the PSIMS file, weekly downtime of the LEO system, weekly downtime of the LSOC system and weekly downtime of the SOC system.

Q And to get an address from the BellSouth database, you have to go through every one of those systems every time?

A No, you don't. You have to go through the LENS

system, and you have to go through the -- I believe the only two I have to go through is through the LENS system and through the RSAG database to get address validation.

Q Okay. Now, the LENS system, you heard Mr. Stacy say -- I am sorry, not LENS. The address validation system you heard him earlier say was only scheduled to be down four hours a week?

A Yes, I did hear him say that.

Q Do you have any reason to believe that's wrong?

A I would have to refer back to -- that -- all of that information is printed on the BellSouth web. So if Mr. Stacy said it's four hours, I would tend to believe him.

Q Okay. The LENS, how much is it down per week on a scheduled basis?

A I would have -- I don't have that information here in front of me. I would have to check that.

Q And is the RSAG database, aside from LENS, is it -- well, I guess the RSAG database is really -- that would be the same as the address validation system?

A Yes, that is the address validation system.

Q Okay. Now, the use of CGI LENS allow the ordering and the preordering to be integrated?

A No.

Q Why not?

A Well, I guess I should state it this way, from MCI's experience, we have had little success with totally being able to utilize the CGI specifications to truly get the level of integration that we are looking for.

MCI requested the CGI specs from BellSouth sometime early mid-1997, actually got the updated version or the most current version, I should say, in the December time frame. And our intent with the -- I am sorry -- with the CGI specifications was to use that to be able to pull customer service record information from the BellSouth database.

Once we embarked upon the utilization of the CGI specifications for that, we quickly uncovered that there was not enough information in the CGI specifications to allow us to effectively integrate the information that we are receiving from the BellSouth system into our own ordering systems. So I would have to answer the question, based on our experiences, no.

Q Okay. And, again, what efforts have you made to integrate them?

A We have taken the CGI specifications, we have incorporated those to give us the capability of pulling the data from BellSouth's system for CSRs, and we are able to display that information on a screen.

Q Okay.

A We are not able to incorporate that information into a usable database, however.

Q Why not?

A Because the data is unparseable, and BellSouth has refused numerous times to provide us with the record layout, or as Mr. Stacy characterized it in his deposition, the SKEMA for the data that would allow us to parse it once we got it.

Q So is that a CGI interface problem, or is that a problem with the data you are getting?

A Well, it's relative -- I think it is all related. I can't truly separate it.

When you ask if it's integratible, truly what you are looking to integrate is the data that you receive from your vendor. And if you are unable to integrate that data, then it makes those interfaces non-integratible, to make it machine to machine.

Machine to machine would give you the capability of taking data from one place and populating data from another place upon demand. And the CGI specifications relative to CSR, as we have tried, does not give us that capability.

Q But that's because of the flow of CSR data, though, correct?

A It is because of the reluctance by BellSouth to

provide us with the data necessary, in order for us to make effective use of that data.

Q Okay. What I am trying to get to, though, is it's not a technical problem with the CGI interface itself, if I understand you correctly. It's rather an issue of BellSouth not giving you information or data that you believe you need to make it workable.

A Well, according to BellSouth, all of the information --

Q Could I just have -- I am just trying to clarify, is it a CGI interface problem, or is it you are not getting data you need problem?

A It's a CGI problem.

Q Okay.

A And it's a CGI problem based on the way it's been characterized by BellSouth, such that the CGI specifications has all the information you need in order to integrate our LENS system with the ordering functionality that MCI has built. And that's not true.

And we view the CGI specifications as being all encompassing; not only of the specifications, the technical specifications that says, send us this information this way and you will get back that.

The information truly that you get from that -- unless you're able to interpret it -- is useless, which

is the essence of building the interface anyway. So it's really difficult, or I would say nearly impossible to separate the usefulness of the data that comes across the interface and the interface itself.

Q Let's put it this way, if you got the CSR layout information that you want, would the interface be usable then?

A We believe it would be, for CSR.

Q Now, we will get into this in greater detail later, but tell me for CSR, you used the word, parse, before, how do you define that word?

A I define parse as the ability to separate groups of data into their discrete usable forms. In other words, I would be able to parse first name from last name in data that float downstream.

Q Okay. Refresh my memory, which issue is this, the CSR; because I know that was dealt with separately. Do you remember offhand?

MR. O'ROARK: Six, I think.

MR. CARVER: Six. Okay. We will come back to that.

MR. O'ROARK: Yes.

BY MR. CARVER:

Q Six?

A Yes.

Q Okay. I am going to talk to you a little bit about count four, television reservations.

A Telephone number.

Q What did I say?

A Television.

Q Oh, okay. You knew what I meant.

Now, you testify on page 21 that LENS only allows a customer service representative to reserve six at a time, correct?

A That's accurate, yes.

Q Now, you heard Mr. Stacy's testimony on this point earlier today, also, correct?

A Yes.

Q And what he said is that after you have reserved six, then you can go back basically two clicks earlier, begin the process again and reserve six more in the same session and six more and six more and six more. Is that the way you understood his testimony?

A That's the way I understood his testimony. I don't know about the number of clicks. But Mr. Stacy is accurate in saying that I could leave that screen and come back and reserve an additional six numbers, but a maximum of six per reservation.

Q Okay. So in a single session, you could get as many numbers as you wanted. You would just have to go

back and forth between screens to do it?

A Yes.

Q Okay. And with RNS, the number 25, is that a maximum that can be obtained in a single session?

A I believe that's a self-imposed maximum on -- by BellSouth, I believe.

Q When you say self-imposed, I mean, that's the way the system works, right?

A Right. I guess what I mean by self-imposed is they decided on that limitation, it wasn't some industry imposed limit.

Q Now, LENS allows access to the Atlas system database for phone numbers, correct?

A You said LENS?

Q Yes.

A Yes, it does.

Q And that's the same database that BellSouth uses, correct?

A For telephone numbers, yes.

Q And EC-Light would also allow access to it?

A Yes.

Q Okay. Let's go into USOC information. In his rebuttal testimony, Mr. Stacy says, as of June 8th, 1998, the USOC information that you requested is on the BellSouth web site, and it can be downloaded.

A What page number, please?
Q I can look it up for you.
A Don't worry, I thought you had it.
Q No. It's just from my notes.
A I believe that's what he says in his testimony.
Q Okay. Do you know if that's true or not?
A The way it is characterized by Bill Stacy, it is true. Whether or not it was usable at the time is an entirely different issue. But subsequent to that, BellSouth has provided to us -- while it's not implied in Mr. Stacy's testimony, I don't believe -- they provided us with the USOC information via what he termed earlier today as the comma-separated value file, which is what we asked them to do, which has now made this information usable for MCI.

But the issue that remains is associated information relative to USOC for FID or feature identifier or field identifier, as well as state validity, which BellSouth has not put in a similar CSV format for us to download.

Q And that information, the fit information, the State identifier, that was not on BellSouth's web site?
A I believe that information was on BellSouth's web site, and that information as it exists on the web site is not usable.

Q Okay. So it's the separated value file that has rendered a portion of that information usable, but not all of it; is that your position?

A Well, yes and no. BellSouth has always had these two pieces of information separate. They would provide the USOC information in one file database. And then they would provide, in a separate file, the FID and state validity information; State validity being that this USOC is good in this state, but it's not good in another state.

So those have always been separated. So you always had to go to multiple places in order to accurately assemble all of the information necessary to place an order.

What we have asked BellSouth to do is to provide us with this information in a usable format -- on the web is fine -- because we can download it if it is in the right format. The format that we asked them to make the transition for USOC as well as for FID they have made, but they have not made that same transition for the FID information.

And I think this issue could be easily resolved if BellSouth just changed that format to the CSV format. We can download it, we can incorporate the date, and we can submit orders to you -- at least for USOCs -- air

free. So it's a real simple request.

Q Okay. Let's go back to his testimony, it's on page 16.

A Direct or rebuttal.

Q Direct. It may be rebuttal. Rebuttal.

A Sixteen.

Q Yes. Line 14.

Now, he says that the -- that on that date, the USOC information on BellSouth's web site is now available in an additional format, which is a generic format that will enable customers to import USOC information into spreadsheets and databases as MCImetro requested. Now, I read that to mean that it's usable.

A Yes. That's that CSV format that BellSouth agreed to put the USOC information in.

Q Okay. So your complaint, as I understand it now, is that the FID information hasn't been put in the same format.

A It's not a different complaint. It's just an offshoot of the fact that they only did one piece as opposed to the whole piece.

Q Okay. So it's the FID and the State verifier?

A I term it the State validity.

Q Okay. And is that in a third document?

A State validity?

Q Yes.
A FID and State validity are in the same document.
Q Okay. In terms of why you need this information -- and I am looking at page 24 of your direct testimony -- you say that ALECs are experiencing higher rejection rates and BellSouth's retail units and USOCs are the biggest culprit?
A I missed it. Page 24?
Q That's line 18 where I started reading, ALECs are experiencing much higher rejection rates?
A Uh-huh.
Q What's your basis for making that statement that USOCs are the reason for the rejection rates?
A Comments made by Bill Stacy identifying reject rates or reasons, number one -- the number one and number two reason for rejects being bad fit in USOC and bad address validation.
Q Do you know what MCI's reject rates are?
A Today, MCI probably has very little reject rate relative to USOCs, because we are not currently submitting orders via these interfaces to BellSouth.
Q How are you submitting the orders?
A Right now, orders to BellSouth go through R4 ASRs across NETPRO today.
Q So when you make the statement that on page 24

lines 18 and 19 about what ALECs are experiencing, you are not including MCI in that? You are talking about other ALECs?

A When MCI gets the EDI system up and operational, if we don't have this functionality, we would expect to experience similar rejects to those that are utilizing BellSouth systems to submit orders.

Q Okay. But my question was, are you referring here to other ALECs?

A Well, MCI has some experience in reject rates relative to orders. So here while I am referring to other ALECs, we do have experience from earlier ordering of BellSouth.

Q Earlier ordering through electronic interfaces?

A Through a LENS interface.

Q And what was the time frame for that experience?

A This time last year.

Q What reject rates did you have then?

A I don't know, but I would be -- I am sure we can dig up that old history.

Q Do you -- did you analyze that information to see if USOCs were the reasons for the rejections?

A I don't recall whether we did or did not.

Q Okay. So as you sit here today, you don't know that that was the reason?

A I don't know.

Q Okay. Now, in his testimony, Mr. Stacy says that some ALECs are experiencing only 10 percent rejection.

A Okay.

Q Now, for purposes of this question, assume that's accurate. Is that an acceptable rejection level; do you believe?

A I can't -- it's real difficult for me to address what's an acceptable reject level. An acceptable reject level, because of ALECs failure or refusal to provide information that is necessary in order to circumvent rejects, I would say that, no, that is not an acceptable reject rate. If that reject rate is due to some flaw in what the CLEC is doing to submit an order to BellSouth, I would say the jury would still be out on whether 10 percent was an acceptable number.

Q Well, aside from the reason for it, is there any number at which you could say, this is a good rate of orders going through and the numbers that are being rejected? I mean, if it were 99 percent, could you say that would be acceptable without getting into why the one percent didn't go through?

A I would have to refer back to whatever performance measurement data we have, where we would

utilize historical information. BellSouth could take a look at their reject rate. And to ensure that the reject rate that they were experiencing was similar to that same reject rate that a CLEC would be experiencing.

Q Okay.

A So I can't pick a number out of the air and say, 10 percent is acceptable. I can't give you a yes or a no to that.

Q Okay. So whatever number would constitute parity, that would be the acceptable number?

A Yes.

Q Okay. Let's turn to issue six.

A CSR.

Q Yes. Television information.

A Been there before.

Q Okay. On page 18 of his rebuttal --

A Mr. Stacy.

Q Yes. Mr. Stacy gives a list of CSR information that is being provided.

A Okay.

Q Do you agree that all of the information he lists there on lines 12 through 22 of page 18, all of that is, in fact, being provided?

A Yes.

Q So what is it that you want that's not being

provided?

A That's another list that I truly don't have. When -- I was the one who worked on the CSR stuff, so this one -- BellSouth and MCI sat down, and BellSouth instructed MCI what fields it was going to provide relative to a CSR.

And they actually provided to MCI a list of the fields within a CSR and determined unilaterally, I would say, what was available or -- I am sorry, necessary versus unnecessary versus proprietary. And it was a unilateral decision at that time.

And MCI, being a carrier who, I think, has the wherewithal to determine what's necessary, doesn't believe that BellSouth should be allowed to unilaterally decide what information it provides versus what information it doesn't. There is a list that was provided by BellSouth.

Q Okay. What is it that MCI wants that you are not currently getting?

A I can list at least one thing that stands out in my mind that we would want and we are not getting, and that is calling card information.

Q Okay. And that would be, what, information regarding the particular customer's calling cards?

A Information regarding the number of calling

cards associated with this account, who those calling cards are assigned to.

Obviously, if you are going to make a transition of a customer from one service provider to another, you would want to keep the services the same.

Q Okay. Anything else?

A Not that I could run off of the top of my head. But, again, similar to the other requests, we can provide that list of CSR fields and information types that we think are necessary.

Q Okay.

MR. CARVER: Let's make that a late file, then.

MR. O'ROARK: That's fine. I think that's one that's actually been an exhibit in another proceeding; we can dig it up.

MR. CARVER: Okay.

(Whereupon, Exhibit No. 3 was marked for identification as a late-filed exhibit.)

BY MR. CARVER:

Q Mr. Stacy's position on behalf of BellSouth is that you're already getting everything, except pricing information. I take it you are saying there is something beyond pricing information that you're not getting?

A Yes.

Q Okay. And that's the list that you are going to

provide me?

A Uh-huh.

Q Okay. Do you object to the fact that BellSouth does not give you pricing information?

A Well, I guess I would say, in Florida, that's true. In Georgia, they have been ordered to do so.

And our objection in Georgia would be the same for Florida, in that we do object to BellSouth not providing us with pricing information.

Q Well, you say they have been ordered in Georgia; you are talking about the OSS docket, okay?

A Yes.

Q Not -- well, I don't want to ask you too much to interpret that order. But whether a confidentiality proprietary restriction is placed on the conveyance or the use you would make of that information?

A No.

Q Okay. So it said -- so your representation is that the Georgia order says that we can give you all of the information regarding pricing of the services we provide to customers, and you could do anything you want with it?

A Basically, it says, calling from recollection, that BellSouth shall make available to MCI, or to CLECs rather, not to specifically MCI, pricing information

relative to the products and services provided to a customer.

Q Okay. So for individual customers, it's your testimony that we have to tell you how we price the things that they buy.

A You have to provide us with the pricing information. I mean, if you consider that telling us. What you do today is you strip that information off of the CSR before you provide it to us.

Q Okay. What is your understanding -- you keep saying, pricing information. I am trying to figure out exactly what that is. Is that the price of the individual services that individual customers of BellSouth purchase today? Is it your understanding that that's what we have been ordered to provide in Georgia?

A It's my understanding -- I mean, I guess it depends on how you would determine price. Price is what a customer pays for services. That's price. I mean, it's real straightforward and simple.

Q So is that a yes, then? That's your understanding of what we have been told to provide, individual prices for individual services purchased by individual customers?

A That's my understanding.

Q Okay. And it is your understanding that that

order doesn't place any sort of restrictions on the use that you make of it?

A That's my understanding, as well.

Q And that there is no sort of proprietary protection whatsoever.

A That's my understanding as well.

Q Now, the Georgia order, again, doesn't deal with this from a contract standpoint, does it? In other words, the OSS order did not reach any sort of determination that MCI has a contractual right for this information?

A Again, I guess I characterized that Georgia OSS workshop as a collaborative effort put forth by the Georgia commission. That included not only MCI, but all other industry participants, to decide what functionality, what capabilities, what things you needed from the vendor in order to have a meaningful opportunity to compete.

So there was never an issue where there were contract-related terms or conditions that came up as a result. So it wasn't a specific MCI and BellSouth hearing.

Q So that would be a no?

A Yes. Yes, that would be a no.

Q Okay. I am just trying -- if you can give me

your answer before you explain, that would be helpful.

A All right. I apologize.

Q Okay. Why does MCI want this information?

A MCI wants this information because, first of all, it's public information anyway. It is all tariff pricing. Whether we go to the tariff to get it or whether it is going to the CSR, I don't think drives any proprietary issues within BellSouth.

It also gives us the capability of potentially coming up with unique products and services relative to what a customer is doing as well.

What you may ultimately come up with in the future by having this information -- I don't think that I can, you know, safely say all of the reasons. But it was identified as a major issue by our marketing contacts and our marketing people in the field, because this information was all of a sudden stripped from the CSR and this information that they had been used to receiving for years from BellSouth. And that's -- go ahead, I am sorry.

Q So basically, it's your marketing people who want the information?

A Our sales people want the information.

Q Okay. So -- and I assume they want it so that they can target what they perceive to be the more

profitable customers?

A Absolutely not, because you can't mine a CSR database in order to do prospecting. So any customer that we would be accessing the CSR for is a customer who has provided us permission to access that CSR. So mining is absolutely not an issue here relative to pricing information on a CSR.

Q My question was, do the marketing people want this information so that they can target the more profitable customers?

A And my answer to your question is no.

Q Okay. What do they want it for, then?

A I thought I just said that. The reason we want the information, pricing information on the CSR, number one, is so that we would know accurately what a customer is being billed for services.

Oftentimes, when you deal with a customer, they do not know what products and services, number one, they have in all instances; number two, what rates they are being charged. The CSR, with the pricing information, gives us the capability to, number one, convey that information to a customer; number two, that information, we have the potential of auditing what you charge us for services, because I believe that there is some discount off of the retail rate. So it would give us that

capability as well looking at a customer account.

So I can audit, I can help a customer know what their pricing is, I can determine from a customer how to cut their bill by 10 percent, because they don't need a service.

It's a number of things that you can do. I would say the possibilities are endless.

Q And you are going to do this for our customers, or do you anticipate that you are going to win those customers by the use of this information and then help them with their bill?

A I know it's not fair for me to ask you a question. So, I mean, I won't. I don't know what you mean when you say, our customers.

Q Well, if the information relates to a BellSouth customer, that's what you want; you want information about what BellSouth charges the customers that it currently has for the services that they have, correct?

A That information is tariffed information today. What you are asking us to do is take an extra step.

Q You need to answer my question. That's what you want, correct?

A I am sorry, you have to restate the question.

Q Information about what BellSouth charges customers that are its customers today, the individual

customers, individual services, that's what you are asking for, correct?

A I am asking for BellSouth to include the tariff pricing that they charge customers on the CSR.

Q On individual customers?

A Yes. CSRs are by individual customers.

Q Well, you said yourself you wanted to know the tariff price; you could just go look at the tariff, right?

A That's one place you could go do that.

Q Okay. What you want is additional information beyond what you would get from the tariff --

A I would consider --

Q Let me finish my question. What you want is additional information about what individual customers order, right?

A That information would already be available on the CSR, what services a customer orders.

Q And the price for those services, that's the information you want for individual customers, correct?

A We want the tariff pricing for products and services sold to a customer on the CSR.

Q Well, what an individual customer purchases and what they pay for it, you can't get that out of a tariff, can you?

A The part that I guess I can't get out of a tariff would be what a customer purchases.

Q Well, okay. So you are saying that you could get the CSR and you could look at what the customer purchases, and you could reconstruct the price from looking at the tariff?

A Yeah, with much diligence, I suppose that's exactly what we do today, and do a path in that information provided to us.

Q Okay. So you could -- in your view, you could get the information you are looking for without having BellSouth give it to you?

A I would say that the information exists.

Q And you could obtain it in your view by comparing the tariff to comparing what you're provided?

A By going to the tariff and looking at those prices and doing a comparison back to what's on the CSR for a customer. And when you start to look at the large customers, customers with a lot of products and services, the amount of time necessary to do that could be extremely long.

Q That was a yes, you could do that?

A I think so.

Q Okay. Now, you say that the marketing people don't want this to target the high margin customers. How

do you know this? Has anyone in marketing, who's asked for this information, made a statement to you to that effect?

A Well, I know this because we can't access a CSR without customer permission. So there has to be some marketing intelligence that we use to target customers well in advance of acquiring the CSR.

Q Explain to me how that process works.

A I don't have any familiarity with that process. I am not in marketing.

Q Okay. Well, when you say you can't access the CSR without the customer's information, what do you mean?

A That means we have to have an LOI, a letter of -- an LOA, I am sorry, a letter of authorization from a customer in order to access a CSR, and that there are guidelines put in place by the FCC second order that put the proof of burden on the CLEC, should there be an inquiry as to whether or not they were accessing CSRs without customer permission. So the ruling here at MCI is that you have to have LOA before you access customer CSRs.

Q Okay. So it's your testimony, then, that in every instance in which you request BellSouth to provide you with CSR information, you already have an LOA on file signed by that customer? Could I have a yes or no,

please?

A I am going to say no. BellSouth -- MCI has a blanket LOA with BellSouth. So from the BellSouth vantage point in every instance, we should -- I guess I am going to take that no and say I don't know if we do or if we don't.

The process is, we should have permission from a customer before we access their customer service record. Now, whether or not that is a recording based upon some third party verification process that we use to capture the fact that we got permission from a customer or whether or not that's something written by the customer, I can't say which of those two processes we employ or whether or not we employ both.

But I will say that the process dictated through MCI is that there is no access to CSRs without permission from a customer.

Q Each and every customer individually?

A Each and every customer.

Q Okay. So it's your testimony that this CSR information you want in some form, although you are not aware of what the form is, you have the permission of every one of these customers for MCI to have that information?

A Yes.

Q Now, what document would evidence that?
A I am sorry, evidence what?
Q The fact that you got that permission from the customer, or is that one of the things you don't know?
A I don't know if I am following the question. A document, this letter of authorization, this blanket LOA we have with BellSouth?
Q Well, if I want -- okay. You're losing me when you talk about a blanket LOA.
A Okay.
Q Do you have to have permission from every customer individually?
A Yes.
Q Okay. So if I want to find out whether or not you had permission to get the CSR for John Smith, how would you find out if you did or you didn't?
A Well, first of all, the FCC would initiate an investigation; at which point, we would have to produce specific information relative to permission to access a CSR. I don't have one document or a host of documents that says, here is this stack that are signed, and these are the customers that we have accessed. I don't have access to that information.
And, again, it could be written, or it can be recorded information. MCI houses that information, and

if the FCC were to initiate an investigation, we could produce the necessary information to prove that our accessing of CSRs is within the guidelines of the law.

Q Okay. So if you undertook to find out whether there was an LOI for John Smith, personally, as you sit here, you wouldn't know how to do that?

A Yes, that's true, I would not.

Q Okay. And just so I am clear on this point of your testimony, the reason why you contend that MCI doesn't want this to target high margin customers is because they have an LOI that says the customer information could be given to them; is that your testimony?

A No, that was not.

Q Okay. Then tell me again. How is it that you know that that's not the reason why MCI wants this information about what particular customers are buying and paying for what they buy?

A In MCI's marketing process, they identify target customers for service. Once they have identified that through whatever means they do, be it, you know, if they are high long distance customers or if, you know, whatever other marketing intelligence they can gather from a customer, cold call, whatever the case may be; that process would happen before you could access a CSR,

because, again, you have to have permission from a customer to access a CSR. So MCI just does not arbitrarily access CSRs to mine high value customers.

Q So it's your testimony that MCI would do some sort of marketing intelligence, I think you said, to figure out who the high volume customers are. And then, and only then, would they go through the steps necessary to procure the CSR information for those customers?

A High volume and any other customers they target, yes.

Q Okay. Well, I don't understand the reference to high volume.

A Well, you allude to high volume. MCI markets to all customers ubiquitously. So there are marketing approaches that we will make sales to all customers. So we are not -- we are not isolating customers from the profile.

The testimony here is this --

Q But wait a minute, though. I thought you told me before that MCI's marketing process involved targeting particular customers.

A They target customers for some products and services. For general long distance services. They sell to everybody. I mean, depending on what you are selling to the customer, be it Internet services or data services

or just general long distance telephone service will determine from a targeting vantage point what product and service you offer to that customer.

But generically, MCI sells services to all customers and before acquiring or accessing the CSR, has permission from each and every customer before they access a CSR.

Q Well, if MCI is trying to sell to all customers, then wouldn't it seek to obtain that information from all customers?

A I am sorry, what's, the information?

Q This information in the CSRs?

A Maybe I am talking past you.

MCI's process before acquiring the CSR is to get permission from every customer, period.

Q Okay. How do you decide whose CSR information you want and who you don't want?

A Based on customers that give us permission to access it.

Q Okay. So you ask everybody for permission?

A If we are making a sale to the customer, absolutely. Customers don't generally just say, here, access my CSR.

Q Okay. So then basically any customer that would give you their CSR information, you would want it; and

then once you have it, you can look at it and determine whether they are generating a lot of profit based on what they are buying, correct?

A I can't answer that question.

Q Why not?

A Because I think it is very misleading, and you want a yes or a no. The way the question is characterized is, we get permission, we look at a CSR, they are not high value customers, we don't sell to them.

Q Well, let's assume that you are moving in a local market and you have limited resources. Wouldn't you assume that you are going to expend those resources trying to sell to the customers who will be the most profitable?

A MCI's marketing strategy, as best I know it --

Q You are just not going to give me yes or no's, are you?

A You know, it's really difficult for me to give yes or no to these types of questions, I mean, because they are not yes or no questions.

Ask the question again, I will try to answer yes or no.

Q Okay. You basically said MCI sells to everyone. And my question is, if you have limited resources and you're entering the local market, wouldn't you expend

those limited resources trying to get to the customers who will be the most profitable to serve?

A Because I am not the sales manager, I don't know how they would deploy their resources if they had limited resources. So I guess my answer to that question is, I don't know.

Q Okay. I am going to take one more pass at this.

Specifically, how do you go about obtaining the LOIs from customers?

A I don't. I'm sorry, go ahead.

Q No. How --

MR. O'ROARK: Counsel, excuse me, counselor.

THE WITNESS: I don't know. I am not the marketing representative.

MR. O'ROARK: You are referring to LOIs. I think you mean to refer to LOAs.

MR. CARVER: Yeah, or whatever.

THE WITNESS: I don't know what the specific process is that MCI utilizes to go through it. I think I alluded to a couple of processes that could be used. One is third party verification, one is written permission from a customer.

Specifically, I don't know.

BY MR. CARVER:

Q But in terms of which customers you would request written authorization from, you don't know how that decision is made?

A No, I don't.

Q Okay. So you don't know if you just try to get it from everybody or particular customers?

A No, I don't.

Q Okay. One other question on this same area, you say on page 26, line four.

A Direct or rebuttal.

Q Direct still. You say ALECs may be able to use this information to design new services BellSouth has not even thought of.

Is that your testimony there?

A Yes.

Q Explain to me how you would use the pricing information, that is basically what BellSouth charges its customers, to design a new offering that BellSouth hasn't even thought of?

A I think it's mentioned there in the context that we could.

Again, I think I mentioned that there is a number of scenarios that some creative soul may be able to identify it. I don't have specifics on what that product or process would be that would allow us to do

that.

Q Okay.

MR. CARVER: Do y'all want to take a break at some point?

MR. O'ROARK: It's about time for one.

(Brief recess.)

BY MR. CARVER:

Q Let's go to issue seven, and let me ask you, when did MCI request electronic notification of jeopardies?

A I don't have the specific date. It was early in our EDI development for a version BellSouth defined six dot two, early, mid-'97.

Q Was that --

A I don't have a specific date.

Q Was that done by way of some particular document?

A As a matter of fact -- I don't recall if it was by document or by E-mail or by some other means of communication to the BellSouth account team.

Q Okay. Are you sure that there was a formal notification in writing of some sort?

A Yes, I am sure.

Q Okay.

MR. CARVER: Can I get that?

MR. O'ROARK: You may. It may be attached to Mr. Green's testimony.

MR. CARVER: Okay. Well, the reason I ask is that Stacy says there was no such notification. And I mean, it should be pretty easy to clear up, I would think.

MR. O'ROARK: One of the exhibits to Mr. Green's testimony refers to it, that might shortcut things a little bit.

MR. CARVER: Okay.

MR. O'ROARK: Would you like us to find it now?

MR. CARVER: Yes.

THE WITNESS: Well, I have one issue eight that talks about electronic jeopardies, rejects and loss notification on a document dated September 1997. That's Exhibit BG8.

MR. O'ROARK: That's the one I was thinking of.

MR. CARVER: Okay.

THE WITNESS: Okay. And that letter is from my vice-president to BellSouth's vice-president of sales, which means that the issue was worked down at the lower levels before it was escalated up to the VP level for resolution or attempted resolution.

BY MR. CARVER:

Q Okay. So when you say that MCI requested

electronic notification of jeopardies, this document is that request, BG eight?

A I guess I would characterize it as the culmination of a number of requests.

Q Are there any other written documents in which this was requested?

A Yes. We would have to go back and look for them. I will check through documentation; I have to find that.

MS. BEDELL: Okay. I am sorry, are you asking for another late-filed exhibit?

MR. CARVER: Let me make sort of a half-way request. If it can be located easily, I would like to see it. But I don't want you to have to look through a bunch of documents. This is frankly not that big a point.

MR. O'ROARK: Okay. We will take a look, and I will notify you one way or the other.

MR. CARVER: If it doesn't take a lot of time, this is not a crucial point. I just wanted to clear that up.

MR. O'ROARK: Okay.

BY MR. CARVER:

Q Now, in order to make this process work -- and when I say, process, I am referring to the electronic

notification of jeopardies -- what would MCI need to do on its end?

A Code specifications provided to us by BellSouth.

Q Okay. And do what with the specifications, I didn't understand?

A With EDI, there is a process called mapping, where we map the specifications into the interface that BellSouth provides us. So what we would need to do in order to map the specifications for service jeopardies is to get, number one, the specifications or business rules from BellSouth; code those into the interface; and then test functionality across the interface to BellSouth.

Q Okay. Before you get the specs from BellSouth, is there any kind of preliminary software development that would need to be done?

A No.

Q Okay. So at this point, has MCI done anything to develop the capability that it needs on its end?

A MCI can't develop this functionality without BellSouth. Since -- we are trading partners, but BellSouth is truly, you know -- and dictate may be too strong of a word, but they definitely decide what functionality will be available and what functionality won't.

So it's impossible for us to code in advance of

having what's defined as the business rules or specifications for the functionality from BellSouth in advance.

Now, this functionality service jeopardy, let me be more specific, has a -- what I will term as a subling called missed appointment jeopardies, that BellSouth has coded for in this edition of EDI and has left off the capability of supporting service jeopardies in this same version of the interface.

Q Now, is MCI requesting interim codes in advance of the development of the national standard?

A Yes, we are. And codes would be numbers, letters, numerics, whatever, that would give you a quick -- what I am going to term as a Morse Code definition of what happened with your order, no facilities available, bad payers, whatever the specific reason for the service jeopardy is.

So in advance of standards -- and I am not really positive that standards will define the actual codes that will be used. But if they do, then, the answer to your question is yes, we are asking for those in advance of the industry standards.

Q And do you know when the industry standards will be developed?

A I believe service jeopardies are in the EDI

version 10, local service ordering guide four, which is scheduled for vote early '99, somewhere in that time frame. I would say, to be safe, by first quarter.

Q Okay. So you are asking for codes to be developed and basically just be used for, what, I guess a five-month period?

A Well, once it's approved, then you have implementation, which could take about six months. So we could conceivably be looking at a year from now. And, again, in the context of time, while it may seem that five months is insignificant now, this, again, has been one of those requests that has been lingering for some time with BellSouth where we tried to move and to get this functionality included when we first began development with EDI.

Q Now, if the national standards differ from the interim codes, do you agree with Mr. Stacy that that would require both BellSouth and MCI to rewrite and recode their respective sides of the interface?

A Yes. If we wanted to stay consistent with the standard. I mean, if the people who were using the interface, those being the players in the region, decided that the functionality was not that great to dictate the expense necessary to making the transition to be -- I guess I would term industry compliant at that time --

it's conceivable that we might all agree to say that, for this functionality, we are not necessarily concerned about the industry standard here.

So there is a potential -- the answer to your question is, yes, but -- again, it would be a partnering approach at that stage of the game to determine whether we move forward or not and in what time frame it happened.

Q You say when we move forward, are you talking about the CLEC group or BellSouth?

A The CLEC group.

Q A couple of brief questions on issue eight, and this is the one we discussed earlier with the T1 ordering.

If MCI ordered MegaLink as a result service, would that provide the same functionality as a T1?

A MegaLink, MegaLink. MegaLink is BellSouth's T1 partner, correct, resell? Define MegaLink, I don't --

Q You are not familiar with MegaLink?

A I am not familiar enough to know whether or not it would provide me with the same functionality, and I hesitate to answer that because I don't have all of that information for MegaLink.

Q Okay. Do you know why this is ordered as a T1 rather than ordering a resold product that would provide

that functionality, whatever it might be?

A Well, I mean, it's ordered as a T1 because that's the functionality that's necessary in order to provide the service to the customer. If your question is -- I think where you are trying to head, and maybe I am wrong, maybe I am not -- the question is why am I ordering -- why am I not ordering that service from the resell product line?

Q Not exactly. Why don't I just ask another question.

A Okay.

Q Are you ordering the T1 from the access tariff?

A Yes.

Q Okay. Now, this may be outside of your testimony. If so, just tell me. You talked briefly about the FOC process and how long it takes BellSouth to send FOCs to MCImetro?

A Uh-huh.

Q Does your testimony encompass whether FOCs apply to items ordered from the access tariff, or is that beyond the scope of your testimony?

A I don't believe my testimony goes into that.

Q Okay. Do you take a position on that? I will ask it that way.

A I would ask you to restate your question for me,

please.

Q Okay. Do you have an opinion as to whether the FOC process covers items ordered from the access tariff?

A The FOC process absolutely covers services ordered out of the access tariff.

Q Okay. And what's your basis for that opinion?

A I believe there is -- even in the access tariff, there is timing around when a FOC should be returned, in effect, that a firm ordered confirmation should be returned for services orderd --

Q So in the FOC process, it would apply to orders out of the access tariff as whatever process is set forth in the tariff?

A Well, my --

Q Could I have a yes or a no?

A You know -- the answer to the question is yes.

Q Okay.

A Now, let me explain what I mean there.

There is an identifier that goes on a service that would identify whether or not the services are being ordered by MCImetro, which would be the local company, or MCIt, which would be the long distance company. And I believe this is more broadly covered in Mr. Martinez' testimony than in mine.

The expectation under the interconnection

agreement is that services ordered for MCIm are bound by what I am going to define as the performance measurements relative to firm order confirmation timeliness.

Q And is that your opinion, or is that the opinion that's been communicated to you by --

A Now, what you asked me at the beginning was my opinion. So that is my opinion.

Q Okay. And is there some particular -- at the beginning of this examination, you told me that you weren't testifying specifically about what the contract required. And it sounds to me like we have gotten into that area.

A No. What you asked me was, whether or not I had an opinion. Now, I shared my opinion with you. The resident expert or the one that would define contract interpretation is Ron Martinez.

Q So what is your opinion based on?

A Let me say that, then, I don't have an opinion relative to this, and I will leave that testimony to be addressed by Mr. Martinez.

Q Okay.

MR. CARVER: That's all I have got.

EXAMINATION

BY MS. BEDELL:

Q Mr. Green, my name is Cathy Bedell, and I

represent the PSC staff.

A Hello, Cathy.

Q And we are going to start with issue one.

A Okay.

Q Some of these are covering, of course, some of the same things we have covered already today. But if you will just bear with us, we might be able to get through it in a more organized fashion that way.

On page nine of your direct testimony, you state that MCI is unable to interpret the CSR data obtained via the common Gateway interface because it's transmitted as a continuous string of characters.

What information or what format does MCI need in order to be able to parse the information so it can be presented on an MCI customer service rep's screen?

A We need -- what we need is the capability of determining how to segment the data. If the -- the data today comes across as this block of one's and zero's, which represent letters. And there is no clear delineation as to when one character string starts and where another one begins.

What we have asked BellSouth for in our efforts to try to make use of the CSR data is to provide us with the information that would define for us what the field lifts are for a particular field. And from that, we

would know that from character one to character 37, that's going to be last name. And we could parse that data that way.

That also gives us the capability of effectively putting that information into a database for use in a real machine to machine environment. That would allow me to take or do a sort on ZIP Code, for example, to identify all of the customers served out of a particular ZIP Code area.

So what we need from BellSouth is, as Mr. Stacy defined it, and I will use his terms, a SKEMA that would tell us exactly where I could expect to see information relative to its position in a data stream.

Q And what is the basis for not being able to get this information from BellSouth as you understand it?

A Right now, the way the CGI specifications are provided, BellSouth defines the CSR fields, and they break it up by this thing called a tag. And the tag is our indication of where the particular information in a CSR begins and where it ends.

So the tag is a block of data. It's nothing more than a block of information. And we really can't make effective use out of that. We can view the information on the screen, which is, in essence, the same functionality that I could get through LENS, but I can't

effectively utilize the data.

We have tried a number of different ways, and we have been playing with this technology now for -- and playing may be, you know, mischaracterized here. But we have been trying to utilize this information now since early January. We received the information December 15th. So between now and early January, we have really been trying to make heads or tails out of the CSR data and have numerously asked a number of times for BellSouth to provide us with either a data dictionary relative to CSRs and/or a CSR record layout that would allow us to effectively use the data.

Q And what is your understanding about why they can't give you the LENS data dictionary or the CSR record layout?

A And it's really the CSR data dictionary or the CSR record layout. BellSouth defines that; either, one, it doesn't exist and therefore it's not available; or, two, the information is proprietary.

Q The actual data?

A No. Not the data, the SKEMA.

Q All right. On page 11 of your testimony, you state that the industry's agreed through a consensus that the electronic communication interface committee, which I believe is pronounced ECIC or --

A ATIS -- okay, that one is called ECIC.

Q All right. The ECIC of ATIS.

A ATIS.

Q You state that the industry has agreed that EDI via TCP/IP/SSL3 is an appropriate interim interface for preordering. I actually have a couple of questions about the ECIC. Do you know what the makeup of the ECIC is?

A The ECIC is made up of industry players, which would be a combination of both CLECs, ALECs and independent carriers.

Q Does MCI have any rule -- does MCI have any role on the ECIC committee?

A MCI is a member of the ECIC committee.

Q Okay. And as a member of the committee, can you give us some idea of what your -- what the role is, what the responsibilities are?

A Our responsibility -- and I would have to check back internally. I don't believe that we are chairing or cochairing a seat at ECIC. So that makes our role kind of as just a general member.

Q A participant?

A A participant.

Q And please let me know if this is something outside of your understanding. But what authority does the committee have for setting national standards?

A Well, the committee doesn't have any authority, so to speak. They have the responsibility to -- through consensus, set the direction for the industry. So their primary responsibility is to try to get consensus on resolution of industry issues and try to come to some agreement that could be -- that's really a win/win for all players; which is why everybody has an equal vote, and they go through a democratic process to determine whether or not an interface or a protocol will be accepted or rejected.

Q So there isn't any particular authority that they have that comes from any act or anything?

A No, nothing at all. It's -- I believe it's a voluntary group put together to try to get issues closed sooner rather than later.

Q And in your rebuttal testimony, where you state that the EDI TCP/IP was approved as an industry guideline, is it your understanding that that was approved as a permanent interface for preordering?

A Yes. Permanent interface for preordering.

Q Okay. And has the ECIC stated that API using the Corba protocol is also an appropriate interface?

A Corba is one of the other potential preorder interfaces that has yet to be approved by the industry. There is still some work left to be done by that group

before it goes to vote.

I know Mr. Stacy characterized it -- characterizes it as being before the groups today. That's not my understanding, that it's up for voting. And I believe from my internal resources the best case date for potential approval of that protocol is slated for sometime fourth quarter '98, best case.

Q Is it your understanding that the EDI TCP/IP is an interim interface also?

A Interim in the sense that ultimately where the industry wants to get to is to an interface that is termed as electronically bonded, which gives you more of a realtime functionality than what EDI provides you.

So while it's characterized as interim there, my intention for characterizing it as such is to let you know that it's not the end state for where we ultimately want to be longer term.

Q And does that have something to do with the screen scraping that you were talking about earlier today? It doesn't give you the direct interface that you are looking for?

A No. This actual interface with EDI TCP/IP/SSL3 would be an interface that we believe would give us the ability to integrate both preordering and ordering.

And the assumption there is that we would be

working closely with BellSouth to determine the functionality that was necessary in order to do that. But based upon the standard, it will provide us with that capability, which CGI today does not provide us with.

Q And I may have missed something. What does the electronic bonding interface that MCI wants adopted do that the EDI does not?

A It -- probably nothing more. And I say probably because my team and I have been very focused on getting interfaces up and operational that we can use today. And electronic bonding is more long-term into, you know, beyond the year 2000 as far as we are concerned, based on the progress the industry is making.

So I can't really answer what electronic bonding would provide us that EDI doesn't, with the exception of giving me direct access to the system.

EDI is a batch process. In other words, we are on our side of the interface. We are inputting all of this information, and then we send it across to the BellSouth system, and it has to go through these EDI translators before it actually gets into the BellSouth legacy systems.

Electronic bonding potentially could provide us with the capability of not having to go through all of those various interfaces, and more quickly getting us to

the BellSouth ordering system for order entry, and preorder systems for preorder acquisition.

Q Okay. Just more streamlined?

A More streamlined. That's an easy way of saying that.

Q What is the reason that MCI does not support BellSouth's application program interface using the Corba protocol?

A ED -- MCI has built an ordering interface built on EDI. And Corba would use an entirely different set of data model than EDI would. It has its own set of data models that -- it would require us to build a separate interface for preorder functionality.

EDI built on a TCP/IP/SSL3 is a protocol that has been approved for both ordering and preordering. And the development of that functionality is far more effective than building a separate API interfacing and having to maintain two separate Corba data model interfaces and a whole different set of EDI data model. So we prefer to have a single set of data models.

Q So would I be correct to say that it's your opinion that the API interface could not be integrated with the EDI ordering?

A No. It probably could be done with some additional work and effort required.

Q What advantages to MCI would there be if the EDI was available so that it could integrate the preordering and ordering functions?

A The immediate advantage to MCI is that we could take full advantage of some of the preorder functionalities that would exist. And the assumption there is that we would remove a number of the barriers that LENS introduces to us today, number reservations, or only having access to six numbers, limitation on CSRs, not having access to due date calculation, things of that nature.

It would also give us immediate advantage of being able to prepopulate our ordering screens with preorder information, such as existing customer telephone number, potentially products and services the customer already is using if we are doing what's termed as I guess a convert as is, or a migrate as is customer. Directory listing information, I could grab right off of the CSR and prepopulate.

So there is a number of synergies that MCI could take advantage of if we were able to integrate the preordering and ordering functionalities.

Q That would include not having to have two screens?

A Right. We could then integrate that into our

own front-end, such that our customer service representatives use a standardized interface across all CLECs, or all ALECs; BellSouth, Bell Atlantic, all of those that do one single standard interface that we would use. And I wouldn't have to burden my reps with the knowledge of what unique things happen for each RBOC.

Q And would it mean that you wouldn't need the LENS CGI interface anymore?

A Yes. LENS would go away, use of LENS would go away for MCI.

Q And would -- and you wouldn't need the CGI for the CSR record layout or the data dictionary?

A No.

Q I will move on to issue two.

On page 12 of your testimony, you state that DST has recently acknowledged that invalid addresses constitute the second most common reason for ALEC orders. And I think you mentioned it earlier, but what is the source of that?

A Mr. Stacy's testimony, I believe, in Tennessee or at the Tennessee OSS workshop, Tennessee 271 case.

Q And to the extent that you were aware of that information, do you know whether there was any statement related to that as to why the ALECs would be having such a hard time validating addresses?

A No.

Q Do you personally have an opinion on why ALECs would have trouble validating addresses?

A Well, no. It would only be a guess right now. I don't know what front-end systems those ALECs would be using. But if they were using LENS, then one of the issues would be the fact that they mistyped the information that they got out of LENS into the ordering system to be submitted there, would be my guess; or they didn't check and assume that the customer had the right information, and just went ahead and submitted the information the customer gave them.

Q On page 12, you also state that BellSouth requires ALECs to access the RSAG through LENS or through the interexchange carrier reference validation, which I believe is pronounced ICREF?

A ICREF.

Q ICREF. Okay.

Is ICREF available to other ALECs to your knowledge; do you know?

A To my knowledge, I believe ICREF is available to all ALECs.

Q And can you explain to us the differences between the LENS and the ICREF for validating addresses?

A The difference is that ICREF is used strictly

for address validation, and it's the absolute purpose for ICREF. You would validate an address through that. Where LENS, even with it's deficiencies, give you more preordering functionality.

You can get telephone numbers, you can reserve telephone numbers, you can access a CSR. And in the early days of LENS, it was counted as being an ordering tool as well for submission of orders to BellSouth.

Q So the ICREF is a very limited --

A Yes. Very narrow function.

Q All right. On page 13 of your testimony, you state that the RSAG system has a scheduled outage. And I think you talked -- I think Mr. Carver asked you a couple of questions about that. And what is your understanding about why those outages occur? Do you have any --

A Yeah. Those are scheduled outages by BellSouth for what's been defined to me as system maintenance, or actually, I will just term it as system maintenance, necessary downtime to maintain the systems.

Q For updating data?

A Updating data, making system enhancements.

Q Doing what other people do with computers?

A Yes.

Q Around here, they take it down every Thursday night or something.

A Right.

Q Okay. And does this outage prevent MCI from validating addresses through LENS and ICREF, and possibly from placing orders?

A No, not today, because MCI is not using LENS for address validation, nor are we using ICREF for any ordering.

Q Would it -- does -- would the outage prevent -- well, it would only affect people that -- or companies that use the LENS program.

A Yes. And, you know, just to be fair and make sure that this 42 hours is in context, the 42 hours represents the aggregate total of downtime against all of the systems necessary in order to submit an order with BellSouth.

And I don't know what the total downtime is per week for just the portion of the network necessary to do address validation. But if this was for the entire order process, then that 42 hours would accurately represent the total amount of downtime for each individual system; the cumulative downtime, I should say.

Q Okay. And would this prevent BellSouth from placing orders at the same time; do you know, would you have an opinion?

A It potentially would prevent BellSouth from

being able to -- if RSAG is down, it's my belief that it's down for everybody, not just the CLEC.

But if LENS is down, then it won't prevent BellSouth from doing anything relative to the normal operation of business.

So the way I would characterize that, if the legacy systems are down, then BellSouth is out of business. If those new systems -- and I term that as CLEC systems are down, that would be LENS, LEO, LESOG and whatever else is in the front-end goes down, no impact on Bell's normal operation.

Q On page 14 of your testimony, you state that MCI is capable of accepting an electronic download of RSAG data via the network data mover until a regular mechanism daily batch process can be implemented to accommodate daily updates. Can you tell me what the network data mover is and how it works?

A Network data mover is a protocol that basically facilitates the batch transmission of information. So every night, for example, at 12:00, 1:00, 2:00 in the morning, there would be a job that would be run to transmit that information across the link.

And the underlying protocol, the rules for transmission that we would use would be this protocol defined as network data mover, which is an industry

standard for some batch processing.

Q When Mr. Carver addressed some questions to you earlier about the Georgia PSC ruling on the RSAG -- what is it on? Hang on one second here. Are you familiar with the order we were talking about earlier?

A Yes.

Q Yes. Okay. Does -- is it your understanding that the -- that the Georgia PSC will resolve the cost issues that are related?

A It's my understanding that they will attempt to do that, and that there is a docket open relative to cost issues. So I think they are -- there is an effort to try to resolve cost.

Q Okay. To the extent that there might be some similar cost issues present in this docket, would they be resolved by that?

A I don't know.

Q Do you know who might know? Is that something we should address to Mr. Martinez? Would he perhaps know? Have I asked the question --

A I don't know, because I don't deal with the cost piece of it. And I am not sure that Mr. Martinez does, either. And it's not that I am trying to evade the question, but I would assume that if there were cost issues relative to this complaint and this is the same

complaint that is addressed in Georgia, and Georgia addressed those issues, then it would be my assumption that all issues relative to cost would be addressed in that docket.

But that's a very soft answer, because I haven't identified some things that may come out as costs, additional costs in this docket.

Q Okay. On issue three, on page 18 of your testimony, you state that LENS has no method of calculating due dates for the UNE orders. In addition, you state that the, none of the due date information in LENS applies to UNEs.

Has MCI submitted orders to BellSouth for UNEs?

A We have submitted some manual orders to BellSouth for UNEs, and we will submit more UNE orders when the EDI interface is up and operational, targeted for end of August.

Q If MCI places a UNE order via EDI, which you have not yet, right?

A No, we haven't.

Q Would it be your expectation that BellSouth -- the BellSouth direct order entry support applications program would provide MCI access to BellSouth's due date calculation function?

A No. We will have no way of gaining any due date

information from BellSouth in advance of submission of an order to BellSouth. DSAP, as it's termed, today is only accessible through LENS. And I believe it's accessible through EC-Light, neither of which MCI is using. And even if we were, DSAP does not hold any due date information relative to unbundled network elements.

Q So how is it that you would go about calculating due dates for UNEs?

A Well, what we would use in lieu of having something more realtime is we would have to rely upon two things. One is the paper interval that BellSouth provides us relative to when they believe they can get the unbundled UNEs turned up, as well as a firm order confirmation back from BellSouth that should be an indication as to when they expect to turn the service up. The two may not be in sync, and we would have to go with what the firm order confirmation date says as opposed to what our requested date for turn up.

And I believe as of today, even if I submitted that order to BellSouth electronically, there would be no automated firm order confirmation back. It would be manual.

Q On page 19 of your testimony, you state that when using the inquiry mode in LENS, MCI customer service reps must manually calculate a due date after taking into

account several separate pieces of information, such as installation intervals and normal working days and days when the particular end office may be closed.

A Uh-huh.

Q Can you explain to us what due date information is provided to the customer service reps in the inquiry mode of LENS?

A In the inquiry mode of LENS, what you get is a schedule of days the office is open and intervals for different types of services. In other words, if you were ordering residential, one to three lines, the interval may be three days. And that's -- so you get when the office is open and the interval for the service that you are going to turn up.

What you have to do at that stage of the game, if you went to the inquiry mode, you would gather that information. Then once you got all of the order information, you would have to calculate, based on the day of the week, so you would have to have a calendar there; you would look across the calendar, identify the days that the office is open, identify the days that they could turn up your service and identify the interval for the service to manually calculate when you can best expect a due date for that particular service.

Q And then if the customer doesn't -- isn't

available or rejects that date for some reason, you would have to start all over again?

A Yeah, you would. But the further out the date, the easier it probably is to get the service turned up. You would have to deal with less information. One would be interval. Interval doesn't matter if it's further out. You would still have to deal with workforce availability as well as the availability at a wire center itself, whether it was open or closed for business.

Q And would all of these calculations be going on while the customer was on the line waiting?

A Potentially, it could be. Yes. It would be done in a residential mode with the customer on the line trying to guesstimate the due date, trying to provide similar functionality and service that BellSouth provides to their customers.

Q On page 19, you also state that by the time MCI submits an order, the due dates calculated in an inquiry mode of LENS might no longer be available.

What is the typical time delay between MCI taking the preordering information from LENS and actually placing an order in EDI?

A And the assumption that we have to make here is that we are submitting a clean order to BellSouth, and that there is no rejects for that order.

If I assume that it's a clean order for BellSouth -- and I don't have a time frame that I can say, well, it's typically like four minutes from the time I get the preorder information to the time I submit. What I will walk you through is from the time I submit the information and the time necessary for it to get to the BellSouth SOC system that basically sends back the firm order confirmation back with the installation date. When we submit that order, it goes from our system across the network to a value added network provider, VAN, which is, in essence, a mail box. And we send it to our VAN.

Our value added network provider will then send that information across to BellSouth's VAN. BellSouth would then pick that information up from their VAN and then flow it through their systems. So based on the fact that it's a batch process, it can be 15 minutes on our side. It could be, you know, maybe five minutes between mailboxes in the VAN. And these are guesstimates.

Fifteen minutes is the time frame by which BellSouth goes every 15 minutes to check the mailbox. So depending on where they were in that interval, it could be as long as 15 minutes. So it would be upwards of about 30, 40 minutes before this order flows through and hits the SOC system.

In a busy wire center where there is a lot of

activity going on, BellSouth reps submitting orders directly into that system, it's conceivable that that due date that you had is no longer available.

Q Do you all keep any data on that flow?

A We haven't yet, because the EDI electronic system -- again, we are in the test mode with BellSouth on that. And plan to have that interface up and operational in late August. And even then, we wouldn't be using LENS inquiry mode to do that, because we would be ordering unbundled network elements at that stage.

Q And you do not and have not used the LENS to calculate due dates at present?

A Early last year -- or I am sorry, mid -- in the summer of last year, we were doing trials in a number of BellSouth's regions. And I think we did some trials in the Florida region as well.

And our order entry vehicle for doing those trials was through LENS. And LENS does calculate due dates when you use the firm order mode of LENS. But in order to use the firm order mode of LENS, you have to move through that system as if you're issuing an order. So in the early days of '97, summer of '97, we were actually using LENS to submit residential resale orders in a number of BellSouth states.

Q And will the EDI system provide MCI with due

date calculation information?

A No, it won't.

Q And did you -- and why not?

A EDI is an ordering system, and doesn't have access to DSAP and the other pieces of information necessary in order to calculate due dates.

Our hope and expectation is that as we build this TCP/IP preordering interface that we will have the capability to access DSAP to do due date calculations. But with the EDI ordering functionality that's going to be turned up at the end of August, there is no preorder functionality.

Q So if EDI becomes the industry standard, you would still have to use something else to do the calculation of due dates?

A No. The way I would characterize that is that right now today the EDI functionality that we are building only supports ordering. And what we are moving in discussions with BellSouth on is the development of some additional functionality relative to EDI to support preordering.

Once that gets all built and I can integrate that together, then I should have the capability through our EDI front-end to be able to send not only orders to BellSouth but preorder requests to BellSouth and get

those all back through the same system.

Q And has MCI taken -- I am going to call it an idea, for lack of any other better words, this idea to the ECIC committee?

A The ECIC?

Q Yes.

A Yes. The ECIC committee recently approved the EDI PCIP protocol for both ordering and the preordering.

Q I am going to move on to issue four.

On page 21 of your testimony, you state that LENS does not permit MCI to integrate the telephone number reservation function within MCI ordering?

A Uh-huh.

Q Could you clarify for us what MCI's ordering system is?

A It's the EDI interface that we are building with BellSouth. We have preorder -- I am sorry, we have some front-end systems that we use at MCI to capture specific information relative to the customer. And it would be as part of those preordering systems that we would like to be able to kick off queries going out to BellSouth to gather the necessary information relative to phone number, customer service record, not necessarily due dates, service availability, those types of things.

Q And that would be integrated with EDI?

A Yes.

Q The EDI TCP/IP/SSL3?

A When I built that EDI interface for preordering, I would work with BellSouth to include all of the preorder functionality necessary in order to effectively submit orders, which would include telephone number reservation.

Q And this will solve the number reservation function problems?

A Assuming that there is no arbitrary limitation put on the number of -- the number of numbers I could reserve in one request.

Q Can you please -- and I think you may have done this earlier, but could you please define what a field identifier is and how its used in conjunction with the USOC?

A A field identifier is additional information necessary in order to allow BellSouth to deliver the appropriate type of service.

An example of a field identifier would be voice mail service. Voice mail has a USOC associated with it. But then there is some other characteristics you could have relative to voice mail, such as maybe you want pager notification, maybe you want a call forwarded number.

Those other two pieces of information would be

considered FIDS associated with the USOC for voice mail that you would need in order to get a complete package.

Q Okay. On page 23 of your testimony, you state that BellSouth provides USOCs and FIDS in the local exchange ordering guide, or the LEO guide.

Are all the USOCs and FIDS listed in the LEO ordering guide, or does MCI have to go to other sources to obtain some of the USOCs and FIDS?

A Our experience with the LEO guide was that it wasn't complete, and that it didn't contain all of the USOCs. But right now, our experience has been that we believe we have all of the USOCs based on that CSV file that BellSouth has put on the web that we can now download and access to a database.

Q So that would be the source for the other information?

A Not for the FID and the state validity, because those things are housed in a separate file. They are not put together. So BellSouth is not giving us that information in the appropriate format to allow us to download it.

Q So the LEO guide does not identify the states in which the USOC is valid?

A The LEO guide does. The paper version, as well as the electronic version on the web, both give you FID

and state validity. Our issue is correlating FID back to USOC. And if we had a database that we could build based on having the capability of downloading the information from BellSouth, we could correlate those two back and put them in the system.

Q And does MCI have access to the USOC and FID updates from BellSouth in a form other than from the web site?

A No. Yes. Paper version.

Q Okay. On page 12 of your rebuttal testimony, you state that BellSouth has provided USOCs in a spaced value format that enables MCI to download USOCs into a database?

A Uh-huh.

Q Which you state appears to resolve the problem?

A Uh-huh.

Q When you make that statement, are you referring to the diskette that BellSouth provides to MCI that contains the service order edit, routine edits?

A No. I am referring to the format by which BellSouth places the USOC information on the web.

There is a couple of formats that they could use. And early on they were using, I believe it was called Adobe Acrobat, which we couldn't download and parse and put into a database.

We subsequently went back to BellSouth and asked them to provide this data to us via CSV or comma spaced value format, which is parsable and incorporatable into a database.

Q And what is the difference between the spaced value format than the SOER edits?

A The SOER edits are documents by BellSouth that are the edit routines used by the service order control system.

It has nothing to do with -- I guess it's not accurate to say that it has nothing to do with USOCs. There's another place you could go to find out what USOCs -- a definition of USOCs.

Q On page 25 of your testimony, you state that BellSouth should be required to update USOCs and FID information on a biweekly basis and should give notice of the implementation or deactivation of a USOC 45 days in advance?

A Uh-huh.

Q Why does MCI need this information updated biweekly?

A The biweekly update would keep us current with all the USOCs. USOCs have a tendency to change based on services being grandfathered, which means I have taken them out of service, I won't sell any new ones, but I

will maintain the old ones that exist as well as the addition of new services.

So biweekly was our request for it until we better understand kind of the frequency of change relative to USOCs.

Q And would the ability to download USOC information from the web site mean that MCI would no longer need the biweekly information, the information on a biweekly basis?

A We would need the information updated as often as USOCs changed. I mean, it does us no good to have an out of date file.

Q And why would you need 45 days advance notification of the addition or deactivation of a code, a USOC code?

A Because if BellSouth is going to no longer continue to support a USOC, then we need as much advance notice as possible to make sure that information gets disseminated throughout the field.

Q And how does MCI believe that BellSouth should notify MCI regarding updates, additions, or deactivations?

A Right now, BellSouth notifies us in a couple of ways. They either send us a letter or give us a call for some things, not necessarily this, or post the

information on the web. If they posted the information on the web, I think that would be sufficient in giving us enough advance notice of changes.

Q Moving to issue six. On page 26 of your testimony, you state that BellSouth should provide MCI with access to all CSR data, except such data that BellSouth is not authorized to release by its customers. What information does MCI believe is customer proprietary information that BellSouth could not release?

A Again, I am going to have to refer to a list of information that I have to refresh my memory of all of the fields relative to CSR. And there could be some things on there, like maybe customer Social Security number; maybe one of the things that might be deemed as proprietary, or, you know, mother's maiden name; some of those types of things might be deemed proprietary.

Q On page three of your Exhibit 1, MCI states that CSR access is limited to 50 pages of data?

A Uh-huh.

Q And CSR information is not fielded?

A Right.

Q To the best of MCI's knowledge, do BellSouth's retail reps have the same page limitations for CSR information?

A Our limitation for CSRs, I think the correct

number is 54 pages. And this has changed since this date.

I believe as of today the limitation is 54 pages per section, and a CSR has seven sections associated with it. The limitation here is that we cannot view nor print anything above 54 pages per section.

I believe the limitation for BellSouth is that they cannot view anything greater than 54 pages per section, but have the capability of printing that information on-site.

What we have to do is call BellSouth and have them Fed Ex or FAX that CSR over to us if it exceeds the limitations.

Q And what is your opinion about what BellSouth would need to do to provide the CSR information in a fielded format?

A They would have to provide us the data in a delimited format. In other words, they would need to give us -- send the data over with the parsing character in it that would allow us to parse the data on each individual field.

Q Moving on to issue eight. In your direct testimony on page 30, you state that MCI has experienced delays in receiving firm order confirmations from BellSouth for orders for Off-net T1 lines.

Can you explain to us why MCI orders the T1s out of the access tariff?

A T1s are ordered out of the access tariff because that's where -- oh, let me think about this one for a minute.

It's got a lot to do with kind of how things have been provisioned and set up with BellSouth.

ASRs are access service requests, which is the process used to orders things out of the access tariff. In ordering similar services from BellSouth -- in our request to order similar service from BellSouth, we have always been directed to the ASR for the submission of orders relative to Off-net T1s. And that's primarily been the reason why we are ordering Off-net T1s out of the access tariff, in addition to the fact that we have tried to order what we term as unbundled T1 from BellSouth and have been refused the capability of ordering those today.

Q Unbundled out of the access tariff?

A Unbundled out of the interconnection agreement.

Q Okay. And is it your understanding that you could use LSR as opposed to an ASR to order a T1?

A No. It is BellSouth's requirement that you use an ASR for all design services, and the T1 is a design service.

Q Okay. And are the firm order confirmation delays occurring for orders of T1s only?

A Yes, because that's what we are ordering today.

Q Okay.

A We are not ordering USOC.

Q And what type of electronic interface is MCI using to place those orders for T1s?

A I believe we are still in the FAX mode for submission of ASRs to BellSouth for Off-net T1 orders. And it's either this week or first part of next week where we will transition to an electronic process called NETPRO.

Q And why do you use the FAX?

A The FAX process is employed because -- and this is going to get a little technical. I am going to use some terminology here, and I hope to be able to do it kind of at the layman's level.

There is an identifier on the T1s that would identify a T1 for MCIm, which would be metro or MCIt or MCI International, and that's called a CCNA. And right now, in the NETPRO process, while our long distance side of the house uses NETPRO to submit ASR orders over to BellSouth, BellSouth has not been agreeable to using a different identifier for a wire center.

So because of that limitation, we have continued

to send orders across to BellSouth via FAX as opposed to NETPRO. Our transition from FAX to NETPRO is that we have gotten movement on that, and we will test that functionality going forward in the next -- either, again, this week or some part of next week. So we are in the transition stages of moving from FAX to automated process.

Q And BellSouth has asserted that the T1s have been ordered by MCI out of the access tariff, and are therefore not governed by the firm order confirmation measurement standards in the agreement. What is your understanding of how that should work?

A Based on conversations I have had with the contract interpreters, BellSouth should be governed by the same firm order confirmation or performance measurements for all services ordered to support local service. And Off-net T1s being identified as MCIm circuits should be governed by the same thought timeliness as orders issued out of the -- off of LSRs, or local service requests.

Q And on page 16 of your rebuttal testimony, you state that MCI requested BellSouth to provide Off-net T1 combinations?

What elements are you referring to when you say combinations?

A Combinations, we are talking about loop and port.

Q Port same as transport?

A Yes. Actually, transport would be ordered separately. Loop -- I guess port would be the same as switch.

Q Okay.

A Transport would be the connection from the wire center to MCI's pop. So we would order that transport piece separate from the combination piece.

Q And are the combination orders for customers currently being served by BellSouth for the same service?

A I am sorry?

Q Are the orders currently being --

(Discussion off the record.)

BY MS. BEDELL:

Q Mr. Green, are the orders that you're placing for the T1 lines for customers that are currently being served by BellSouth for the same kind of service?

A Sometimes yes, sometimes no. Oftentimes, the T1 is used to aggregate services and to deliver them in a more cost effective manner to a customer. Some of those customers may be existing BellSouth customers, some may not. It may be brand new service.

Q Okay. And is MCI providing any network elements

in combination with the T1s ordered from BellSouth?

A No. Well --

Q Such as switching?

A For the Off-net T1s, we are providing the switching functionality and providing dial tone to those customers on Off-net T1s, if that was the question.

Q We are on the last page.

On Exhibit BG 23?

A Uh-huh.

Q On page two of the exhibit, which is a June 1, 1998 letter to BellSouth's Mr. Lee from MCI's Mr. Schmidt, the letter states that MCI would like to schedule a meeting to discuss processes for migrating and existing T1s to UNEs for new T1 orders.

Do you have any knowledge of the status of these discussions?

A No, I don't. I don't have any knowledge of those -- of where those discussions are that I could share today.

Q Or whether there have been any further discussions?

A I know that there has been some discussion. I don't know what the ultimate outcome of those discussions were.

Q Is that something somebody else might know?

A That's something that I could find out. Mr. Martinez may have some information relative to that, but I could find out.

MS. BEDELL: If we could hold on just one minute, we may be finished.

(Discussion off the record.)

BY MS. BEDELL:

Q I need to go back to our question that I asked you about using the ASRs LSRs for the T1 --

A Uh-huh.

Q -- service. I believe you said that you were -- that MCI was directed by -- was directed to use ASRs.

My question to you is by whom or --

A It's by BellSouth. BellSouth's policy is that digital services, which an Off-net T1 is, is considered a design service, and all design services are ordered to be an ASR.

Q Okay. So this is a BellSouth policy, that because the T1 is a design service, that it has to be ordered as an ASR?

A Correct.

Q Okay.

MS. BEDELL: We don't have any further questions.

THE WITNESS: Thank you.

(Whereupon, the deposition was concluded at 4:50 p.m., and reading and signing by the witness was not waived.)

TRANSCRIPT CERTIFICATE

STATE OF FLORIDA)

COUNTY OF LEON)

I, DEBRA R. KRICK, Court Reporter, hereby certify that the foregoing transcript was taken down as stated in the caption, and the questions and answers thereto were reduced to typewriting under my direction;

That the foregoing pages 4 through 113 represent a true, correct, and complete transcript of the evidence given upon said hearing;

And I further certify that I am not of kin or counsel to the parties in the case; am not in the regular employ of counsel for any of said parties; nor am I in anywise interested in the result of said case.

Dated this 30th day of January, 1998.

DEBRA R. KRICK
Court Reporter and Notary Public
State of Florida at Large

C O R R E C T I O N S

Corrections to the deposition of BRYAN GREEN, taken in the case of BellSouth Telecommunications, Inc., Docket No. 980281-TP, taken on July 28th, 1998.

Page-Line	Correction

Date Signature

AS TO SIGNATURE ONLY

IN WITNESS WHEREOF, I have set my hand and affixed my seal this _____ day of _____, 1998; said instrument was acknowledged before me by _____ who is personally known or identified himself to me.

Notary Public

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Complaint of MCImetro Access Transmission Services, Inc., against BellSouth Telecommunications, Inc. for breach of approved Interconnection agreement.) DOC NO.980281-TP

DEPOSITION OF: BRYAN GREEN

TAKEN AT THE INSTANCE OF: BellSouth

DATE: Tuesday, July 28, 1998

TIME: Commenced at 2:00 p.m.
Concluded at 4:60 p.m.

REPORTED BY: Debra Krick

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PHILLIP CARVER, ESQUIRE, BellSouth, Suite 4300, 675 West Peachtree Street, NE, Atlanta, Georgia 30375

ALSO PRESENT:

WAYNE STAVANJA, FPSC Staff
BRIAN MUSSELLWHITE, FPSC Staff

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EXHIBITS

NUMBER		IDENTIFIED
1	List of MCI requests refused by BellSouth (Late-filed)	22
2	List of information discovered by MCI in OSS process not offered to MCI by BellSouth (Late-filed)	22
3	List of items MCI wants from BellSouth not currently receiving (Late-filed)	49

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DEPOSITION

Whereupon,

BRYAN GREEN

was called as a witness, having been first duly sworn to speak the truth, the whole truth, and nothing but the truth, was examined and testified as follows:

EXAMINATION

BY MR. CARVER:

Q Good afternoon, Mr. Green. My name is Phil Carver, and I represent BellSouth.

A Good afternoon, Phil.

Q Just a couple of preliminary matters; would it be fair to call you the technical witness on issues one through eight or counts one through eight?

A Yes.

Q Okay. Now, you are not testifying regarding contract dispute issues, per se, are you?

A That's correct.

Q And that would be entirely Mr. Martinez who would address those?

A Yes.

Q Okay. In your testimony, there was some references to various commission rulings, both by this commission and other commissions in other states. Those were all in the context of 271 proceedings or OSS

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proceedings spun off from 271s; is that correct?

A That's accurate.

Q Okay. So at this juncture, no commission has ruled on an MCI complaint against BellSouth, of the type that is at issue in this proceeding?

A That's true, no commission has.

Q Okay. So by these references in your testimony, then, is it fair to say you are not contending that some commission has found BellSouth to be in breach of the contract?

A No.

Q No, they have not?

A No, I am not contesting that a commission has found that.

Q Okay. And currently, the other states where this complaint is pending are Georgia, North Carolina, and where else, or is that it?

A I believe that is it, besides Florida.

Q Okay. Now, this may not be your issue, and if so just tell me. But there is an issue here regarding the ordering of T1s and whether FOCs apply to those or not.

A Uh-huh.

Q That count was not filed in North Carolina, was it?

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A Subject to check, I don't have those notes here. I don't believe that it was filed in North Carolina.

Q Okay. And the North Carolina complaint was filed after the complaint here?

A Yes, it was.

Q Can you tell me why it was not filed in North Carolina?

MR. ROARK: I want to object to the question as potentially calling for work product information. You're inquiring into MCI's litigation strategy.

MR. CARVER: No. I am inquiring as to whether there are different facts there or whether it's been resolved or circumstances have changed or why the difference.

So let me suggest this, if you can answer it in that way, without divulging any work product or attorney-client information, that I would like for you to. But if you can't, then we will move on.

MR. O'ROARK: That's fine.

THE WITNESS: Okay. Restate the question, if you would, please.

BY MR. CARVER:

Q Okay. The question is the aspect of the complaint, the count of the complaint that deals with T1s and form order commitments. I think we have agreed that

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that was filed here, it was not filed in North Carolina. And I am just wondering, again, without divulging any privileged information, if you could tell me why that is.

A Let me think about that one for a minute. I believe that the reason that that was not filed in North Carolina was primarily because I did not have data relevant to affirm order confirmation dates being missed in that state as opposed to states such as Florida and Georgia.

Q Okay. Any other reason?

A No.

Q As far as you know, the contractual obligations, whatever they are, would be the same in both states on that issue?

A That goes to the interconnection agreements, which vary slightly, but I believe that they are, for that particular matter, the same across most states. So I believe North Carolina would be the same as Florida.

Q Okay. Now, a specific question I wanted to ask in reference to count one. In count one -- and I apologize if this is repetitive. But you are testifying specifically about what the contract requires in terms of access to OSS systems.

A That's accurate.

Q Now, have you had any role -- did you have any

role in negotiating the contract at all?
A No, I did not.
Q The OSS information that you have requested, which I believe is set forth on page three, are you the one who decided that this information is what's required in MCI's view?
A No, I am not the one that decided that this information was necessary. This was decided by our internal technical people in an effort to try to design systems and understand what systems we needed to have interfaces built to or to build interfaces for, as well as what functionality existed.
This goes back to our continued request from BellSouth to try to get information, and that information being disseminated to us in piece parts.
Q Now, do you know when the technical people made the decision that this was the information that they wanted?
A I don't have a date here with me. I believe -- as a matter of fact, I know for a fact that it's been at least a year. And this -- in our first complaint, which I believe was filed in Georgia, this was also count one there.
Q Okay. And I want to make sure I understand this, what you're requesting is access to every OSS

system that BellSouth uses for itself of every type?
A Yes.
Q And how many would that be; do you know?
A I only know based on reading the deposition from Bill Stacy, and I think he alluded to anywhere between 1,000 and 5,000, and ultimately broke that down to be within the realm of both characteristics relative to OSS 60 to 70.
Q Okay. Now, what's the difference -- you have used two numbers, 5,000 and 60 to 70. Can you explain?
A I am only reciting information that I was -- that was provided to me as a result of the deposition of Bill Stacy.
Q Okay. Well, my recollection from his deposition was that he said that there were about 400 BellSouth systems altogether. And I am just trying to get clear on your understanding of what the 60 and 70 is.
A I believe what I recall reading out of Mr. Stacy's deposition was that there were either 60 to 70 systems or 60 to 70 databases that were used by BellSouth with respect to the five OSS functions defined as ordering, preordering, provisioning, billing and maintenance.
Q Okay. Ordering, preordering, billing?
A Provisioning and maintenance.

Q Okay. If -- let's assume -- and the numbers are not important. We will just use hypothetical numbers. Let's just assume that there were 400 and that only 60 relate to these five functions. Do you still want the other 340?
A What MCI is interested in is having the information available to us such that we can build the necessary systems to give us a meaningful opportunity to compete.
It's been our experience with BellSouth that, unless you ask for the specific information or piece of information that you need, then you won't get anything above and beyond that. Because we don't know or have experience with BellSouth systems, the databases they use, the systems they use; and so for the record, we took the approach of asking for everything in hopes that we would be able to identify those things that were critical in order to operate the business.
Q Okay. I don't think you gave me an answer to my question. So let me try again.
If we -- if it were established that these 60 systems were the only ones that relate to the five functions, would you be satisfied just with those, or do you want all 400?
A If through some means we establish that just 60

were those that were necessary for the functionality relative to the five functions under OSS, then I would believe that those 60 would be sufficient.
Q Okay. Now, if, for example, an OSS system had to do with some retail function of BellSouth, so it didn't really relate to anything that MCI would be ordering, that's one that you wouldn't need?
A I don't know if you could explain kind of the retail piece to me. It's really difficult to answer a generic question like that, because there is no detail behind it. But I don't know. Assuming that it was not a functionality that was within the scope of the five OSS functions, then I would agree with you.
Q Okay. So do you have any idea how many -- well, let's see, the 60 that would relate -- let me ask you this way, the 60 that would relate to the five functions, I assume that's going to be more than the number that are analogous to whatever MCI is using for these functions now, correct?
A From BellSouth?
Q Yes.
A Yes.
Q Okay.
A Or in addition to, I should say.
Q And if it could be established that you weren't

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going to order a particular thing for BellSouth, you wouldn't have a need for that analogous system, would you?

A Well, I guess the way I would answer that question is, no, because today while I may not have any plans to order --

Q No, you wouldn't have a need for it?

A I guess -- okay. I disagree with that.

Q Okay. So, yes, you would have a need for it?

A If it's a yes or no, then I would say, yes, I may potentially have a need for it.

Q Okay. So if it's something that MCI has no intention of ordering whatsoever today, you would still want that, too?

A And it would only be based on --

Q I need a yes or a no, before you explain, if you could.

A Okay. I would say the answer to the question is yes.

Q Okay.

A And the reason that it's yes is because today there is a business model that we are working from. And that business model may not be the same across all nine BellSouth regions to date or in the future. So I don't believe that we are smart enough to know two years from

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now, 18 months from now just exactly what retail functionality we need.

We are smart enough to know what we need at this moment. But it doesn't make sense to build a system today precluding potentially functionality that you may need in the future.

Q Do you know how many -- and I understand your business is a little bit different. But do you know how many OSS systems MCI employs for its own use?

A I don't have that number readily available today.

Q Okay. Does MCI make those publicly available?

A Make what publicly available?

Q It's OSS systems.

A I don't think we have had any reason to make them publicly available.

Q Well, if someone requested them, would you make them publicly available, or is that something that you, for whatever reason, might believe should be kept?

A I would say that that's probably going to be a business decision, one that I can't make here today. Mine would be nothing more than a guess, so I can't answer that question.

Q Okay. And you are aware that from BellSouth's perspective these OSS systems -- I am having trouble

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getting this question out -- contain proprietary business information?

A I think that's been shared with me that there is the potential that some of them may have proprietary information in them.

And, again, what you need to keep in mind is that we are not specifically asking for the data that is contained within the databases -- which I believe is what's proprietary, but the functionality of the system, technical specifications relative to the databases; not necessarily, but if there is proprietary data, the data within each of those systems or databases.

Q Okay. So you don't think the descriptions or the functionalities or any of that would be proprietary?

A Absolutely not.

Q Okay. And what do you base that on?

A I base that on the fact that technical specifications, such as database layouts, for example, only define the fields that are contained with the database, not the data. And the data itself is what's defined as proprietary.

Q So the systems themselves and the way that they are structured and the way that they are operated, you can't concede that that might be proprietary?

A Not in the sense of proprietary marketing data.

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Q Okay. Assume for purposes of this question that there is proprietary information here. And I just want to understand your position.

If that were the case, why wouldn't it be reasonable for MCI to ask for this on a need to know, as opposed to just asking for all of it?

A Well, the expect -- well, let me answer the question the way you asked it.

If BellSouth was forthcoming with the information relative to what we needed, as opposed to us stumbling upon different pieces of information that are necessary in order to build interfaces, we probably could operate in that mode. But it's been our experience, since we have entered into this process, that information is not forthcoming, and there is often significant delays in receiving information that is necessary.

And I think an example of that would be the SOER edit that BellSouth ultimately provided in December, after we had been into this process for over a year. And come to find out that those edits are necessary in order for you to continue building the interfaces that you have been trying to build for over a year.

Q Okay. So just so I understand your position, you're basically saying that asking for this on a need to know as opposed to asking for everything would be

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reasonable if you believed that your requests were going to be responded to in a way that you deem appropriate.
A Yes.
Q Other than the SOER edit situation you just talked about, is there anything else that you can point to as a situation where there was some OSS system or functionality that you needed that you didn't know about until you found out about it later?
A Well, there is a number of databases out there that we have stumbled upon, a few of which are a result of a Florida demonstration that was held, I believe, in this building or another building sometime last year, where we identified other databases, such as coffee databases, and a list of others that I don't have here with me, that are related to BellSouth's operation relative to RNS, that we had no familiarity with.
Q Okay. Can you tell me anything more specifically about what they are?
A Not here today I can't, no.
Q Okay. Once you found out about them, did MCI request them or undertake to utilize them in some way?
A MCI requested similar functionality, which you read in our cases here, which you read in 271 cases going forward. And you get back from BellSouth the fact that those things are not available.

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Some of the things that we asked for are as simple as a record layout relative to customer service records which was deemed proprietary at one point, and then at another point unavailable. So you get different stories from BellSouth.
Q Okay. I want to be very specific. In the demonstration, I think -- if I understand you correctly, you are saying that you became aware that BellSouth had available to it databases or functionalities that you didn't know about previously.
A Uh-huh.
Q Okay. Can you tell us specifically, other than the customer layout that you have referred to, anything else that you became aware of that MCI has since put in a request for or obtained or that it plans to use?
A Let me think about that one. Let me make sure I can answer your question.
To the best of my recollection, relative to that demonstration -- I am trying to think through all of the systems right now that I know about, and a list that I didn't bring with me. I can't specifically answer your question relative to that, because I don't have that data here in front of me today.
Q Okay. Now, when you say, this demonstration, are you talking about a demonstration here in Florida?

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A Yes.
Q And that's the only demonstration that you are discussing. You are not talking about, for example, workshops in other states.
A Well, the demonstrations are the same for the OSS regionwide. So be it here in Florida, be it in Georgia, or I believe I saw a demonstration in Louisiana as well, they were basically the same demonstrations across the board.
Q Okay. That list that you can't recall today, are you going to review that and refresh your recollection before the hearing next week?
A Yes.
Q Okay. Then in that case, I would like to get a copy of it before the hearing.
MR. O'ROARK: So just so we are clear on the record --
MR. CARVER: As I understand it, tell me if I am wrong, it's a list of BellSouth functionalities or databases that he became aware of through the OSS demonstration in Florida. I guess this would be the one last September that was part of the 271 hearing?
THE WITNESS: I believe so.
MR. CARVER: Yes. Anything he became aware of then that MCI wants or has requested and been refused

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or has asked for and gotten and actually uses, basically anything he saw there that MCI believes would be of use to it.
MR. O'ROARK: Mr. Carver, I will say the same thing that you said back in Atlanta last week; that we will make an effort to find that document, if there is one.
We are, as you pointed out, toward the end of the discovery period. So we are not necessarily going to produce a whole host of late-filed exhibits. But in this case, we will see what we can find. I can't tell you that there is such a document.
MR. CARVER: Yes.
MR. O'ROARK: If there is one, we will provide it for you.
MR. CARVER: Okay. And if you want to answer it in the form of an interrogatory, that's fine, too, because all I am really getting to -- I am not trying to shift any sort of huge discovery burden onto you. But I get the impression from the way that the witness is testifying is that by the time we come to hearing, he is going to have some clear, crisp examples. So to the extent he does, obviously, he will know that. So if you will just provide me with that information, so that we can have it in discovery

before the hearing begins.

MR. O'ROARK: Okay. We will take a look at that and get back to you on it.

MR. CARVER: Okay. That's fine.

(Whereupon, Exhibit Nos. 1 and 2 were marked for identification as late-filed exhibits.)

BY MR. CARVER:

Q Now, since that demonstration in September, is there anything else -- basically, the same question on any intervening events or any subsequent events. Since September, has it come to MCI's attention that BellSouth has available to it some system of functionality that MCI wants and hasn't been able to get?

A And I guess I will answer the question this way. I know of a number of databases that are in operation with BellSouth. What I am not familiar with are the functionalities of each of those databases.

BellSouth, while I don't believe that we have asked for them in a specific written request to BellSouth other than through our complaints here as well as, I believe, we asked for it in our -- let me check -- in our November 24th letter relative to general OSS requirements where we asked for this information, as well, back in December from BellSouth. And our response at that stage of the game was -- I believe BellSouth either ignored

that response and gave us no answer or basically said they are not obligated to provide such information. And I am referring to Exhibits 1 and 2 of my direct testimony.

Q So Exhibits 1 and 2 would have all the databases that you are referring to listed there?

A It doesn't list all of the databases. Again, it's a broad general request that BellSouth demonstrate to us those interfaces.

Q Okay. Well, my question is, you said there is some databases, if I understand you correctly, that may have functionalities or information in them that MCI might want. Can you give me a list of those databases?

A I believe that's what we just went through here, so am I back to the same point?

Q No. It's a little bit different. Then we were talking specifically about things that you discovered during the OSS demonstration. Now I am talking about anything that you became aware of at any later time.

A I guess I would have to refer that back to this list that we will either provide to you if it exists -- I don't have that list off the top of my head. I believe it's the same set of lists in the same set of examples, whether I was exposed to them in a regulatory event or demonstration. It's the same grouping.

So what I don't have today, I don't have for what I was informed of in September nor throughout the course of my dealings with BellSouth.

Q Okay. So after September, you can't think of any particular event or time where you became aware of a functionality and said, wait a minute, we want that, or we could use that, or why weren't we told about that? You can't think of any event like that occurring since September?

A You asked the question around databases, and I guess I am going to refer you back to just generic systems functionalities, which was more of the issue there.

When you start to build systems, you're looking for functionality. Functionality is driven by databases or systems that your vendor, BellSouth, has available to you.

So we have identified a number of functionalities that we would want. Now, have we identified them down to a specific database, I guess the answer to that question would be no.

But if you want me to answer the question relative to functionality, I can certainly do that. I mean, they are listed throughout this complaint as well as the other 271 filings.

Q Okay. So these are functionalities that BellSouth has available to it that MCI does not have available to it?

A Correct.

Q Okay. And can you just give me a list of those?

A Telephone number reservations greater than six, access to DID numbers and access to DID trunk information, access to UNE provider status, the individual company that's providing the UNE to a particular customer. We will look for information relative to USOCs. We are looking for information relative to customer service records. We are looking for information that would give us the capability of utilizing information we get from BellSouth systems, which I believe would come from the CRIS database, but maybe it comes from the PSIMS database. I am not sure where it comes from. There is a whole host of functionalities that are there. Integration capability between preorder and order.

Q How do you define the term functionality?

A I define the term functionality as our ability to gain access and utilize information.

Q Okay. So you are not just limiting it to a situation where, let's say, BellSouth ordering system can do something and the analogous MCI system can't. When

you say functionality, you're going beyond that?
A Not really. I think that's encompassed in functionality as well.
Q Okay. Maybe I am just not understanding, because when I asked you about what functionalities, you start telling me about types of information. So are you looking for access to information, is that what it is, that you have become aware of that you don't believe you have, is that things our system will do that the systems made available to you won't? I am just trying to get a handle on what it is we are talking about.
A And what we are looking for is a clear delineation between system and database. And I don't think that that is appropriate, but I will take a shot.
And I will give one example. Your RNS system, I believe, has the capability of providing for your customer service rep particular NSX that is available in a neighborhood or an area.
Now, where that functionality comes from, I believe, from testimony from Mr. Stacy, it comes from the LER or the local exchange routing guide. That's an example of some functionality there that BellSouth has not built into the interfaces it provides to the CLECs, specifically not built or excluded from the development of LENS.

Q Okay. I am trying to think about how to move through this as quickly as possible.
Is there any – so let me ask the question this way, is there any information or functionality that you believe that BellSouth has that MCI hasn't been given that you don't talk about in your testimony?
A Not specifically, no.
Q Okay. Let's move to count two or issue two. I will ask you a little bit about the SAG data.
Do you know what the current status of the SAG data issue is?
A The current data of SAG, as far as Georgia is concerned, is that BellSouth was ordered as a result of the OSS workshop to provide our SAG downloads to CLECs.
Q Okay. Now, assume that BellSouth complies with that order, is there anything left here for the commission to do?
A Assuming that they provid it to us for regionwide in a format that we wanted, I would believe that there would be nothing left here for the commission to do. However, I will note that BellSouth has not provided MCI with any information relative to the what and the when as to the providing of the RSAG data. There have been no meetings relative to RSAG between MCI and BellSouth.

Q Okay. Now, there is still a payment issue, correct?
A According to BellSouth, there is still a payment issue, yes.
Q Well, we think you should pay, and you don't think you should. So that's what I am calling an issue.
A Then that's the issue.
Q Okay.
A To us, there is no payment issue. To you, there is. But you are right, the way you characterize it.
Q Okay. And your position is that you don't owe anything for it, because it's something we were obligated to do under the contract?
A Yes.
Q And our position – tell me if this has been articulated to you differently by anybody at BellSouth. But is it your understanding that our position is it was not included under the contract? So if we are going to undertake to provide that, then you need to pay us something to cover the cost of doing so?
A It's never been articulated to me that way. What has been articulated to me by BellSouth and BellSouth account teams is that I believe your interpretation of the contract is that you were provided to – you're obligated, rather, to provide it to me in an

electronic format and LENS auffices.
Now, since the order relative to Georgia, there is this payment issue, but no one has articulated it the way that you did.
Q Okay. You heard Mr. Stacy's testimony this morning, earlier?
A Yes, I did.
Q Did you hear him say that he believes that the Georgia commission has provided a mechanism to work out the payment issue?
A Yes, I did.
Q Would you agree with him?
A I believe there is a cost docket in Georgia. Cost was never addressed in the OSS workshop. I did – I do recall them referring to a cost docket, but that's the only information I have. I don't get involved with the cost issues relative to systems development and whether or not MCI should be obligated to pay or not.
Q Okay. So assuming that BellSouth provides the information, and assuming that cost gets worked out some way that the Georgia commission approves, then is there anything left here to do for count two in this proceeding?
A No. There would be nothing left to do.
Q Okay. One thing I wanted to follow up on just

for completeness sake.

Exactly what is it that you could do with a download that you can't do by accessing the information through an electronic interface?

A If that electronic interface, which is the one that's available to date is LENS, the issue with accessing RSAG or address validation information through LENS is that, first of all, LENS is a proprietary interface, which requires me to have LENS on every desk top for all of my customer service representatives, which now means they have two systems that they need to utilize in order to complete a customer order.

One, they have to validate an address, and I would go through the LENS screen to do that. And then I would have to retype that information or rekey it into our order system in order to get that information into our order.

By having to download that information, MCI is now able to incorporate that information into their own front-end systems and integrate it into our preorder and ordering functionality, such that now that information could be prepopulated on a screen similarly to how it happens in your system today. So that we don't, number one, have to access a different system; and number two, rekey that information into the order.

Q Now, would this integrated functionality be included in the -- and I can't remember the letters, but in the sort of national standard system that MCI advocates?

A You want me to help you with the letters, TCP/IP/SSL3, ADIT TCP/IP/SSL3.

Q I thinkg the fourth or the fifth letters were reversed.

A Is that the one?

Q Yes, that's the one.

A Conceivably.

Q Okay.

A Absolutely conceivably address validation. First of all, address validation is a part of the specifications for preorder. And it makes sense to be able to do that in an integrated manner as opposed to having to have that downloaded.

What we need to think about here is really timing and our efforts to get RSAG data. It's been -- without having the dates right here before me, it has been at least a year that we have been addressing this issue with BellSouth, trying to get them to download to us the RSAG database, because we identified earlier on that LENS was too cumbersome, imposed too many hurdles for us to use in a true production environment.

So from a timing vantage point, it is conceivable that you may make the transition from a download to utilizing the information through a true interface that is integratible between preorder and order.

Q Okay. I am just going through the notes here, because some of these things we have covered already.

A Okay.

Q On page 13 in discussing RSAG, you say that access in the database on a transaction by transaction basis causes the ALECs to remain completely dependent on BellSouth for access to the information.

A Is that direct?

Q Yes. I believe. Yes, it's direct.

A Okay. I am sorry, what lines again?

Q It begins -- let's see, it's on page 13, actually, I think the sentence probably starts on 12.

A Okay.

Q You say LENS and ICREF provide on-line access to RSAG data, only on a transaction by transaction basis, and ALECs remain completely dependent on BellSouth for access.

A Uh-huh.

Q And then you go on to talk about an outage, a scheduled outage situation. Other than what's listed

here, this scheduled outage, and other than what you told me about today, does this dependency create any other problems, or is that basically it?

A This dependency on either LENS or ICREF having to utilize a totally separate system to do a single function, and the fact that it's a proprietary interface are the primary reasons.

In addition -- well, you know, there is a number of reasons. I have to go through multiple screens in order to get to address information every time I want to do it. So if I had to list the issues relative to LENS, it would be response time relative to LENS, the fact that LENS is proprietary, the fact that LENS requires me to have my service reps utilize multiple systems and multiple interfaces, not only from BellSouth, which would be one, but potentially from other ALECs as well; having to rekey that information in, and having to go through LENS and do sign on and do address validation to get to that information. And address validation is truly accomplished in LENS with a phone number.

Q Okay. Aside from the LENS specific issues, though, is it fair to say that accessing the BellSouth database on a transaction by transaction basis, in and of itself, isn't a problem?

A Outside of the LENS front-end?

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Q Right.
A Today, it's a problem. The anticipation in the future with BellSouth moving to a standard EDI TCP/IP interface should not pose an issue for us.
Q Okay. The schedule, the outage issue here, I think, is independent -- well, we will get into the substance of it in a second. Now, let me ask you, first of all, that's independent of LENS, correct?
A Actually, this 42 hours a week, I think, is not 100 percent accurate relative to the address validation portion, itself. This 42 hours worth of downtime per week is the total amount of downtime for all systems available by BellSouth that we would have been required to go through at the time in utilizing LENS to submit an order.
So this downtime total represents weekly downtime of LENS, weekly downtime of DSAP, weekly downtime of RSAG, weekly downtime of I believe it's called the PSIMS file, weekly downtime of the LEO system, weekly downtime of the LSOC system and weekly downtime of the SOC system.
Q And to get an address from the BellSouth database, you have to go through every one of those systems every time?
A No, you don't. You have to go through the LENS

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system, and you have to go through the -- I believe the only two I have to go through is through the LENS system and through the RSAG database to get address validation.
Q Okay. Now, the LENS system, you heard Mr. Stacy say -- I am sorry, not LENS. The address validation system you heard him earlier say was only scheduled to be down four hours a week?
A Yes, I did hear him say that.
Q Do you have any reason to believe that's wrong?
A I would have to refer back to -- that -- all of that information is printed on the BellSouth web. So if Mr. Stacy said it's four hours, I would tend to believe him.
Q Okay. The LENS, how much is it down per week on a scheduled basis?
A I would have -- I don't have that information here in front of me. I would have to check that.
Q And is the RSAG database, aside from LENS, is it -- well, I guess the RSAG database is really -- that would be the same as the address validation system?
A Yes, that is the address validation system.
Q Okay. Now, the use of CGI LENS allow the ordering and the preordering to be integrated?
A No.
Q Why not?

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A Well, I guess I should state it this way, from MCI's experience, we have had little success with totally being able to utilize the CGI specifications to truly get the level of integration that we are looking for.
MCI requested the CGI specs from BellSouth sometime early mid-1997, actually got the updated version or the most current version, I should say, in the December time frame. And our intent with the -- I am sorry -- with the CGI specifications was to use that to be able to pull customer service record information from the BellSouth database.
Once we embarked upon the utilization of the CGI specifications for that, we quickly uncovered that there was not enough information in the CGI specifications to allow us to effectively integrate the information that we are receiving from the BellSouth system into our own ordering systems. So I would have to answer the question, based on our experiences, no.
Q Okay. And, again, what efforts have you made to integrate them?
A We have taken the CGI specifications, we have incorporated those to give us the capability of pulling the data from BellSouth's system for CSRs, and we are able to display that information on a screen.
Q Okay.

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A We are not able to incorporate that information into a usable database, however.
Q Why not?
A Because the data is unparseable, and BellSouth has refused numerous times to provide us with the record layout, or as Mr. Stacy characterized it in his deposition, the SKEMA for the data that would allow us to parse it once we got it.
Q So is that a CGI interface problem, or is that a problem with the data you are getting?
A Well, it's relative -- I think it is all related. I can't truly separate it.
When you ask if it's integratible, truly what you are looking to integrate is the data that you receive from your vendor. And if you are unable to integrate that data, then it makes those interfaces non-integratible, to make it machine to machine.
Machine to machine would give you the capability of taking data from one place and populating data from another place upon demand. And the CGI specifications relative to CSR, as we have tried, does not give us that capability.
Q But that's because of the flow of CSR data, though, correct?
A It is because of the reluctance by BellSouth to

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provide us with the data necessary, in order for us to make effective use of that data.

Q Okay. What I am trying to get to, though, is it's not a technical problem with the CGI interface itself, if I understand you correctly. It's rather an issue of BellSouth not giving you information or data that you believe you need to make it workable.

A Well, according to BellSouth, all of the information --

Q Could I just have -- I am just trying to clarify, is it a CGI interface problem, or is it you are not getting data you need problem?

A It's a CGI problem.

Q Okay.

A And it's a CGI problem based on the way it's been characterized by BellSouth, such that the CGI specifications has all the information you need in order to integrate our LENS system with the ordering functionality that MCI has built. And that's not true.

And we view the CGI specifications as being all encompassing; not only of the specifications, the technical specifications that says, send us this information this way and you will get back that.

The information truly that you get from that -- unless you're able to interpret it -- is useless, which

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is the essence of building the interface anyway. So it's really difficult, or I would say nearly impossible to separate the usefulness of the data that comes across the interface and the interface itself.

Q Let's put it this way, if you got the CSR layout information that you want, would the interface be usable then?

A We believe it would be, for CSR.

Q Now, we will get into this in greater detail later, but tell me for CSR, you used the word, parse, before, how do you define that word?

A I define parse as the ability to separate groups of data into their discrete usable forms. In other words, I would be able to parse first name from last name in data that float downstream.

Q Okay. Refresh my memory, which issue is this, the CSR; because I know that was dealt with separately. Do you remember offhand?

MR. O'ROARK: Six, I think.

MR. CARVER: Six. Okay. We will come back to that.

MR. O'ROARK: Yes.

BY MR. CARVER:

Q Six?

A Yes.

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Q Okay. I am going to talk to you a little bit about count four, television reservations.

A Telephone number.

Q What did I say?

A Television.

Q Oh, okay. You knew what I meant.

Now, you testify on page 21 that LENS only allows a customer service representative to reserve six at a time, correct?

A That's accurate, yes.

Q Now, you heard Mr. Stacy's testimony on this point earlier today, also, correct?

A Yes.

Q And what he said is that after you have reserved six, then you can go back basically two clicks earlier, begin the process again and reserve six more in the same session and six more and six more and six more. Is that the way you understood his testimony?

A That's the way I understood his testimony. I don't know about the number of clicks. But Mr. Stacy is accurate in saying that I could leave that screen and come back and reserve an additional six numbers, but a maximum of six per reservation.

Q Okay. So in a single session, you could get as many numbers as you wanted. You would just have to go

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back and forth between screens to do it?

A Yes.

Q Okay. And with RNS, the number 25, is that a maximum that can be obtained in a single session?

A I believe that's a self-imposed maximum on -- by BellSouth, I believe.

Q When you say self-imposed, I mean, that's the way the system works, right?

A Right. I guess what I mean by self-imposed is they decided on that limitation, it wasn't some industry imposed limit.

Q Now, LENS allows access to the Atlas system database for phone numbers, correct?

A You said LENS?

Q Yes.

A Yes, it does.

Q And that's the same database that BellSouth uses, correct?

A For telephone numbers, yes.

Q And EC-Light would also allow access to it?

A Yes.

Q Okay. Let's go into USOC information. In his rebuttal testimony, Mr. Stacy says, as of June 8th, 1998, the USOC information that you requested is on the BellSouth web site, and it can be downloaded.

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A What page number, please?
Q I can look it up for you.
A Don't worry, I thought you had it.
Q No. It's just from my notes.
A I believe that's what he says in his testimony.
Q Okay. Do you know if that's true or not?
A The way it is characterized by Bill Stacy, it is true. Whether or not it was usable at the time is an entirely different issue. But subsequent to that, BellSouth has provided to us -- while it's not implied in Mr. Stacy's testimony, I don't believe -- they provided us with the USOC information via what he termed earlier today as the comma-separated value file, which is what we asked them to do, which has now made this information usable for MCI.

But the issue that remains is associated information relative to USOC for FID or feature identifier or field identifier, as well as state validity, which BellSouth has not put in a similar CSV format for us to download.

Q And that information, the fit information, the State identifier, that was not on BellSouth's web site?
A I believe that information was on BellSouth's web site, and that information as it exists on the web site is not usable.

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Q Okay. So it's the separated value file that has rendered a portion of that information usable, but not all of it; is that your position?
A Well, yes and no. BellSouth has always had these two pieces of information separate. They would provide the USOC information in one file database. And then they would provide, in a separate file, the FID and state validity information; State validity being that this USOC is good in this state, but it's not good in another state.

So those have always been separated. So you always had to go to multiple places in order to accurately assemble all of the information necessary to place an order.

What we have asked BellSouth to do is to provide us with this information in a usable format -- on the web is fine -- because we can download it if it is in the right format. The format that we asked them to make the transition for USOC as well as for FID they have made, but they have not made that same transition for the FID information.

And I think this issue could be easily resolved if BellSouth just changed that format to the CSV format. We can download it, we can incorporate the data, and we can submit orders to you -- at least for USOCs -- air

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free. So it's a real simple request.
Q Okay. Let's go back to his testimony, it's on page 18.
A Direct or rebuttal.
Q Direct. It may be rebuttal. Rebuttal.
A Sixteen.
Q Yes. Line 14.

Now, he says that the -- that on that date, the USOC information on BellSouth's web site is now available in an additional format, which is a generic format that will enable customers to import USOC information into spreadsheets and databases as MCImetro requested. Now, I read that to mean that it's usable.

A Yes. That's that CSV format that BellSouth agreed to put the USOC information in.
Q Okay. So your complaint, as I understand it now, is that the FID information hasn't been put in the same format.
A It's not a different complaint. It's just an offshoot of the fact that they only did one piece as opposed to the whole piece.
Q Okay. So it's the FID and the State verifier?
A I term it the State validity.
Q Okay. And is that in a third document?
A State validity?

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Q Yes.
A FID and State validity are in the same document.
Q Okay. In terms of why you need this information -- and I am looking at page 24 of your direct testimony -- you say that ALECs are experiencing higher rejection rates and BellSouth's retail units and USOCs are the biggest culprit?
A I missed it. Page 24?
Q That's line 18 where I started reading, ALECs are experiencing much higher rejection rates?
A Uh-huh.
Q What's your basis for making that statement that USOCs are the reason for the rejection rates?
A Comments made by Bill Stacy identifying reject rates or reasons, number one -- the number one and number two reason for rejects being bad fit in USOC and bad address validation.
Q Do you know what MCI's reject rates are?
A Today, MCI probably has very little reject rate relative to USOCs, because we are not currently submitting orders via these interfaces to BellSouth.
Q How are you submitting the orders?
A Right now, orders to BellSouth go through R4 ASRs across NETPRO today.
Q So when you make the statement that on page 24

lines 18 and 19 about what ALECs are experiencing, you are not including MCI in that? You are talking about other ALECs?

A When MCI gets the EDI system up and operational, if we don't have this functionality, we would expect to experience similar rejects to those that are utilizing BellSouth systems to submit orders.

Q Okay. But my question was, are you referring here to other ALECs?

A Well, MCI has some experience in reject rates relative to orders. So here while I am referring to other ALECs, we do have experience from earlier ordering of BellSouth.

Q Earlier ordering through electronic interfaces?

A Through a LENS interface.

Q And what was the time frame for that experience?

A This time last year.

Q What reject rates did you have then?

A I don't know, but I would be -- I am sure we can dig up that old history.

Q Do you -- did you analyze that information to see if USOCs were the reasons for the rejections?

A I don't recall whether we did or did not.

Q Okay. So as you sit here today, you don't know that that was the reason?

utilize historical information. BellSouth could take a look at their reject rate. And to ensure that the reject rate that they were experiencing was similar to that same reject rate that a CLEC would be experiencing.

Q Okay.

A So I can't pick a number out of the air and say, 10 percent is acceptable. I can't give you a yes or a no to that.

Q Okay. So whatever number would constitute parity, that would be the acceptable number?

A Yes.

Q Okay. Let's turn to issue six.

A CSR.

Q Yes. Television information.

A Been there before.

Q Okay. On page 16 of his rebuttal --

A Mr. Stacy.

Q Yes. Mr. Stacy gives a list of CSR information that is being provided.

A Okay.

Q Do you agree that all of the information he lists there on lines 12 through 22 of page 16, all of that is, in fact, being provided?

A Yes.

Q So what is it that you want that's not being

A I don't know.

Q Okay. Now, in his testimony, Mr. Stacy says that some ALECs are experiencing only 10 percent rejection.

A Okay.

Q Now, for purposes of this question, assume that's accurate. Is that an acceptable rejection level; do you believe?

A I can't -- it's real difficult for me to address what's an acceptable reject level. An acceptable reject level, because of ALECs failure or refusal to provide information that is necessary in order to circumvent rejects, I would say that, no, that is not an acceptable reject rate. If that reject rate is due to some flaw in what the CLEC is doing to submit an order to BellSouth, I would say the jury would still be out on whether 10 percent was an acceptable number.

Q Well, aside from the reason for it, is there any number at which you could say, this is a good rate of orders going through and the numbers that are being rejected? I mean, if it were 99 percent, could you say that would be acceptable without getting into why the one percent didn't go through?

A I would have to refer back to whatever performance measurement data we have, where we would

provided?

A That's another list that I truly don't have. When -- I was the one who worked on the CSR stuff, so this one -- BellSouth and MCI sat down, and BellSouth instructed MCI what fields it was going to provide relative to a CSR.

And they actually provided to MCI a list of the fields within a CSR and determined unilaterally, I would say, what was available or -- I am sorry, necessary versus unnecessary versus proprietary. And it was a unilateral decision at that time.

And MCI, being a carrier who, I think, has the wherewithal to determine what's necessary, doesn't believe that BellSouth should be allowed to unilaterally decide what information it provides versus what information it doesn't. There is a list that was provided by BellSouth.

Q Okay. What is it that MCI wants that you are not currently getting?

A I can list at least one thing that stands out in my mind that we would want and we are not getting, and that is calling card information.

Q Okay. And that would be, what, information regarding the particular customer's calling cards?

A Information regarding the number of calling

cards associated with this account, who those calling cards are assigned to.

Obviously, if you are going to make a transition of a customer from one service provider to another, you would want to keep the services the same.

Q Okay. Anything else?

A Not that I could run off of the top of my head. But, again, similar to the other requests, we can provide that list of CSR fields and information types that we think are necessary.

Q Okay.

MR. CARVER: Let's make that a late file, then.

MR. O'ROARK: That's fine. I think that's one that's actually been an exhibit in another proceeding; we can dig it up.

MR. CARVER: Okay.

(Whereupon, Exhibit No. 3 was marked for identification as a late-filed exhibit.)

BY MR. CARVER:

Q Mr. Stacy's position on behalf of BellSouth is that you're already getting everything, except pricing information. I take it you are saying there is something beyond pricing information that you're not getting?

A Yes.

Q Okay. And that's the list that you are going to

provide me?

A Uh-huh.

Q Okay. Do you object to the fact that BellSouth does not give you pricing information?

A Well, I guess I would say, in Florida, that's true. In Georgia, they have been ordered to do so.

And our objection in Georgia would be the same for Florida, in that we do object to BellSouth not providing us with pricing information.

Q Well, you say they have been ordered in Georgia; you are talking about the OSS docket, okay?

A Yes.

Q Not -- well, I don't want to ask you too much to interpret that order. But whether a confidentiality proprietary restriction is placed on the conveyance or the use you would make of that information?

A No.

Q Okay. So it said -- so your representation is that the Georgia order says that we can give you all of the information regarding pricing of the services we provide to customers, and you could do anything you want with it?

A Basically, it says, calling from recollection, that BellSouth shall make available to MCI, or to CLECs rather, not to specifically MCI, pricing information

relative to the products and services provided to a customer.

Q Okay. So for individual customers, it's your testimony that we have to tell you how we price the things that they buy.

A You have to provide us with the pricing information. I mean, if you consider that telling us. What you do today is you strip that information off of the CSR before you provide it to us.

Q Okay. What is your understanding -- you keep saying, pricing information. I am trying to figure out exactly what that is. Is that the price of the individual services that individual customers of BellSouth purchase today? Is it your understanding that that's what we have been ordered to provide in Georgia?

A It's my understanding -- I mean, I guess it depends on how you would determine price. Price is what a customer pays for services. That's price. I mean, it's real straightforward and simple.

Q So is that a yes, then? That's your understanding of what we have been told to provide, individual prices for individual services purchased by individual customers?

A That's my understanding.

Q Okay. And it is your understanding that that

order doesn't place any sort of restrictions on the use that you make of it?

A That's my understanding, as well.

Q And that there is no sort of proprietary protection whatsoever.

A That's my understanding as well.

Q Now, the Georgia order, again, doesn't deal with this from a contract standpoint, does it? In other words, the OSS order did not reach any sort of determination that MCI has a contractual right for this information?

A Again, I guess I characterized that Georgia OSS workshop as a collaborative effort put forth by the Georgia commission. That included not only MCI, but all other industry participants, to decide what functionality, what capabilities, what things you needed from the vendor in order to have a meaningful opportunity to compete.

So there was never an issue where there were contract-related terms or conditions that came up as a result. So it wasn't a specific MCI and BellSouth hearing.

Q So that would be a no?

A Yes. Yes, that would be a no.

Q Okay. I am just trying -- if you can give me

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your answer before you explain, that would be helpful.
A All right. I apologize.
Q Okay. Why does MCI want this information?
A MCI wants this information because, first of all, it's public information anyway. It is all tariff pricing. Whether we go to the tariff to get it or whether it is going to the CSR, I don't think drives any proprietary issues within BellSouth.
It also gives us the capability of potentially coming up with unique products and services relative to what a customer is doing as well.
What you may ultimately come up with in the future by having this information -- I don't think that I can, you know, safely say all of the reasons. But it was identified as a major issue by our marketing contacts and our marketing people in the field, because this information was all of a sudden stripped from the CSR and this information that they had been used to receiving for years from BellSouth. And that's -- go ahead, I am sorry.
Q So basically, it's your marketing people who want the information?
A Our sales people want the information.
Q Okay. So -- and I assume they want it so that they can target what they perceive to be the more

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profitable customers?
A Absolutely not, because you can't mine a CSR database in order to do prospecting. So any customer that we would be accessing the CSR for is a customer who has provided us permission to access that CSR. So mining is absolutely not an issue here relative to pricing information on a CSR.
Q My question was, do the marketing people want this information so that they can target the more profitable customers?
A And my answer to your question is no.
Q Okay. What do they want it for, then?
A I thought I just said that. The reason we want the information, pricing information on the CSR, number one, is so that we would know accurately what a customer is being billed for services.
Oftentimes, when you deal with a customer, they do not know what products and services, number one, they have in all instances; number two, what rates they are being charged. The CSR, with the pricing information, gives us the capability to, number one, convey that information to a customer; number two, that information, we have the potential of auditing what you charge us for services, because I believe that there is some discount off of the retail rate. So it would give us that

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capability as well looking at a customer account.
So I can audit, I can help a customer know what their pricing is, I can determine from a customer how to cut their bill by 10 percent, because they don't need a service.
It's a number of things that you can do. I would say the possibilities are endless.
Q And you are going to do this for our customers, or do you anticipate that you are going to win those customers by the use of this information and then help them with their bill?
A I know it's not fair for me to ask you a question. So, I mean, I won't. I don't know what you mean when you say, our customers.
Q Well, if the information relates to a BellSouth customer, that's what you want; you want information about what BellSouth charges the customers that it currently has for the services that they have, correct?
A That information is tariffed information today. What you are asking us to do is take an extra step.
Q You need to answer my question. That's what you want, correct?
A I am sorry, you have to restate the question.
Q Information about what BellSouth charges customers that are its customers today, the individual

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customers, individual services, that's what you are asking for, correct?
A I am asking for BellSouth to include the tariff pricing that they charge customers on the CSR.
Q On individual customers?
A Yes. CSRs are by individual customers.
Q Well, you said yourself you wanted to know the tariff price; you could just go look at the tariff, right?
A That's one place you could go do that.
Q Okay. What you want is additional information beyond what you would get from the tariff --
A I would consider --
Q Let me finish my question. What you want is additional information about what individual customers order, right?
A That information would already be available on the CSR, what services a customer orders.
Q And the price for those services, that's the information you want for individual customers, correct?
A We want the tariff pricing for products and services sold to a customer on the CSR.
Q Well, what an individual customer purchases and what they pay for it, you can't get that out of a tariff, can you?

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A The part that I guess I can't get out of a tariff would be what a customer purchases.
Q Well, okay. So you are saying that you could get the CSR and you could look at what the customer purchases, and you could reconstruct the price from looking at the tariff?
A Yeah, with much diligence, I suppose that's exactly what we do today, and do a path in that information provided to us.
Q Okay. So you could -- in your view, you could get the information you are looking for without having BellSouth give it to you?
A I would say that the information exists.
Q And you could obtain it in your view by comparing the tariff to comparing what you're provided?
A By going to the tariff and looking at those prices and doing a comparison back to what's on the CSR for a customer. And when you start to look at the large customers, customers with a lot of products and services, the amount of time necessary to do that could be extremely long.
Q That was a yes, you could do that?
A I think so.
Q Okay. Now, you say that the marketing people don't want this to target the high margin customers. How

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do you know this? Has anyone in marketing, who's asked for this information, made a statement to you to that effect?
A Well, I know this because we can't access a CSR without customer permission. So there has to be some marketing intelligence that we use to target customers well in advance of acquiring the CSR.
Q Explain to me how that process works.
A I don't have any familiarity with that process. I am not in marketing.
Q Okay. Well, when you say you can't access the CSR without the customer's information, what do you mean?
A That means we have to have an LOI, a letter of -- an LOA, I am sorry, a letter of authorization from a customer in order to access a CSR, and that there are guidelines put in place by the FCC second order that put the proof of burden on the CLEC, should there be an inquiry as to whether or not they were accessing CSRs without customer permission. So the ruling here at MCI is that you have to have LOA before you access customer CSRs.
Q Okay. So it's your testimony, then, that in every instance in which you request BellSouth to provide you with CSR information, you already have an LOA on file signed by that customer? Could I have a yes or no,

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please?
A I am going to say no. BellSouth -- MCI has a blanket LOA with BellSouth. So from the BellSouth vantage point in every instance, we should -- I guess I am going to take that no and say I don't know if we do or if we don't.
The process is, we should have permission from a customer before we access their customer service record. Now, whether or not that is a recording based upon some third party verification process that we use to capture the fact that we got permission from a customer or whether or not that's something written by the customer, I can't say which of those two processes we employ or whether or not we employ both.
But I will say that the process dictated through MCI is that there is no access to CSRs without permission from a customer.
Q Each and every customer individually?
A Each and every customer.
Q Okay. So it's your testimony that this CSR information you want in some form, although you are not aware of what the form is, you have the permission of every one of these customers for MCI to have that information?
A Yes.

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Q Now, what document would evidence that?
A I am sorry, evidence what?
Q The fact that you got that permission from the customer, or is that one of the things you don't know?
A I don't know if I am following the question. A document, this letter of authorization, this blanket LOA we have with BellSouth?
Q Well, if I want -- okay. You're losing me when you talk about a blanket LOA.
A Okay.
Q Do you have to have permission from every customer individually?
A Yes.
Q Okay. So if I want to find out whether or not you had permission to get the CSR for John Smith, how would you find out if you did or you didn't?
A Well, first of all, the FCC would initiate an investigation; at which point, we would have to produce specific information relative to permission to access a CSR. I don't have one document or a host of documents that says, here is this stack that are signed, and these are the customers that we have accessed. I don't have access to that information.
And, again, it could be written, or it can be recorded information. MCI houses that information, and

if the FCC were to initiate an investigation, we could produce the necessary information to prove that our accessing of CSRs is within the guidelines of the law.

Q Okay. So if you undertook to find out whether there was an LOI for John Smith, personally, as you sit here, you wouldn't know how to do that?

A Yes, that's true, I would not.

Q Okay. And just so I am clear on this point of your testimony, the reason why you contend that MCI doesn't want this to target high margin customers is because they have an LOI that says the customer information could be given to them; is that your testimony?

A No, that was not.

Q Okay. Then tell me again. How is it that you know that that's not the reason why MCI wants this information about what particular customers are buying and paying for what they buy?

A In MCI's marketing process, they identify target customers for service. Once they have identified that through whatever means they do, be it, you know, if they are high long distance customers or if, you know, whatever other marketing intelligence they can gather from a customer, cold call, whatever the case may be; that process would happen before you could access a CSR,

because, again, you have to have permission from a customer to access a CSR. So MCI just does not arbitrarily access CSRs to mine high value customers.

Q So it's your testimony that MCI would do some sort of marketing intelligence, I think you said, to figure out who the high volume customers are. And then, and only then, would they go through the steps necessary to procure the CSR information for those customers?

A High volume and any other customers they target, yes.

Q Okay. Well, I don't understand the reference to high volume.

A Well, you allude to high volume. MCI markets to all customers ubiquitously. So there are marketing approaches that we will make sales to all customers. So we are not -- we are not isolating customers from the profile.

The testimony here is this --

Q But wait a minute, though. I thought you told me before that MCI's marketing process involved targeting particular customers.

A They target customers for some products and services. For general long distance services. They sell to everybody. I mean, depending on what you are selling to the customer, be it internet services or data services

or just general long distance telephone service will determine from a targeting vantage point what product and service you offer to that customer.

But generically, MCI sells services to all customers and before acquiring or accessing the CSR, has permission from each and every customer before they access a CSR.

Q Well, if MCI is trying to sell to all customers, then wouldn't it seek to obtain that information from all customers?

A I am sorry, what's, the information?

Q This information in the CSRs?

A Maybe I am talking past you.

MCI's process before acquiring the CSR is to get permission from every customer, period.

Q Okay. How do you decide whose CSR information you want and who you don't want?

A Based on customers that give us permission to access it.

Q Okay. So you ask everybody for permission?

A If we are making a sale to the customer, absolutely. Customers don't generally just say, here, access my CSR.

Q Okay. So then basically any customer that would give you their CSR information, you would want it; and

then once you have it, you can look at it and determine whether they are generating a lot of profit based on what they are buying, correct?

A I can't answer that question.

Q Why not?

A Because I think it is very misleading, and you want a yes or a no. The way the question is characterized is, we get permission, we look at a CSR, they are not high value customers, we don't sell to them.

Q Well, let's assume that you are moving in a local market and you have limited resources. Wouldn't you assume that you are going to expend those resources trying to sell to the customers who will be the most profitable?

A MCI's marketing strategy, as best I know it --

Q You are just not going to give me yes or no's, are you?

A You know, it's really difficult for me to give yes or no to these types of questions, I mean, because they are not yes or no questions.

Ask the question again, I will try to answer yes or no.

Q Okay. You basically said MCI sells to everyone. And my question is, if you have limited resources and you're entering the local market, wouldn't you expend

those limited resources trying to get to the customers who will be the most profitable to serve?

A Because I am not the sales manager, I don't know how they would deploy their resources if they had limited resources. So I guess my answer to that question is, I don't know.

Q Okay. I am going to take one more pass at this.

Specifically, how do you go about obtaining the LOIs from customers?

A I don't. I'm sorry, go ahead.

Q No. How --

MR. O'ROARK: Counsel, excuse me, counselor.

THE WITNESS: I don't know. I am not the marketing representative.

MR. O'ROARK: You are referring to LOIs. I think you mean to refer to LOAs.

MR. CARVER: Yeah, or whatever.

THE WITNESS: I don't know what the specific process is that MCI utilizes to go through it. I think I alluded to a couple of processes that could be used. One is third party verification, one is written permission from a customer.

Specifically, I don't know.

BY MR. CARVER:

that.

Q Okay.

MR. CARVER: Do y'all want to take a break at some point?

MR. O'ROARK: It's about time for one.

(Brief recess.)

BY MR. CARVER:

Q Let's go to issue seven, and let me ask you, when did MCI request electronic notification of jeopardies?

A I don't have the specific date. It was early in our EDI development for a version BellSouth defined six dot two, early, mid-'97.

Q Was that --

A I don't have a specific date.

Q Was that done by way of some particular document?

A As a matter of fact -- I don't recall if it was by document or by E-mail or by some other means of communication to the BellSouth account team.

Q Okay. Are you sure that there was a formal notification in writing of some sort?

A Yes, I am sure.

Q Okay.

MR. CARVER: Can I get that?

Q But in terms of which customers you would request written authorization from, you don't know how that decision is made?

A No, I don't.

Q Okay. So you don't know if you just try to get it from everybody or particular customers?

A No, I don't.

Q Okay. One other question on this same area, you say on page 26, line four.

A Direct or rebuttal.

Q Direct still. You say ALECs may be able to use this information to design new services BellSouth has not even thought of.

Is that your testimony there?

A Yes.

Q Explain to me how you would use the pricing information, that is basically what BellSouth charges its customers, to design a new offering that BellSouth hasn't even thought of?

A I think it's mentioned there in the context that we could.

Again, I think I mentioned that there is a number of scenarios that some creative soul may be able to identify it. I don't have specifics on what that product or process would be that would allow us to do

MR. O'ROARK: You may. It may be attached to Mr. Green's testimony.

MR. CARVER: Okay. Well, the reason I ask is that Stacy says there was no such notification. And I mean, it should be pretty easy to clear up, I would think.

MR. O'ROARK: One of the exhibits to Mr. Green's testimony refers to it, that might shortcut things a little bit.

MR. CARVER: Okay.

MR. O'ROARK: Would you like us to find it now?

MR. CARVER: Yes.

THE WITNESS: Well, I have one issue eight that talks about electronic jeopardies, rejects and loss notification on a document dated September 1997. That's Exhibit BGS.

MR. O'ROARK: That's the one I was thinking of.

MR. CARVER: Okay.

THE WITNESS: Okay. And that letter is from my vice-president to BellSouth's vice-president of sales, which means that the issue was worked down at the lower levels before it was escalated up to the VP level for resolution or attempted resolution.

BY MR. CARVER:

Q Okay. So when you say that MCI requested

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electronic notification of jeopardies, this document is that request, BG eight?

A I guess I would characterize it as the culmination of a number of requests.

Q Are there any other written documents in which this was requested?

A Yes. We would have to go back and look for them. I will check through documentation; I have to find that.

MS. BEDELL: Okay. I am sorry, are you asking for another late-filed exhibit?

MR. CARVER: Let me make sort of a half-way request. If it can be located easily, I would like to see it. But I don't want you to have to look through a bunch of documents. This is frankly not that big a point.

MR. O'ROARK: Okay. We will take a look, and I will notify you one way or the other.

MR. CARVER: If it doesn't take a lot of time, this is not a crucial point. I just wanted to clear that up.

MR. O'ROARK: Okay.

BY MR. CARVER:

Q Now, in order to make this process work -- and when I say, process, I am referring to the electronic

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notification of jeopardies -- what would MCI need to do on its end?

A Code specifications provided to us by BellSouth.

Q Okay. And do what with the specifications, I didn't understand?

A With EDI, there is a process called mapping, where we map the specifications into the interface that BellSouth provides us. So what we would need to do in order to map the specifications for service jeopardies is to get, number one, the specifications or business rules from BellSouth; code those into the interface; and then test functionality across the interface to BellSouth.

Q Okay. Before you get the specs from BellSouth, is there any kind of preliminary software development that would need to be done?

A No.

Q Okay. So at this point, has MCI done anything to develop the capability that it needs on its end?

A MCI can't develop this functionality without BellSouth. Since -- we are trading partners, but BellSouth is truly, you know -- and dictate may be too strong of a word, but they definitely decide what functionality will be available and what functionality won't.

So it's impossible for us to code in advance of

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having what's defined as the business rules or specifications for the functionality from BellSouth in advance.

Now, this functionality service jeopardy, let me be more specific, has a -- what I will term as a sibling called missed appointment jeopardies, that BellSouth has coded for in this edition of EDI and has left off the capability of supporting service jeopardies in this same version of the interface.

Q Now, is MCI requesting interim codes in advance of the development of the national standard?

A Yes, we are. And codes would be numbers, letters, numerics, whatever, that would give you a quick -- what I am going to term as a Morse Code definition of what happened with your order, no facilities available, bad payers, whatever the specific reason for the service jeopardy is.

So in advance of standards -- and I am not really positive that standards will define the actual codes that will be used. But if they do, then, the answer to your question is yes, we are asking for those in advance of the industry standards.

Q And do you know when the industry standards will be developed?

A I believe service jeopardies are in the EDI

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version 10, local service ordering guide four, which is scheduled for vote early '99, somewhere in that time frame. I would say, to be safe, by first quarter.

Q Okay. So you are asking for codes to be developed and basically just be used for, what, I guess a five-month period?

A Well, once it's approved, then you have implementation, which could take about six months. So we could conceivably be looking at a year from now. And, again, in the context of time, while it may seem that five months is insignificant now, this, again, has been one of those requests that has been lingering for some time with BellSouth where we tried to move and to get this functionality included when we first began development with EDI.

Q Now, if the national standards differ from the interim codes, do you agree with Mr. Stacy that that would require both BellSouth and MCI to rewrite and recode their respective sides of the interface?

A Yes. If we wanted to stay consistent with the standard. I mean, if the people who were using the interface, those being the players in the region, decided that the functionality was not that great to dictate the expense necessary to making the transition to be -- I guess I would term industry compliant at that time --

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it's conceivable that we might all agree to say that, for this functionality, we are not necessarily concerned about the industry standard here.

So there is a potential -- the answer to your question is, yes, but -- again, it would be a partnering approach at that stage of the game to determine whether we move forward or not and in what time frame it happened.

Q You say when we move forward, are you talking about the CLEC group or BellSouth?

A The CLEC group.

Q A couple of brief questions on issue eight, and this is the one we discussed earlier with the T1 ordering.

If MCI ordered MegaLink as a result service, would that provide the same functionality as a T1?

A MegaLink, MegaLink. MegaLink is BellSouth's T1 partner, correct, resell? Define MegaLink, I don't --

Q You are not familiar with MegaLink?

A I am not familiar enough to know whether or not it would provide me with the same functionality, and I hesitate to answer that because I don't have all of that information for MegaLink.

Q Okay. Do you know why this is ordered as a T1 rather than ordering a resold product that would provide

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that functionality, whatever it might be?

A Well, I mean, it's ordered as a T1 because that's the functionality that's necessary in order to provide the service to the customer. If your question is -- I think where you are trying to head, and maybe I am wrong, maybe I am not -- the question is why am I ordering -- why am I not ordering that service from the resell product line?

Q Not exactly. Why don't I just ask another question.

A Okay.

Q Are you ordering the T1 from the access tariff?

A Yes.

Q Okay. Now, this may be outside of your testimony. If so, just tell me. You talked briefly about the FOC process and how long it takes BellSouth to send FOCs to MCImetro?

A Uh-huh.

Q Does your testimony encompass whether FOCs apply to items ordered from the access tariff, or is that beyond the scope of your testimony?

A I don't believe my testimony goes into that.

Q Okay. Do you take a position on that? I will ask it that way.

A I would ask you to restate your question for me,

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please.

Q Okay. Do you have an opinion as to whether the FOC process covers items ordered from the access tariff?

A The FOC process absolutely covers services ordered out of the access tariff.

Q Okay. And what's your basis for that opinion?

A I believe there is -- even in the access tariff, there is timing around when a FOC should be returned, in effect, that a firm ordered confirmation should be returned for services orderd --

Q So in the FOC process, it would apply to orders out of the access tariff as whatever process is set forth in the tariff?

A Well, my --

Q Could I have a yes or a no?

A You know -- the answer to the question is yes.

Q Okay.

A Now, let me explain what I mean there.

There is an identifier that goes on a service that would identify whether or not the services are being ordered by MCImetro, which would be the local company, or MCIt, which would be the long distance company. And I believe this is more broadly covered in Mr. Martinez' testimony than in mine.

The expectation under the interconnection

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agreement is that services ordered for MCIm are bound by what I am going to define as the performance measurements relative to firm order confirmation timeliness.

Q And is that your opinion, or is that the opinion that's been communicated to you by --

A Now, what you asked me at the beginning was my opinion. So that is my opinion.

Q Okay. And is there some particular -- at the beginning of this examination, you told me that you weren't testifying specifically about what the contract required. And it sounds to me like we have gotten into that area.

A No. What you asked me was, whether or not I had an opinion. Now, I shared my opinion with you. The resident expert or the one that would define contract interpretation is Ron Martinez.

Q So what is your opinion based on?

A Let me say that, then, I don't have an opinion relative to this, and I will leave that testimony to be addressed by Mr. Martinez.

Q Okay.

MR. CARVER: That's all I have got.

EXAMINATION

BY MS. BEDELL:

Q Mr. Green, my name is Cathy Bedell, and I

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represent the PSC staff.
A Hello, Cathy.
Q And we are going to start with issue one.
A Okay.
Q Some of these are covering, of course, some of the same things we have covered already today. But if you will just bear with us, we might be able to get through it in a more organized fashion that way.
On page nine of your direct testimony, you state that MCI is unable to interpret the CSR data obtained via the common Gateway interface because it's transmitted as a continuous string of characters.
What information or what format does MCI need in order to be able to parse the information so it can be presented on an MCI customer service rep's screen?
A We need -- what we need is the capability of determining how to segment the data. If the -- the data today comes across as this block of one's and zero's, which represent letters. And there is no clear delineation as to when one character string starts and where another one begins.
What we have asked BellSouth for in our efforts to try to make use of the CSR data is to provide us with the information that would define for us what the field lifts are for a particular field. And from that, we

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would know that from character one to character 37, that's going to be last name. And we could parse that data that way.
That also gives us the capability of effectively putting that information into a database for use in a real machine to machine environment. That would allow me to take or do a sort on ZIP Code, for example, to identify all of the customers served out of a particular ZIP Code area.
So what we need from BellSouth is, as Mr. Stacy defined it, and I will use his terms, a SKEMA that would tell us exactly where I could expect to see information relative to its position in a data stream.
Q And what is the basis for not being able to get this information from BellSouth as you understand it?
A Right now, the way the CGI specifications are provided, BellSouth defines the CSR fields, and they break it up by this thing called a tag. And the tag is our indication of where the particular information in a CSR begins and where it ends.
So the tag is a block of data. It's nothing more than a block of information. And we really can't make effective use out of that. We can view the information on the screen, which is, in essence, the same functionality that I could get through LENS, but I can't

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effectively utilize the data.
We have tried a number of different ways, and we have been playing with this technology now for -- and playing may be, you know, mischaracterized here. But we have been trying to utilize this information now since early January. We received the information December 15th. So between now and early January, we have really been trying to make heads or tails out of the CSR data and have numerously asked a number of times for BellSouth to provide us with either a data dictionary relative to CSRs and/or a CSR record layout that would allow us to effectively use the data.
Q And what is your understanding about why they can't give you the LENS data dictionary or the CSR record layout?
A And it's really the CSR data dictionary or the CSR record layout. BellSouth defines that; either, one, it doesn't exist and therefore it's not available; or, two, the information is proprietary.
Q The actual data?
A No. Not the data, the SKEMA.
Q All right. On page 11 of your testimony, you state that the industry's agreed through a consensus that the electronic communication interface committee, which I believe is pronounced ECIC or --

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A ATIS -- okay, that one is called ECIC.
Q All right. The ECIC of ATIS.
A ATIS.
Q You state that the industry has agreed that EDI via TCP/IP/SSL3 is an appropriate interim interface for preordering. I actually have a couple of questions about the ECIC. Do you know what the makeup of the ECIC is?
A The ECIC is made up of industry players, which would be a combination of both CLECs, ALECs and independent carriers.
Q Does MCI have any rule -- does MCI have any role on the ECIC committee?
A MCI is a member of the ECIC committee.
Q Okay. And as a member of the committee, can you give us some idea of what your -- what the role is, what the responsibilities are?
A Our responsibility -- and I would have to check back internally. I don't believe that we are chairing or cochairing a seat at ECIC. So that makes our role kind of as just a general member.
Q A participant?
A A participant.
Q And please let me know if this is something outside of your understanding. But what authority does the committee have for setting national standards?

A Well, the committee doesn't have any authority, so to speak. They have the responsibility to -- through consensus, set the direction for the industry. So their primary responsibility is to try to get consensus on resolution of industry issues and try to come to some agreement that could be -- that's really a win/win for all players; which is why everybody has an equal vote, and they go through a democratic process to determine whether or not an interface or a protocol will be accepted or rejected.

Q So there isn't any particular authority that they have that comes from any act or anything?

A No, nothing at all. It's -- I believe it's a voluntary group put together to try to get issues closed sooner rather than later.

Q And in your rebuttal testimony, where you state that the EDI TCP/IP was approved as an industry guideline, is it your understanding that that was approved as a permanent interface for preordering?

A Yes. Permanent interface for preordering.

Q Okay. And has the ECIC stated that API using the Corba protocol is also an appropriate interface?

A Corba is one of the other potential preorder interfaces that has yet to be approved by the industry. There is still some work left to be done by that group

before it goes to vote.

I know Mr. Stacy characterized it -- characterizes it as being before the groups today. That's not my understanding, that it's up for voting. And I believe from my internal resources the best case date for potential approval of that protocol is slated for sometime fourth quarter '98, best case.

Q Is it your understanding that the EDI TCP/IP is an interim interface also?

A Interim in the sense that ultimately where the industry wants to get to is to an interface that is termed as electronically bonded, which gives you more of a realtime functionality than what EDI provides you.

So while it's characterized as interim there, my intention for characterizing it as such is to let you know that it's not the end state for where we ultimately want to be longer term.

Q And does that have something to do with the screen scraping that you were talking about earlier today? It doesn't give you the direct interface that you are looking for?

A No. This actual interface with EDI TCP/IP/SSL3 would be an interface that we believe would give us the ability to integrate both preordering and ordering.

And the assumption there is that we would be

working closely with BellSouth to determine the functionality that was necessary in order to do that. But based upon the standard, it will provide us with that capability, which CGI today does not provide us with.

Q And I may have missed something. What does the electronic bonding interface that MCI wants adopted do that the EDI does not?

A It -- probably nothing more. And I say probably because my team and I have been very focused on getting interfaces up and operational that we can use today. And electronic bonding is more long-term into, you know, beyond the year 2000 as far as we are concerned, based on the progress the industry is making.

So I can't really answer what electronic bonding would provide us that EDI doesn't, with the exception of giving me direct access to the system.

EDI is a batch process. In other words, we are on our side of the interface. We are inputting all of this information, and then we send it across to the BellSouth system, and it has to go through these EDI translators before it actually gets into the BellSouth legacy systems.

Electronic bonding potentially could provide us with the capability of not having to go through all of those various interfaces, and more quickly getting us to

the BellSouth ordering system for order entry, and preorder systems for preorder acquisition.

Q Okay. Just more streamlined?

A More streamlined. That's an easy way of saying that.

Q What is the reason that MCI does not support BellSouth's application program interface using the Corba protocol?

A ED -- MCI has built an ordering interface built on EDI. And Corba would use an entirely different set of data model than EDI would. It has its own set of data models that -- It would require us to build a separate interface for preorder functionality.

EDI built on a TCP/IP/SSL3 is a protocol that has been approved for both ordering and preordering. And the development of that functionality is far more effective than building a separate API interfacing and having to maintain two separate Corba data model interfaces and a whole different set of EDI data model. So we prefer to have a single set of data models.

Q So would I be correct to say that it's your opinion that the API interface could not be integrated with the EDI ordering?

A No. It probably could be done with some additional work and effort required.

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Q What advantages to MCI would there be if the EDI was available so that it could integrate the preordering and ordering functions?

A The immediate advantage to MCI is that we could take full advantage of some of the preorder functionalities that would exist. And the assumption there is that we would remove a number of the barriers that LENS introduces to us today, number reservations, or only having access to six numbers, limitation on CSRs, not having access to due date calculation, things of that nature.

It would also give us immediate advantage of being able to prepopulate our ordering screens with preorder information, such as existing customer telephone number, potentially products and services the customer already is using if we are doing what's termed as I guess a convert as is, or a migrate as is customer. Directory listing information, I could grab right off of the CSR and prepopulate.

So there is a number of synergies that MCI could take advantage of if we were able to integrate the preordering and ordering functionalities.

Q That would include not having to have two screens?

A Right. We could then integrate that into our own front-end, such that our customer service representatives use a standardized interface across all CLECs, or all ALECs; BellSouth, Bell Atlantic, all of those that do one single standard interface that we would use. And I wouldn't have to burden my reps with the knowledge of what unique things happen for each RBOC.

Q And would it mean that you wouldn't need the LENS CGI interface anymore?

A Yes. LENS would go away, use of LENS would go away for MCI.

Q And would -- and you wouldn't need the CGI for the CSR record layout or the data dictionary?

A No.

Q I will move on to issue two.

On page 12 of your testimony, you state that DST has recently acknowledged that invalid addresses constitute the second most common reason for ALEC orders. And I think you mentioned it earlier, but what is the source of that?

A Mr. Stacy's testimony, I believe, in Tennessee or at the Tennessee OSS workshop, Tennessee 271 case.

Q And to the extent that you were aware of that information, do you know whether there was any statement related to that as to why the ALECs would be having such a hard time validating addresses?

A No.

Q Do you personally have an opinion on why ALECs would have trouble validating addresses?

A Well, no. It would only be a guess right now. I don't know what front-end systems those ALECs would be using. But if they were using LENS, then one of the issues would be the fact that they mistyped the information that they got out of LENS into the ordering system to be submitted there, would be my guess; or they didn't check and assume that the customer had the right information, and just went ahead and submitted the information the customer gave them.

Q On page 12, you also state that BellSouth requires ALECs to access the RSAG through LENS or through the interexchange carrier reference validation, which I believe is pronounced ICREF?

A ICREF.

Q ICREF. Okay.

Is ICREF available to other ALECs to your knowledge; do you know?

A To my knowledge, I believe ICREF is available to all ALECs.

Q And can you explain to us the differences between the LENS and the ICREF for validating addresses?

A The difference is that ICREF is used strictly for address validation, and it's the absolute purpose for ICREF. You would validate an address through that. Where LENS, even with it's deficiencies, give you more preordering functionality.

You can get telephone numbers, you can reserve telephone numbers, you can access a CSR. And in the early days of LENS, it was counted as being an ordering tool as well for submission of orders to BellSouth.

Q So the ICREF is a very limited --

A Yes. Very narrow function.

Q All right. On page 13 of your testimony, you state that the RSAG system has a scheduled outage. And I think you talked -- I think Mr. Carver asked you a couple of questions about that. And what is your understanding about why those outages occur? Do you have any --

A Yeah. Those are scheduled outages by BellSouth for what's been defined to me as system maintenance, or actually, I will just term it as system maintenance, necessary downtime to maintain the systems.

Q For updating data?

A Updating data, making system enhancements.

Q Doing what other people do with computers?

A Yes.

Q Around here, they take it down every Thursday night or something.

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A Right.
Q Okay. And does this outage prevent MCI from validating addresses through LENS and ICREF, and possibly from placing orders?
A No, not today, because MCI is not using LENS for address validation, nor are we using ICREF for any ordering.
Q Would it -- does -- would the outage prevent -- well, it would only affect people that -- or companies that use the LENS program.
A Yes. And, you know, just to be fair and make sure that this 42 hours is in context, the 42 hours represents the aggregate total of downtime against all of the systems necessary in order to submit an order with BellSouth.
And I don't know what the total downtime is per week for just the portion of the network necessary to do address validation. But if this was for the entire order process, then that 42 hours would accurately represent the total amount of downtime for each individual system; the cumulative downtime, I should say.
Q Okay. And would this prevent BellSouth from placing orders at the same time; do you know, would you have an opinion?
A It potentially would prevent BellSouth from

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being able to -- if RSAG is down, it's my belief that it's down for everybody, not just the CLEC.
But if LENS is down, then it won't prevent BellSouth from doing anything relative to the normal operation of business.
So the way I would characterize that, if the legacy systems are down, then BellSouth is out of business. If those new systems -- and I term that as CLEC systems are down, that would be LENS, LEO, LESOG and whatever else is in the front-end goes down, no impact on Bell's normal operation.
Q On page 14 of your testimony, you state that MCI is capable of accepting an electronic download of RSAG data via the network data mover until a regular mechanism daily batch process can be implemented to accommodate daily updates. Can you tell me what the network data mover is and how it works?
A Network data mover is a protocol that basically facilitates the batch transmission of information. So every night, for example, at 12:00, 1:00, 2:00 in the morning, there would be a job that would be run to transmit that information across the link.
And the underlying protocol, the rules for transmission that we would use would be this protocol defined as network data mover, which is an industry

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standard for some batch processing.
Q When Mr. Carver addressed some questions to you earlier about the Georgia PSC ruling on the RSAG -- what is it on? Hang on one second here. Are you familiar with the order we were talking about earlier?
A Yes.
Q Yes. Okay. Does -- is it your understanding that the -- that the Georgia PSC will resolve the cost issues that are related?
A It's my understanding that they will attempt to do that, and that there is a docket open relative to cost issues. So I think they are -- there is an effort to try to resolve cost.
Q Okay. To the extent that there might be some similar cost issues present in this docket, would they be resolved by that?
A I don't know.
Q Do you know who might know? Is that something we should address to Mr. Martinez? Would he perhaps know? Have I asked the question --
A I don't know, because I don't deal with the cost piece of it. And I am not sure that Mr. Martinez does, either. And it's not that I am trying to evade the question, but I would assume that if there were cost issues relative to this complaint and this is the same

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complaint that is addressed in Georgia, and Georgia addressed those issues, then it would be my assumption that all issues relative to cost would be addressed in that docket.
But that's a very soft answer, because I haven't identified some things that may come out as costs, additional costs in this docket.
Q Okay. On issue three, on page 18 of your testimony, you state that LENS has no method of calculating due dates for the UNE orders. In addition, you state that the, none of the due date information in LENS applies to UNEs.
Has MCI submitted orders to BellSouth for UNEs?
A We have submitted some manual orders to BellSouth for UNEs, and we will submit more UNE orders when the EDI interface is up and operational, targeted for end of August.
Q If MCI places a UNE order via EDI, which you have not yet, right?
A No, we haven't.
Q Would it be your expectation that BellSouth -- the BellSouth direct order entry support applications program would provide MCI access to BellSouth's due date calculation function?
A No. We will have no way of gaining any due date

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information from BellSouth in advance of submission of an order to BellSouth. DSAP, as it's termed, today is only accessible through LENS. And I believe it's accessible through EC-Light, neither of which MCI is using. And even if we were, DSAP does not hold any due date information relative to unbundled network elements.

Q So how is it that you would go about calculating due dates for UNEs?

A Well, what we would use in lieu of having something more realtime ie we would have to rely upon two things. One is the paper interval that BellSouth provides us relative to when they believe they can get the unbundled UNEs turned up, as well as a firm order confirmation back from BellSouth that should be an indication as to when they expect to turn the service up. The two may not be in sync, and we would have to go with what the firm order confirmation date says as opposed to what our requested date for turn up.

And I believe as of today, even if I submitted that order to BellSouth electronically, there would be no automated firm order confirmation back. It would be manual.

Q On page 19 of your testimony, you state that when using the inquiry mode in LENS, MCI customer service reps must manually calculate a due date after taking into

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account several separate pieces of information, such as installation intervals and normal working days and days when the particular end office may be closed.

A Uh-huh.

Q Can you explain to us what due date information is provided to the customer service reps in the inquiry mode of LENS?

A In the inquiry mode of LENS, what you get is a schedule of days the office is open and intervals for different types of services. In other words, if you were ordering residential, one to three lines, the interval may be three days. And that's -- so you get when the office is open and the interval for the service that you are going to turn up.

What you have to do at that stage of the game, if you went to the inquiry mode, you would gather that information. Then once you got all of the order information, you would have to calculate, based on the day of the week, so you would have to have a calendar there; you would look across the calendar, identify the days that the office is open, identify the days that they could turn up your service and identify the interval for the service to manually calculate when you can best expect a due date for that particular service.

Q And then if the customer doesn't -- isn't

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available or rejects that date for some reason, you would have to start all over again?

A Yeah, you would. But the further out the date, the easier it probably is to get the service turned up. You would have to deal with less information. One would be interval. Interval doesn't matter if it's further out. You would still have to deal with workforce availability as well as the availability at a wire center itself, whether it was open or closed for business.

Q And would all of these calculations be going on while the customer was on the line waiting?

A Potentially, it could be. Yes. It would be done in a residential mode with the customer on the line trying to guesstimate the due date, trying to provide similar functionality and service that BellSouth provides to their customers.

Q On page 19, you also state that by the time MCI submits an order, the due dates calculated in an inquiry mode of LENS might no longer be available.

What is the typical time delay between MCI taking the preordering information from LENS and actually placing an order in EDI?

A And the assumption that we have to make here is that we are submitting a clean order to BellSouth, and that there is no rejects for that order.

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If I assume that it's a clean order for BellSouth -- and I don't have a time frame that I can say, well, it's typically like four minutes from the time I get the preorder information to the time I submit. What I will walk you through is from the time I submit the information and the time necessary for it to get to the BellSouth SOC system that basically sends back the firm order confirmation back with the installation date. When we submit that order, it goes from our system across the network to a value added network provider, VAN, which is, in essence, a mail box. And we send it to our VAN.

Our value added network provider will then send that information across to BellSouth's VAN. BellSouth would then pick that information up from their VAN and then flow it through their systems. So based on the fact that it's a batch process, it can be 15 minutes on our side. It could be, you know, maybe five minutes between mailboxes in the VAN. And these are guesstimates.

Fifteen minutes is the time frame by which BellSouth goes every 15 minutes to check the mailbox. So depending on where they were in that interval, it could be as long as 15 minutes. So it would be upwards of about 30, 40 minutes before this order flows through and hits the SOC system.

In a busy wire center where there is a lot of

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activity going on, BellSouth reps submitting orders directly into that system, it's conceivable that that due date that you had is no longer available.

Q Do you all keep any data on that flow?

A We haven't yet, because the EDI electronic system -- again, we are in the test mode with BellSouth on that. And plan to have that interface up and operational in late August. And even then, we wouldn't be using LENS inquiry mode to do that, because we would be ordering unbundled network elements at that stage.

Q And you do not and have not used the LENS to calculate due dates at present?

A Early last year -- or I am sorry, mid -- in the summer of last year, we were doing trials in a number of BellSouth's regions. And I think we did some trials in the Florida region as well.

And our order entry vehicle for doing those trials was through LENS. And LENS does calculate due dates when you use the firm order mode of LENS. But in order to use the firm order mode of LENS, you have to move through that system as if you're issuing an order. So in the early days of '97, summer of '97, we were actually using LENS to submit residential resale orders in a number of BellSouth states.

Q And will the EDI system provide MCI with due

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date calculation information?

A No, it won't.

Q And did you -- and why not?

A EDI is an ordering system, and doesn't have access to DSAP and the other pieces of information necessary in order to calculate due dates.

Our hope and expectation is that as we build this TCP/IP preordering interface that we will have the capability to access DSAP to do due date calculations. But with the EDI ordering functionality that's going to be turned up at the end of August, there is no preorder functionality.

Q So if EDI becomes the industry standard, you would still have to use something else to do the calculation of due dates?

A No. The way I would characterize that is that right now today the EDI functionality that we are building only supports ordering. And what we are moving in discussions with BellSouth on is the development of some additional functionality relative to EDI to support preordering.

Once that gets all built and I can integrate that together, then I should have the capability through our EDI front-end to be able to send not only orders to BellSouth but preorder requests to BellSouth and get

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those all back through the same system.

Q And has MCI taken -- I am going to call it an idea, for lack of any other better words, this idea to the ECIC committee?

A The ECIC?

Q Yes.

A Yes. The ECIC committee recently approved the EDI PCIP protocol for both ordering and the preordering.

Q I am going to move on to issue four.

On page 21 of your testimony, you state that LENS does not permit MCI to integrate the telephone number reservation function within MCI ordering?

A Uh-huh.

Q Could you clarify for us what MCI's ordering system is?

A It's the EDI interface that we are building with BellSouth. We have preorder -- I am sorry, we have some front-end systems that we use at MCI to capture specific information relative to the customer. And it would be as part of those preordering systems that we would like to be able to kick off queries going out to BellSouth to gather the necessary information relative to phone number, customer service record, not necessarily due dates, service availability, those types of things.

Q And that would be integrated with EDI?

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A Yes.

Q The EDI TCP/IP/SSL3?

A When I built that EDI interface for preordering, I would work with BellSouth to include all of the preorder functionality necessary in order to effectively submit orders, which would include telephone number reservation.

Q And this will solve the number reservation function problems?

A Assuming that there is no arbitrary limitation put on the number of -- the number of numbers I could reserve in one request.

Q Can you please -- and I think you may have done this earlier, but could you please define what a field identifier is and how its used in conjunction with the USOC?

A A field identifier is additional information necessary in order to allow BellSouth to deliver the appropriate type of service.

An example of a field identifier would be voice mail service. Voice mail has a USOC associated with it. But then there is some other characteristics you could have relative to voice mail, such as maybe you want pager notification, maybe you want a call forwarded number.

Those other two pieces of information would be

considered FIDS associated with the USOC for voice mail that you would need in order to get a complete package.

Q Okay. On page 23 of your testimony, you state that BellSouth provides USOCs and FIDS in the local exchange ordering guide, or the LEO guide.

Are all the USOCs and FIDS listed in the LEO ordering guide, or does MCI have to go to other sources to obtain some of the USOCs and FIDS?

A Our experience with the LEO guide was that it wasn't complete, and that it didn't contain all of the USOCs. But right now, our experience has been that we believe we have all of the USOCs based on that CSV file that BellSouth has put on the web that we can now download and access to a database.

Q So that would be the source for the other information?

A Not for the FID and the state validity, because those things are housed in a separate file. They are not put together. So BellSouth is not giving us that information in the appropriate format to allow us to download it.

Q So the LEO guide does not identify the states in which the USOC is valid?

A The LEO guide does. The paper version, as well as the electronic version on the web, both give you FID

and state validity. Our issue is correlating FID back to USOC. And if we had a database that we could build based on having the capability of downloading the information from BellSouth, we could correlate those two back and put them in the system.

Q And does MCI have access to the USOC and FID updates from BellSouth in a form other than from the web site?

A No. Yes. Paper version.

Q Okay. On page 12 of your rebuttal testimony, you state that BellSouth has provided USOCs in a spaced value format that enables MCI to download USOCs into a database?

A Uh-huh.

Q Which you state appears to resolve the problem?

A Uh-huh.

Q When you make that statement, are you referring to the diskette that BellSouth provides to MCI that contains the service order edit, routine edits?

A No. I am referring to the format by which BellSouth places the USOC information on the web.

There is a couple of formats that they could use. And early on they were using, I believe it was called Adobe Acrobat, which we couldn't download and parse and put into a database.

We subsequently went back to BellSouth and asked them to provide this data to us via CSV or comma spaced value format, which is parsable and incorporatable into a database.

Q And what is the difference between the spaced value format than the SOER edits?

A The SOER edits are documents by BellSouth that are the edit routines used by the service order control system.

It has nothing to do with -- I guess it's not accurate to say that it has nothing to do with USOCs. There's another place you could go to find out what USOCs -- a definition of USOCs.

Q On page 25 of your testimony, you state that BellSouth should be required to update USOCs and FID information on a biweekly basis and should give notice of the implementation or deactivation of a USOC 45 days in advance?

A Uh-huh.

Q Why does MCI need this information updated biweekly?

A The biweekly update would keep us current with all the USOCs. USOCs have a tendency to change based on services being grandfathered, which means I have taken them out of service, I won't sell any new ones, but I

will maintain the old ones that exist as well as the addition of new services.

So biweekly was our request for it until we better understand kind of the frequency of change relative to USOCs.

Q And would the ability to download USOC information from the web site mean that MCI would no longer need the biweekly information, the information on a biweekly basis?

A We would need the information updated as often as USOCs changed. I mean, it does us no good to have an out of date file.

Q And why would you need 45 days advance notification of the addition or deactivation of a code, a USOC code?

A Because if BellSouth is going to no longer continue to support a USOC, then we need as much advance notice as possible to make sure that information gets disseminated throughout the field.

Q And how does MCI believe that BellSouth should notify MCI regarding updates, additions, or deactivations?

A Right now, BellSouth notifies us in a couple of ways. They either send us a letter or give us a call for some things, not necessarily this, or post the

information on the web. If they posted the information on the web, I think that would be sufficient in giving us enough advance notice of changes.

Q Moving to issue six. On page 26 of your testimony, you state that BellSouth should provide MCI with access to all CSR data, except such data that BellSouth is not authorized to release by its customers. What information does MCI believe is customer proprietary information that BellSouth could not release?

A Again, I am going to have to refer to a list of information that I have to refresh my memory of all of the fields relative to CSR. And there could be some things on there, like maybe customer Social Security number; maybe one of the things that might be deemed as proprietary, or, you know, mother's maiden name; some of those types of things might be deemed proprietary.

Q On page three of your Exhibit 1, MCI states that CSR access is limited to 50 pages of data?

A Uh-huh.

Q And CSR information is not fielded?

A Right.

Q To the best of MCI's knowledge, do BellSouth's retail reps have the same page limitations for CSR information?

A Our limitation for CSRs, I think the correct

Can you explain to us why MCI orders the T1s out of the access tariff?

A T1s are ordered out of the access tariff because that's where -- oh, let me think about this one for a minute.

It's got a lot to do with kind of how things have been provisioned and set up with BellSouth.

ASRs are access service requests, which is the process used to orders things out of the access tariff. In ordering similar services from BellSouth -- in our request to order similar service from BellSouth, we have always been directed to the ASR for the submission of orders relative to Off-net T1s. And that's primarily been the reason why we are ordering Off-net T1s out of the access tariff, in addition to the fact that we have tried to order what we term as unbundled T1 from BellSouth and have been refused the capability of ordering those today.

Q Unbundled out of the access tariff?

A Unbundled out of the interconnection agreement.

Q Okay. And is it your understanding that you could use LSR as opposed to an ASR to order a T1?

A No. It is BellSouth's requirement that you use an ASR for all design services, and the T1 is a design service.

number is 54 pages. And this has changed since this date.

I believe as of today the limitation is 54 pages per section, and a CSR has seven sections associated with it. The limitation here is that we cannot view nor print anything above 54 pages per section.

I believe the limitation for BellSouth is that they cannot view anything greater than 54 pages per section, but have the capability of printing that information on-site.

What we have to do is call BellSouth and have them Fed Ex or FAX that CSR over to us if it exceeds the limitations.

Q And what is your opinion about what BellSouth would need to do to provide the CSR information in a fielded format?

A They would have to provide us the data in a delimited format. In other words, they would need to give us -- send the data over with the parsing character in it that would allow us to parse the data on each individual field.

Q Moving on to issue eight. In your direct testimony on page 30, you state that MCI has experienced delays in receiving firm order confirmations from BellSouth for orders for Off-net T1 lines.

Q Okay. And are the firm order confirmation delays occurring for orders of T1s only?

A Yes, because that's what we are ordering today.

Q Okay.

A We are not ordering USOC.

Q And what type of electronic interface is MCI using to place those orders for T1s?

A I believe we are still in the FAX mode for submission of ASRs to BellSouth for Off-net T1 orders. And it's either this week or first part of next week where we will transition to an electronic process called NETPRO.

Q And why do you use the FAX?

A The FAX process is employed because -- and this is going to get a little technical. I am going to use some terminology here, and I hope to be able to do it kind of at the layman's level.

There is an identifier on the T1s that would identify a T1 for MCIm, which would be metro or MCIt or MCI International, and that's called a CCNA. And right now, in the NETPRO process, while our long distance side of the house uses NETPRO to submit ASR orders over to BellSouth, BellSouth has not been agreeable to using a different identifier for a wire center.

So because of that limitation, we have continued

to send orders across to BellSouth via FAX as opposed to NETPRO. Our transition from FAX to NETPRO is that we have gotten movement on that, and we will test that functionality going forward in the next -- either, again, this week or some part of next week. So we are in the transition stages of moving from FAX to automated process.

Q And BellSouth has asserted that the T1s have been ordered by MCI out of the access tariff, and are therefore not governed by the firm order confirmation measurement standards in the agreement. What is your understanding of how that should work?

A Based on conversations I have had with the contract interpreters, BellSouth should be governed by the same firm order confirmation or performance measurements for all services ordered to support local service. And Off-net T1s being identified as MCIm circuits should be governed by the same thought timeliness as orders issued out of the -- off of LSRs, or local service requests.

Q And on page 18 of your rebuttal testimony, you state that MCI requested BellSouth to provide Off-net T1 combinations?

What elements are you referring to when you say combinations?

A Combinations, we are talking about loop and port.

Q Port same as transport?

A Yes. Actually, transport would be ordered separately. Loop -- I guess port would be the same as switch.

Q Okay.

A Transport would be the connection from the wire center to MCI's pop. So we would order that transport piece separate from the combination piece.

Q And are the combination orders for customers currently being served by BellSouth for the same service?

A I am sorry?

Q Are the orders currently being --

(Discussion off the record.)

BY MS. BEDELL:

Q Mr. Green, are the orders that you're placing for the T1 lines for customers that are currently being served by BellSouth for the same kind of service?

A Sometimes yes, sometimes no. Oftentimes, the T1 is used to aggregate services and to deliver them in a more cost effective manner to a customer. Some of those customers may be existing BellSouth customers, some may not. It may be brand new service.

Q Okay. And is MCI providing any network elements

in combination with the T1s ordered from BellSouth?

A No. Well --

Q Such as switching?

A For the Off-net T1s, we are providing the switching functionality and providing dial tone to those customers on Off-net T1s, if that was the question.

Q We are on the last page.

On Exhibit BG 23?

A Uh-huh.

Q On page two of the exhibit, which is a June 1, 1998 letter to BellSouth's Mr. Lee from MCI's Mr. Schmidt, the letter states that MCI would like to schedule a meeting to discuss processes for migrating and existing T1s to UNEs for new T1 orders.

Do you have any knowledge of the status of these discussions?

A No, I don't. I don't have any knowledge of those -- of where those discussions are that I could share today.

Q Or whether there have been any further discussions?

A I know that there has been some discussion. I don't know what the ultimate outcome of those discussions were.

Q Is that something somebody else might know?

A That's something that I could find out. Mr. Martinez may have some information relative to that, but I could find out.

MS. BEDELL: If we could hold on just one minute, we may be finished.

(Discussion off the record.)

BY MS. BEDELL:

Q I need to go back to our question that I asked you about using the ASRs LSRs for the T1 --

A Uh-huh.

Q -- service. I believe you said that you were -- that MCI was directed by -- was directed to use ASRs.

My question to you is by whom or --

A It's by BellSouth. BellSouth's policy is that digital services, which an Off-net T1 is, is considered a design service, and all design services are ordered to be an ASR.

Q Okay. So this is a BellSouth policy, that because the T1 is a design service, that it has to be ordered as an ASR?

A Correct.

Q Okay.

MS. BEDELL: We don't have any further questions.

THE WITNESS: Thank you.

(Whereupon, the deposition was concluded at 4:50 p.m., and reading and signing by the witness was not waived.)

TRANSCRIPT CERTIFICATE

STATE OF FLORIDA)
COUNTY OF LEON)

I, DEBRA R. KRICK, Court Reporter, hereby certify that the foregoing transcript was taken down as stated in the caption, and the questions and answers thereto were reduced to typewriting under my direction;

That the foregoing pages 4 through 113 represent a true, correct, and complete transcript of the evidence given upon said hearing;

And I further certify that I am not of kin or counsel to the parties in the case; am not in the regular employ of counsel for any of said parties; nor am I in anywise interested in the result of said case.

Dated this 30th day of January, 1998.

DEBRA R. KRICK
Court Reporter and Notary Public
State of Florida at Large

CORRECTIONS

Corrections to the deposition of BRYAN GREEN, taken in the case of BellSouth Telecommunications, Inc., Docket No. 980281-TP, taken on July 28th, 1998.

Page-Line	Correction

Date _____ Signature _____

AS TO SIGNATURE ONLY

IN WITNESS WHEREOF, I have set my hand and affixed my seal this _____ day of _____, 1998; said instrument was acknowledged before me by _____ who is personally known or identified himself to me.

Notary Public

ERRATA SHEET

DOCKET NUMBER 980281-TP
RONALD MARTINEZ
JULY 23, 1998

REFERENCE PAGE 24 - LINE 5; CHANGE BMOQ TO DMOQ

REFERENCE PAGE 101 - LINE 23; CHANGE PARALEGAL TO ATTORNEY

CORRECTIONS

Corrections to the deposition of BRYAN GREEN, taken in the case of BellSouth Telecommunications, Inc., Docket No. 980281-TP, taken on July 28th, 1998.

Page-Line	Correction
25 - 17	Change NSX to NXX
30 - 6	Change ADTT to EDI
32 - 16	Change ALEC to ILEC
33 - 20	Change LSOC to LESOG
33 - 21	" SOC to SOCS
41 - 21	" fit to FID
42 - 24	" date to data
42 - 25	" air to error
44 - 16	" fit to fID
44 - 23	" R4 to an.
71 - 16	" payer to pairs
73 - 15	" Result to resold
73 - 18	" Partner to SERVICE
Date	Signature
99 - 23	delete not necessarily
108 - 5	delete entire Answer (we are not ordering USOC

AS TO SIGNATURE ONLY

IN WITNESS WHEREOF, I have set my hand and affixed my seal this _____ day of _____, 1998; said instrument was acknowledged before me by _____ who is personally known or identified himself to me.

Notary Public

Bryan Green
Docket No. 980281-TP

LATE FILED DEPOSITION EXHIBITS 1 & 2

REQUEST: Provide a list of BellSouth OSS systems or databases which MCIm has identified and to which it may want access.

RESPONSE: As a result of the Florida RNS/DOE demonstration and subsequent information from a variety of sources, MCIm has identified the following OSS systems or databases which it believes are used by BellSouth. MCIm does not know the details of these systems or databases. MCIm therefore cannot determine which ones are necessary to provide parity in access to OSS functions. In addition, MCIm learned during the deposition of Mr. Stacy that there are 60-70 OSS systems and one hundred or more databases used by BellSouth to perform the five basic OSS functions. MCIm has no additional information about these systems and databases and therefore cannot determine which ones are necessary to provide parity in access to OSS functions.

RSAG
DSAP
LFAC
RCMAC
CRIS
COSMOS
MARCH
HAL
BOCRIS
ATLAS
COFFI
OASIS1
LMOS
SOCS
DLETH
DLR
JMOS
LMOSupd
ORION
MELD
SECURITY
MOBI
COFFEE
COFFEE/TLAS
BRIS

Bryan Green
Docket No. 980281-TP

LATE FILED DEPOSITION EXHIBIT 3

REQUEST: Provide a list of information in the CSR which BellSouth does not make available to MCIm.

RESPONSE: See attachment for a list of information that MCIm has been advised is contained in the CSR.

BELLSOUTH

BellSouth Interconnection Services **Memorandum**

RECEIVED
AUG 4 1998
Hopping, Green, Sams & Smith

File Code	000 000 000
Date	May 20, 1997
To	Bryan Green
Telephone number	404-267-5515
Fax number	
From	Ilene Barnett
Telephone number	770-492-7525
Fax number	
Subject	Customer Record Bill Screen

Attached is a list detailing the major fields on a Customer Record Information System (CRIS) Bill screen and the BellSouth CLEC Access to Records Proposal. This information was furnished to me by Jim Childress.

Our conference call will be Tuesday, May 20, 3:00 p.m. EDT - 4:00 p.m. The conference bridge number is 205-970-3742, access code 4675.

Please call me if you have any questions or comments.

Jim C.
(404) 420.0031 - Fax
404 529.6191 - Ope

Customer Record Information System (CRIS) Bill Screen

N 1. Account number including area code and customer code.
U 2. Screen Name
U 3. Date of the Bill (Bill cycle)
U 4. Status of Account. (Live or final)
U 5. Account Status Indicator
U 6. Four digit abbreviation for the exchange (Calling Exchange)
N 7. Class of Service
U 8. Rate Group Identification
N 9. Billing Name and Address
P 10. Pay By Date - Date bill is considered past due
P 11. Start Treatment Amount - Amount of money a customer must owe before treatment action is appropriate.
U 12. Four digit code indicating the federal, state, local, etc. tax states of the account.
P 13. Credit Classification
P 14. Months in Credit Class - This is the umber of months that an account has been in its present credit class
U 15. RAO number (the first 3 numbers) for the customer's account as well as the customer's check digit (the last number).
P 16. Refer Account Date - Date notice is mailed to a customer when a treatable amount is due
P 17. Remove from Treatment Amount - The dollar amount an account must be reduced below to no longer be considered treatable.
U 18. Taxing Area Code - Indicates the city, county, franchise, or surcharge tax rat on an account
N 19. Toll Billing Exception - This code represents a restriction from certain types of calls (Should show up under prod & SVC
N 20. Primary Interexchange Carrier Code
P 21. Date of Installation - Date svc installed
P 22. Refer to Business Office - The date a referral is sent to the Collection Center/Accourft Center on a treatable amount
23. No Treatment - An indicator to stop computerized treatment of an account.
24. Toll Credit Limit
V 25. Deposit - An amount of money obtained to secure an account.
P 26. Write Off Date
U 27. Preferred Payment Date
P 28. Calling Card Holder - indicator to that they have a calling card.

Customer Record Information System (CRIS) Bill Screen

P 29. Amount Due - The current amount due on the account.
U 30. Old Telephone Number/New Telephone Number
P 31. Credit Information
P 32. Credit Information Verified
P 33. Bill Summary
U 34. Features - A code indicating the available central office services in a customer's area to which the customer does NOT subscribe
P 35. Itemized Calls - The total dollar amount of toll charges from all entities which appeared on each of the three preceding bills.
P 36. Treatment History (12 months)
P 37. Return Check History (12 months)
P 38. Social Security Number
P 39. Unregulated Billing
P 40. Last Bill - The amount of the last bill
P 41. Payments and Adjustments posted since the last bill
U 42. Transfer - Amount of money transferred from another account with the telephone number indicating where the balance originated.
P 43. Balance - Balance after last bill plus/minus any payments and adjustments
U 44. Late Payment Charge
P 45. Current month's total charges for charges incurred since last month's bill
46. Total of current charges and any unpaid charges from previous bills.
47. BellSouth Charges
48. Interexchange Charges
49. Payments and Adjustments Through Bill
50. Payments and adjustments posted during the current billing cycle
V 51. Memo Screen for making customer notations

Bryan Green
Docket No. 980281-TP

LATE FILED DEPOSITION EXHIBIT 4

REQUEST: Provide documentation of any requests for electronic notification of service jeopardies.

RESPONSE: MCIm has been unable to locate any documentation beyond that contained in the exhibits to Mr. Green's prefiled testimony. MCIm believes that there are some e-mails between MCIm and BST relating to this topic, but has been unable to locate them in the time available for preparation of this response.

MCI Telecommunications Corporation

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Internet: 2161607@MCIMail.Com

Marcel Henry
Regional Vice President
Southern Financial Operation

December 24, 1997

Mr. Mark L. Feidler
President - Interconnection Services
BellSouth Telecommunications, Inc.
Suite 4511
675 West Peachtree Street
Atlanta, GA 30375

FLORIDA PUBLIC SERVICE COMMISSION
DOCKET NO. 980281-TP EXHIBIT NO. 9
COMPANY/ WITNESS: Stacy
DATE: 8-5-98

Dear Mr. Feidler:

As we have discussed, there are a number of open issues between our companies concerning BellSouth's provision of local service capabilities to MCI. Some of those issues were addressed in the Florida Public Service Commission's November 19, 1997 order rejecting BellSouth's Section 271 application and clarifying the obligations BellSouth must meet as a prerequisite to entering the in-region long distance market. The Commission addressed deficiencies in BellSouth's systems relating to Operations Support Systems ("OSS"), interconnection, unbundled network elements ("UNEs"), directory assistance, reciprocal compensation, resold services and performance measures. Although MCI does not agree with all of the conclusions reached in the order, the order provides a useful starting point in addressing some (but certainly not all) of the issues that have arisen under our Interconnection Agreement.

A discussion of the issues identified in the Florida Commission order follows. Although this discussion necessarily focuses on changes we wish to be made in Florida, we request that these changes be made outside Florida on a regionwide basis as well. Please respond to this letter by January 8, 1998. In your response, please state in detail BellSouth's plan for addressing each of the problems discussed below and confirm that these solutions will be implemented no later than January 31, 1998 (unless otherwise specified below). If it is BellSouth's position that a solution for a particular problem cannot be put in place by January 31, please provide a detailed explanation why and state when the problem will be remedied.

1. OSS

A. General requirements

The Florida Commission required BellSouth to demonstrate that its interfaces provide nondiscriminatory access to OSS functions. The Commission identified four characteristics of a nondiscriminatory interface:

1) The interface must be electronic: The interface must require no more human or manual intervention than is necessarily involved for BellSouth to perform a similar transaction itself.

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2) The interface must provide the capabilities necessary to perform functions with the same level of quality, efficiency, and effectiveness as BellSouth provides to itself.

3) The interface must have adequate documentation to allow an ALEC to develop and deploy systems and processes, and to provide adequate training to its employees.

4) The interface must be able to meet the ordering demand of all ALECs, with response times equal to that which BellSouth provides itself.

Order, pp. 97, 174. The Commission concluded that none of the OSS functions provided by BellSouth meet these criteria. As a first step in moving toward compliance, MCI requests that BellSouth provide a detailed listing of all OSS systems that BellSouth uses, along with technical specifications for each system, and a detailed listing of each of the data bases that are used by BellSouth's OSS systems, along with a description of each data base (including data base layouts). That information will enable MCI to determine the capabilities that BellSouth provides itself and thus what is required for parity of service.

B. Pre-ordering

The Commission determined that BellSouth must provide a pre-ordering interface that is integrated with the EDI ordering interface. Order, pp. 92, 167. As you know, MCI has sought to meet with BellSouth to discuss the implementation of an interface for pre-ordering using EDI TCP/IP SSL3 that would be integrated with the EDI ordering interface. We now repeat our request that our companies meet and begin discussing how to implement an interface using this protocol.

The Commission also noted deficiencies in the following areas:

1) LENS requires multiple address validations for the same fields in different screens. In accordance with the Commission's order, MCI requests that any pre-ordering interfaces offered by BellSouth not require multiple address validations. On a related point, MCI previously has requested that BellSouth provide a download of the RSAG, as required by our Interconnection Agreement, so that we may remedy other address validation problems we have encountered. In response, BellSouth has offered to sell MCI an extract from the RSAG for an amount exceeding $500,000 plus recurring charges. Under our interconnection agreement, MCI is entitled to obtain a download of the RSAG at no additional cost, and we repeat our request that it be provided on that basis.



2) No on-line customer credit checking capability and limited availability of customer service records. In addition to the problems identified by the Commission, MCI notes that BellSouth's system is deficient in that BellSouth refuses to provide CSR data that it unilaterally deems to be proprietary or unnecessary. Further, CSR access is limited to fifty pages of data and CSR information is not fielded, which means that MCI cannot load and edit CSR data and use the data to generate orders. Please redress these problems.

3) BellSouth can reserve more telephone numbers than ALECs. BellSouth's RNS system permits it to reserve up to twenty-five numbers per order, as compared to six for ALECs. Moreover, unlike the system afforded to ALECs, RNS automatically assigns numbers for its customers and provides BellSouth representatives with lists of available NXXs. In addition, BellSouth has a list of available vanity numbers that it does not provide to ALECs. We request BellSouth afford these same capabilities to MCI.

4) Cumbersome and inefficient methods of locating long distance company and product and service information selected by customer. In addition to addressing the problems specifically identified by the Commission, MCI requests that BellSouth provide via fixed format NDM a description or definition of each of its USOCs, including the required field identifiers and their descriptions and the states in which the USOCs are valid. This information should be updated on a biweekly basis and should give notice of the implementation or deactivation of a USOC forty-five days in advance.

5) LENS does not provide access to calculated due dates in the inquiry mode. BellSouth should provide in a system-to-system interface the capability to determine due dates efficiently and to expedite those due dates when appropriate.

C. Ordering and provisioning

The Commission ruled that a number of problems in BellSouth's ordering and provisioning systems require improvement. Order, pp. 83-94, 158-68. These problems are discussed below:

1) EDI does not have electronic edit capability at parity with BellSouth's RNS and DOE systems. Because we intend to order via EDI, we are particularly concerned with the functionality of that interface. We request that BellSouth provide the same on-line editing capability in EDI that BellSouth has for itself. On a related point, please provide a detailed description of how order rejections are handled and a list of all reasons that both fatal and non-fatal errors occur, including descriptions and error codes.

MCI

2) No order summary screen exists in EDI as in RNS. BellSouth should provide access to pending orders in its systems, a recap of the services ordered on the FOC and a recap of the services installed on the completion notice.

3) ALECs cannot access or make changes to pending orders. We request that BellSouth provide the capability to change pending orders at parity with what BellSouth provides itself. Further, please (i) provide the business rules for making changes to existing orders; (ii) the circumstances that will cause due dates to be changed on a pending order when a change is submitted; and (iii) a detailed description of the process used to make changes to pending orders.

4) BellSouth has not provided requesting carriers with the technical specifications of the interfaces. We have requested CGI specifications before and twice BellSouth has provided outdated specifications that are of little use. BellSouth recently has provided another set of CGI specifications that we are now reviewing. Once we have completed our review, we will inform you if further action is necessary.

5) Interfaces are not fully electronic or integrated, and require manual intervention. Measures needed to integrate BellSouth's and MCI's systems include (but are not limited to) the following: (i) supplemental orders should be processed mechanically without human intervention; (ii) ordering for complex services should be automated; (iii) ALECs should have systems available that allow ALECs to determine if loops and lines are ISDN capable; (iv) service orders for all unbundled loops, unbundled ports, transport and loop/port combinations should be mechanically generated and should flow through BellSouth's systems without manual intervention; and (v) the percentage of POTS resale orders processed mechanically for ALECs should be increased to equal the percentage of BellSouth POTS orders processed mechanically. Please provide MCI with these capabilities.

(6) Sufficient capacity to meet demand. MCI concurs with the Commission's conclusion that BellSouth's system lacks sufficient capacity and requests that sufficient capacity be provided.

(7) Installation intervals not at parity with BellSouth. Performance measures and standards are discussed below.

MCI

D. Maintenance and repair

The Florida Commission concluded that BellSouth must provide ALECs with the technical specifications of TAFI so that ALECs can integrate their OSS with BellSouth's OSS for maintenance and repair. Order, pp. 94-96, 168-69. Please comply with this requirement.

E. Billing

The Commission concluded that BellSouth cannot render accurate bills for resold services. Order, p. 171. Please remedy this problem, or, if it already has been fixed, provide the date on which it was fixed.

Because the Commission dealt with UNE billing issues together with other UNE issues, we will follow suit and deal with those issues under the UNE heading below.

2. Interconnection

1. Collocation

The Commission notes that "in Docket No. 960846-TP, we specifically allowed MCI to interconnect with other collocators who are interconnected with BellSouth in the same central office; to purchase unbundled dedicated transport from BellSouth between the collocation facility and MCI's network; to collocate subscriber loop electronics in a BellSouth central office; and to select virtual over physical collocation, where space and other considerations permit." Order, p. 44. Please provide the methods and procedures necessary to perform these functions.

2. Network blockage and End Office Trunking

The Commission required BellSouth to "provide ALECs with more frequent and better data on their traffic over BellSouth's network"; "to demonstrate that any blockages experienced by ALECs are not excessive in comparison to the blockages experienced by BellSouth"; to work together with ALECs to improve intercompany communications; and to "provide data sufficient to show that blockage levels are comparable between BellSouth and ALEC traffic." Order, p. 59. Accordingly, please provide the most recent three months of blockage data on all common trunk groups utilized for ALEC traffic that experienced blockage; for the same three month period, blockage data on all of MCI's interconnection trunk groups from your end offices and tandems to our points of termination that experienced blockage; for the same three month period, blockage data on all ALEC interconnection trunk groups from your end offices and tandems to ALEC points of termination that experienced blockage; and for the same three month period, similar blockage data on all trunks carrying BellSouth local traffic. Please provide the same information on a month-to-month basis going forward.



3. Local Tandem Interconnection

The Commission made clear that BellSouth must provide interconnection at its local tandems without requiring a BFR. Order, p. 60. Previously, BellSouth had made inconsistent statements as to whether it would allow such interconnection. Please confirm that BellSouth will permit MCI to interconnect at BellSouth's local tandems, and please provide all information necessary to permit us to do so. Further, please confirm that, once MCI is interconnected at the BellSouth local tandem, MCI's traffic will travel on the same trunk groups as BellSouth's local traffic and that all existing independent telephone company local and EAS traffic routes served by the local tandem will be identified and made available to MCI traffic.

3. Unbundled Network Elements

The Commission required BellSouth to provide mechanized billing statements for usage sensitive UNEs in a CABS formatted billing statement. Order, pp. 76-77. Please begin providing UNE bills in a CABS format.

The Commission further required BellSouth to provide access usage detail to requesting carriers. Order, p. 77. As you know, this issue is already the subject of a pending action. In light of the Commission's order, however, we again request that BellSouth provide this information on a going-forward basis and provide the historical data that should have been provided on all UNEs from the time of installation.

4. Directory Assistance

The Florida Commission determined that BellSouth is not providing all directory listings to requesting carriers, specifically listings from other local exchange companies. Order, pp. 117, 119. Our agreement provides that "BellSouth shall provide to MCIm, to the extent authorized, the residential, business and government subscriber records used by BellSouth to create and maintain its Directory Assistance Data Base, in a non-discriminatory manner." Interconnection Agreement, Attachment VIII, § 6.1.6.1. Under the Federal Act, BellSouth not only is authorized but is required to provide the directory listings it has for the customers of other telephone companies. MCI requests that BellSouth provide these listings as required by our agreement.

5. Reciprocal Compensation

In its discussion of the reciprocal compensation issue, the Commission acknowledged the dispute that has arisen concerning ISP traffic – that is whether MCI and other ALECs are entitled to compensation for traffic originating from BellSouth customers and routed to an ALEC's ISP customer. The Commission did not resolve this dispute, although it did express concern over the allegations that BellSouth failed to comply with contractual dispute resolution procedures.



For several months, BellSouth has been withholding funds that should have been paid to MCI in reciprocal compensation for the termination of local traffic. Please pay all amounts due by December 31, 1997 and confirm that BellSouth will pay all amounts due for reciprocal compensation (including amounts due for ISP traffic) in the future.

6. Resale Services

The Commission addressed the following resale issues, in addition to the OSS issues discussed above:

A. Services not being provided on an a branded or unbranded basis to MCI

The Commission noted that the Interconnection Agreement provides that BellSouth will brand all services at every point of customer contact exclusively as MCI services unless MCI requests that the services be unbranded. Order, pp. 171-72. Please confirm that BellSouth is prepared to provide voice mail, operator services and directory assistance on an MCI branded basis. In this connection, please note compliance with the agreement should not require the use of selective routing, because these calls already are routed to the BellSouth operator platform.

The branding or unbranding requirement of the Interconnection Agreement also applies to BellSouth's softdial product known as QuickService. As you know, this product permits a customer whose telephone line has been disconnected to call 911. If the customer dials any other three digits, QuickService provides a recording informing the customer that he or she should call BellSouth or another local service provider. This recording should be unbranded so that there is no reference to BellSouth.

BellSouth also is required to provide its 611 service on an unbranded basis as provided in our Interconnection Agreement, but to date has not done so. (See Attachment VIII, § 5.1.14.) MCI requests that BellSouth begin complying with this requirement.

B. Parity in conversions

The Commission ruled that BellSouth is not providing parity with respect to customer conversions. Order, p. 175. Please rectify this problem.

MCI

7. Performance Measurements

The Commission found that "BellSouth should provide performance measures that are clearly defined, permit comparison with BellSouth retail operations, and are sufficiently disaggregated to permit meaningful comparison." BellSouth was required to provide statistically valid commercial usage data showing:

A. average installation intervals for resale;
B. average installation intervals for loops;
C. comparative performance information for unbundled network elements;
D. service order accuracy and percent flow through;
E. held orders and provisioning accuracy;
F. bill quality and accuracy; and
G. repeat trouble reports for unbundled network elements.

Order, pp. 185-86.

The Commission also required BellSouth to "provide the necessary historical data to facilitate the establishment of initial benchmarks" that "should, at a minimum, address all of the functions listed in the LCUG." Order, p. 185. Please begin providing the performance measures and standards information required by the Commission. We request that BellSouth disaggregate this information in accordance with the LCUG Service Quality Measures report, including geographic disaggregation by state, city and wire center. In addition, we request that BellSouth provide the performance measures and standards information required by the Interconnection Agreement in a mutually agreed upon format.

We look forward to your response specifying how BellSouth plans to address these concerns, must be resolved in order for MCI to enter the local market in an effective manner.

Sincerely,

Marcel Henry

Marcel Henry

MLH/mle

BELLSOUTH

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Mark L. Feidler
President – Interconnection Services

January 8, 1998

Marcel Henry
Regional Vice President
MCI Southern Financial Operations
Three Ravinia Drive
Atlanta, GA 30346

Dear Mr. Henry:

This is to acknowledge receipt of your December 24, 1997, letter concerning BellSouth's provision of local service capabilities to MCI. As you are well aware, BellSouth has clearly stated its position to most, if not all, of the issues you raise in your letter in various proceedings before the FCC and various state commissions, e.g., the recent OSS Workshops in Georgia and Alabama. For your convenience, however, BellSouth will provide you with a point by point response to your letter on or before January 31, 1998.

Finally, BellSouth strongly disagrees with MCI's assertion that BellSouth's position on any of the issues raised in your letter have any effect whatsoever on MCI's ability to enter the local market.

Sincerely,

M. L. Feidler

Mark Feidler

BELLSOUTH TELECOMMUNICATIONS

W. Scott Schaefer
President Interconnection Services
Suite 4511
675 West Peachtree Street, N.E.
Atlanta, Georgia 30375

February 11, 1998

Marcel Henry
Regional Vice President
Southern Financial Operations
Two Northwinds Center - 5th Floor
2520 Northwinds Parkway
Alpharetta, GA 30004

Dear Mr. Henry:

This is a follow-up to Mark Feidler's January 8, 1998 letter in which he stated that BellSouth would provide a point-by-point response to the issues raised in your December 24, 1997 letter. As he mentioned in his initial response, BellSouth strongly disagrees with MCIm's assertion that BellSouth's position on these issues in any way affects MCIm's entry into the local market.

BellSouth's response to each of the issues raised in your letter are set forth below. Please note, however, that by responding to the issues as posed, BellSouth is not consenting to MCI's characterization of the November 19, 1997 Order of the Florida Public Service Commission in BellSouth's Section 271 proceeding (the "Florida Order").

BellSouth strongly disagrees with MCI's characterization that BellSouth's electronic interface product line contains deficiencies. The electronic interfaces were developed and implemented pursuant to BellSouth's contractual obligations, existing industry standards, the technical capabilities then available to BellSouth. BellSouth is proud of the development it has done in this area.

Issue 1 OSS:

A. General Requirements

BellSouth has provided access to the ordering, pre-ordering, and repair databases required by the Florida Commission in the MCIm arbitration proceeding and has met the requirements imposed by the Interconnection Agreement. Therefore, there is no legal obligation to comply with the overly broad and burdensome request stated in MCI's December 24, 1997 letter. The obligation regarding access to BellSouth's operating support systems through electronic interfaces is found in Attachment VIII, Section 2.1.1.1. BellSouth is in compliance with that section. BellSouth is continually planning, as standards become available, upgrades, refinements and additions to its electronic interface product line. Both the API/Corba gateway and EDI/SSL3 interface have been conditionally recommended by the ECIC with an indication that API/Corba will be the long-term recommendation. BellSouth is advancing in its development of API/Corba and would be delighted to discuss its plans with MCI.

B. Pre-ordering

1) LENS requires multiple address validations for the same fields in different screens

This is not the case in the firm order mode. Address validation is a necessary input for other pre-ordering functions and can be accomplished in a matter of seconds. For example, the list of telephone numbers that can be offered to a particular customer is driven by the set of available numbers in the central office serving that customer's address, which is determined during the course of address validation. The inquiry mode includes address validation for telephone number selection, product and service availability, and due date information, because associating a central office with an address is a prerequisite for each of these functions, and in the inquiry mode, each of these functions can be performed independently. This does not have a negative impact on the CLECs' ability to obtain pre-ordering information; rather, it allows CLECs to choose which particular pre-ordering functions they desire without having to go through all available options.

In a continuing effort to be responsive to CLECs' requests and suggestions, BellSouth, as of February 2, 1998, provided a modified inquiry mode that eliminates multiple address validations.

With respect to your request for a download of the RSAG database, BellSouth disagrees with MCI's assertion that the BellSouth-MCIm Interconnection Agreement entitles MCI to a download of RSAG. MCI is entitled to electronic access to the RSAG database and BellSouth provides that access via LENS. BellSouth will provide access through the API gateway when API becomes available. BellSouth provided a proposal to MCI for extracts of the RSAG on a daily basis for a fee. MCI rejected that proposal and raised this issue in a complaint to the Georgia PSC. This issue is now being addressed in that proceeding for the Georgia Interconnection Agreement.

2) No on-line customer credit checking capability and limited availability of customer service records

BellSouth currently meets all contractual obligations regarding access to customer service records including credit history. The obligation regarding credit history is contained in Attachment VIII of the Interconnection Agreement.

EC-Lite and LENS provide CLECs with on-line access to view and print customer service record information in substantially the same time and manner as BellSouth retail service representatives. The CLEC can obtain, via the EC-Lite and LENS pre-ordering interfaces, Customer Service Record (CSR) information. Using this capability and with the same condition regarding page limitations as experienced by BellSouth retail operations, the CLEC can obtain account information on-line for customers. The LCSC will continue its customer support function of providing account information where conditions impose page limitations.

3) BellSouth can reserve more telephone numbers than ALEC's

The 100 telephone number limit was removed effective January 15, 1998.

4) Cumbersome and insufficient methods of locating long distance company, and product and service information selected by customer.

The Local Exchange Ordering Implementation Guide contains the required products and services USOCs/ordering codes and valid combinations that constitute business rules. Additionally, BellSouth is providing interested CLECs an electronic copy of the extensive edits used by SOCS. Further, effective January 20th, CLECs can access via the Internet the entire non-proprietary list of USOCs. PIC codes are shown randomly per a regulatory equal access requirement.

5) LENS does not provide access to calculated due dates in the inquiry mode

The use of the due date calendar in the inquiry mode is in compliance with BellSouth's contractual and parity obligations.

LENS calculates a due date as part of a firm order, which is the same situation in which BellSouth's retail systems actually calculate a due date. The installation calendar tables used to calculate the due date are shown in the inquiry mode as well. The installation calendar also is accessed separately by BellSouth's retail service representatives to respond to retail customer inquiries.

C. Ordering and Provisioning

1) EDI does not have electronic edit capability at parity with BellSouth's RNS and DOE systems.

BellSouth will handle all rejects mechanically by March, 1998. This capability will be based on BellSouth requirements developed in advance of the national standards. BellSouth can currently perform 68% of all mechanized rejects as of November, 1997.

2) No order summary screen exists in EDI as in RNS

BellSouth does make a summary screen available in EDI.

3) ALECs cannot access or make changes to pending orders.

CLECs currently have the capability to do a single "C" (change) order. As of January 30, 1998, the extensive SOER edits were distributed on disk, and copies of the LEO and LESOG edits were given to the CLECs.

CLECs can submit supplemental orders, or changes to pending orders, via the 860 transaction. Currently, 860s are handled manually in substantially the same time and manner as 860s are handled for BellSouth's retail customers. As of March 16, 1998, 860s will be handled mechanically.

4) BellSouth has not provided requesting carriers with the technical specifications of the interfaces

To the best of BellSouth's knowledge and belief, BellSouth has, to date, provided MCI with all technical specifications for requested interfaces. As MCI indicated, BellSouth provided MCI the updated CGI specification on December 15, 1997. Apparently, these are still under review by MCI.

5) Interfaces are not fully electronic or integrated, and require manual interventions

(i) As stated previously, BellSouth has met the contractual obligations regarding electronic interfaces as set forth in Attachment VIII. MCI requested supplemental orders be processed mechanically and EDI can process supplemental orders mechanically.

(ii) With respect to your request for the automation of ordering complex services, that is an Ordering and Billing Forum (OBF) issue. BellSouth does not have the capability for mechanical ordering of complex services itself. There are no industry standard for MCI's request. MCI can take this issue to the OBF for resolution.

(iii) BellSouth currently does not determine if a loop or line is Basic Rate ISDN capable prior to issuing a service order. BellSouth makes the determination on BRISDN compatibility after the service order is received. If a loop or line is not compatible the order drops out and will be evaluated by the local outside engineering plant district. Normal service order coordination occurs subsequent to this.

(iv) BellSouth does offer mechanized ordering and mechanized order generation for loops and ports. BellSouth is progressing on the development of the necessary ordering and provisioning capabilities for loop/port combinations in accordance with applicable state regulatory requirements and the terms of the interconnection agreement with MCI. However, there is no industry standard available.

(v) As for the mechanical processing of POTS resale orders, BellSouth has submitted evidence in OSS and Performance Measurements affidavits and exhibits filed with PSCs and the FCC demonstrating that CLECs can achieve flow-through rates exceeding 95% - if they use the systems correctly. This success rate is dependent on how well the CLEC's service representatives are trained.

6) Sufficient capacity to meet demand

The capacity requirements for BellSouth's interfaces were established by incorporating CLECs' forecasts in BellSouth's aggregated forecasts. The aggregate forecast was then used to set the capacity requirements for the interfaces. BellSouth also has undertaken capacity testing to insure that the interfaces are capable of supporting the planned volumes. This testing process has been documented in several different venues, including the recent Section 271 FCC filings for South Carolina and Louisiana. BellSouth has the capacity to handle pre-ordering transactions for more than 10,000 orders per day, and has appropriate capacity plans in place to increase capacity as the CLECs' volume increases. At present, however, there is significant excess capacity, as the highest individual day's electronic pre-ordering and ordering volume for 1997 reached approximately 3,300 orders, with associated pre-ordering transactions, which is only one-third of the initial capacity for which BellSouth planned and has tested.

7) Installation intervals not at parity with BellSouth

BellSouth responds to this issue in Issue No. 7 below.

D. Maintenance and repair

The TAFI specifications were sent to MCI again on January 30, 1998.

E. Billing

BellSouth is currently billing the appropriate resale discount rates for MCIm. This capability was implemented in Florida on September 20, 1997. In addition, BellSouth implemented the discounting of nonrecurring charges in Florida on September 11, 1997.

Issue 2 Interconnection:

1. Collocation

You have requested the methods and procedures necessary "to interconnect with other collocators who are interconnected with BellSouth in the same central office; to purchase unbundled dedicated transport from BellSouth between the collocation facility and MCIm's network; to collocate subscriber loop electronics in a BellSouth central office; and to select virtual over physical collocation, where space and other considerations permit".

The requested procedures have already been made available to MCIm. The procedures to purchase unbundled dedicated transport between the collocation facility and MCIm's network reside in the Local Exchange Ordering [LEO] Implementation Guide which is on the BellSouth website, and in the BellSouth Collocation Handbook. BellSouth has always permitted the placement of digital loop carrier (DLC) equipment as part of a collocation arrangement given that specific DLC is considered transmission equipment. BellSouth offers CLECs both virtual and physical collocation.

2. Network blockage and End Office Trunking

BellSouth responds to this issue in Issue No. 7 below.

3. Local Tandem Interconnection

Consistent with the Florida Order and the BellSouth-MCIm Interconnection Agreement, BellSouth will allow a CLEC to interconnect with BellSouth at a local tandem. MCI's issue, and the issue not addressed by the contract, is whether BellSouth will terminate MCI's traffic to an independent telephone company or another CLEC at the local tandem.

Issue 3 Unbundled Network Elements

There are no national standards for record layouts and data elements for billing UNEs in a CABS Billing Data Tape [BDT] format. However, BellSouth will implement an interim process during April, 1998 to provide a CABS formatted UNE bill.

Although national standards for this UNE billing do not exist, BellSouth is nevertheless prepared to meet the needs of its CLEC customers. In addition, BellSouth will work cooperatively with the CLEC industry to develop the national standards through the OBF, and pursue other means of providing to all CLECs billing data that is useful.

BellSouth has the capability to provide the interstate access records to CLECs to enable them to bill Interexchange carriers for the provision of interstate access. As stated on page 74 of the Florida Order, this file is provided to "requesting CLECs". BellSouth requires contract provisions (either in the form of the Access Daily Usage File (ADUF) contract or as part of or an amendment to the existing interconnection agreement) before the ADUF will be provided.

With the files that have been generated through this process thus far, according to BellSouth's knowledge and belief, MCIm has had no interstate access records that would have been provided for December, 1997, or January, 1998.

Issue 4 Directory Assistance

As you indicated, the BellSouth-MCIm Interconnection Agreement states: "BellSouth shall provide to MCIm, to the extent authorized, the residential, business and government subscriber records used by BellSouth to create and maintain its Directory Assistance Data Base, in a non-discriminatory manner." Attachment VIII, Section 6.1.6.1. The words "to the extent authorized" were not in the original language initially proposed by MCI. Rather, they were proposed by BellSouth, and agreed to by MCI, in recognition of the fact that certain agreements with CLECs and independent telephone companies restrict BellSouth's ability to provide this information to MCI.

BellSouth has not changed its position and believes that MCI should honor its contractual obligation.

Issue 5 Reciprocal Compensation

On January 23, 1998, BellSouth sent to MCI via overnight delivery checks totaling $695,569.91 representing the amount claimed due for the termination of intraLATA minutes and local reciprocal compensation less the amount representing Internet Service Provider [ISP] traffic. BellSouth and MCI agreed to an additional amount of $199,012.61, which is associated with the usage cap under the agreement that was in effect until May, 1997.

With respect to your request that BellSouth will in the future pay for ISP traffic, BellSouth's position has been made clear on this point time and time again. Internet-bound traffic is not local traffic and is therefore not eligible for reciprocal compensation. BellSouth's position has not changed.

Issue 6 Resale Services

A. Services not being provided on a branded or unbranded basis to MCIm

Voice Mail

BellSouth voluntarily agreed to offer to CLECs the ability to resell BellSouth's MemoryCall® service, even though this service is not a telecommunications service. BellSouth agreed to do so but did not agree to change the service offering. BellSouth is willing to discuss and assess the development of a MemoryCall® service to include MCI custom branding.

Operator Services and Directory Assistance

BellSouth is prepared to provide operator services and directory assistance on an MCIm branded basis. The interconnection agreement in Attachment VIII does, however, require selective routing.

QUICKService

BellSouth is currently in the process of changing its present QUICKService recording to:

> "You can only dial '911' from this line. To reach BellSouth or another local service provider, you must call from another location."

Due to the number of BellSouth's main central offices affected by this change (approximately 800), BellSouth estimates that, barring any unforeseen obstacles, the change will be completed by February 27, 1998. BellSouth is providing QUICKService on a competitively neutral basis. Competitive neutrality does not mean BellSouth is restricted from mentioning itself on its QUICKService recording. BellSouth's QUICKService recording strikes a balance by stating that other local service providers are available while continuing to allow BellSouth an opportunity to market its services provided through its own facilities.

611 Service

BellSouth will attempt to work with MCI in reaching a mutually acceptable resolution of this issue.

B. Parity in conversions

BellSouth believes it is in compliance with "switched-as-is" customer conversions. The due date for MCIm customers is calculated in the same manner as the due date for BellSouth's own retail customers.

Issue 7 Performance Measurements

MCI stated that BellSouth was required to provide statistically valid commercial usage data showing:

A. average installation intervals for resale;
B. average installation intervals for loops;
C. comparative performance information for unbundled network elements;
D. service order accuracy and percent flow through;
E. held orders and provisioning accuracy;
F. bill quality and accuracy; and
G. repeat trouble reports for unbundled network elements.

The seven specific items (A-G) above will be provided as part of a larger set of service quality measurements currently under development by BellSouth. These forthcoming measurements are in response to the recent requirements set forth by the Georgia Public Service Commission in Docket No. 7892-U and will meet and/or exceed the needs of all BellSouth's CLEC customers, including MCIm. These measurements will provide a standard basis for comparison across the region. A complete list of the standard data to be collected and reported is set forth in the table below. BellSouth expects to have this regional data available in report format by the end of March, 1998.

The BellSouth MCIm account team is currently working with representatives from MCI to develop a methodology for reporting Performance Measurements as called for in the Florida Interconnection Agreement.

Standard CLEC/ILEC Measurements:

CATEGORY	FUNCTION
Pre-Ordering	1. Average Response Interval 2. OSS Interface Availability
Ordering	1. Firm Order Confirmation Timeliness 2. Reject Interval 3. Percent Rejected Service Requests 4. Percent Flow-through Service Requests 5. Total Service Order Cycle Time 6. Service Request Submissions per Request 7. Speed of Answer in Ordering Center
Provisioning	Order Completion Intervals 1. Average Completion Interval 2. Order Completion Interval Distribution Held Orders 3. Mean Held Order Interval Installation Timeliness, Quality & Accuracy 4. Percent Missed Installation Appointments 5. Percent Provisioning Troubles within 30 days 6. Percent Order Accuracy
Maintenance & Repair	1. Customer Trouble Report Rate 2. Missed Repair Appointments Quality of Repair & Time to Restore 3. Out of Service > 24 Hours 4. Percent Repeat Troubles within 30 days 5. Maintenance Average Duration 6. Average Answer Time - Repair Center
Billing	Invoice Accuracy & Timeliness 1. Invoice Accuracy 2. Mean Time to Deliver Invoices
Operator Services and Directory Assistance	Directory Assistance 1. Average Speed to Answer 2. Mean Time to Answer Operator Services 3. Average Speed to Answer 4. Mean Time to Answer
E911	1. Timeliness 2. Accuracy
Trunking	1. CLEC Trunk Group Service Report 2. BellSouth CTTG Blocking Report 3. Local Network Trunk Group Service Report 4. BellSouth Local Network Blocking Report

Other:

1. BST will provide state level reports only.
2. These quality measurement reports are designed to meet the requirements of the Interconnection Agreement and will be delivered in either electronic or printed format to the CLEC(s).

I trust the above answers the issues raised in your letter. BellSouth, as it has consistently done in the past, is prepared to discuss any and all issues with MCIm. To the extent you have any further questions or comments regarding BellSouth's policies or issues concerning implementation of the MCIm/BellSouth Interconnection Agreement, your BellSouth Account Team Representative can assist you.

Sincerely,

Scott Schaefer

BELLSOUTH

BellSouth Telecommunications, Inc.
Room 34S91 BellSouth Center
675 West Peachtree Street, N.E.
Atlanta, Georgia 30375

June 26, 1997

WNS-4

Ms. Helen Arthur
MCI Telecommunications Corporation
Suite 500
780 Johnson Ferry Road
Atlanta, Georgia 30342

RE: MCIm/BellSouth-GA Interconnection Agreement - Attach VIII, Sect 2.1.3

Dear Ms. Arthur:

This letter is in response to your inquiry of June 16, 1997 in reference to the following stipulation in the MCIm/BellSouth Interconnection Agreement:

Attachment VIII
2.1.3 .1 Street Address Guide (SAG)

> Within thirty (30) days after the Effective Date of this Agreement, BellSouth shall provide to MCIm the SAG data, or its equivalent, in electronic form. All changes to the SAG shall be made available to MCIm on the same day as the change to the data is made.

Your interpretation of the above stipulation is that BellSouth will provide the Street Address Data, not online access, to MCIm . However, the stipulation states that BellSouth is to provide the SAG data to MCI or its equivalent in electronic form. Since, BellSouth is unable to provide the initial SAG data and daily updates in batch form the only available equivalent would be using online access.

Sincerely,

Cathy Forbes

Cathy Forbes
Compliance Manager
Interconnection Services

cc: Ilene Barnett

MCI Telecommunications Corporation
780 Johnson Ferry Road
Suite 500
Atlanta, GA 30342

June 16, 1997

Ilene M. Barnett
Sales Director
MCI Account Team
BellSouth Interconnection Services
Suite 420
1960 West Exchange Place
Tucker, Georgia

Dear Ilene,
Thanks for the prompt response regarding the Regional Street Address Guide. For your reference, I have included in this letter an excerpt from the MCImetro – BellSouth Georgia Interconnection Agreement, Attachment VIII, Section 2.1.3:

> "2.1.3 Street Address Guide (SAG)
>
> 2.1.3.1 Within thirty (30) days after the Effective Date of this Agreement, BellSouth shall provide to MCIm the SAG data, or its equivalent, in electronic form. All changes to the SAG shall be made available to MCIm on the same day as the change to the data is made".

It is my understanding that the SAG data is to be provided to MCI, not simply the access to the data. As per the Interconnection Agreement, MCI is requesting the Regional SAG data be provided for the states of Georgia, Tennessee and North Carolina. Please respond in writing by June 25, 1997.

If you have any questions, please contact me on 404-267-6580. Thanks again for your assistance in this matter.

Helen Arthur

Cc: Bryan Green
Georjean Simmons

MCI Telecommunications Corporation
780 Johnson Ferry Road
Atlanta, GA 30342
404 267 5500

August 18, 1997

Ms. Ilene Barnett
Sales Director
BellSouth Interconnection Services
1960 West Exchange Place
Tucker, GA 30084

Dear Ms. Barnett:

This letter is in response to Cathy Forbes' June 26 letter, which replied to Helen Arthur's June 16, 1997 inquiry in reference to the following section in the MCImetro-BellSouth Interconnection Agreement:

Attachment VIII
2.1.3 Street Address Guide (SAG)
2.1.3.1 Within thirty (30) days after the Effective Date of this Agreement, BellSouth shall provide to MCIm the SAG data, or its equivalent, in electronic form. All changes to the SAG shall be made available to MCIm on the same day as the change to the data is made.

This section clearly requires BellSouth to provide to MCIm in electronic form either the SAG data or its equivalent. As it is more than thirty (30) days since the interconnection agreements became effective in Georgia, Florida, Tennessee, and North Carolina, BellSouth is overdue in providing to MCIm in electronic form the SAG data.

Ms. Forbes letter states, and I quote, " Since, BellSouth is unable to provide the initial SAG data and daily updates in batch form the only available equivalent would be using online access". MCIm is capable of accepting an electronic download of this data via NDM until a regular mechanized daily batch process can be implemented to accommodate daily updates.

MCIm insists that BellSouth comply with the terms of its interconnection agreements with MCIm and provide MCIm in electronic form with the SAG data no later than August 29, 1997. Failure to do so will significantly hamper MCIm's entry into the local market by forcing MCIm to continue to contend with manual intervention in the pre-ordering/ordering process to verify customer street address information, and, will demonstrate BellSouth's continued lack of compliance with the contracts.

Please reply to this letter no later than August 22, 1997.

Sincerely,

Walter J. Schmidt

cc: Marcel Henry - MCI
Charlene Keys - MCI
Bryan Green - MCI
Jeremy Marcus - MCI
Joe Baker - BellSouth
Pam Lee - BellSouth

BELLSOUTH

BellSouth Interconnection Services
Suite 420
1960 West Exchange Place
Tucker, Georgia 30084

770 492-7510
Fax 770 621-0632
MCI ID 361-2846

Pam Lee
Sales Assistant Vice President
MCI Account Team

October 10, 1997

Mr. Marcel Henry
Regional Vice President
Southern Financial Operations
MCI Telecommunications, Inc.
Three Ravinia Drive
Atlanta, Georgia 30346

Dear Marcel:

This is in response to your September 18, 1997, letter to Joe Baker regarding the three issues you asked him to review and to assist in a resolution for each issue. We value our relationship with MCI and are continuously striving to meet your needs whenever and wherever we can. However, we are not always able to meet MCI's requests in the specific manner requested. Unfortunately, with the exception of our plans for handling rejects through EDI, this is the case with the issues you have brought to our attention. The following is a summary of BellSouth's position on each of the three issues:

1) CARE Processing:

Our position is still the same as that described in the September 19, 1997, email from Kim Uhles of BellSouth to Phyllis Maslia of MCI and the July, 1997, letter from Susan Arrington of BellSouth to Helen Arthur of MCI. BellSouth has not yet established a process for advising CLECs when their customers change their PIC. However, BellSouth will work with MCI to document your requirements and develop a time and price estimate to deliver this enhancement if you desire.

2) Regional Street Address Guide (RSAG):

BellSouth is open to working with MCI to understand the information that MCI needs out of RSAG and to develop the time and costs required to develop this enhancement.

3) EDI Transactions:

* Jeopardies: As explained verbally to MCI on several occasions, BellSouth's position is generally to adhere to national standards for EDI. To date, national standards have not been established for jeopardies.

* Rejects: This will be addressed in Release 2.0 as part of our upgrade to TCIF Issue 7, which is tentatively scheduled for January 30, 1998.

* Loss Notification: As described in Cliff Bowers', BellSouth, August 8, 1997, letter to Helen Arthur, MCI, BellSouth does not have the capability at this time to offer the EDI 836 transaction set for loss notification nor does BellSouth have plans to develop that capability. However, BellSouth will work with MCI to document your requirements and to develop a time and price estimate to deliver this enhancement if you desire.

Although we are unable to commit to addressing all of the issues in the manner MCI originally requested, BellSouth's Account Team and Product Team representatives met on September 30, 1997, with Bryan Green, MCI, and members of his staff to discuss these issues as well as other topics. In the meeting both companies agreed to investigate and seek other mutually satisfactory means of addressing each issue.
I will keep you informed as to our progress, and in the meantime, please let me know if you have any questions or need additional information.

Sincerely,

Pamela K. Lee

BELLSOUTH

BellSouth Interconnection Services
Suite 420
1960 West Exchange Place
Tucker, Georgia 30084

770 492-7500
Fax 770 621-0632

MCI Account Team

August 20, 1997

Mr. Walter J. Schmidt
MCI Telecommunications Corporation
780 Johnson Ferry Road
Atlanta, Georgia 30342

Dear Wally,

This is in response to Bryan Green's verbal request to provide MCIm with a copy of BellSouth's Regional Street Address Guide (RSAG) database files and RSAG record layouts and to your letter dated August 18, 1997, regarding the same subject. In accordance with the MCIm/BST Interconnection Agreement, MCIm can access BellSouth's RSAG database through the Local Exchange Navigation System (LENS) and/or via Interexchange Carrier Reference Validation (ICREF) service.

The RSAG database files are extremely voluminous for downloading and the fact is that the database changes so rapidly it would be outdated by the time MCIm would be in receipt of the database files. The RSAG technical specifications are proprietary.

MCIm may pursue receipt of the RSAG database files in a form other than that described in the Interconnection Agreement through the Agreement's Bona Fide Request (BFR) process. I trust that the above provides you with the desired information.

Sincerely,

Cliff Bowers

for Pam Lee
Sales Assistant Vice President

cc: Joe Baker - BST
Marcel Henry- MCI
Charlene Keys - MCI
Bryan Green - MCI
Jeremy Marcus - MCI

MESSAGE Dated: 10/21/97 at 7:17
Subject: BOR - System Access for Pre-Ordering Contents: 3
Sender: Judy Rueblinger /AL,BRHM05

Item 1

FROM: Judy Rueblinger /AL,BRHM05 { Undisplayable address parts }
TO: Bryan Green /SMTP (@bstfirewall:bryan.green@mci.com)
CC: Clifford H. Bowers /AL,BRHM07 { Undisplayable address parts }
Pamela K. Lee /AL,BRHM07 { Undisplayable address parts }

Item 2

Bryan,

Please review the attached draft write up for the Business Opportunity Request (BOR) we will be submitting based on our discussions yesterday.

We welcome any comments you have to add that will make our request perfectly clear to those reviewing it what MCI's desire is for pre-ordering system access.

Once I hear back from you I will make the appropriate changes and actually transfer it to the actual BOR form.

Thank you in advance for taking time to review this.

Judy
770-492-7524

Item 3

BonaFide Operations Request (BOR)
MCI - SYSTEM ACCESS FOR PRE-ORDERING
10/21/97

DRAFT

.

MCIm's request is to have access to BellSouth's "back end" systems such as
RSAG (for address validation) and BOCRIS (for CSR information). MCIm's desire is for these systems to interface with their front end ordering system.

Screen Scraping is a means to give MCIm this data. If Screen Scraping is an alternative to providing the actual databases, MCIm's request is for BellSouth to provide them with the technical specifications for screen scraping.

Another option for pre-ordering is the protocol TCP/ICP SSL3 - JIT. There is concern here as to when this will be available.

Application Programmable Interface (API) is a method BellSouth will be looking at to provide CLECs the ability to customize and maintain the information MCIm is looking for in regards to pre-ordering information such as address validation and CSRs. However, discussions on this process are just getting started and MCIm does not want to wait on this.

discussed. They are:

Provide MCI with the RSAG database.

Provide MCI an extract of the RSAG database. The information to be extracted would be all fields pertinent to validating a customer's address. The fields we have identified for address validation are:

HOUSE NUMBER	STATE
S/F	SUPPPLEMENTAL
AHN	APT
DIR	FLR
STREET	BLDG
T/F	
COMMUNITY	

MSAG is another option. This information data has been given to other CLECs but does not contain the "Community" abbreviations for the Southern Bell states.

This means that BellSouth must also furnish the CLECs with a list of community abbreviations which would cause the CLEC to integrate the two pieces of information together to serve as an address validation tool.

BELLSOUTH

BellSouth Telecommunications, Inc.
Suite 4511
675 West Peachtree Street, N.E.
Atlanta, Georgia 30375

404 927-7020
Fax 404 521-2311

Mark L Feidler
President – Interconnection Services

November 13, 1997

Mr. Marcel Henry
Regional Vice President
Southern Financial Operations
MCI Telecommunications
Three Ravinia Drive
Atlanta, Georgia 30346

Dear Marcel:

Recently, you brought to the attention of the BellSouth MCI Account Team your concerns over MCImetro's ("MCI") perceived lack of progress on several MCImetro OSS issues, including Change Management, Loss Notification/NDM, RSAG, and Common Graphical Interface (CGI). We then discussed these items on the phone last week. I am now in a position to provide you with an update.

At present, BellSouth is in compliance with the interface obligations and interface duties set forth in the MCImetro/BellSouth Interconnection agreements. The OSS requirements were negotiated between the parties and are contained within Attachment VIII of the Interconnection Agreements. In that Attachment you will find that MCI agreed to accept, on an interim basis, the interfaces approved by BellSouth.

I want to assure you that BellSouth has been very focused in its quest to meet the additional requests from MCI. The outstanding MCI requests are complex and BellSouth must make sure that the responses are fully researched and as correct and current as possible. To ensure MCI understands where BellSouth stands on these issues, I have summarized below their current status and BellSouth's plans for addressing each one.

- Change Management: BellSouth is in the process of developing a change management plan. BellSouth appreciates and will consider MCI's input, including MCI's proposal entitled "BellSouth/MCI Change Management Process for OSS Interfaces" that you provided recently. BellSouth's goal is present the plans to you by mid December.

  As information, our plans will address BellSouth's support of dual OSS platforms. At this time, BellSouth will support dual platforms associated with EDI releases for 60 days. When technically feasible, the CLECs will have the opportunity to negotiate longer periods for the dual platforms, however, due to the potentially significant expenses associated with supporting multiple platforms, there will likely be additional charges to the CLECs should BellSouth agree to extending the dual platforms beyond 60 days. We will address dual platforms for LENS and other systems as part of our change notification plan that should be finalized in early December.

- Loss Notification/NDM: Currently MCI is receiving information regarding disconnections via paper. Pursuant to Attachment VIII, section 2.2.12, MCI has agreed, in a September 10, 1997 letter to Cliff Bowers of BellSouth, to an interim method of notification via Network Data Mover. BellSouth can provide such data via Network Data Mover in June 1998. We understand your desire that we implement this arrangement by the end of the year. This possibility is being reviewed by appropriate BellSouth management. The account team will notify the appropriate MCI representatives by Friday, November 21, 1997, as to whether this delivery date can be moved up.

- RSAG: Within the next two weeks, BellSouth will be able to provide you cost estimates and the time and price for developing the detailed design, project plan, and a firm quote for the overall delivery. Please note that BellSouth is exploring the development of an Application Programming Interface (API) that may better suit your needs. It is my understanding that five MCI employees will be at a BellSouth meeting on November 14, 1997 to discuss this interface. At present, BellSouth is meeting its contractual obligations regarding MCI's access to SAG data.

- Common Graphical Interface (CGI): CGI specifications were sent to you by the account team on November 7, 1997. These specifications will allow MCI to build its Common Graphical Interface. The next release of specifications is in development. This will be a supplement to the existing specifications and will allow MCI to add some fields that are not represented in the current specifications. MCI does not have to wait for the next release to begin building its Common Graphical Interface since the next release will simply be an extension of the existing specifications. Once MCI has reviewed the specifications, BellSouth can establish a Joint Implementation Team (JIT) with MCI to begin developing plans, including timelines, to implement CGI.

We will keep you apprised as to our progress on each of these important issues. Meanwhile, if you have any questions or need additional information, please call me at 404-927-7530.

Sincerely,

M. L. Feidler

Mark Feidler

BELLSOUTH

BellSouth Interconnection Services
Room 34A35
675 West Peachtree Street, N.E.
Atlanta, Georgia 30375

12/02/97

Bryan Green
Sr. Manager - Systems Implementation
MCI Telecommunications
780 Johnson Ferry Road
Suite 500
Atlanta, Ga. 30342

Dear Bryan:

This letter is a response to your request that BellSouth provide MCI extracts from our Regional Street Address Guide (RSAG) database of the information necessary to perform address validations.. The cost estimate has been developed based on your stated need of submitting Local Service Requests with valid address. Your objective is to use the RSAG data to support your front end edits.

The proposal is for two extract files to be produced and sent to MCI every night. Please note that these are complete files and not updates. The data will be sent via Connect:Direct. MCI will be responsible for the cost of the circuit and modem equipment to connect to BellSouth as well as all hardware and software at your location needed to receive and process the data. The cost for that connection is not included here.

The following is a preliminary estimate of the costs to build and maintain the RSAG data delivery system. The final price for this project will be within +- 15% of this estimate. In order to proceed, BellSouth must put a project team in place, develop a project plan and timelines for this work in conjunction with MCI, and develop a final price for the project. The cost for this initial phase is $30,000 which will count toward the overall price. You will be asked to approve the project plan and final price before we move into the development phase.

Project plan, timeline, and final proposal	$30,000
Total Startup costs for the new connection	$538,030
Monthly recurring charge	$8,650

Please sign below and return this letter to me if you accept this estimate and agree to pay the $30,000 cost for the development of the project plan, timelines, and final price. Upon completion of the project plan, timelines, and final proposal, you will be asked to approve the project plan and final price before proceeding with the implementation of this arrangement. Your signature below will authorize BellSouth to proceed with final costs and a project plan for this work.

Bob Siegel

Bob Siegel - BellSouth

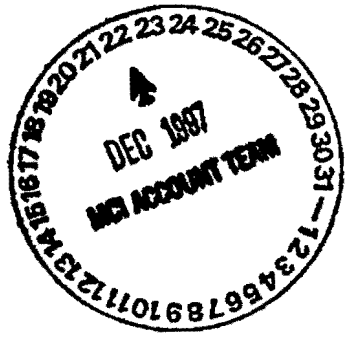
Authorized Signature - MCI

12/04/97

Date

Date

MCI Telecommunications Corporation
780 Johnson Ferry Road
Atlanta, GA 30342
404 267 5500



December 16, 1997

Bob Siegel
Product Manager
BellSouth Interconnection Services
Room 34A35
675 W. Peachtree Street, N.E.
Atlanta, Georgia 30375

Bob,

This letter is in response to the proposal provided to MCI on 12/04/97 relative to the cost to provide an extract of your RSAG database.

As you know, for several months we have been requesting that BellSouth provide MCI with a download of the RSAG database. The RSAG database is necessary to allow MCI to validate addresses in our own front end system prior to submitting an order to BellSouth. This capability will improve order processing time, reduce the amount of rework for both companies due to errors and decrease the cost of doing business. As you are aware, the RSAG issue is now pending before the Georgia Public Service Commission.

As an interim measure pending the outcome of the PSC proceeding, you have proposed that BellSouth provide an extract of the RSAG database based on the following cost structure:

- $30,000 – Project plan, timeline, and final proposal
- $538,030 – Total Start of costs for the new connections; and
- $8,650 – Monthly recurring charge

MCI rejects this offer because our Interconnection Agreement entitles us to receive a download of the entire RSAG at no cost. MCI again requests BellSouth to comply with the agreement by providing a complete RSAG download to MCI immediately.

Respectfully,

Bryan K. Green
Sr. Manager –OSS Implementation
404-267-5515

cc: Marcel Henry
Pam Lee
Charlene Keys
Joe Baker

MCI Telecommunications Corporation
780 Johnson Ferry Road
Suite 500
Atlanta, GA 30342

September 5,1997

Mr. Cliff Bowers, Sales Director
BellSouth Telecommunications
1960 West Exchange Place, Ste. 420
Tucker, GA 30084

Cliff,

Per the LENS Access Technical Specification, the LENS application can be accessed directly by other computer systems. Based on that fact, MCI would like to meet with BellSouth and develop the interface that would provide us with that access. The specifications we have are dated 9/5 and per the documentation it supports the 4/22/97 release of LENS. In order to develop this interface we need the latest technical specification which includes all the LENS upgrades (eg csr). We'd like an updated copy to review prior to the meeting.

We will be available to meet via conference call on September 15, 17, or 18. Please let me know which date is best for you and your technical SME. You may direct your questions to me on 404-267-6593.

Sincerely,

Anna Hopkins
Local Systems Implementation Specialist

Clifford H. Bowers /AL,BRHM07 11/18/97 11:02 Page 1

MESSAGE Dated: 11/7/97 at 16:21
Subject: CGI Contents: 3
Sender: Clifford H. Bowers /AL,BRHM07

Item 1

FROM: Clifford H. Bowers /AL,BRHM07 (Undisplayable address parts)
TO: byan green /smtp (@bstfirewall:0002169860@mcimail.com)
CC: Pamela K. Lee /AL,BRHM07 (Undisplayable address parts)
Judy Rueblinger /AL,BRHM05 (Undisplayable address parts)
Bob Siegel /AL,BRHM02 (Undisplayable address parts)

Item 2

Bryan,

Attached are the release 1.0 CGI specifications. These should give your folks something they can begin working with. Also notice that Bob should have release 1.1 specifications in around four weeks.

Thanks,

Cliff

Item 3

MESSAGE Dated: 11/7/97 at 10:16
Subject: CGI Contents: 3
Creator: Bob Siegel /AL,BRHM02

Item 3.1

FROM: Bob Siegel /AL,BRHM02 (Undisplayable address parts)
TO: Clifford H. Bowers /AL,BRHM07

Item 3.2

Cliff:

Attached are the CGI specifications, release 1.0. These specifications will give MCI the capability to build their screen scrapping application. Release 1.1 of these specifications is currently in development and will be released in approximately 4 weeks. This release will give MCI added capability to match some new fields that have recently been added in LENS.

I will forward release 1.1 to you when it is complete.

Item 3.3

LENS Access Technical Specification
Access by a Client Application

Overview
This document specifies the details of the interface that can be utilized by a Competitive Local Exchange Carrier (CLEC) to access the BellSouth Telecommunication's Local Exchange Negotiation System (LENS) from software emulating a Web Browser.

The LENS application can be accessed directly by other computer systems bypassing the need for a Web Browser. This paper contains specifications for a methodology for using an application client in place of browser to communicate

Clifford H. Bowers /AL,BRHM07 11/24/97 15:47 Page 1

MESSAGE Dated: 11/20/97 at 15:28
Subject: RE: CGI Contents: 3
Sender: Clifford H. Bowers /AL,BRHM07

Item 1

FROM: Clifford H. Bowers /AL,BRHM07 (Undisplayable address parts)
TO: bryan green /internet (0002169860@mcimail.com)
CC: Judy Rueblinger /AL,BRHM05 (Undisplayable address parts)
Bob Siegel /AL,BRHM02 (Undisplayable address parts)
Linda W. Tate /AL,BRHM08 (Undisplayable address parts)

Item 2

Bryan,

I have been working with Bob Siegel to obtain responses to your questions from the attached. Bob has just confirmed that our target date for providing the CGI release 1.1 specifications will be 12/12/97.

The enhancements that will be included in this release have not yet been finalized. Bob has promised to let me know as soon as he can as to when the 1.1 enhancements will be confirmed so that I can convey that to you. We will provide you a list of the planned enhancements as soon as they are available.

Cliff

Item 3

MESSAGE Dated: 11/13/97 at 13:43
Subject: RE: CGI Contents: 3
Creator: Bryan!Green /internet (Bryan.Green@mci.com)

Item 3.1

FROM: Bryan!Green /internet (Bryan.Green@mci.com)
TO: Clifford H. Bowers /AL,BRHM07
CC: Pamela K. Lee /AL,BRHM07
Judy Rueblinger /AL,BRHM05
Bob Siegel /AL,BRHM02
Alan!Anglyn /internet (Alan.Anglyn@mci.com)
Anna!Hopkins /internet (Anna.Hopkins@mci.com)

Item 3.2

ARPA MESSAGE HEADER

Item 3.3

Cliff,

After reviewing the attached CGI specifications, we have determined that they are the same specifications that we received on 9/5/97. Your note mentions that release 1.1 will be available in the next four weeks or so. In order for our developers to evaluate the specs as quickly as possible, we would need a more accurate availability date as well as a list of the enhancements release 1.1 will support.

Please let me know if you will be able to provide me with the requested information by 11/20/97. If you are unable to meet this date, please let me know when I can expect to receive.

Bryan

-----Original Message-----
From: Clifford.H.Bowers [SMTP:Clifford.H.Bowers@bridge.bellsouth.com]
Sent: Friday, November 07, 1997 5:24 PM
To: Bryan Green
Cc: Pamela.Lee; Judy.Rueblinger1; Bob.Siegel

1

Clifford H. Bowers /AL,BRHM07 11/24/97 15:47 Page 2

Subject: CGI

<< Message: CGI >> Bryan,

Attached are the release 1.0 CGI specifications. These should give your folks
something they can begin working with. Also notice that Bob should have release 1.1 specifications in around four weeks.

Thanks,

Cliff

Clifford H. Bowers /AL,BRHM07 12/18/97 14:52 Page 1

MESSAGE Dated: 12/15/97 at 17:15
Subject: CGI Contents: 3
Creator: Bob Siegel /AL,BRHM02

Item 1

FROM: Bob Siegel /AL,BRHM02 (Undisplayable address parts)
TO: bryan green /internet (0002169860@mcimail.com)
CC: Clifford H. Bowers /AL,BRHM07 (Undisplayable address parts)

Item 2

See attached CGI specifications

Item 3

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MESSAGE Dated: 4/9/98 at 14:10
Subject: CGI Document - Updated Contents: 3
Creator: Judy Rueblinger /AL,BRHM05

Item 1

FROM: Judy Rueblinger /AL,BRHM05 { Undisplayable address parts }
TO: Helen Arthur /SMTP (@bstfirewall:helen.arthur@mci.com)
Beverly Gordon /SMTP (@bstfirewall:beverly.gordon@mci.com)
Bryan Green /SMTP (@bstfirewall:bryan.green@mci.com)
Mark Turner /SMTP (@bstfirewall:mark.e.turner@mci.com)
CC: Mary Bennett /AL,BRHM07 { Undisplayable address parts }
Clifford H. Bowers /AL,BRHM07 { Undisplayable address parts }

Item 2

Please see the attached updated CGI document. It contains updates based on Releases 2.0 and 2.1.

You should be seeing this on our web site soon. We have not gotten a date as to when it will be posted but know that MCI is in development and wanted you to have this information ASAP.

If you have any questions, don't hesitate to call.

Thanks,

Judy

Item 3

MESSAGE Dated: 4/8/98 at 17:32
Subject: CGI Document - Updated Contents: 3
Creator: Carol J. Douglas /AL,BRHM09

Item 3.1

FROM: Carol J. Douglas /AL,BRHM09 { Undisplayable address parts }
TO: Bob Siegel /AL,BRHM02
CC: Raymond J. Betz /AL,BRHM05 { Undisplayable address parts }
Marsha V. Causey /AL,BRHM07 { Undisplayable address parts }
Srinivas Dharmaji /AL,BRHM07 { Undisplayable address parts }
Alex L. Dizon /AL,BRHM09
Robert Foose /AL,BRHM04 { Undisplayable address parts }
Barry K. Holt /AL,BRHM08 { Undisplayable address parts }
jack /internet (jack@albion-intl.com)
Karen D. Johnson /AL,BRHM02 { Undisplayable address parts }
Kevin L. Maher /AL,BRHM05 { Undisplayable address parts }
Rick Mccloy /AL,BRHM03 { Undisplayable address parts }
Don R. Stewart /Intranet (Stewart.DonR@bis.bls.com) { Undisplayable add...
Ranae Stewart /AL,BRHM09 { Undisplayable address parts }
Linda W. Tate /AL,BRHM08 { Undisplayable address parts }
Arthur B. Timms /AL,BRHM05 { Undisplayable address parts }
Kathy M. Wilsonchu /AL,BRHM09 { Undisplayable address parts }

Item 3.2

Bob,

Attached is the latest version of the CGI document for LENS. This document includes changes for Release 2.0 and 2.1. I understand you are responsible for placing this document on a web-site in BellSouth.

If you have any questions, please do not hesitate to contact me.

Thanks,

Carol Douglas
LENS-System Manager
205/977-5807

Item 3.3

<LENS CGI Interface Specification 1
ensProdSptCGISpec
Document Version 2.1
SSPC0097
CMVC Version 1.2

>
<

Created: 1/6/97
?
Revised: 4/8/98

PRIVATE / PROPRIETARY

Contains Private and/or Proprietary Information. May Not Be Used or Disclosed Ou
tside
the BellSouth Companies Except Pursuant to a Written Agreement.
>

LENS

CGI Interface
Specification

FINAL

LENSdocdesiface - (Sspc0097)

Version 2.1

BELLSOUTH

BellSouth Interconnection Services
Suite 420
1960 West Exchange Place
Tucker, Georgia 30084

770 492-7500
Fax 770 621-0632

MCI Account Team

February 23, 1998

Mr. Bryan Green
MCI Telecommunications
2520 Northwinds Parkway
Alpharetta, Ga. 30004

Dear Bryan,

This letter is responding to MCI's verbal request made during the January 23, 1998 OSS meeting, requesting that BellSouth provide a data dictionary to be used for CGI. The data dictionary, as you explained, would help MCI determine how to interpret or "break up" data sets.

According to our programmers, the information normally contained in a data dictionary is contained in the CGI technical specifications document that BellSouth provided MCI in December. Thus, BellSouth does not believe that preparing a separate data dictionary would serve any useful purpose, particularly since MCI's programmers should have all the information they need to complete their development efforts with respect to CGI.

However, if your programmers have questions about the technical specifications or need assistance with parsing, please let me know. As we discussed previously, I will be available to arrange a joint technical meeting to discuss this and any other CGI concerns you have.

In the meantime, we have enclosed an example of output specifications when the user is performing the "Validate Address" function. The data used in this example was taken from the December 15, 1997 CGI technical specifications document, starting on page 8. You will see that the example identifies the data fields, their allowable length and the allowable character types (e.g., alpha or numeric) which is the same information included in a data dictionary.

When MCI is ready to schedule the joint technical meeting please let me know. In the meantime, if you have any additional questions don't hesitate to call me.

Sincerely,

Clifford Bowers

Attachment

CGI Technical Specifications
(Example of Input/Data Output)

(EXAMPLE) (CGI Technical Specifications document, 12/15/97, Page 8)

3.2 Input/Output Requirements for Street Address Validation

In this section the input/output requirements for street address validation are provided. Street address validation is the precursor to all other preorder functionality. The non-error flow is as follows: address validation selection (3.2.1), address validation (3.2.2), address validation acknowledgment (3.2.3). In the case of any possible error response, the response and appropriate action are described.

3.2.1 Street Address Validation Request

Notify the CGI server that the application wishes to perform street address validation.

3.2.1.1 Input Specification

There are two possible input specifications. The first, simply notifies the CGI server that the application wishes to perform street address validation. The second passes a telephone number and state to the CGI server as the "address" to validate.

The pertinent HTML for this page is as follows:

```
<INPUT maxlength=18 size=18 type=text name="telephoneNumber">

<INPUT maxlength=36 size=36 type=text name="circuitNumber">

<SELECT name="stateAbbr"><OPTION value=" "> </OPTION><OPTION value="AL
">AL  </OPTION><OPTION value="FL-North">FL-North</OPTION><OPTION
value="FL-South">FL-South</OPTION><OPTION value="FL-Southeast">FL-
Southeast</OPTION><OPTION value="GA-Atlanta">GA-Atlanta</OPTION><OPTION
value="GA-Outstate">GA-Outstate</OPTION><OPTION value="KY  ">KY
</OPTION><OPTION value="LA  ">LA  </OPTION><OPTION value="MS  ">MS
</OPTION><OPTION value="NC  ">NC  </OPTION><OPTION value="SC  ">SC
</OPTION><OPTION value="TN  ">TN  </OPTION></SELECT>
```

Send street address validation request:

```
POST InquiryScreenURL HTTP/1.0


Content-type: application/x-www-form-urlencoded


inquiryOption=Validate+Address&TelephoneNumber=&StateAbbr=&OK=OK
```

Note: *InquiryScreenURL* is obtained from the `action` attribute in the form in the response from the main screen access.

Send telephone number to be validated.

```
POST InquiryScreenURL HTTP/1.0


Content-type: application/x-www-form-urlencoded
```

InquiryOption=Validate+Address&TelephoneNumber=*TelephoneNumber*&StateAbbr=*stateAbbr*&OK=OK

Note: inquiryScreenURL is obtained from the action attribute in the form in the response from the main screen access. *telephoneNumber* is a 10 digit telephone number containing no delimiting characters, and *stateAbbr* is a two letter USPS state abbreviation (all capitals). If no telephone number is sent, the telephone number and state field names (telephoneNumber, stateAbbr) are included but no value is passed with them. Please note that the state abbreviation (*stateAbbr*) must correctly match the option presented for StateAbbr according to the HTML above.

Return to Main Menu:

POST *InquiryScreenURL* HTTP/1.0

Content-type: application/x-www-form-urlencoded

Cancel=Cancel

Note: This action can be performed substituting the URL from the given form, for any form that contains a Cancel button.

3.2.1.2 Output Specification

The two inputs result in two different outputs. The first input returns an action that requires a street address or telephone number to be input. The second input causes the telephone number to be validated. It returns an action that expects an acknowledgment of the validated telephone number.

Action requiring an address to be input:

The URL for the next CGI and the required data fields are obtained from the following form in the page.

```
<FORM method=post action="ValidateAddrURL">

<INPUT size=8 maxlength=8 type=text name="BasicStreetAddressNumber">

<INPUT size=44 maxlength=44 type=text
name="BasicStreetAddressStreetName">

<INPUT size=4 maxlength=4 type=text name="BasicStreetAddressSuffix">

<SELECT name="BasicStreetDirPrefix">
<OPTION></OPTION><OPTION>E</OPTION><OPTION>N</OPTION><OPTION>NE</OPTION>
<OPTION>NW</OPTION><OPTION>S</OPTION><OPTION>SE</OPTION><OPTION>SW</OPTI
ON><OPTION>W</OPTION>

</SELECT>

<SELECT name="BasicStreetAddressThor">
<OPTION></OPTION><OPTION>ALY</OPTION><OPTION>ANX</OPTION><OPTION>ARC</OP
TION><OPTION>AV</OPTION><OPTION>BEND</OPTION><OPTION>BLK</OPTION><OPTION
>BDWK</OPTION><OPTION>BLVD</OPTION><OPTION>BR</OPTION><OPTION>BTM</OPTIO
N><OPTION>BYP</OPTION><OPTION>CSWY</OPTION><OPTION>CTR</OPTION><OPTION>C
IR</OPTION><OPTION>CV</OPTION><OPTION>CT</OPTION><OPTION>CRES</OPTIQN><O
PTION>CRK</OPTION><OPTION>CRSG</OPTION><OPTION>DR</OPTION><OPTION>ESPLND
</OPTION><OPTION>EST</OPTION><OPTION>EXPWY</OPTION><OPTION>EXT</OPTION><
OPTION>FRK</OPTION><OPTION>FRWY</OPTION><OPTION>GRDN</OPTION><OPTION>HBR
</OPTION><OPTION>HL</OPTION><OPTION>HLS</OPTION><OPTION>HT</OPTION><OPTI
ON>HTS</OPTION><OPTION>HWY</OPTION><OPTION>HOLW</OPTION><OPTION>ISL</OPT
ION><OPTION>JCTN</OPTION><OPTION>LK</OPTION><OPTION>LDG</OPTION><OPTION>
LN</OPTION><OPTION>LOOP</OPTION><OPTION>MNR</OPTION><OPTION>MKT</OPTION>
```

```
<OPTION>MT</OPTION><OPTION>MTN</OPTION><OPTION>NK</OPTION><OPTION>PASS</
OPTION><OPTION>PATH</OPTION><OPTION>PK</OPTION><OPTION>PKWY</OPTION><OPT
ION>PR</OPTION><OPTION>PKE</OPTION><OPTION>PL</OPTION><OPTION>PLZ</OPTIO
N><OPTION>PT</OPTION><OPTION>PD</OPTION><OPTION>PROM</OPTION><OPTION>PVT
</OPTION><OPTION>DR</OPTION><OPTION>RDG</OPTION><OPTION>RD</OPTION><OPTI
ON>RDWY</OPTION><OPTION>RT</OPTION><OPTION>ROW</OPTION><OPTION>RUN</OPTI
ON><OPTION>SQ</OPTION><OPTION>STA</OPTION><OPTION>ST</OPTION><OPTION>TER
</OPTION><OPTION>THRWY</OPTION><OPTION>TRC</OPTION><OPTION>TR</OPTION><O
PTION>TRNPK</OPTION><OPTION>VLG</OPTION><OPTION>WK</OPTION><OPTION>WAY</
OPTION><OPTION>WHF</OPTION><OPTION>YD</OPTION>

</SELECT>

<SELECT name="BasicStreetDirSuffix">
<OPTION></OPTION><OPTION>E</OPTION><OPTION>N</OPTION><OPTION>NE</OPTION>
<OPTION>NW</OPTION><OPTION>S</OPTION><OPTION>SE</OPTION><OPTION>SW</OPTI
ON><OPTION>W</OPTION>

</SELECT>

<SELECT name="SupplementalAddressUnitType">
<OPTION></OPTION><OPTION>APT</OPTION><OPTION>LOT</OPTION><OPTION>RM</OPT
ION><OPTION>SLIP</OPTION><OPTION>SUIT</OPTION><OPTION>UNIT</OPTION>

</SELECT>

<INPUT type=text size=10 name="SupplementalAddressUnitData">

<SELECT name="SupplementalAddressElevationType">
<OPTION></OPTION><OPTION>FLR</OPTION>

</SELECT>

<INPUT type=text size=10 name="SupplementalAddressElevationData">

<SELECT name="SupplementalAddressStructureType">
<OPTION></OPTION><OPTION>BLDG</OPTION><OPTION>PIER</OPTION><OPTION>WNG</
OPTION>

</SELECT>

<INPUT type=text size=10 name="SupplementalAddressStructureData">

<INPUT backgroundcolor=ff1e2b maxlength=32 size=32 type=text
name="CommunityName">

<SELECT name="StateAbbr">
<OPTION</OPTION><OPTION>AL</OPTION><OPTION>FL</OPTION>GA<OPTION>KY</OPTI
ON><OPTION>LA</OPTION><OPTION>MS</OPTION><OPTION>NC</OPTION><OPTION>SC</
OPTION><OPTION>TN</OPTION>

<INPUT size=50 maxlength=50 type=text name="DescriptiveAddressName">

<INPUT size=2 maxlength=2 type=text name="BasicStreetAddressRoute">

<INPUT size=8 type=text name="BasicStreetAddressBox">

<INPUT type=text size=24 name="TelephoneOrCircuitIdentifier">

<INPUT type=submit value="Validate" name="validate">

<INPUT type=submit value="Cancel" name="Cancel">

</FORM>
```

Action requiring an acknowledgment of a validated telephone number.

There are two forms returned on this page. The first is identical to the form returned in response to an address validation request. This form is populated with the value of the submitted telephone number and the submitted state. The second form is the acknowledgment of a validated address form. The second form contains the URL of the next CGI process and the name of the variables that must be passed to that CGI.

```
<FORM method=post action="SuccessfulValidationURL">

<INPUT type=hidden name="UnparsedStreetAddressStr" value="StreetAddr">

<INPUT type=submit value="OK" name="OK">

<INPUT type=hidden value="Valid Address..." name="hiddenValidAddr">

</FORM>
```

If this is the output received, proceed to section to 3.2.3 for the requirements of successful street address validation acknowledgment.

Return to Main Menu:

See 3.1.2.2.

MCI Telecommunications Corporation
Two Northwinds Center
2520 Northwinds Parkway
Alpharetta, GA 30004

March 9, 1998

Clifford Bowers
BellSouth Interconnection Services
1960 West Exchange Place, Suite 420
Tucker, Georgia 30084

Dear Cliff,

On January 23, 1998 MCI requested a LENS data dictionary and CSR record layout. BellSouth responded on February 23, 1998 stating that the LENS CGI specifications contain this information and therefore does not need to provide a separate document. In order to help BellSouth understand MCI's request for a data dictionary and a record layout, this letter will provide definitions of each, as well as attached examples, and further reasons why each is required.

The data dictionary is a dictionary of all the data elements contained in CSRs provided by LENS as well as all the data elements used to develop the LENS application. A data dictionary is a document presented in a dictionary style, in alphabetical order, beginning with the data element (or term) and followed by its definition including the type of data (such as integer, alpha, string or decimal), attributes, parameters, location within the application, exception rules and examples of usage.

The CSR record layout is a visual representation of the physical layout of the data contained in a CSR. Usually the CSR record layout is a picture that describes all the field names, field labels, field lengths and their positioning when displayed on a computer screen or when printed on paper. It also describes the positioning of all the fields relative to one another.

MCI needs the CSR record layout and LENS data dictionary documentation from BellSouth to retrieve CSRs using the CGI specifications. Without the data dictionary and the CSR record layout, MCI will waste valuable resources attempting to determine what information is being received in the data stream obtained via LENS and how that data should be interpreted.

The LENS Access Technical Specifications document provided by BellSouth does not include a CSR Record Layout or a LENS Data Dictionary. Please review the attached examples for clarification and a better understanding of what MCI expects to receive. This type of information is required for each data element on the CSR. Until MCI receives this information, we are stalled in our attempt to evaluate the CGI capabilities. This information is requested no later than Monday March 16, 1998.

Sincerely,

Bryan Green
Sr. Manager, MCI Southern Financial Operations

Enclosure (1)

cc: Pamela Lee

CANC_RSRV_TNS_IND - Cancel Reserve TNs Indicator

Cancel Reserve Telephone Numbers Indicator

Data Characteristics:

Length: 1

Type: alphanumeric

Valid Values: Y=YES, N=NO

Additional Information: "Yes" indicates that all the reservations for a given reservation number should be cancelled. "No" indicates that either the assignment or the reservation for the given telephone number only should be cancelled.

Rule: TNA: If this is set to NO, then NPA, PRFX_CD, and LN for TNA Cancel Request (7020) is required.

Rule: TNA: If this is set to YES, any telephone numbers also entered on the TNA Cancel Request (7020) will be ignored.

Transaction(s)/Usage:

1000	1010	1020	1100	1120	1170	1200	1210	1220	1260	1300	7000	7010	7020
													R

C=conditional

O=optional

R=required

b=not used

Provided in Output Events:

Telephone Number Assignment (TNA) responses

CLLI - Common Language Location Identification

The CLLI (Common Language Location Identification) or switch that serves the customer's location.

Data Characteristics:

Length: 11

Type: alphanumeric

Valid Values:

Additional Information: An alternate name is switch.

Transaction(s)/Usage:

1000	1010	1020	1100	1120	1170	1200	1210	1220	1260	1300	7000	7010	7020
		R						R					

C=conditional

O=optional

R=required

b=not used

Provided in Output Events:

1001 (PFA response by NPA & Prefix)

1011 (PFA response by EXCO)

1021 (PFA response by CLLI)

1201 (CIC response by NPA & Prefix)

1211 (CIC response by EXCO)

1221 (CIC response by CLLI)

DPA_IND - Different Premises Address Indicator

Different premises address flag

Data Characteristics:

Length: 1
Type: alpha
Valid Values: Y=YES, N=NO
Additional Information:

Provided in Output Events:

1121 (SOS response)

DY - Day

Day portion of a date/time stamp.

Data Characteristics:

Length: 2
Type: numeric
Valid Values:
Additional Information: Is part of the date stamp as returned by the OSS.

Provided in Output Events:

1301-1315 (Address Validation responses)
CIC & PFA responses

BELLSOUTH

BellSouth Interconnection 770 492-7500
Suite 420
1960 West Exchange Place
Tucker, Georgia 30084

March 23, 1998

Mr. Bryan Green
MCI Telecommunications
2520 Northwinds Parkway
Alpharetta, Ga. 30004

Dear Bryan,

BellSouth appreciates the additional information regarding MCI's request for a LENS data dictionary and CSR record layout in MCI's letter dated March 9, 1998.

However, it is still unclear to BellSouth's technical Subject Matter Experts (SMEs) as to why this information in addition to the CGI technical specifications document provided to MCI in December is required by MCI in order to implement CGI. The documents requested do not exist and BellSouth has serious concerns to committing valuable resources to develop such documents (e.g., data dictionary) when the same information that has already been provided to MCI is in the CGI technical specifications document.

To help BellSouth better understand MCI's needs regarding implementation of the electronic interfaces, BellSouth requested on March 18, 1998, that a joint technical meeting or conference call involving appropriate BST and MCI technical SMEs be arranged as quickly as possible to discuss MCI's concerns. As you are aware, BellSouth requested this meeting in the January 23, 1998 OSS meeting as well as through several follow-up letters and e-mails. On March 18, 1998 Helen Arthur from MCI agreed to coordinate this meeting. The meeting is currently scheduled for March 23, 1998.

The information previously requested by BellSouth should be provided prior to a joint technical meeting or during the meeting is as follows:

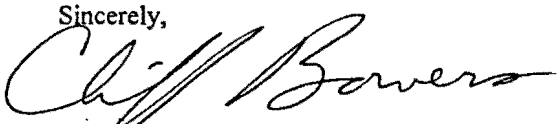
- Which screen scraper will MCI be using for CGI? This information will aid BellSouth in determining the complexity, time frames and level of support BellSouth will reasonably need to provide. Additionally, the screen scraper information is critical to ensure the appropriate SMEs are included in the joint technical meeting.

- What are MCI's time frames for implementing CGI?

- What is MCI's forecast for CGI? How many total pre-orders, and times of day for each of the five categories: Address Validation, Telephone Number reservation, Service and Features, Due Dates, Customer Service Records?

BellSouth is eager to close this issue during the joint technical meeting and looks forward to receiving MCI's answers to the questions listed above.

Sincerely,



Cliff Bowers

BELLSOUTH

BellSouth Telecommunications, Inc.
Suite 420
1960 West Exchange Place
Tucker, Georgia 30084

770 492-7500
Fax 770 621-0632

MCI Account Team

April 9, 1998

Ms. Helen Arthur
MCI Telecommunications
Two Northwinds Pkwy.
2520 Northwinds Pkwy.
Alpharetta, Ga. 30004

Dear Helen;

This letter is in response to your verbal request on Friday, April 3, 1998, for BellSouth to provide current status of a data dictionary for CGI and a CSR layout.

The data dictionary is currently under development and will contain data related to the CGI only. We expect to deliver the data dictionary to MCI by April 24, 1998.

As stated in the March 27, 1998 OSS meeting, the data dictionary will not contain data related to the CSR. MCI's source for obtaining USOC information is from the BellSouth Interconnection web site and the source for CSR FID information is in the SOER documentation provided to MCI on January 30, 1998.

If you have any questions please feel free to call me.

Sincerely,

Cliff Bowers

Cliff Bowers

MCI Telecommunications Corporation
Two Northwinds Center
2520 Northwinds Parkway
Alpharetta, GA 30004

April 23, 1998

Clifford Bowers
BellSouth Interconnection Services
Suite 420
1960 West Exchange Place
Tucker, Georgia 30084

Dear Cliff:

This letter is in response to your letter dated April 9, 1998 regarding the status of MCI's request for a CSR data dictionary and record layout.

From our March 23, 1998 meeting with BellSouth, it was my understanding that MCI's requirements were clear. Further, during the March 27, 1998 OSS meeting, I do not recall your statement that the data dictionary currently under development by BellSouth is for CGI only and will not contain data related to the CSR. As a result, MCI has been directed to use the SOER edits file found on the BellSouth web site for definitions of CSR data.

The data dictionary for CGI will not provide the detail MCI requires to correctly interpret the data contained on the CSR. The lack of a data dictionary and record layout for CSRs will contribute to delays in provisioning service to our end users and increase the number of errors generated on the Local Service Request (LSR) due to lack of clarity regarding the FIDS and USOCS found on the CSR.

This request from MCI was opened on January 23, 1998 during an OSS meeting. Since that time, MCI has provided you and your team additional information and examples to clarify MCI's requirements. I will emphasize again that this issue is a high priority for MCI. Please provide a response by April 29, 1998.

Sincerely,

Helen Arthur

Helen Arthur

BELLSOUTH

Fax 770 821-0832

May 6, 1998

Helen Arthur
MCI Telecommunications
Corporation
Two Northwinds Center
2520 Northwinds Parkway
Alpharetta, GA 30004

Dear Helen;

This letter is in response to your letter dated April 23, 1998 regarding the status of MCI's request for a Customer Service Record [CSR] data dictionary and record layout.

As a result of the January 23, 1998 meeting, BellSouth understood MCI's request for the Common Gateway Interface [CGI] data dictionary to be a high priority. However, MCI's specific requirements and expectations regarding the CSR data dictionary and record layout were not made clear to BellSouth until the conference call on March 23, 1998.

During the March 23, 1998 conference call, BellSouth SMEs advised MCI that the Customer Record Information System (CRIS) would be the source for the data contained on the CSR. MCI asked whether there was a data dictionary for the data contained in CRIS. The BellSouth SMEs agreed to determine whether there was any such data accessible and available that would define the fields contained on the CSR in CRIS.

On April 3, 1998, BellSouth determined that a CRIS data dictionary is not available. MCI was advised on April 3, 1998 that a CRIS data dictionary was not available and that the CGI data dictionary, which is under development, would not contain data related to the CSR. BellSouth also advised MCI that the source for obtaining CSR FID information is the SOER document. USOC information could be obtained from the BellSouth Interconnection web site. This discussion was followed-up with letter dated April 9, 1998.

The format for a CSR record layout varies based on each individual customer request. In order produce the CSR record layout, BellSouth would extract data from the SOER document and the USOC manual. A diskette containing SOER information was provided to MCI on January 30, 1998. Also, the USOC information can be found on BellSouth's web site address:

www.bellsouth.com/interconnection/guides/guides.html

If MCI would like to have BellSouth to pursue the development of a CSR data dictionary, we will be glad to pursue the possibility of creating this document to meet MCI's needs, assuming MCI provides BellSouth with an appropriate business request.

Please let me know if you have any questions,

Sincerely,

Cliff Bowers



BellSouth Telecommunications Ordering / Pre-ordering Integration Interface (OPII) Software

Albion International, Inc.
210 Interstate North Parkway
Suite 700
Atlanta, GA 30339
(770) 980-6753
www.albion-intl.com

Contacts

Greg Berman, Project Manager
Greg@albion-intl.com

Jack Runnels, Software Consultant
Jack@albion-intl.com

Document Version 1.1

BellSouth Telecommunications Ordering / Pre-ordering Integration Interface (OPII) Software

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Executive Overview

Albion International, Inc. (Albion) was contracted by BellSouth Telecommunications (BST) to prove the integration viability of the BST pre-order CGI interface and the BST orders EDI interface. Acting as a Competitive Local Exchange Carrier (CLEC), Albion wrote the Ordering / Pre-ordering Integration Interface (OPII) application that integrates internal CLEC Information Systems functions with external system functions—in this case, the BST pre-order and firm order interfaces. The OPII application, using a client-server architecture, currently has the ability to process new orders for residential service. The OPII application was developed using Forté® Software's Forté Application Development Environment (Forté), an n-tier, object-oriented, distributed computing environment.

Time

Albion began the OPII project on February 24, 1998 and completed the project April 30, 1998.

The total hours required to produce the OPII software was 1007.5 with a total cost of $120,675.00. The breakdown of the hours by role within the development team were:

Title	Hours
Product Architect	12
Project Manager	158.5
Software Consultants (2)	837

Resources

The Albion – OPII development team was made up of four team members: one product architect, one project manager, and two software consultants. In the case of the OPII project, each of the aforementioned roles provide the following expertise:

Title	Description
Product Architect	Provide expertise in creating a cohesive technical application architecture to support business requirements and to meet or exceed performance requirements set forth by BellSouth Telecommunications.
Project Manager	Provide project leadership, technical mentoring to the 'team' to insure successful completion of the project within budget and the time constraints set forth by BellSouth Telecommunications.
Software Consultants (2)	Provide programming / technical expertise to design, develop and implement the OPII software to specification.

Development Approach

Project Methodology

For the OPII software, Albion used an object-oriented, component-based 'spiral' development approach. This development approach promotes the delivery of functional software components in increments. Incremental delivery gives management the ability to constantly review the progress of the development effort throughout the development cycle. By proactively previewing the software, 'course corrections' to business and functional requirements are more easily made before the later stages of development, resulting in a shorter and less costly development cycle.

Requirements

From a business requirements perspective, BST's LENs web application was used as a model for the business requirements used in OPII. Functionally, requirements were communicated to Albion using various methods including CGI (HTML) and ANSI standard Purchase Order 850 EDI transaction specifications from BST. Additionally, Albion integrated other non-BST requirements into the software to show internal versus external integration between in-house and BST services.

Software Development

An object-oriented approach to software development was used for OPII. Class diagrams were modeled using the business requirements set forth by BST. From a coding perspective, by using Albion's 'Framework' of class libraries and components, the code development effort theoretically started at day 60 instead of day 1 thus reducing the overall development cycle time tremendously.

Development Environment

The development environment Albion used for OPII development utilized the following hardware and software:

- Forté Software's Forté Application Development Environment
- Albion's Forté 'Framework' (Class Libraries and Components)
- Repository based development
- Microsoft NT® OS Clients and Servers
- Oracle® 7.3 RDBMS Software
- Harbinger's Trusted Link Commerce® EDI Software
- Select Software's Select OO Case Tool®

Documents/Information Used

Albion made use of documentation and information that is readily available to all CLECs via the Internet, or through a CLEC's business contact at BellSouth. These information sources included:

- LENS CGI Interface Specification Version 2.1
- LEO Implementation Guide (Volume 1)
- Local Exchange Navigation System screens and associated source code. Source code for the screens was obtained simply by using the "View Source" command from an Internet browser.

What the Software Does

New Service–Residential

The Local Exchange Navigation System (LENS) is a web-based application that was developed by BellSouth to enable CLECs to place orders. The objective of the OPII software is to provide a fully integrated means for a CLEC to place an order (New Service—Residential) without forcing them to go through a web browser. This is accomplished by accessing the BellSouth LENS CGI server to obtain information during the Pre-Order and Firm-Order phase, and converting the completed order to an EDI document that can interface with the Harbinger PC-EDI application. The OPII application also allows the CLEC to access its own database to integrate internal information (billing, marketing, etc.) into the ordering process. The OPII application can be divided into three main pieces of functionality: **Order Processing**, **Administrative Information**, and **View CSR**.

Order Processing

This is the primary function of the application. Order Processing within OPII allows a CLEC user to view information from the LENS system, enter customer information to generate a Local Service Request (LSR) for a New Order—Residential, and generate a file which can be submitted using Harbinger's PC-EDI software. All Order Processing begins at the Action Selection Launcher Window. From this window, a user can go to the Pre-Order and Firm Order folders. This section will describe the **Action Selection Launcher**, the **Pre-Order Phase**, and the **Firm Order Phase**.

Action Selection Launcher

The Action Selection Launcher is the starting point for Order Processing. The end user selects the Activity Type (e.g., New Installation), the Service Type (e.g., Residential), and the Area (e.g., GA-Atlanta). Once a user has entered this data, the steps for completing the Pre-Order phase are displayed within the window. The user then double-clicks on the Pre-Order node to launch the Pre-Order Folder. The launcher window keeps track of which steps of Order Processing have been completed with checkmarks to the side of each step. Once all required steps have been completed, the user can click the Submit button. A Purchase Order Number is assigned and displayed. Once the user has submitted an order, the OPII application uses all the information entered by the user to generate an EDI file that can be imported into the Harbinger PC-EDI software. For more information on how the OPII application generates an EDI order, see the section on *Submitting the LSR Order*

Pre-Order Phase

The Pre-Order folder contains tabs that allow the CLEC to validate an address and get other preliminary information prior to generating an LSR. Calls to the LENS CGI server are only made during the Pre-Order phase. Information that is gathered during the Pre-Order phase is transfer to the Generate LSR phase, eliminating the need to access LENS. For more information on how the OPII application uses HTTP to send and receive information to/from LENS, see the section on *HTTP Integration*.

Address Validation

Unlike the LENS browser, the order of completion of windows within OPII is not pre-determined. The Address Validation tab must be completed first, however. Information gathered on this window is used to gather information for other tabs/windows in the application. To search for a valid address, a user must enter either a telephone number or the combination of street name, city, and state. The OPII application checks to see that key fields have been entered prior to sending a request to the LENS CGI server. This saves the user from waiting for the LENS CGI server to return an error message. Once key fields have been entered, the user can click the Validate button. This causes the data entered by the user to be sent to the CGI server. If the CGI server returns a single address, it is populated in the proper fields on the tab. If multiple addresses are returned, a list is displayed from which the user can choose. Clicking on one of the addresses causes it to be populated in the proper fields. This is in contrast to the LENS browser, which requires that the user re-enter the information into the appropriate fields. Once an address is determined to be valid and the user saves this information, the Reserve, Features, and Calendar tabs become enabled, allowing the user to continue through the rest of the Pre-Order phase.

Reserve Phone Numbers

The Reserve Phone Numbers tab functions very much the same as its counterpart in the LENS browser. The user enters the type of numbers they want along with any special conditions. When the user clicks Get Nos. the application sends a request for telephone numbers to the CGI server. The list of telephone numbers is created from the HTTP returned, then displayed in the "Available Numbers" box. A user then must select from the available numbers. This tab must be completed

Features

When a user enters the Features Tab, a call is made to the CGI server for services and features. A list of available services and features is created from the HTTP that is returned, and that list appears in the "Select Features/Services" box. The drop list of available carriers is populated from the CLEC's database, specifically from a table that contains information on carriers that have contracted with the CLEC. The "Latest Marketing News" box is populated with information on promotions that the CLEC may be running at the time the end user is filling out the order. This marketing information is updated periodically within the application.

Installation Calendar (View Only)

When a user enters the Installation Calendar Tab, a call is made to the CGI server for the Installation Calendar. The Installation Calendar is created from the HTTP that is returned from that request. At this point, the user can only view the Installation Calendar. A due date is not calculated until the user enters the Generate LSR phase.

Firm Order Phase

All sections of the Pre-Order phase must be complete before the Firm Order steps are even populated in the Launcher window. To open the Firm Order folder, a user would simply double click on the "Generate LSR" node of the Launcher window. The Firm Order folder contains tabs that relate to the generation of an LSR. Any information needed from the LENS CGI server has already been retrieved in the Pre-Order phase and transferred to this folder.

Installation Location

The Installation Location tab is similar to what a user would see accessing the "Location and Access" screen in LENS through a browser. Information can be entered regarding the end user's location, wiring option, and access to the location. The address is populated with the address that was validated in the Pre-Order phase. It is not required that this tab be completed for a user to be able to submit an order. However, a customer name must be entered either on this tab or on the Directory Information tab.

Due Date Calculation

The Installation Calendar seen on this tab is the same seen in the Installation Calendar (View Only) tab of the Pre-Order phase, except that there are fields for the user to enter a due date. The application internally verifies that the date entered by the user is valid, avoiding the need to access LENS. This tab must be completed for a user to be able to submit an order.

Directory Information

The Directory Information tab is very much the same as its counterpart in the LENS browser. The user enters the customer name, address for directory delivery, number of books to be sent, and directory listing information. The delivery address and listing address are pre-populated with the validated address from the Pre-Order phase. If the user entered and saved a customer name on the Installation Location tab, "Name" and "Listed Name" will be pre-populated with that information. This saves the user the time it would take to manually enter this information. The information pre-populated in these fields can be manually changed if directory delivery and listing information are not the same as end user billing information. . It is not required that this tab be completed for a user to be able to submit an order. However, a customer name must be entered either on this tab or on the Installation Location tab.

Authorization Information

The Authorization Information tab combines input fields found on the "Administrative," "Billing," and "Contact" screens of the LENS browser. Through this tab, a user can select the billing account number, contacts, and enter a project ID. All drop lists and text boxes on this tab are populated with information from the CLEC's database, specifically the Billing and Contacts tables. This tab must be completed for a user to be able to submit an order.

Hunting Information

The Hunting Information tab is part of the Services Folder, accessible from the Installation Location Tab. It is not part of the main Firm Order Folder because it is not necessary to fill out any hunting information for a New Installation—Residential order.

Services

The Services tab is part of the Services Folder, accessible from the Installation Location Tab. It is not part of the main Firm Order Folder because it is not necessary to fill out any service information for a New Installation—Residential order. This tab is similar to the "Service Details" portion of the LENS browser.

Administrative Information

As stated earlier, the OPII application pulls information from the CLEC's database to complete the order, and provide additional information to the end user while completing the order. In this way, the CLEC can bypass the CGI server for certain information, and marketing information can be used within the application. Additionally, EDI codes necessary for the generation of the EDI file can be stored. The OPPI application provides windows that allow the CLEC to update any information in their database that pertains to Order Processing.

Billing Maintenance

The Billing Maintenance window allows the CLEC to maintain information about each of its billing accounts. It is these accounts that are shown in the Authorization Information Tab during the Firm Order phase.

Contacts Maintenance

The Contacts Maintenance window allows the CLEC to maintain information for the three different types of contacts required for the generation of an LSR. LENS requires different information for each of the three types of contacts. For example, an address is required for an Initiator and Design/Engineering, but not for Implementation. This window therefore "morphs" to include only those fields relative to a particular contact type.

Drop List Maintenance

Some drop lists in the OPII application, such as Activity Type and Service Type, need to have an EDI code associated with each selectable option. These EDI codes can be maintained in the Drop List Maintenance window.

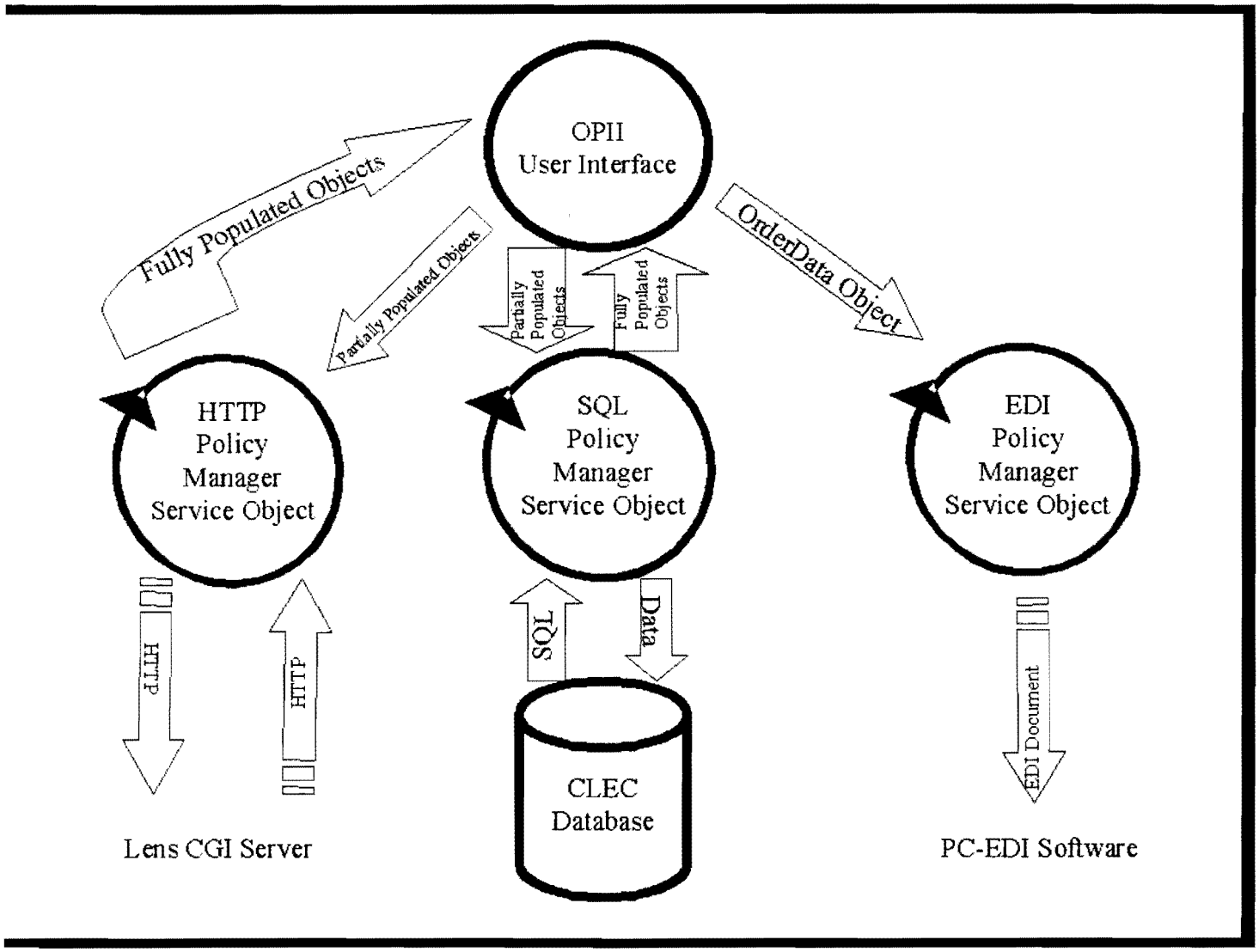
Contracted Carriers Maintenance

The Contracted Carriers Maintenance window allows the CLEC to maintain information for each long distance carrier it has contracted with. The PIC and ACNA are necessary to generate an EDI file.

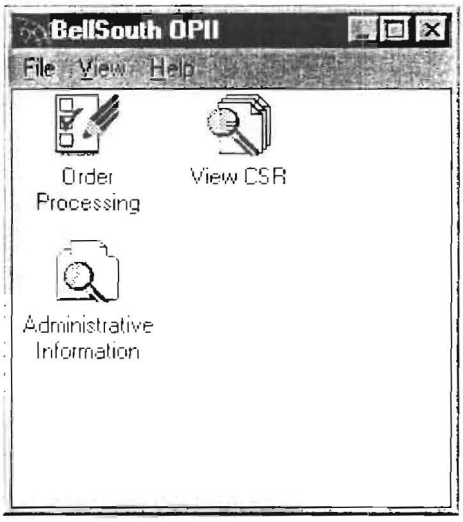
View CSR

The View CSR Window allows the CLEC to view Customer Information for a given telephone number. This window is accessible from the Main Object Group window, or during Order Processing. A user enters a telephone number and area, then presses the View CSR button. A request is sent to the LENS CGI server for the CSR. The information that is returned is parsed (broken down) and displayed in four separate areas: Directory Listing, Directory Delivery, Billing Information, and Services, Equipment, Remarks.

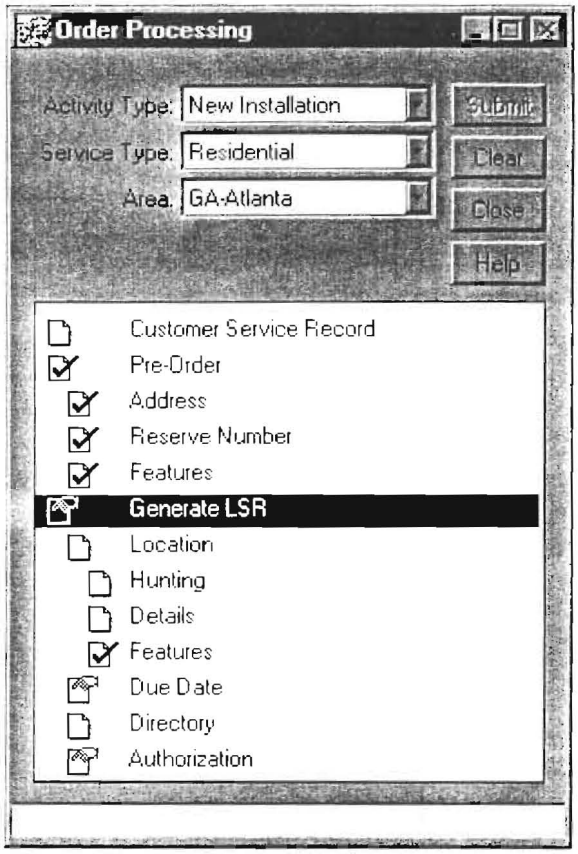
Software Information Flow



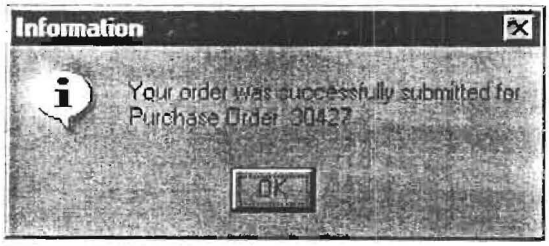
The Software



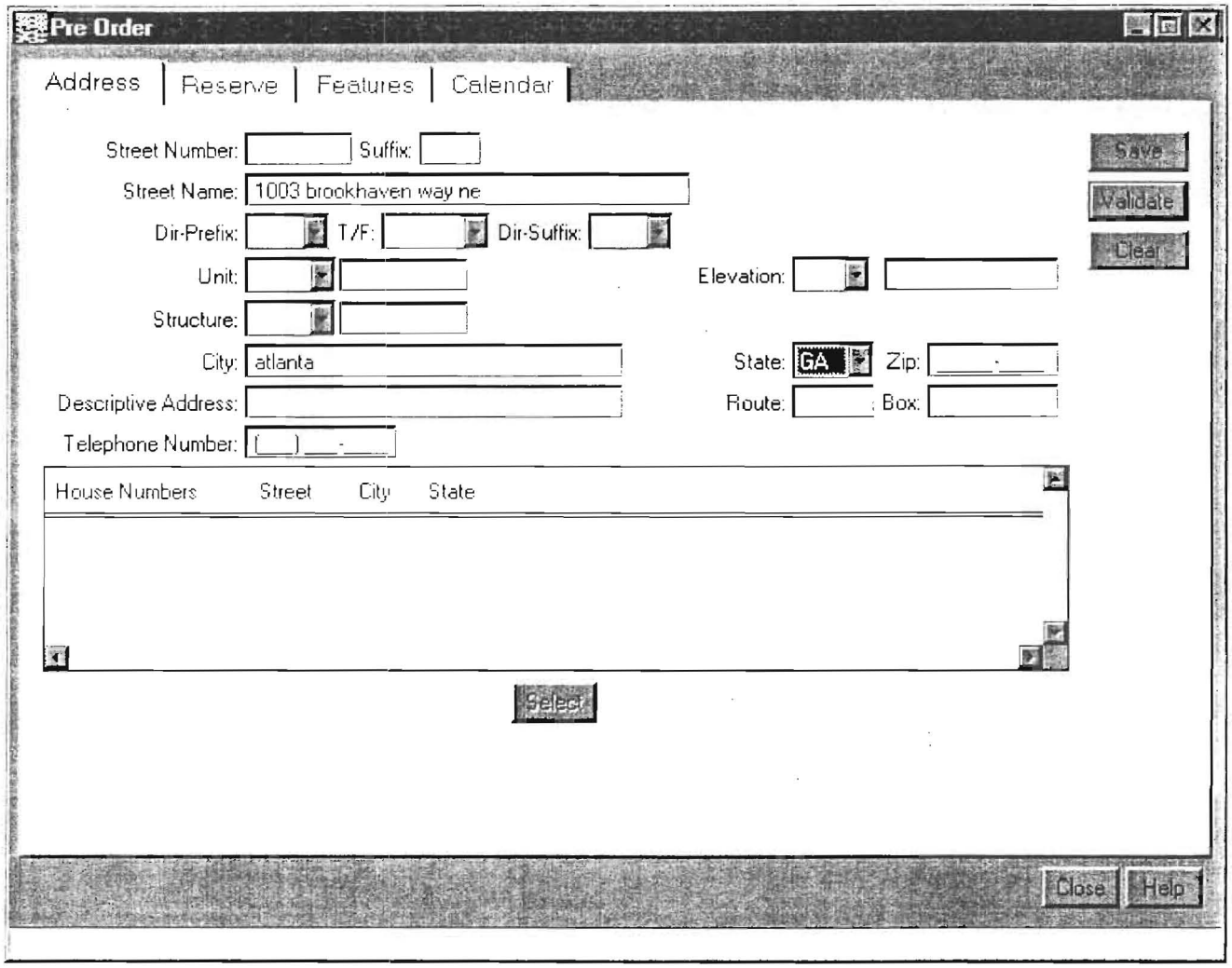
Main Object Group Window



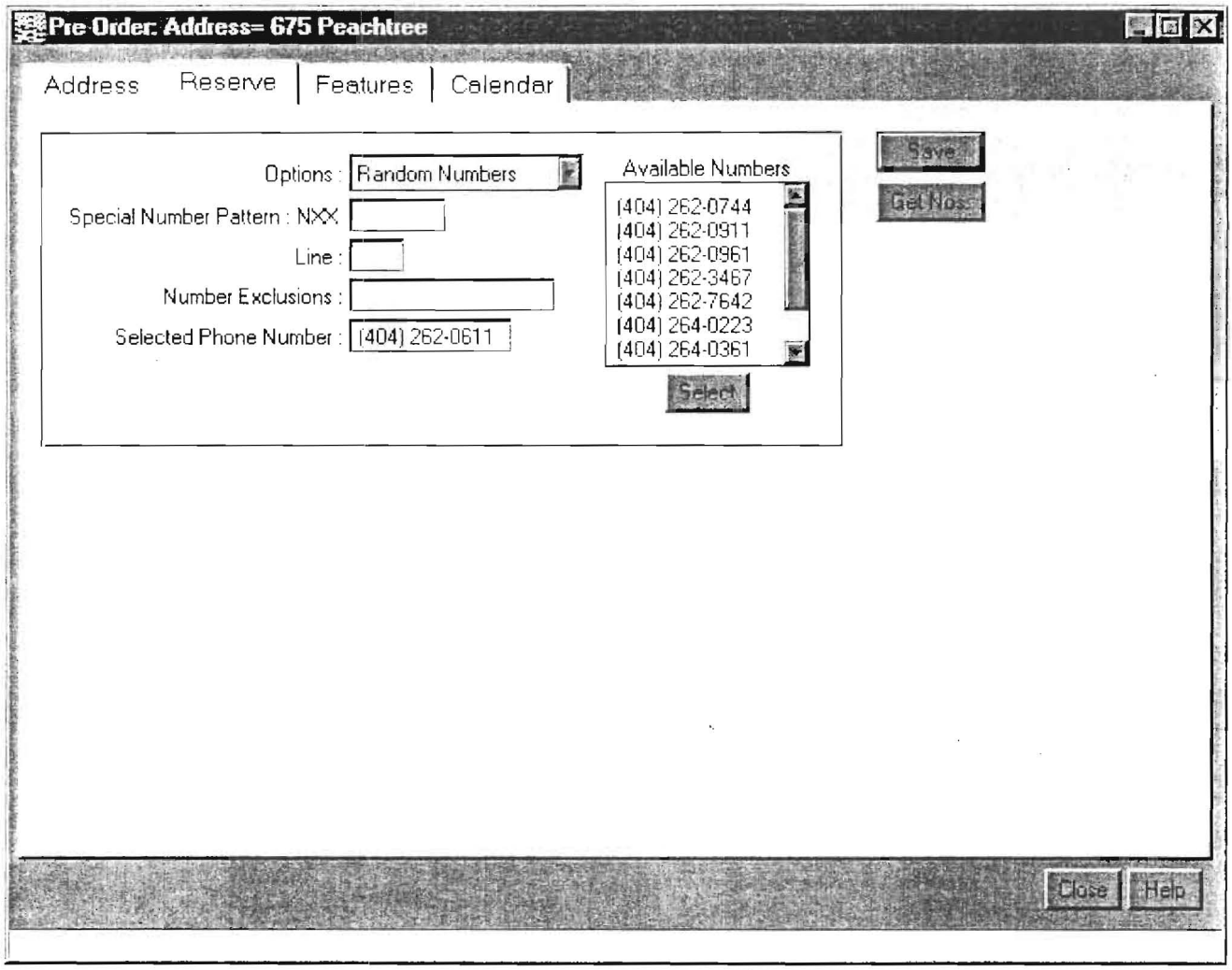
Order Processing Launcher Window



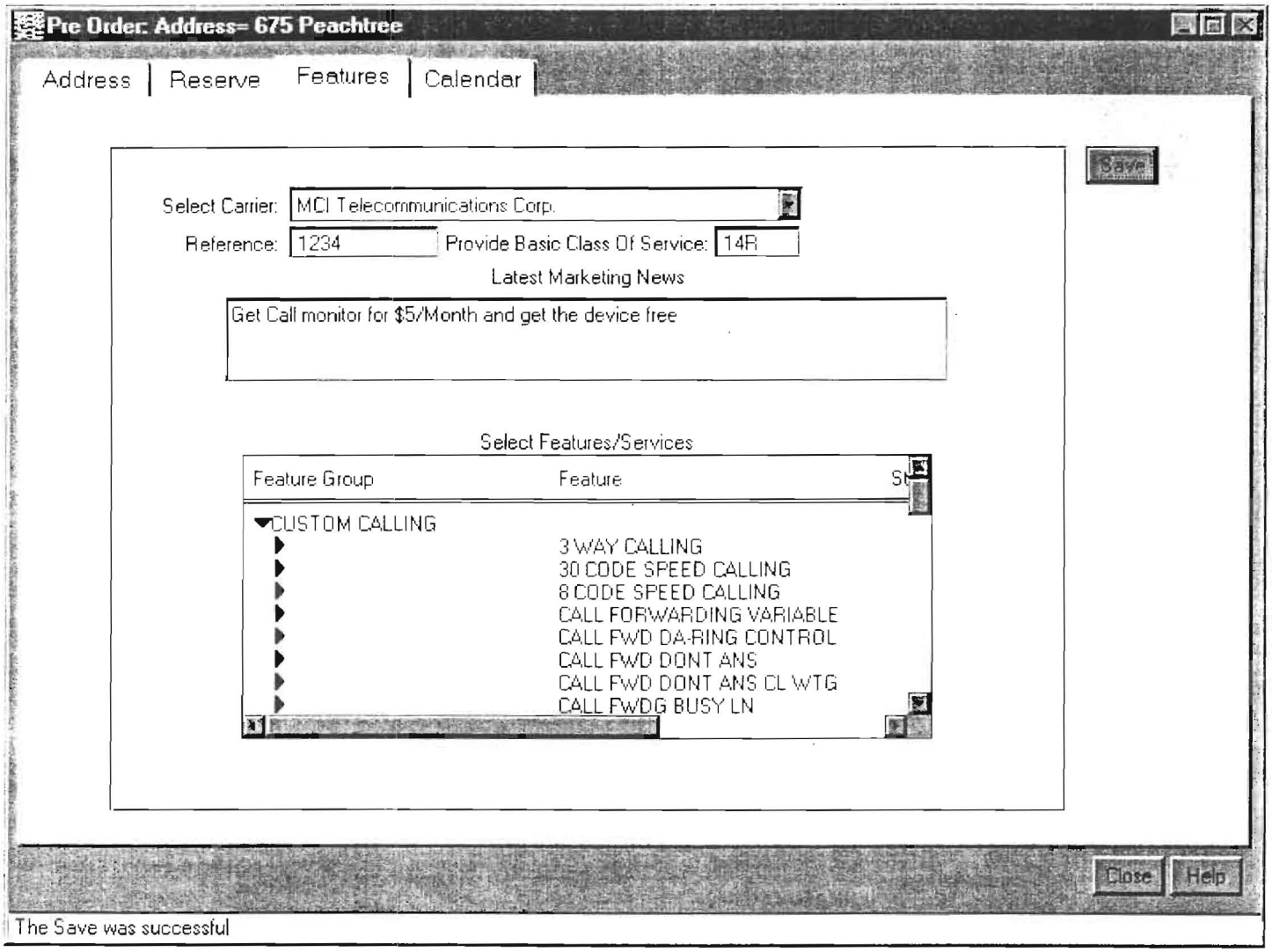
Example of successful order submission.
Note P.O. #



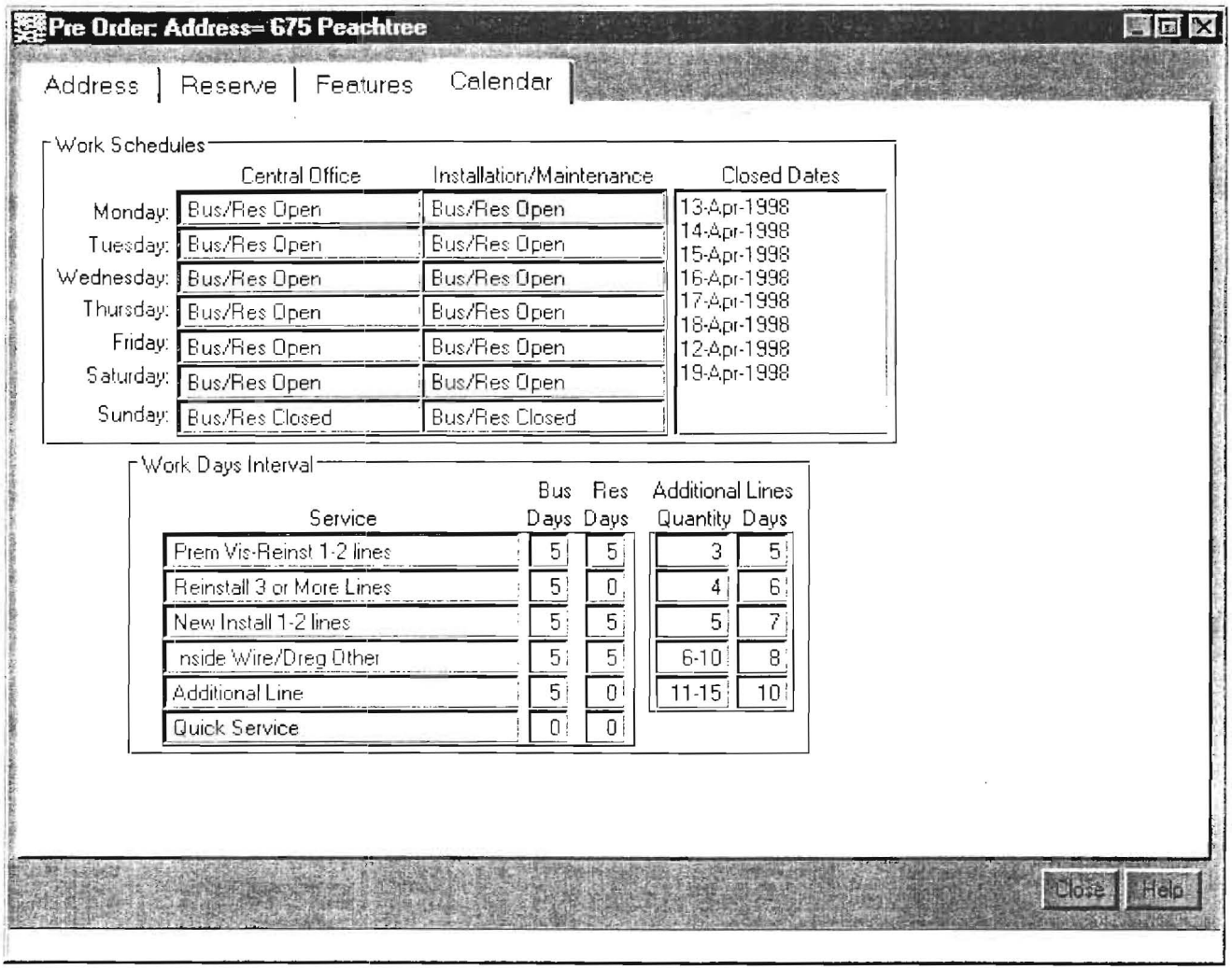
Address Validation Tab, Pre-Order Folder



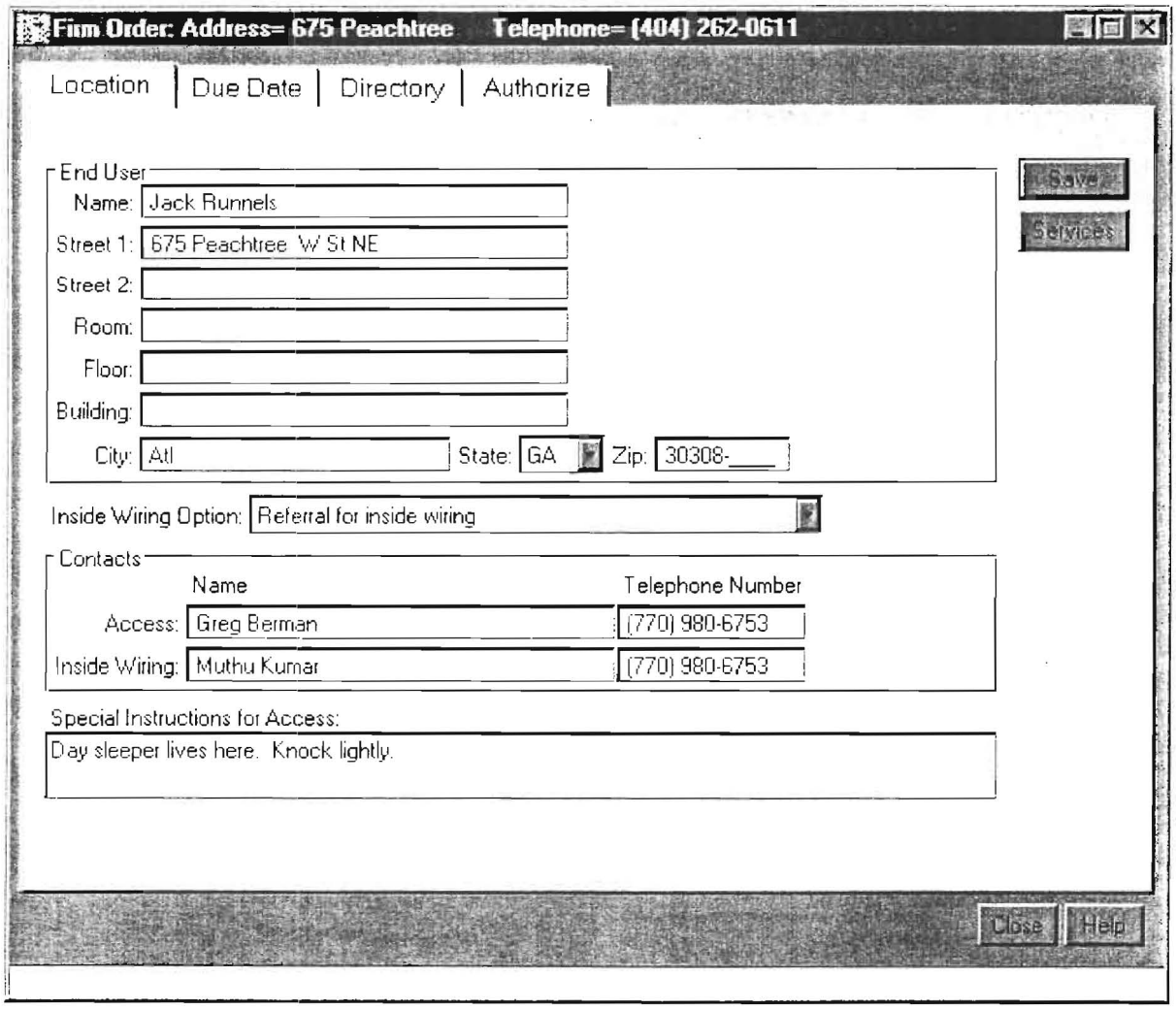
Reserve Phone Numbers Tab, Pre-Order Folder



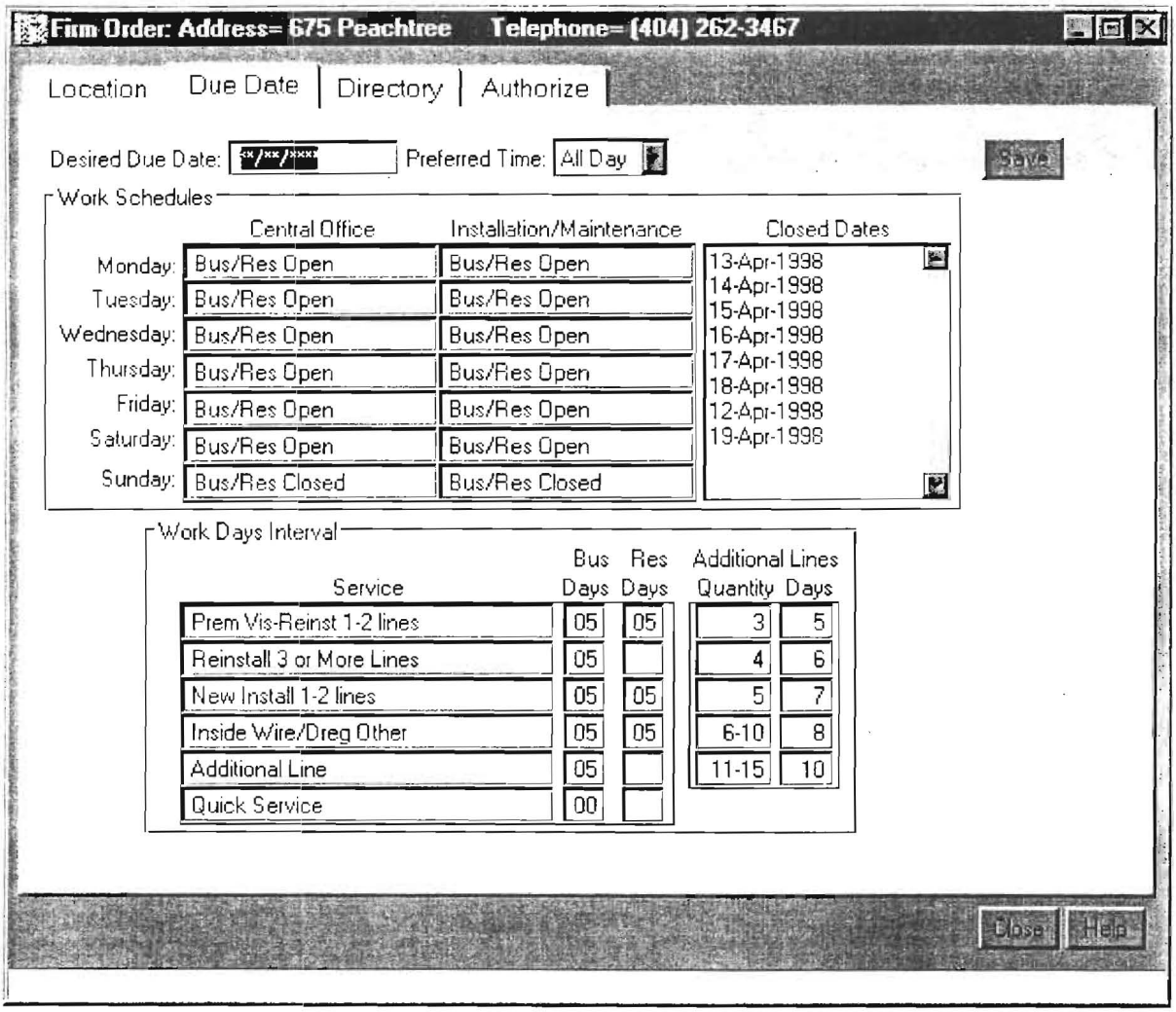
Carrier and Features Selection Tab, Pre-Order Folder



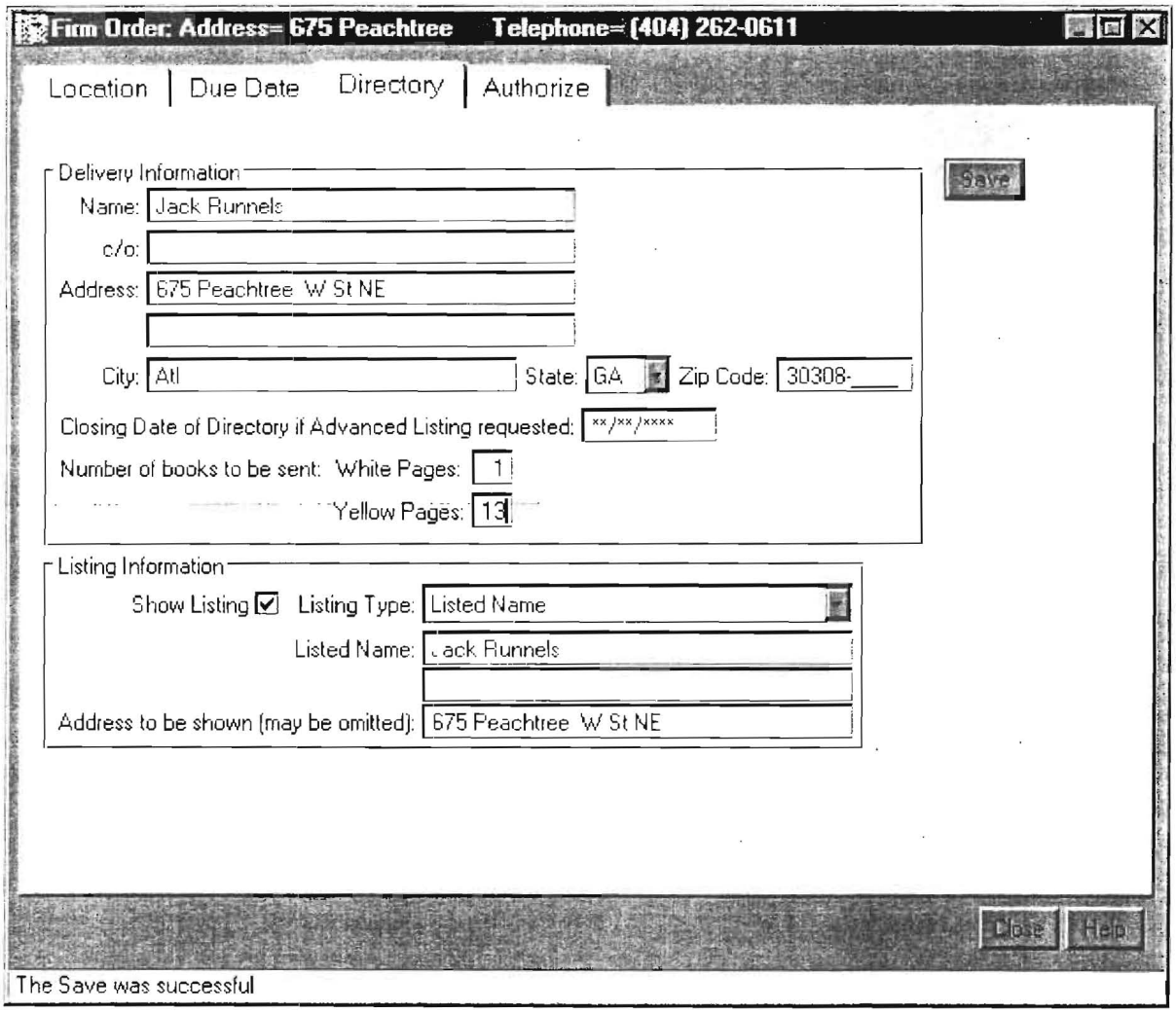
Installation Calendar (View Only), Pre-Order Folder



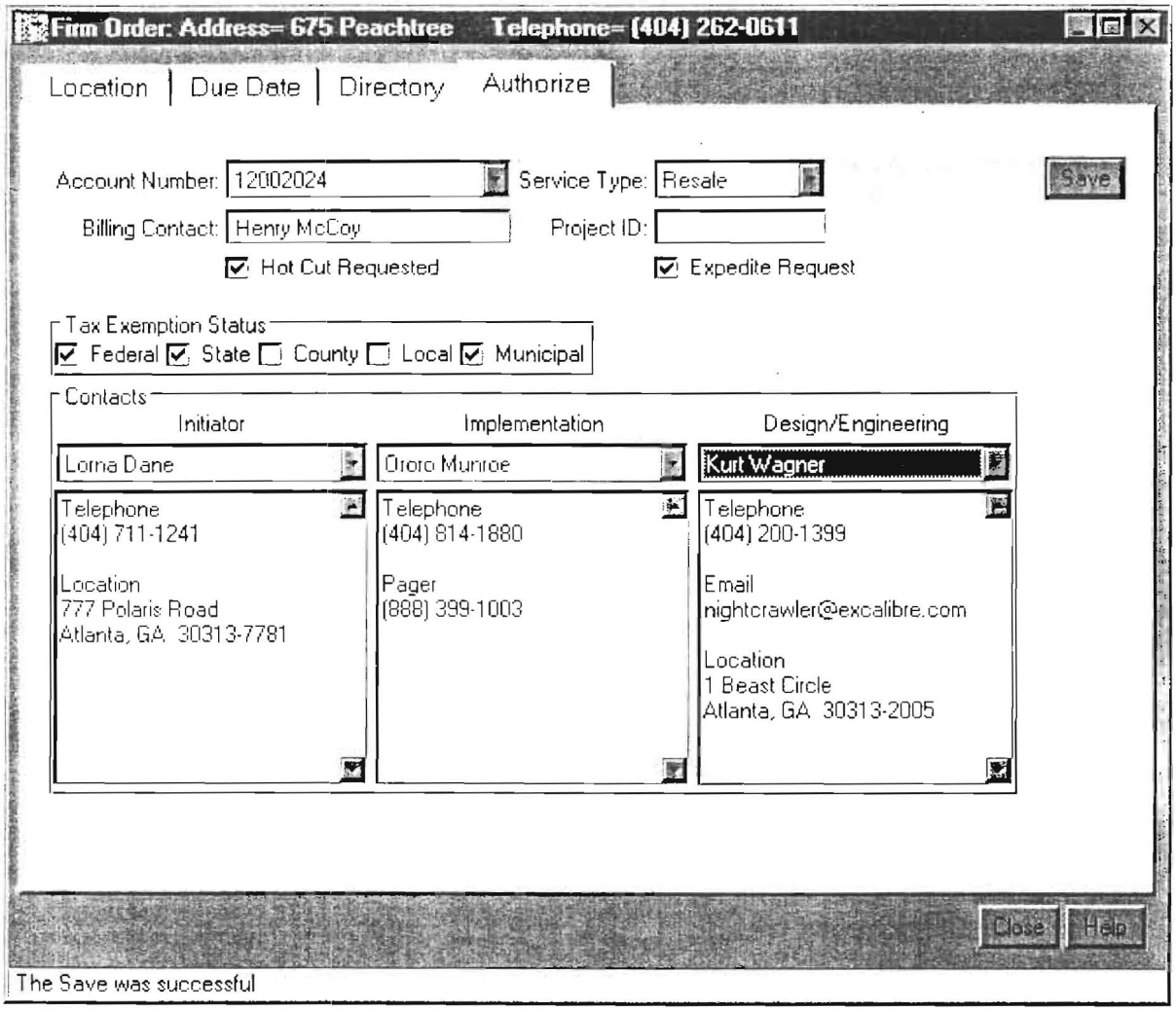
Installation Location Tab, Firm Order Folder



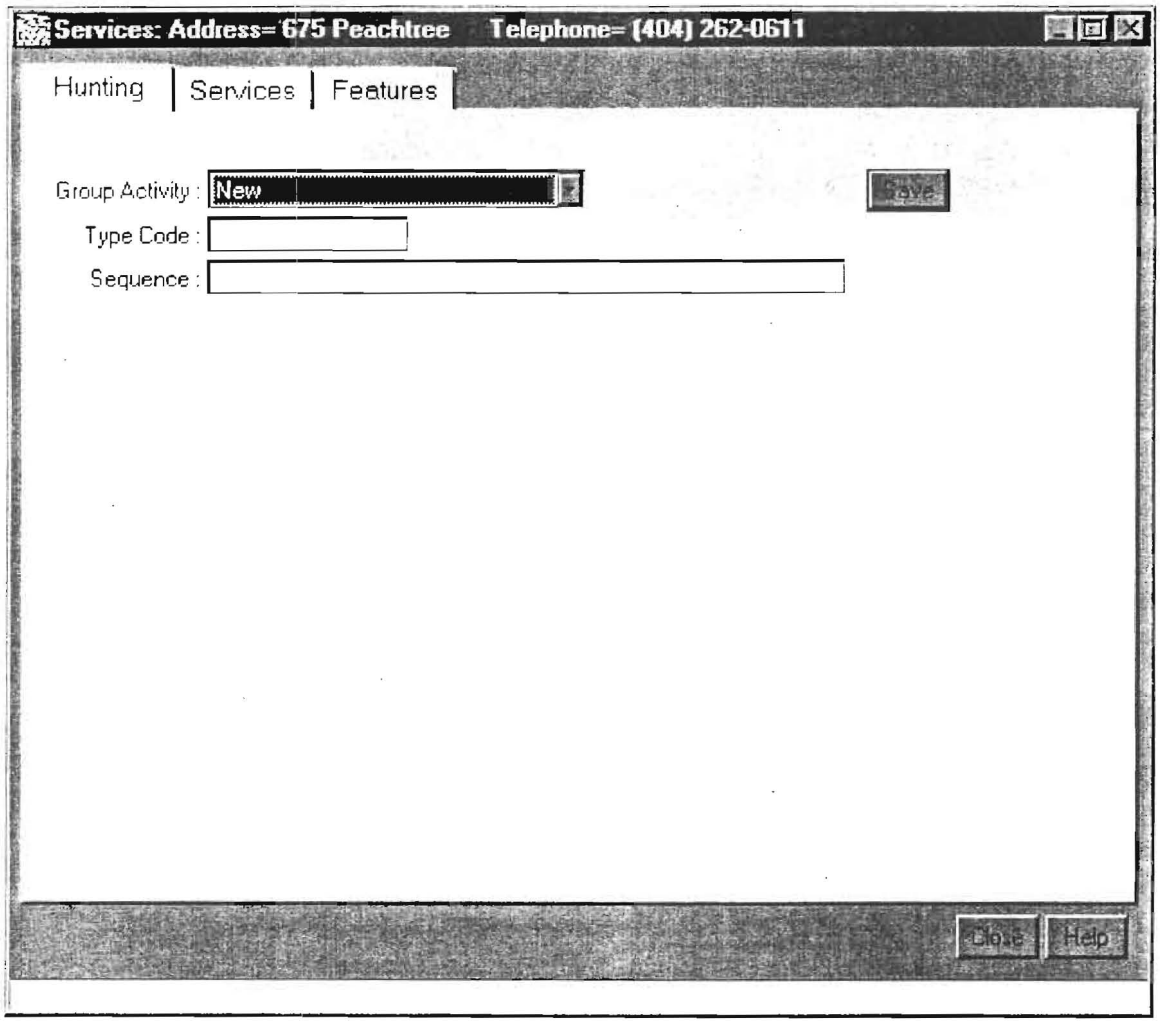
Due Date Calculation, Firm Order Folder



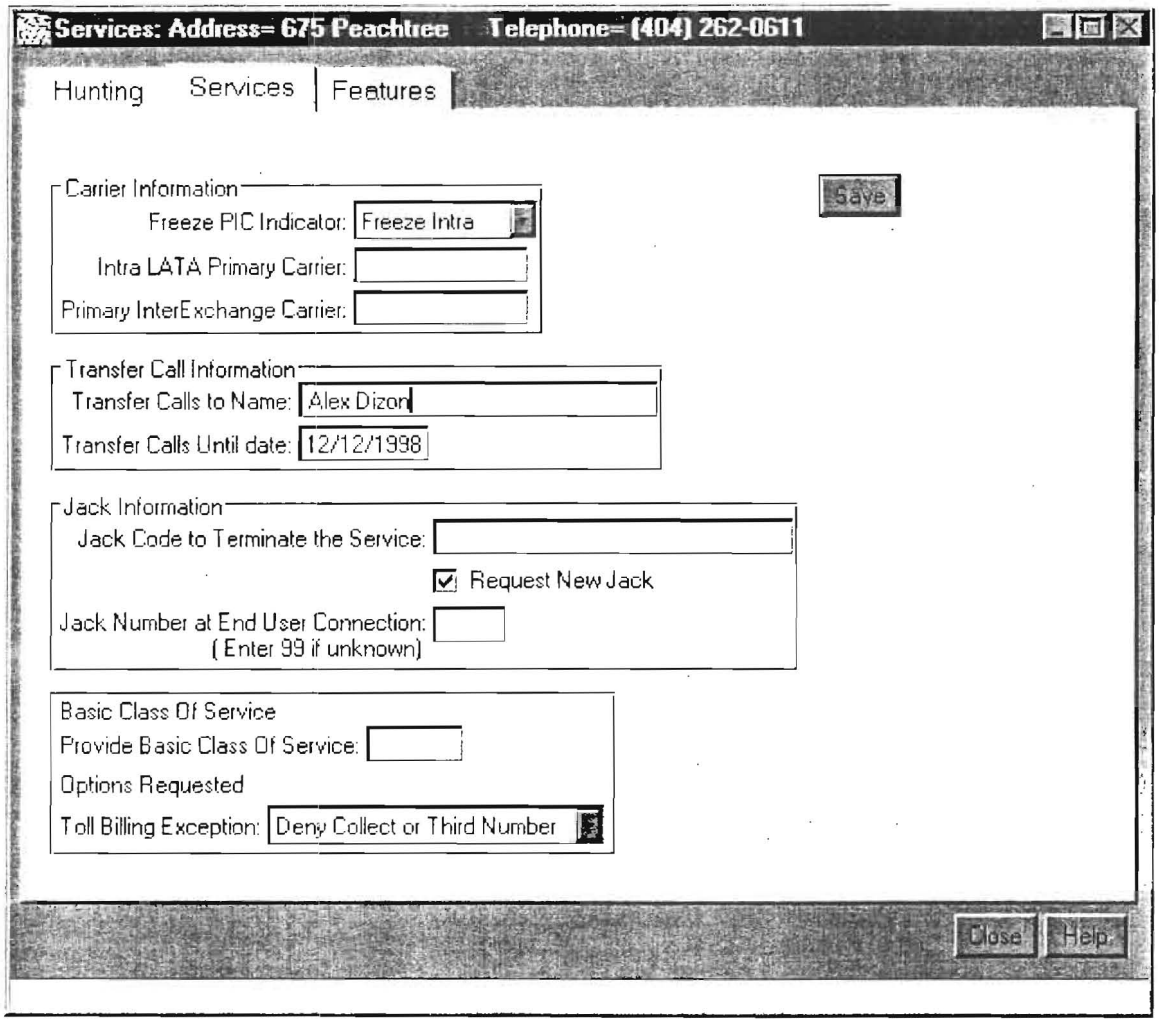
Directory Information Tab, Firm Order Folder



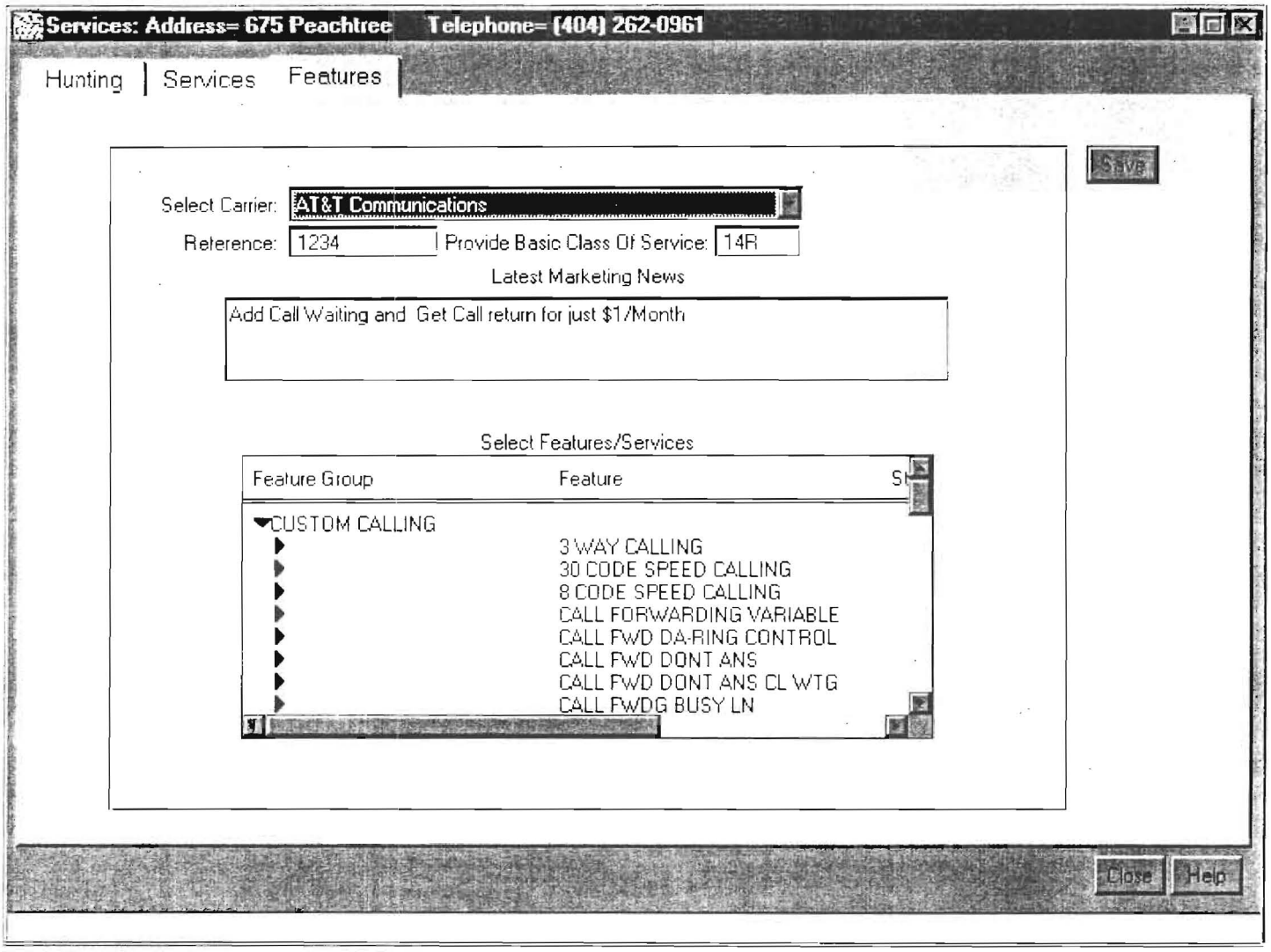
Authorization Information Tab, Firm Order Folder



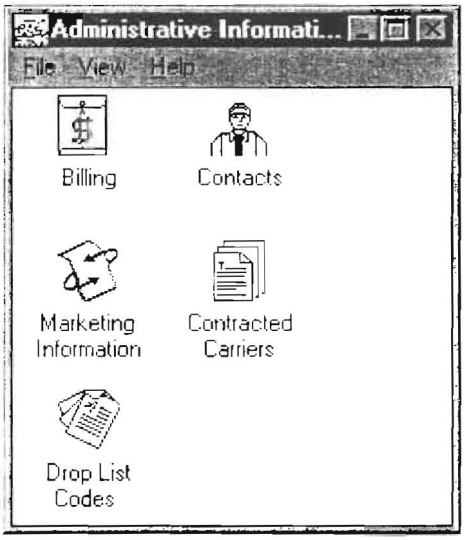
Hunting Information Tab, Services Folder



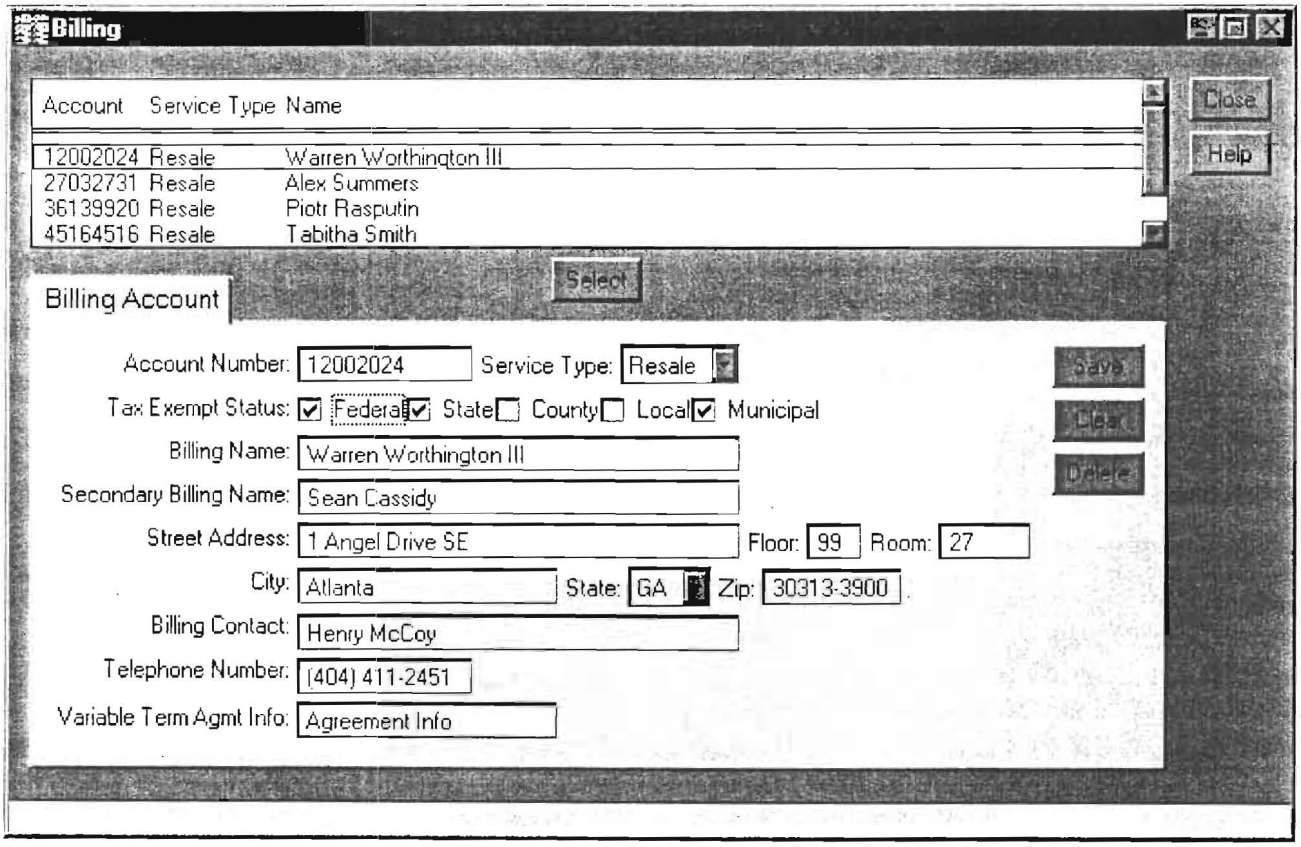
Services Tab, Services Folder



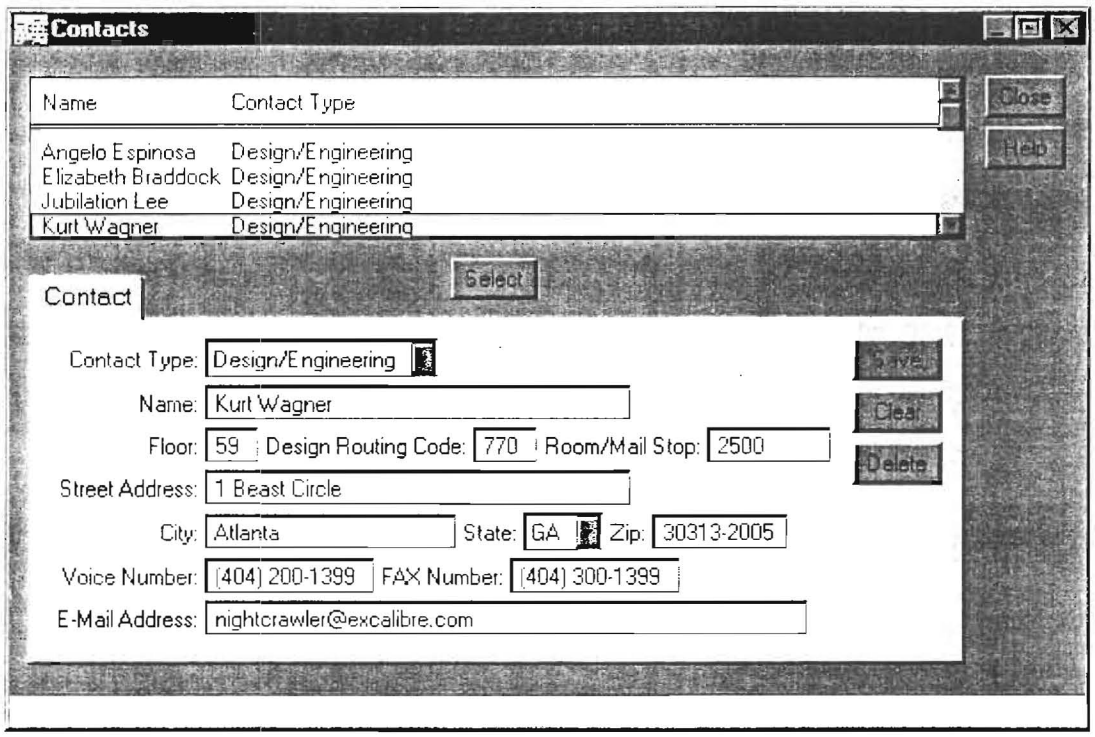
Features Tab, Services Folder



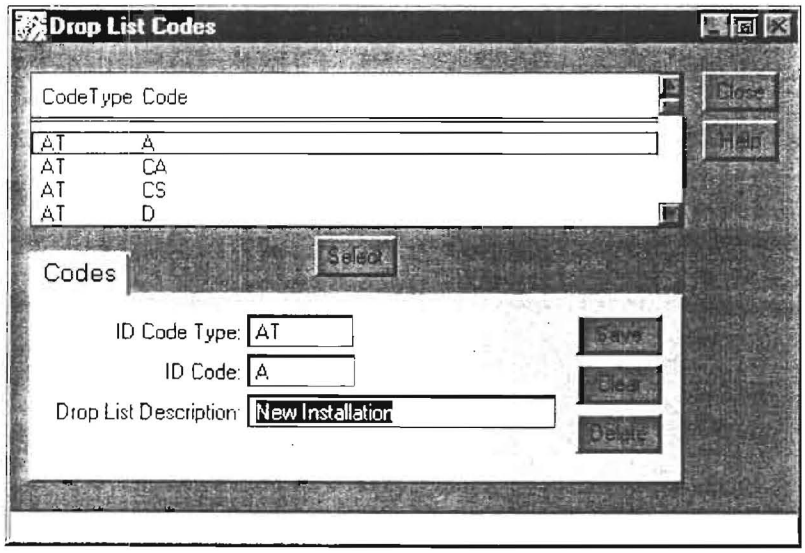
Administrative Object Group Window



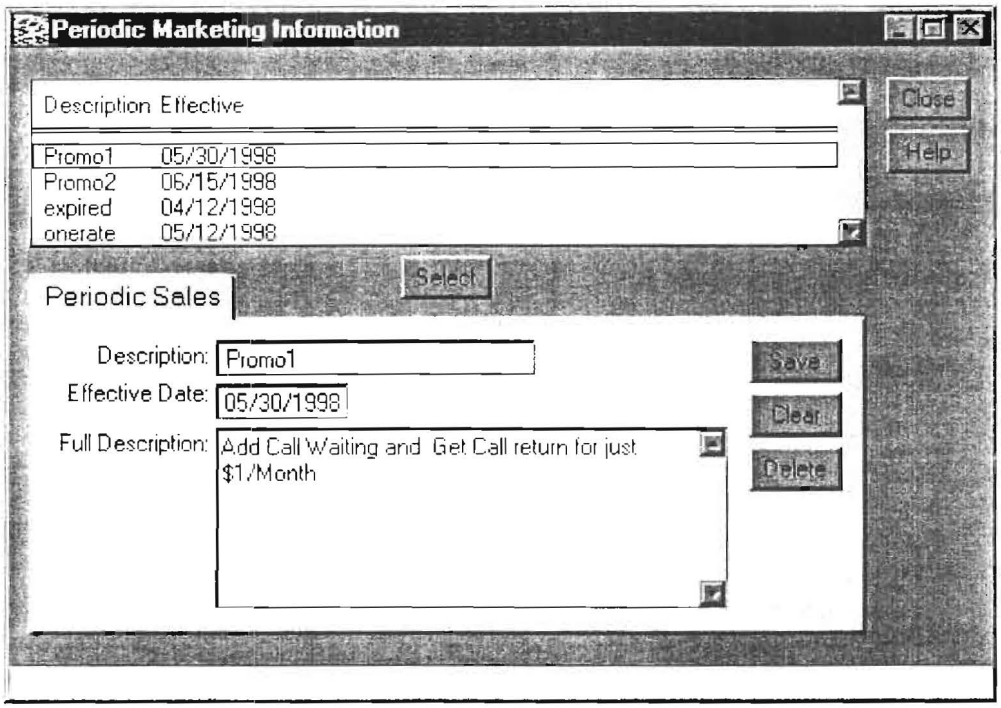
Billing Maintenance Window



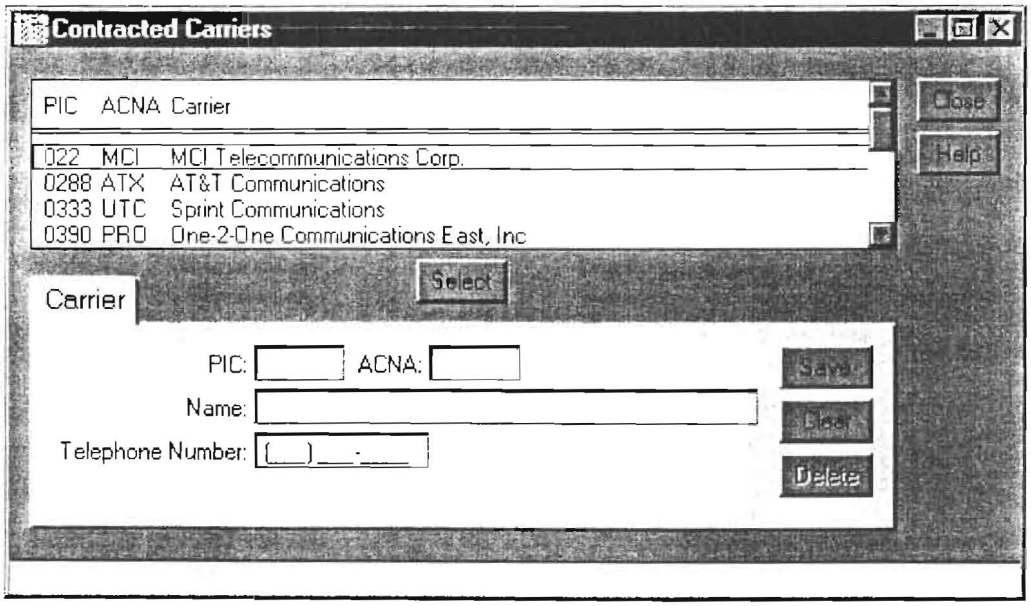
Contacts Maintenance Window



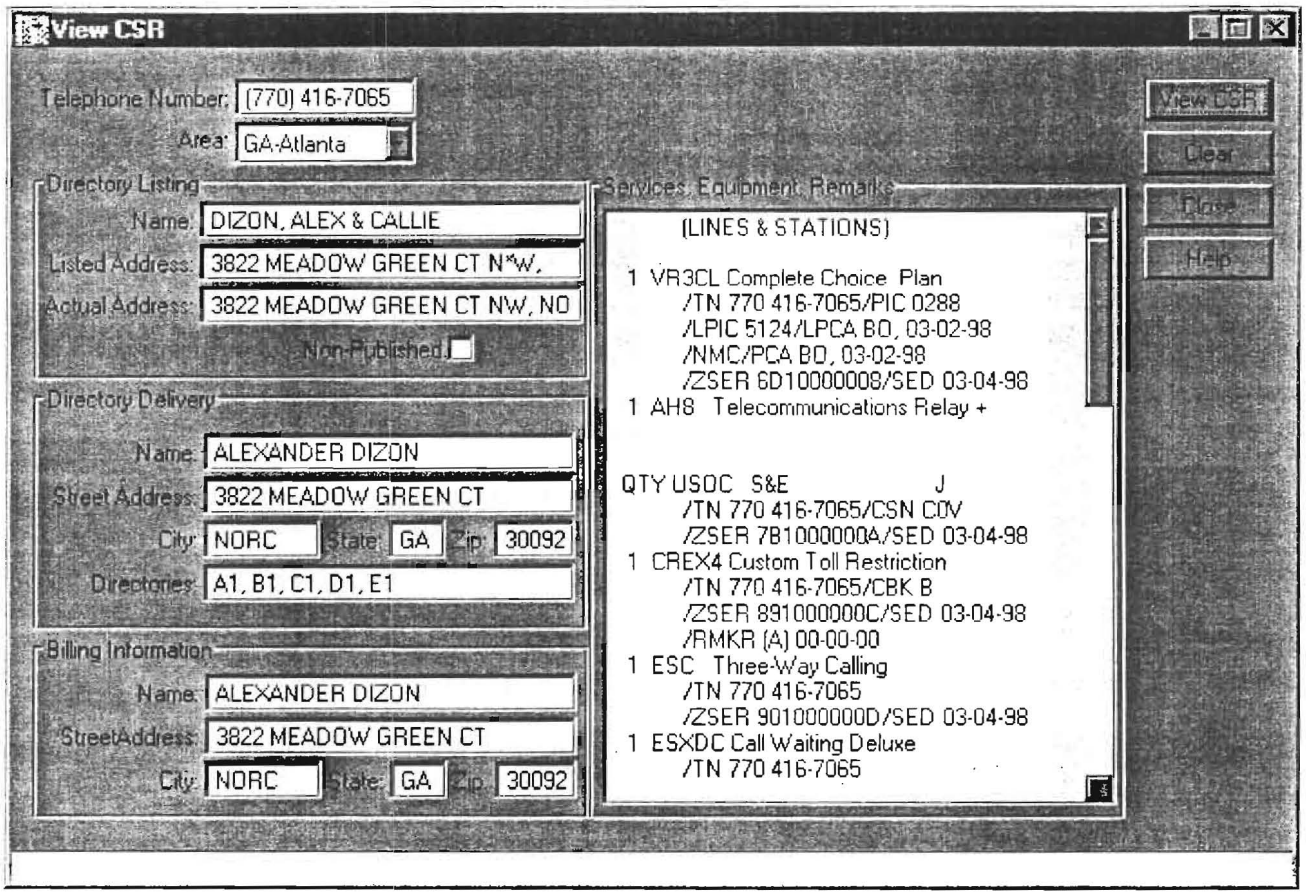
Drop List Maintenance Window



Marketing Promotions Maintenance Window



Contracted Carriers Maintenance Window

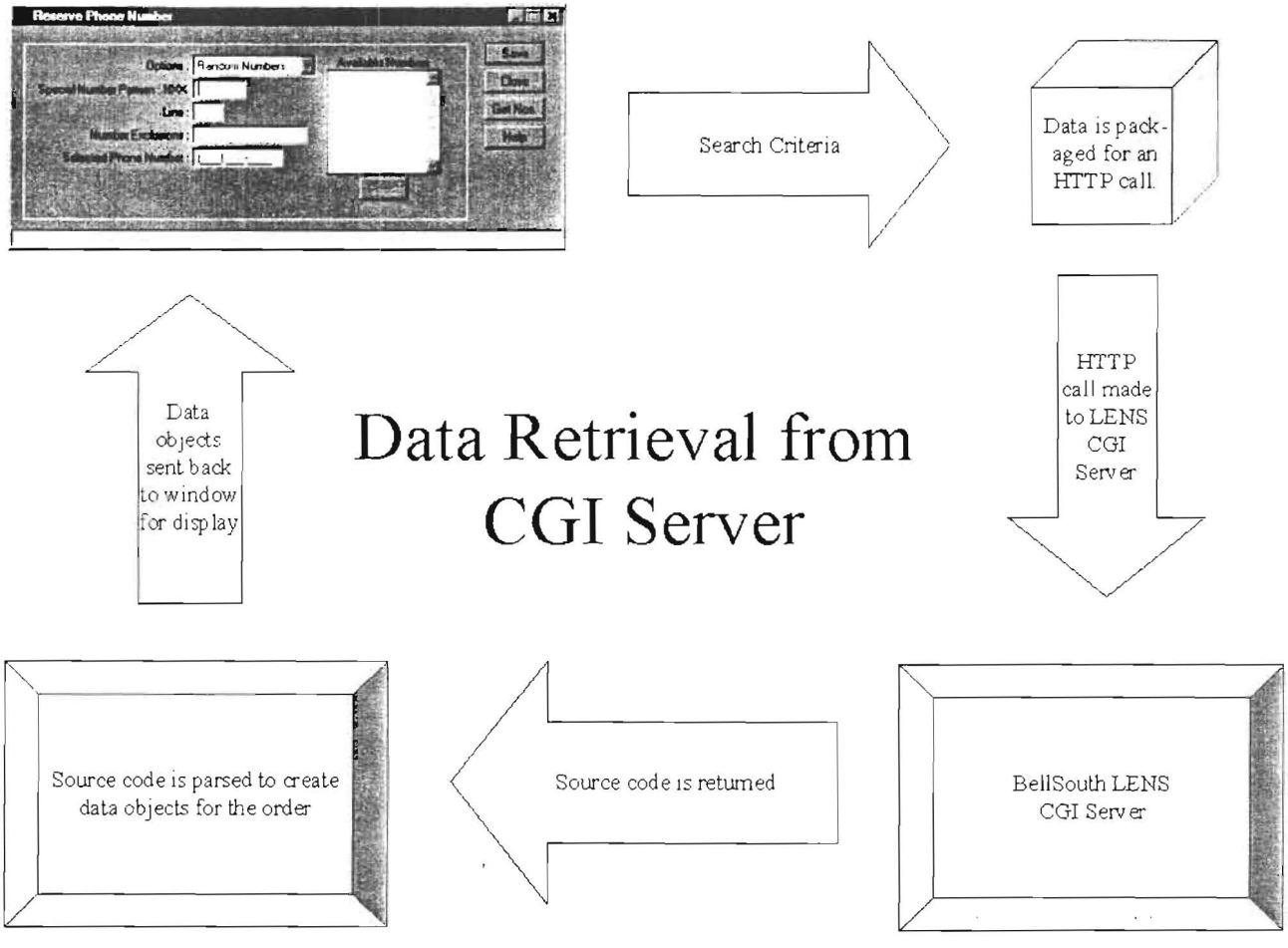


View Customer Service Record Window

HTTP Integration

Validating Information – HTTP

The OPII application uses information entered by the user and known query strings (obtained from the CGI specifications) to build HTTP calls. A query string is composed of variables and their associated values as entered by the end user. An HTTP call is a call to the LENS CGI server composed of the GET command, the URL address of the next "page" of source code, and the query string. These calls are sent to the CGI server to request more information, i.e. the next page of source code. These HTTP calls are obtaining pre-ordering information described in the *Pre-Order Phase* section on pages 4 and 5. All data returned from the LENS CGI is in HTTP format, due to the fact that normally only browsers would be accessing information from the LENS CGI. The OPII application must therefore parse the information, based on tags within the HTTP, into data that can be used within the application. Parsing is explained further in the Section *How Data is Parsed* on page 31.



How We Connect To BST

A connection must exist between the machine running the OPII application and the LENS CGI server. Generally, Albion performed internal testing using a direct dial-up modem connection to the BellSouth CLEC modem pool. Documentation for establishing this type of connection can be obtained from BellSouth.

Prior to the sending/receiving of HTTP, the application establishes a connection with the LENS CGI server. It does this by making use of Forté's ExternalConnection class. A new ExternalConnection object is created and its open method is invoked as follows:

```
connection : ExternalConnection = new();
connection.Open(address = IPAddress), port = PORT,
addressType = CM_ADDR_INTERNET_DOT);
```

where `IPAddress` is the initial connection IP address supplied by BellSouth, and `PORT` is the port number of the CGI application, also supplied by BellSouth.

What Is Sent To BST

Search criteria (variables and their associated values—e.g., BasicStreetAddress = 1003 Brookhaven Way NE) are sent from the user interface to the HTTP Policy Manager, the service within OPII which takes care of making calls to the CGI server for more information, and the parsing of that information. The search criteria are formatted so that they can be used along with a URL address to request information (in the form of HTTP source code) from the CGI server. The URL address for the next "page" of source code is obtained from the current "page" of source code.

Source Code

The format for sending a call to the CGI server to retrieve HTTP source code is as follows:

```
GET nextURL?queryString
```

Where `nextURL` is the URL for the next "page" of source code, and `queryString` is a string sent with the request containing variables and their associate values. These variables and values will be used to determine what information will be retrieved.

The query string must be in a format similar to the following:

```
Variable1=value1&variable2=value2&OK=OK
```

All spaces in the names of variables and values must be replaced by "+".

The query string for the retrieval of telephone numbers looks like this:

```
--use Concat method to append variables and values to queryText
queryText.Concat('SelectedOption=');
queryText.Concat(inReservationTypeString);
queryText.Concat('&NxxField=');
queryText.Concat(inNxx);
queryText.Concat('&LineField=');
queryText.Concat(inLine);
queryText.Concat('&NumberExclusionField=');
queryText.Concat(inDigits);
queryText.Concat('&OK=OK');
```

The query string and the URL for the next "page" of source code are sent into a method that generates the HTTP call. It is done in the following way.

```
--feedData will be what is sent to CGI server
feedData.SetValue(GET);
feedData.Concat(inURL);
feedData.Concat('?');
--replace spaces in inQueryString with '+' as per HTTP format
queryTD.SetValue(inQueryString);
--when a space is encountered, replace it with a +
while queryTD.MoveToString(source = ' ') do
   myOffset = queryTD.Offset;
   queryTD.ReplaceRange(source = '+', startOffset = myOffset, endOffset
= myOffset + 1);
end while;
feedData.Concat(queryTD.TextValue.Value);
feedData.Concat('\n');
```

The completed call would look something like this:

```
GET /cgi-
bin/WebObjects/LENS/12345678909876355?SelectedOption=Random+Numbers&NxxFi
eld=&LineField=&NumberExclusionField=&OK=OK
```

Note that not all variables require a value be sent along with them.

What Is Retrieved From BST

Source code for a web page is retrieved; however, the retrieved source code is not displayed in HTML format. Instead, the data needs to be extracted from the source code to use in building the OPII business objects (e.g., LocationAddress, AvailablePhoneNumbers, CSR). This is done by looking for HTML tags and then extracting the information in between the "start" and "end" tags. Tags are strings that always appear in front of or at the end of the string that OPII will be extracting from the source code.

Source Code

For example, the following snippet of source code contains phone numbers that are available to be reserved.

```
<TD WIDTH=116><CENTER>
<SELECT name="Browser12_LENSx" size=10 multiple><OPTION value="404 262-
0611">404 262-0611</OPTION><OPTION value="404 262-0744">404 262-
0744</OPTION><OPTION value="404 262-0911">404 262-0911</OPTION><OPTION
value="404 262-0961">404 262-0961</OPTION><OPTION value="404 262-
3467">404 262-3467</OPTION><OPTION value="404 262-7642">404 262-
7642</OPTION><OPTION value="404 264-0223">404 264-0223</OPTION><OPTION
value="404 264-0361">404 264-0361</OPTION><OPTION value="404 264-
0835">404 264-0835</OPTION><OPTION value="404 264-9197">404 264-
9197</OPTION></SELECT>
</CENTER>
</TD>
```

As you can see above, each phone number is preceded by `OPTION value=`, and is followed by a quotation mark ("). Therefore, these are used as "tags" to indicate individual phone numbers.

How Data Is Parsed

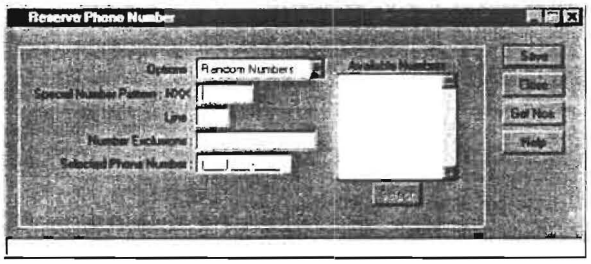
Parsing is defined as extracting data from a larger string of data so that only the data you want remains. In the OPII application, the returned page of source code is parsed into data that is used to build the OPII business objects. The following code parses the above snippet to create an array of phone numbers.

```
while SourceCodeTD.MoveToString(source = PHONE_BEGIN, goPast = TRUE) do
--start offset will be offset immediately after PHONE_BEGIN tag
myStartOffset = SourceCodeTD.Offset;
    --move to end of phone number.
SourceCodeTD.MoveToString(source = PHONE_END);
--end offset will be offset immediately before PHONE_END tag
    myEndOffset = SourceCodeTD.Offset;
    phoneNumber = new();
    --capture only data between tags
phoneNumber = SourceCodeTD.CopyRange(startOffset = myStartOffset,
endOffset =
myEndOffset);
    --add phone number to array of phone numbers that will be returned
phoneNumberArray.AppendRow(phoneNumber);
end While;
```

In our application, `PHONE_BEGIN` has been defined to be the tag `OPTION value`, and `PHONE_END` has been defined to be a quotation mark.

The data objects created from the parsing of the HTTP source code are then sent to the windows for display.

HTTP Policy Manager Source Code



1 User enters search criteria

```
returnedData =
HTTPPolicyMgrSO.GetPhoneNumbers(inReservat
ionTypeString = self.Option,inNxx = self.Nxx,
inLine = self.Line,inDigits = self.NumExclusion);
```

2. Data from window is sent to HTTP Policy Manager

```
queryText.Concat('SelectedOption=');
queryText.Concat(inReservationTypeString);
queryText.Concat('&NxxField=');
queryText.Concat(inNxx),
queryText.Concat('&LineField=');
queryText.Concat(inLine),
queryText.Concat('&NumberExclusionField=');
queryText.Concat(inDigits);
queryText.Concat('&OK=OK');
```

3. Data is formatted for an HTTP call

```
sourceCode =
self.HTTPRequest(inURL =
returnPhoneNumbersURL,inQuery
String =
queryText.TextValue.Value);
```

4. Call is made to retrieve HTML source code from LENS cgi-server.

```
<SELECT name="Browser12_LENSx" size=10 multiple><OPTION
value="404 262-0611">404 262-0611</OPTION><OPTION
value="404 262-0744">404 262-0744</OPTION><OPTION
value="404 262-0911">404 262-0911</OPTION><OPTION
value="404 262-0961">404 262-0961</OPTION><OPTION
value="404 262-3467">404 262-3467</OPTION><OPTION
value="404 262-7642">404 262-7642</OPTION><OPTION
value="404 264-0223">404 264-0223</OPTION><OPTION
value="404 264-0361">404 264-0361</OPTION><OPTION
value="404 264-0835">404 264-0835</OPTION><OPTION
value="404 264-9197">404 264-9197</OPTION></SELECT>
```

5. Source code is returned from LENS cgi-server.

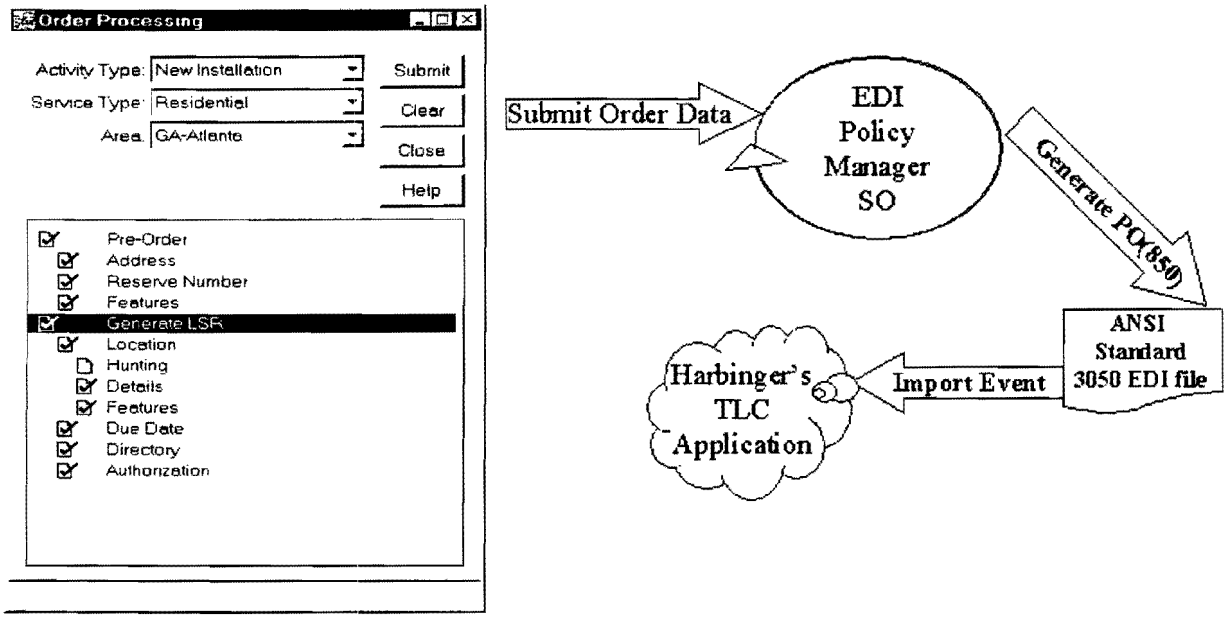
```
while SourceCodeTD.MoveToString(source = PHONE_BEGIN,
goPast = TRUE) do
    myStartOffset = SourceCodeTD.Offset,
    SourceCodeTD.MoveToString(source = PHONE_END);
    myEndOffset = SourceCodeTD.Offset;
    phoneNumber = new();
    phoneNumber = SourceCodeTD.CopyRange(startOffset =
myStartOffset, endOffset = myEndOffset);
    phoneNumberArray.AppendRow(phoneNumber);
end While,
```

6. Source code is parsed to build usable objects. It is then sent back to the window.

Submitting the LSR Order

Create a Submittal File

The final function of the OPII application is to generate an EDI formatted file, which contains all the information that has been entered by the user, and import the file content into a PC-EDI application. This file contains tags, which adheres to the ANSI Standard 3050 - Purchase Order Transaction Set (referred to as PO (850) in this document). For a list of tags and their descriptions, please refer to the *LEO System Mapping – EDI 850 Transaction Set.*



Process Description – Creating File for PC-EDI

To generate the EDI formatted file, the "Submit" button on the launcher window must be enabled. This button is enabled only if all mandatory information has been entered by the user. After clicking on the "Submit" button in the launcher window, a request is made to the EDI Policy Manger service object to create the EDI file. The following code demonstrates this process:

```
ActionSelectionWin.GuiEventHandler:  (code fragment)

When self.<SubmitBtn>.Click do
   self.ProcessSubmitBtnClick();

ActionSelectionWin.ProcessSubmitBtnClick() Method: (code fragment)
   when BV_YES do
         EDIPolicyMgrSO.CreateEDIFile((OrderData)(self.currentObject));
         SubmitTxt : TextData = new();
         SubmitTxt.Replaceparameters('%1  %2',
```

EDI Policy Manager Functions

The EDI Policy Manager performs the following functions:

- Opens a file with the current date/time stamp in a directory specified by the constant.

```
WNAME_EDI_DIRECTORY in OPIIConstant project

EDIPolicyManager.CreateEDIFile (code fragment)

aDate : DateTimeData = new();
aDate.SetCurrent(); --- Get the currrent data and time

myFormat.Template = 'mmmddyyhhmmss';  -- date time format used to
create file

EDIFile  : DirectoryFile = new();
EDIFile.SetPortableName(WNAME_EDI_DIRECTORY);
EDIFile.AddToPath(FileString);
EDIFile.Open(SP_AM_WRITE, IsBinary=False);
```

- Requests CLECSQL Manager Service to generate the next purchase order number from the Oracle database. The CLECSQL Manager Service Object is the service within OPII that handles calls to the CLEC database.

```
EDIPolicyManager.ConstructHeader (code fragment)
NextPo.Value = CLECSQLMgrSO.GetNextPO();
```

- Composes all the tags and values using Order data object and write them to the EDI file. The PO(850) document set is composed of Header, Body and footer tags. A sample body tag construction (construct due date) is shown below.

```
AText : TextData = new();
aText.ReplaceParameters('DTM*150*%1***%2\x85\n',
                        TextData(value=DateString),
                        TextData(value=CentString));
```

- The `DTM*150*` is the tag used to construct the due date.
- `DateString` and `CentString` are values derived from Order data object.
- `\x85` is non printable control character that is required at the end of each tag and value.

- Closes the EDI file.

Integration Process Using PCEDI

Overview

In order to understand the PCEDI interface, it is important to know how Harbinger's Trusted Link Commerce (TLC) application works.

TLC is EDI management software that enables trading communities to exchange electronic documents. BellSouth uses TLC to exchange EDI documents between a CLEC and BellSouth.

TLC – Steps/Process In Sending an EDI PO (850) Document

1. Enter purchase order information using TLC screens
2. Save the document to validate the entered information
3. Envelop the document so that it can be translated to EDI format
4. Send the EDI formatted document via modem
5. Receive acknowledgement

Integrating With TLC

The OPII application generates the document so that it is compatible with the TLC document in step 4, above. The OPII generated document has already been translated to the EDI format and is ready to send via modem.

There are two components in the TLC application that help OPII to interface with TLC:

Document Manager

The Document Manager component allows us to see the OPII generated documents in their outbound list (PO-850 is an outbound document).

Administration

The Administration component is used to define an import event through which OPII documents can be imported to the TLC application. Refer to *Importing and Exporting* in the *TLC User's Guide* to learn more about defining the import event.

While defining the import event, the imported file path should match the path specified in OPII application `OPIIConstants.WNAME_EDI_DIRECTORY`.

How to Import the OPII File

Once a document is created by OPII, TLC's Document Manager component can be used to import this document into TLC.

From the Document Manager File menu, choose Import and select the event name that was specified while defining the event using the Administration component. Select OK. The imported document will appear in the outbound document list.

Assigned Contacts

Primary Business Contact
Dizon, Alex
Project Manager
(404) 614-4175

Primary LENS technical contact
Douglas, Carol
LENS System Administrator
(205) 977-0658

Secondary LENS technical contact
Johnson, Karen
(205) 977-8215

Contacts for establishing connections
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LENS Developer contact
Raymond Betts
(205) 977-1299

BELLSOUTH

BellSouth Interconnection Services
1960 W. Exchange Place
Suite 420
Tucker, GA 30084

December 16, 1997

Brian Murdoch
MCI
780 Johnson Ferry Road
Suite 500
Atlanta, GA 30342

Dear Brian:

This is in response to your letters dated November 17 and 19, 1997, requesting the current version of BellSouth's USOC manual. Please see the attached letter from Fred McCallum to David Burgess, Georgia Public Service Commission, providing an update as to the availability of USOC information. As you can see, this letter was provided to counsel for MCI.

USOCs for some services are now available to CLECs through LENS or the Internet. The internet address is:

www.bellsouth.com/interconnection/local/local_index.html.

As indicated in the attached letter, BellSouth will be adding the USOCs and explanations for the remainder of BellSouth's retail services to the Ordering Guide on the website on January 6, 1998.

Due to the proprietary nature of BellSouth's internal corporate USOCSs and certain USOCs related to the Federal government, all of which are contained in the USOC manual, BellSouth declines to provide to MCI a hard copy of the manual.

The database you referred to that integrates USOCs and the features availability matrix is a function of LENS. MCI has access to this by utilizing the features and services option of LENS. This will provide features as well as the USOCs for services ordered through LENS.

We will keep you informed of the status of the updated USOC file on the internet. Please call Sharon McCreary at 770-492-7520, if you have questions on USOCs in the interim.

Sincerely,

Sharon Daniels

Sharon Daniels
Sales Director

Attachment

cc: Sharon McCreary

Retyped for electronic transmission

Fred McCallum, Jr.
General Counsel - Georgia

BellSouth Telecommunications, Inc.
Legal Department - Suite 376
125 Perimeter Center West
Atlanta, Georgia 30346

December 17, 1997

David Burgess, Director
Telecommunications Division
Georgia Public Service Commission
47 Trinity Avenue, Room 520
Atlanta, Georgia 30334

RE: Investigation into Development of Electronic Interfaces for BellSouth's Operational Support Systems; Docket No. 8354-U

Dear Mr. Burgess:

At the OSS Workshop last week, BellSouth agreed to provide an update on the availability of certain informaiton pertaining to USOCs and FIDs. USOC's, the associated FIDs, and an explanation of the associated service offering are included in Volume 2 of the Local Exchange Ordering Guide, which can be accessses electronically at www.bellsouth.com/interconnection/local. The services that are listed in the Ordering Guide today are generally the ratail services for which an electronic order can be placed. BellSouth will be adding the USOC's , and explanations for the reinder of BellSouth's retail services to the Ordering Guide on the website on January 6, 1998. BellSouth is researching the provision of FIDs for these remaining services. CLECs have the ability to download this information from the website if they so desire.

Participants also requested a list of services for which mechanized service order generation is available. This list is attached as Exhibit 1. All other services, inckuding services with more than six line orders and those with billing telephone numbert to another number, inviove manual entry for service order generation. With the exception of Synchronet, ISDN Basic Rate, PBX trunks, and hunting, all other complex services involve manual order entry, which is also true for BellSouth's retail customers.

Finally, this will confirm that the CGI specification, which was discussed extensively at the workshop, was sent to MCI on December 15, 1997.

USOCs that are proprietary, such as BellSouth's internal corporte USOCs and certain USOCs related to the Federal governme,t will not be published.

My notes reflect that we owe a response to the question about the capacity of BellSouth's electronic interfaces before the end of the year. We have most of this information together and hope to file this response in the next couple of days.

Sincerely,

Fred McCallum Jr.

Fred McCallum Jr.

FMJ/imh

cc: Parties of Record

Retyped for electronic transmission

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Kent Heyman
MGC Communications, Inc
3165 Palms Centre Drive
Las Vegas, NV 89103

Services Available for Ordering through Electronic Data Interchange with Mechanized Order Generation, as of 10/6/97

1. Area Plus
2. Call Waiting Deluxe
3. Call Waiting
4. Caller ID
5. Speed Calling
6. 3-Way Calling
7. Call Forwarding - Variable
8. Remote Access to CF
9. Enhanced Caller ID
10. Flat Rate/Residence
11. Flat Rate/Business
12. Georgia Community Calling
13. Independent Payphone Provider
14. Integrated Package - Area Plus, Area Plus w/Complete Choice and Complete Choice
15. Interim Number Portability
16. Measured Rate/Residence
17. Measured Rate/Business
18. Memory Call
19. Memory Call Answering Service
20. MTS
21. Optional Calling Plan
22. RCF
23. RingMaster® Services
24. Call Tracing
25. Call Block
26. Repeat Dialing
27. Call Selector
28. Call Return
29. Preferred Call Forwarding
30. Touchtone
31. Unbundled Loop
32. Unbundled Port
33. Visual Director

BellSouth Telecommunications
FPSC Docket # 980281
June 1, 1998
Exhibit WNS - 24
Page 7 of 9



November 17, 1997

Sharon Daniels
BellSouth Telecommunications, Inc.
1960 W. Exchange Place
Suite 420
Tucker, Georgia 30084

Error! Bookmark not defined.

MCI requests the current version of BellSouth's USOC Manual be provided either electronically or manually. MCI relies on accurate and complete definitions of USOC when placing orders for BellSouth services and products. While the on-line version, the CLEC USOC Manual, Regional Guide RG-USOC-001BT, Issue Sept_17,1997-9/17/97, is in an acceptable format, it is not complete. For MCI to submit accurate local service requests, the USOC guide(s) is a necessity.

Please provide a response to this request by November 24, 1997. This request sent via fax, electronic mail, and U.S. Mail.

Error! Bookmark not defined.

<Brian Murdoch's signature>

Brian Murdoch
Southern Financial Operations

Cc: Andri Weathersby
Wally Schmidt
Jeremy Marcus

MCI Telecommunications Corporation
780 Johnson Ferry Road
Suite 500
Atlanta, GA 30342



November 19, 1997

Sharon Daniels
BellSouth Telecommunications, Inc.
1960 W. Exchange Place
Suite 420
Tucker, Georgia 30084

Dear Ms. Daniels,

I write to clarify my November 17, 1997 request for USOC information. MCI requests that BellSouth provide a download of the requested USOC information in addition to a hard copy of the USOC Manual. Obtaining the download will save us from having to manually enter USOC information into our system, which could lead to errors and customer service problems. MCI understands that BellSouth has a database that integrates USOCs and the features availability matrix. As you know, BellSouth already has provided us a download of the matrix without USOCs. Obtaining the matrix and USOCs together is important to us because it would enable our customer service representatives easily to cross-reference service features and their corresponding codes. Please confirm that BellSouth has such an integrated database and, if it does, provide a download. Thank you for your assistance with this request.

Please provide a response to this request by November 26, 1997. This request sent via fax, electronic mail, and U.S. Mail.

Sincerely,

Brian Murdoch
Southern Financial Operations

Cc: Andri Weathersby
Wally Schmidt
Jeremy Marcus

BELLSOUTH

BellSouth Interconnection Services
Room 34A35
675 West Peachtree Street, N.E.
Atlanta, Georgia 30375

January 30, 1998

Bryan Green
MCI
2520 Northwinds Parkway
Alpharetta, GA 30004

Dear Bryan:

Per agreement from the Georgia Public Service Commission's OS Workshop held December 9-10, 1997, the enclosed package contains the following items to help your company do business with BellSouth:

Diskette of SOER edits: SOER edits are used by the Service Order Control System (SOCS), the system through which all CLEC and BellSouth retail service orders flow. SOCS uses these edits to analyze service orders before sending them to the provisioning and maintenance systems.

A hard copy of Local Exchange Ordering System (LEO) edits: LEO is an edit checking system that all EDI and LENS orders flow through to insure that data in service orders was input correctly.

A hard copy of Local Exchange Service Order Generator (LESOG) edits: LESOG insures the correct information is on service orders so the system can mechanically generate a service order.

LEO/LESOG Reject Requirements binder: Explains error codes and conditions that cause the errors.

TAFI specifications on diskette: A self-extracting Zip file, formatted to print two-sided.

Please call me at 404 927-7536 with any questions.

Sincerely

Bob Siegel

FAX 770 621-0632

Date 03-26-98

Number of pages including cover sheet

TO:
Judy Ruelleweger

FROM: Real Time Resolution Group
BellSouth Telecommunications, Inc
675 W. Peachtree Street, N.E.
3J39
Atlanta, GA 30375

ELAINE M. LANTZ

PHONE:
FAX PHONE:

PHONE: 404 529-2998
FAX PHONE: 404-876-1410

REMARKS: Urgent For your Review Reply ASAP Please Comment

Judy

Copy of letter to MCIm.
SOER edits.

I also sent you EMAIL with
USOC INFO.

Thx
Elaine M. Lantz

BELLSOUTH

BellSouth Interconnection Services
Suite 420
1960 West Exchange Place
Tucker, Georgia 30084

770 492-7500
Fax 770 621-0632

MCI Account Team

August 20, 1997

Mr. Walter J. Schmidt
MCI Telecommunications Corporation
780 Johnson Ferry Road
Atlanta, Georgia 30342

Dear Wally,

This is in response to Bryan Green's verbal request to provide MCIm with a copy of BellSouth's Regional Street Address Guide (RSAG) database files and RSAG record layouts and to your letter dated August 18, 1997, regarding the same subject. In accordance with the MCIm/BST Interconnection Agreement, MCIm can access BellSouth's RSAG database through the Local Exchange Navigation System (LENS) and/or via Interexchange Carrier Reference Validation (ICREF) service.

The RSAG database files are extremely voluminous for downloading and the fact is that the database changes so rapidly it would be outdated by the time MCIm would be in receipt of the database files. The RSAG technical specifications are proprietary.

MCIm may pursue receipt of the RSAG database files in a form other than that described in the Interconnection Agreement through the Agreement's Bona Fide Request (BFR) process. I trust that the above provides you with the desired information.

Sincerely,

Cliff Bowers

for Pam Lee
Sales Assistant Vice President

cc: Joe Baker - BST
Marcel Henry- MCI
Charlene Keys - MCI
Bryan Green - MCI
Jeremy Marcus - MCI

PF'd Order Processing Procedures

Introduction - Introduction

PURPOSE

The purpose of this Job Aid is to provide instructions for the LCSC on the handling of orders in PF status.

VERSION INFO

Revision History

Chapter	Action Request #	Date/Issue	Description
N/A	N/A	March, 1998/1	Initial release

1.0 PF Reports in Netscape

1.1 Report Characteristics

The most current version of the reports is found in Netscape. The reports are found on the Intranet at http://icsops.bst.bls.com/reports and are date and time stamped.

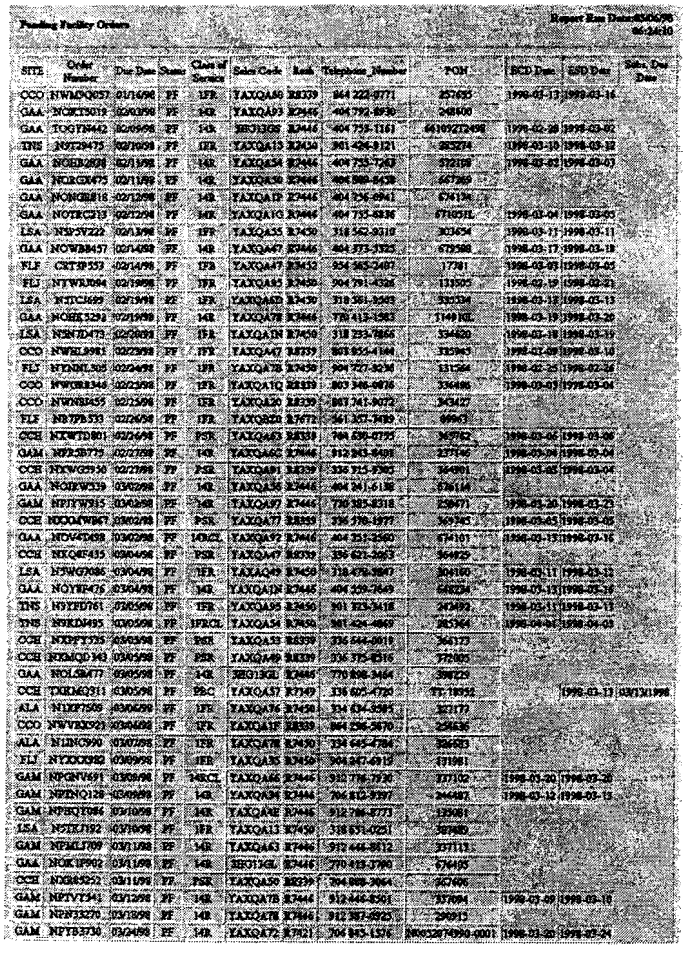
There are three different reports

- PF Report (Sort by Site HTML Format)—This is the UNE Report
- Atlanta LCSC Report—This is for the Atlanta LCSC's Resale orders
- Birmingham LCSC Report—This is for the Birmingham LCSC's Resale orders

All three reports are sorted by original due date. RESH codes are used to sort the Resale PF'd orders into the Atlanta and Birmingham Reports.

When printing the reports chose Landscape as the print orientation.

Figure 2.1 - Example of PF Report for Resale orders



Pending Facility Orders

SITE	Order Number	Due Date	Status	Class of Service	Sales Code	Rank	Telephone_Number	PON	RCD Date	LSD Date	Subscr. Due Date
CCO	NWLPQ057	01/16/98	PF	1FB	TAXQA86	2B339	864 222-9771	257635	1998-01-13	1998-01-14	
GAA	NQRT5019	02/03/98	PF	14R	TAXQA93	2C446	404 792-8930	048400			
GAA	TQGT8942	02/05/98	PF	1SA	3BQ3QR	2C446	404 755-1161	8610922498	1998-02-20	1998-03-02	
DNS	JQT29475	02/10/98	PF	1FB	TAXQA19	2C456	901 496-8121	985274	1998-03-10	1998-03-12	
GAA	NQEB2808	02/13/98	PF	14R	TAXQA84	2C446	404 755-7269	932108	1998-02-02	1998-03-03	
GAA	NQEQX475	02/11/98	PF	14R	TAXQA50	2C446	404 880-8428	667369			
GAA	NQMQB816	02/12/98	PF	14R	TAXQA1D	2C446	404 336-6941	674156			
GAA	NQTRC213	02/12/98	PF	14R	TAXQA1G	2C446	404 755-8836	8710551L	1998-03-04	1998-03-05	
LSA	NSV3V222	02/13/98	PF	1FB	TAXQA55	2C456	318 562-9310	303654	1998-03-17	1998-03-11	
GAA	NQWB8457	02/14/98	PF	14R	TAXQA47	2C446	404 373-5525	672588	1998-03-17	1998-03-19	
FLF	CRT3F553	02/16/98	PF	1FB	TAXQA47	2C452	954 365-2407	17781	1998-02-03	1998-03-05	
FLJ	NTWR3R94	02/19/98	PF	1FB	TAXQA85	2C456	904 791-4308	1318052	1998-02-19	1998-02-23	
LSA	NTTC3499	02/19/98	PF	1FB	TAXQA6D	2C456	318 381-3049	320534	1998-03-13	1998-03-13	
GAA	NQRE3292	02/19/98	PF	14R	TAXQA78	2C446	770 413-5963	1149102	1998-03-19	1998-03-20	
LSA	NSNJD473	02/20/98	PF	1FB	TAXQA1N	2C456	318 233-7866	334620	1998-03-19	1998-03-19	
CCO	NWBL3981	02/23/98	PF	1FB	TAXQA47	2B339	803 855-4160	332967	1998-02-09	1998-03-10	
FLJ	NTNWL305	02/24/98	PF	1FB	TAXQA78	2C456	904 727-3230	331564	1998-02-26	1998-02-26	
CCO	NWBB3346	02/25/98	PF	1FB	TAXQA1Q	2B339	803 346-9836	334486	1998-03-03	1998-03-04	
CCO	NWBB8455	02/25/98	PF	1FB	TAXQA50	2B339	803 741-9072	343427			
FLF	NBTP8333	02/26/98	PF	1FB	TAXQR2D	2C472	561 357-9489	69963			
CCO	NTWT0801	02/26/98	PF	1SA	TAXQA63	2B339	706 650-0775	367762	1998-03-06	1998-03-06	
GAA	NQ23D772	02/27/98	PF	14R	TAXQA66	2C446	912 963-8401	327549	1998-03-24	1998-03-24	
CCO	NTWG9550	02/27/98	PF	2SR	TAXQA91	2B339	336 375-9562	364001	1998-03-02	1998-03-04	
GAA	NQHW5239	03/02/98	PF	14R	TAXQA58	2C446	404 241-6138	678144			
GAM	NPTFW915	03/02/98	PF	14R	TAXQA97	2C446	770 383-8318	329471	1998-03-20	1998-03-23	
CCE	NDQMW867	03/02/98	PF	2SR	TAXQA77	2B339	336 378-1977	363745	1998-03-05	1998-03-05	
GAA	NDV4F458	03/02/98	PF	10GCL	TAXQA92	2C446	404 231-2460	674101	1998-03-17	1998-03-16	
CCE	NDQ4F435	03/04/98	PF	2SR	TAXQA47	2B339	336 621-3613	364925			
LSA	NTWG7686	03/04/98	PF	1FB	TAXQA49	2C456	318 476-9807	304180	1998-03-11	1998-03-11	
GAA	NQYR8476	03/04/98	PF	14R	TAXQA1N	2C446	404 229-3649	648224	1998-03-13	1998-03-19	
DNS	NYTH3761	03/05/98	PF	1FB	TAXQA95	2C456	901 753-3418	343493	1998-03-11	1998-03-13	
DNS	NYRD4495	03/05/98	PF	1FRCL	TAXQA54	2C456	901 624-4869	365744	1998-03-31	1998-04-03	
CCE	NDPT7725	03/05/98	PF	2SR	TAXQA53	2B339	336 644-0819	363173			
CCE	NDMQD143	03/05/98	PF	2SR	TAXQA49	2B339	336 375-4316	372605			
GAA	NQLS8477	03/05/98	PF	14R	3BQ13GL	2C446	770 998-3464	398220			
CCE	TXDM2911	03/05/98	PF	2SC	TAXQA57	2C749	336 605-4720	77-78952		1998-03-13	03/13/1998
ALA	NTXF7509	03/06/98	PF	1FB	TAXQA76	2C458	334 634-3585	323172			
CCO	NWVR8923	03/04/98	PF	1FR	TAXQA1F	2B339	864 256-2870	329636			
ALA	NTJH3990	03/07/98	PF	1FB	TAXQA78	2C458	334 645-4784	326453			
FLJ	NTXX3982	03/09/98	PF	1FB	TAXQA35	2C456	904 247-6913	371981			
GAM	NPGN7491	03/09/98	PF	14RCL	TAXQA46	2C446	912 776-7930	377102	1998-03-20	1998-03-20	
GAM	NPTNQ128	03/09/98	PF	14R	TAXQA59	2C446	706 810-3597	344487	1998-03-12	1998-03-13	
GAM	NPBQT084	03/10/98	PF	14R	TAXQA42	2C446	912 786-8773	329081			
LSA	NTJX7192	03/10/98	PF	1FB	TAXQA13	2C458	318 871-0221	307980			
GAM	NPMLT899	03/10/98	PF	14R	TAXQA63	2C446	912 444-9812	397113			
GAA	NQKW9902	03/11/98	PF	14R	3BQ13GL	2C446	770 913-3790	674105			
CCE	NDX85252	03/11/98	PF	2SR	TAXQA59	2B339	704 889-3064	367406			
GAM	NPTV1341	03/12/98	PF	14R	TAXQA78	2C446	912 446-8301	357084	1998-03-09	1998-03-10	
GAM	NPW33270	03/13/98	PF	14R	TAXQA78	2C446	912 367-6925	290915			
GAM	NPTB3730	03/04/98	PF	14R	TAXQA72	2C921	704 845-1576	0000287490-0001	1998-03-20	1998-03-24	

2.0 Processing Charts

2.1 Resale Orders

The following chart outlines what action is to be taken on orders appearing on the PF Reports for Resale Orders.

For Resale Orders

If Due Date	And	Then
Past Due or ESD FU today	Order is in PD status	FU for CP of order
	Order still in PF and notification has already been sent to CLEC	• Verify if new ESD in ZOSD and Rmks - if so send FU notification to CLEC, place back in FU file under new ESD. • If no new ESD contact SAC and verify if order will be released today. • If not, request new ESD, Fax updated ESD to CLEC and FU until new ESD or order is CP.
	Order still in PF and notification has not been sent to CLEC	• Fax PF Notification Form to CLEC providing ESD or 3 day commitment to provide ESD. • If no ESD in Rmks contact the SAC group. • Place copy of service order and Faxed notification in FU file.
Today	Order is in PD status	FU for CP of order
	Order still in PF and notification has already been sent to CLEC	Continue FU till ESD or CP of order
	Order still in PF and notification has not been sent to CLEC	• Fax PF Notification Form to CLEC providing ESD or 3 day commitment to provide ESD. • If no ESD in Rmks contact the SAC group. • Place copy of service order and Faxed notification in FU file.
Tomorrow	Order is in PD Status	FU for CP of order
	Order still in PF in SOCS	• Check for ZOSD and Rmks for ESD. (If no ESD contact SAC) • Fax PF Notification Form to CLEC with ESD. (If ESD not provided FU needs to be done within 3 days to provide ESD to the CLEC).

- Print copy of the service order, attach to notification form and place in FU file.

- When notification of PF is Faxed to the CLEC, the PF, ESD and notification information is to be noted in tracking (LON) and on Service Order.
- All ESD or DD changes on the order are to be noted in tracking (LON) and on Service Order.

Figure 3.2 - CLEC PF Notification Form

BellSouth Telecommunications
Plant Facilities (PF) Notification

Fax Date: ____/____/____ **Re-Fax Date:** ____/____/____

Service Representative: _____

Company Name: _____ **OCN:** _____

CLEC Representative: _____

PON: _____

BellSouth Order Number: _____

Telephone Number: (____) _____-_____

Original Due Date: ____/____/____

Lack of facilities was discovered after you received an FOC. The estimated service date is listed below or you will receive a new due date in 3 business days.

Estimated Service Date (ESD): ____/____/____

****

ESD Update: ____/____/____

2.2 UNE Orders

The following chart outlines what action is to be taken on orders appearing on the PF Report for UNE Orders.

For UNE orders

If Due Date	And	Then
Past Due or ESD FU today	Order is in PD status	FU for CP of order
	Order still in PF and notification has already been sent to CLEC	• Verify if new ESD in ZOSD and Rmks - if so send FU notification to CLEC, place back in FU file under new ESD. • If no new ESD contact SAC and verify if order will be released today. • If not, request new ESD, Fax updated ESD to CLEC and FU until new ESD or order is CP.
	Order still in PF and notification has not been sent to CLEC	• Fax PF Notification Form to CLEC providing ESD or 3 day commitment to provide ESD. • If no ESD in Rmks contact the SAC group. • Place copy of service order and Faxed notification in FU file.
Today	Order is in PD status	FU for CP of order
	Order still in PF and notification has already been sent to CLEC	Continue FU till ESD or CP of order
	Order still in PF and notification has not been sent to CLEC	• Fax PF Notification Form to CLEC providing ESD or 3 day commitment to provide ESD. • If no ESD in Rmks contact the SAC group. • Place copy of service order and Faxed notification in FU file.
Order Future Due Dated (1st appearance on PF Report)	Order is in PD Status	FU for CP of order
	Order still in PF in SOCS	• Check ZOSD and Rmks for ESD. Fax PF Notification Form to CLEC with ESD (If ESD not provided FU needs to be done within 3 days to provide ESD to the CLEC). • If no ESD, FU for 48 Hours to verify SOCS Rmks for ESD.

		• If not provided contact SAC. • Print copy of the service order, attach to notification form and place in FU file.

- When notification of PF is Faxed to the CLEC, the PF, ESD and notification information is to be noted in tracking (LON).
- All ESD or DD changes on the order are to be noted in tracking (LON).

Figure 3.0 - CLEC PF Notification Form

BellSouth Telecommunications
Plant Facilities (PF) Notification

Fax Date: ____/____/____ **Re-Fax Date:** ____/____/____

Service Representative: _____

Company Name: _____ **OCN:** _____

CLEC Representative: _____

PON: _____

BellSouth Order Number: _____

Telephone Number: (____) _____-_____

Original Due Date: ____/____/____

Lack of facilities was discovered after you received an FOC. The estimated service date is listed below or you will receive a new due date in 3 business days.

Estimated Service Date (ESD): ____/____/____

****

ESD Update: ____/____/____

3.0 Splitting of Mutli-line Orders For Partical PF Condition

3.1 Field Technician Requesting Split Of Order

When a call is received in the LCSC from a Field Technician wanting to split a multi-line order to accommodate a partial PF condition the following steps are to be taken

Step 1 The technician needs to have the CLEC bridged on the line to give their approval to split the order.

Step 2 Service Representative will update the "N"or "T"

- Print copy of N/T order
- Remove the line(s) that are to be PF'd
- Add RO (related order) information pertaining to "C" order
- Update the RMK section including
  - Name of CLEC Representive approving split of order
  - Number of lines being removed
  - Order number of new "C" Order being issued
- Retransmit order to flow to down stream systems

At this point release the Technician and CLEC from the call advising the CLEC that

- The updated N/T order will be completed
- They will get a new FOC for the "C" order through the manual LON process
- They will be advised through the PF process when the "C" order will be worked.

The Technician will be able to complete the updated N/T order.

Step 3 The Service Representative will generate a "C" order for the PF'd line(s).

- USOC, FID and other pertinent information will be taken from the printed copy of the N/T order
- The orginial PON Number will be used.
- The orginial Due Date is to be used..
- Add RO (related order) information pertaining to N/T order
- The RMK section needs to include
  - Statement regarding partial PF condition and splitting of order.
  - Name and employee number of technician advising of the PF condition.
  - Name of CLEC Representive approving split of order.
  - N/T Order number of orginial order.
- Release order for down stream processing
- Send FOC for "C" order through the manual LON process

Step 4 Log information into LON including

- Explanation regarding splitting of order
- CLEC Representatives name
- Order Number for N/T and C order
- FOC information on "C" order

BellSouth Telecommunications
Plant Facilities (PF) Notification

Fax Date: ____/____/____ Re-Fax Date: ____/____/____

Service Representative: _____

Company Name:_____ OCN: _____

CLEC Representative: _____

PON: _____

BellSouth Order Number: _____

Telephone Number: (____) _____-_____

Original Due Date: ____/____/____

Lack of facilities was discovered after you received an FOC. The estimated service date is listed below or you will receive a new due date in 3 business days.

Estimated Service Date (ESD): ____/____/____

****

ESD Update: ____/____/____

For BellSouth Use Only

Version 2
03/05/98
L. Nall

William N. Stacy Direct Testimony
Exhibit WNS-28

BELLSOUTH

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BACK to Regional Reports

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BELLSOUTH INTERCONNECTION SERVICES May 27, 1998

TRAINING GLOSSARY REGIONAL REPORTS

CLEC Specific Reports

Performance Measures
Regional Reports

BellSouth is committed to providing all our customers with the highest quality of service. These Group Aggregate Reports are intended to be used by the CLEC's and Regulators to assure all are receiving their service on an equitable basis.

To assist you in understanding these reports, we have listed some facts you should know:

- These reports are also known as "Common Reports". They are a total of all lines and orders installed and/or repaired within the specified time period. The results are intended to be used for comparison of aggregate CLEC and BST activity for the specified time period.

CLEC and BST Interconnection Report and the CLEC UNE Reports

- Under Provisioning Appointments Met, these are based on Total Inward Lines rather than Total Orders (in all other reports, they are for total orders worked).
- If at any time you need further clarification on a result, please refer to the **glossary** section of the reports.
- If you don't understand, need assistance or have questions please contact your Account Executive.

HOME

The information contained within the CLEC Specific Report is confidential proprietary information and shall be governed by the Confidential Information provisions of the individual Interconnection or Resale Agreement executed between BellSouth and the CLEC.

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BELLSOUTH INTERCONNECTION SERVICES May 27, 1998

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CLEC Specific Reports

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BST AGGREGATE REPORTS

- RETAIL SERVICE
- INTERCONNECTION TRUNKING
- AVERAGE ANSWER TIME
- TRUNK BLOCKING
- BILLING

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TRAINING | GLOSSARY | REGIONAL REPORTS

CLEC Specific Reports

WELCOME...

...TO BELLSOUTH'S PERFORMANCE MEASUREMENTS REPORT INTERNET SITE

BellSouth provides the CLECs with ordering, provisioning and maintenance services that are substantially similar to those provided to BellSouth, or any BellSouth subsidiary, affiliate or end user. BellSouth is committed to providing CLECs the capability to provide their customers with the same experience that BellSouth provides its own customers with respect to all local services. Performance measures and underlying information reports (*see note) are available as follows:

- **Ordering Data** (Reject Notification, Firm Order Confirmation, and Flow Through Report)
- **Resale** (Provisioning / Maintenance)
- **Unbundled Loop** (Provisioning / Maintenance)
- **Local Number Portability** (Provisioning / Maintenance)
- **Trunking** (Provisioning / Maintenance)
- **Center Answer Time**
- **Database Access**
- **Account Maintenance**
- **Operational Support System Availability**.

This Internet site has been established in order to provide BellSouth's CLEC customers with Performance Measurement Reports and associated data. The reports representing the last month's data will be loaded by the 15th of each month and maintained on this site for approximately 25 days. The next month's data will overwrite the previous month's reports. It will be the responsibility of the CLEC to download reports for archival purposes.

Site Training, Glossary Report Definitions, and Regional Aggregate Reports for BellSouth and the CLEC's can be accessed from the bar at the top of this page. Individual CLEC Specific Reports can be accessed on the left side of the page and are password protected.

* These reports based on performance measurements negotiated with individual CLECs are temporary. They will be replaced in June 1998 with BellSouth Service Quality Measurements. These new Performance Measurement Reports are based on negotiations with CLECs, Public Service Commission requirements, and LCUG.

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BELLSOUTH CTTG SERVICE REPORT - SUMMARY

COMMON TRANSPORT TRUNK GROUP (CTTG) REPORT SUMMARY

MONTH: 04/98 PROCESS DATE: 05/11/98

BELL

	AL	GA	KY	LA	MS	NC	NF	SC	SF	TN	TO
TOTAL TRUNK GROUPS:	374	305	182	502	379	421	356	218	147	147	5
TOTAL VALID GROUPS:	370	302	182	502	379	419	356	218	147	147	5
PCT_VAL	98.9	99.0	100.0	100.0	100.0	99.5	100.0	100.0	100.0	100.0	99
TOT GRPS > TDSP THIS REPORT:	6	1	0	2	3	1	0	0	1	0	
PCT1	1.6	.3	.0	.4	.8	.2	.0	.0	.7	.0	
TOT GRPS > TDSP 3 CONSEC MON:	0	0	0	0	0	1	0	0	0	0	
PCT3	.0	.0	.0	.0	.0	.2	.0	.0	.0	.0	
TOT GRPS > DBO 3 CONSEC MON:	2	0	0	0	1	1	3	0	1	0	
PCTD	.5	.0	.0	.0	.3	.2	.8	.0	.7	.0	
DATA_NA	4	3	0	0	0	2	0	0	0	0	
PCT_ND	1.1	1.0	.0	.0	.0	.5	.0	.0	.0	.0	

INDEPENDENT

	AL	GA	KY	LA	MS	NC	NF	SC	TN	TOTAL
TOTAL TRUNK GROUPS:	109	158	53	66	72	97	39	86	166	846
TOTAL VALID GROUPS:	104	155	53	66	72	96	39	86	165	836
PCT_VAL	95.4	98.1	100.0	100.0	100.0	99.0	100.0	100.0	99.4	98.8
TOT GRPS > TDSP THIS REPORT:	5	5	0	0	3	2	0	3	8	26
PCT1	4.8	3.2	.0	.0	4.2	2.1	.0	3.5	4.8	3.1
DATA_NA	5	3	0	0	0	1	0	0	1	10
PCT_ND	4.6	1.9	.0	.0	.0	1.0	.0	.0	.6	1.2

TOTAL

	AL	GA	KY	LA	MS	NC	NF	SC	SF	TN	TOT
TOTAL TRUNK GROUPS:	483	463	235	568	451	518	395	304	147	147	67
TOTAL VALID GROUPS:	474	457	235	568	451	515	395	304	147	147	67
PCT_VAL	98.1	98.7	100.0	100.0	100.0	99.4	100.0	100.0	100.0	100.0	99.
TOT GRPS > TDSP THIS REPORT:	11	6	0	2	6	3	0	3	1	0	1
PCT1	2.3	1.3	.0	.4	1.3	.6	.0	1.0	.7	.0	1.
DATA_NA	9	6	0	0	0	3	0	0	0	0	
PCT_ND	1.9	1.3	.0	.0	.0	.6	.0	.0	.0	.0	.

BELLSOUTH CTTG SERVICE REPORT - DETAIL

BELLSOUTH BLOCKING REPORTS - SUMMARY

INCLUDES BELL AND NONBELL GROUPS FOR 02

GROUPS EXCEEDING MBT

PROCESS DATE: 05/11/98

TGSN	TANDEM	END OFFICE	DESCRPT	STUDY PERIOD	OBSVD BLKG	HR	TKS	VAL DAYS	NBR RPTS	REMARKS
BELL										
AF136422	HNVIALUN0GT	FLRNALMADS0	77 AF DT	042098	.0292*	21	168	20	1	D1I2 144 TKS MTU 041
AF140327	HNVIALUN0GT	SHFDALMTDS0	77 AF DT	042098	.0546*	20	144	20	1	A0A1 120 TKS ADD 051
AF124737	HNVIALUN0GT	HNVIALLWDS0	77 AF DT	042098	.0702*	20	168	20	2	B0A1 48 ADDED ON 042
AF078038	HNVIALUN0GT	CLMNALMADS0	77 AF DT	042098	.0731*	20	720	20	2	A0A2 EQPU ADD 051198
AF130127	MOBLALAZ0GT	MOBLALAPDS0	MM DF DT	042098	.0273*	14	24	19	1	D1I1 16 TKS MTU 0410
AF130267	MTGMALMT0GT	PRVLALMADS0	77 AF DT	042098	.0922*	20	120	20	2	B0A1 24 ADDED 041098
AC174258	ATLNGABU01T	SMYRGAMADS1	77 AF DT	042098	.0292*	21	504	20	1	A0A1 72 TRKS PEND 05
AF073178	NWORLAMA0GT	NWORLAARCG0	77 AF DT	042098	.0235*	20	312	20	1	B0A1 +36 TKS.COMPLET
AF130504	LFYTLAMA0GT	CRNCLAMADS0	77 AF DT	042098	.0231*	20	360	20	1	B0A1 +24 TKS. COMPLE
AF107913	GNWDMSMA26T	HSTNMSMADS0	M- DF ET	042098	.0269*	11	19	20	1	D1C1 CABLE FAILURE
AF121107	TUPLMSMA07T	HSTNMSMADS0	77 AF DT	042098	.0473*	20	192	18	1	D1C1 CABLE FAILURE
AF121111	TUPLMSMA07T	PNTTMSMADS0	77 AF DT	042098	.0296*	20	336	20	1	B0A1 +24 TRUNKS COMP
AC174433	CHRLNCBO05T	LENRNCHA75F	MM AF MD	042098	.0317*	12	24	20	3	D1C2 CARRIER FAILURE
AC170663	NDADFLGG04T	PMBHFLCSDS0	77 AF DT	042098	.0246*	21	432	19	1	B0A1 +96 TRKS 4/22/9
AF122662	NSVLTNWM92T	WHBLTNMTDS0	77 AF DT	042098	.0227*	20	312	17	1	D1B1 TORNADO 4/16
AF133606	NSVLTNWM92T	PLSKTNMADS0	77 AF DT	042098	.0266*	21	288	17	1	D1B1 TORNADO 4/16; S
AF142840	MMPHTNMA84T	MMPHTNSTDS0	77 AF DT	042098	.0377*	15	96	20	2	A0A1 +48; 5/4/98
INDEPENDENT										
AF136520	BRHMALMT0GT	BTLRALXADS0	MM DF DT	042098	.0714*	20	120	19	3	D1Z1 IND RELS RESP
AF150899	BRHMALMT0GT	MNVLALXADS0	77 DF DT	042098	.2036*	20	72	19	1	D1Z1 IND RELS RESP
AF144509	ANTNALMT0GT	RGLDALXADS0	MM DF DT	042098	.0596*	20	72	19	3	D1Z1 IND RELS RESP
AF142437	MOBLALAZ0GT	GVHLALXADS0	77 DF DT	041398	.1211*	20	120	20	8	D1Z1 IND RELS RESP
AF140079	MTGMALMT0GT	HYVLALXADS0	77 DF DT	042098	.0686*	20	144	18	2	D1Z1 IND RELS RESP
AC195525	MACNGAMT04T	BYRNGAXADS1	77 AF DT	042098	.0214*	21	144	20	1	A0A1 24 TRKS PEND 05
AC195951	MACNGAMT04T	PRRYGAXADS0	77 AF DT	042098	.0329*	21	672	20	1	B0A1 24 TRKS COMPTD
AC186093	ALBYGAMA03T	FTZGGAXADS1	77 DF DT	042098	.0311*	21	96	20	1	A0A2 24 TRK ADD 0520
AC191934	ATLNGABU01T	NLSNGAXADS1	77 DF DT	042098	.0265*	20	48	20	1	D1B1 ABNORMAL WEATHE
AC180060	CLMBGAMT01T	GENVGAXA26A	M- DF DD	042098	.0312*	12	10	20	1	D1C1 CABLE FAILURE
AF112461	GNWDMSMA26T	CLCYMSXADS0	M- DF ET	042098	.0233*	20	13	19	1	D1C1 CABLE FAILURE
AF147062	TUPLMSMA07T	CLCYMSXADS0	77 AF DT	042098	.0283*	10	94	20	1	D1C1 CABLE FAILURE
AF114094	HTBGMSMA06T	PRNTMSXADS0	77 DF DT	042098	.1723*	20	189	19	4	D1Z1 OTHER
AC202477	AHVLNCOH04T	BDVLNCXADS0	MM DF DT	042098	.0423*	21	40	20	1	A0F1 CONSTRUCTION RE
AC151375	GNBONCEU05T	EDENNCXBDS0	77 AF MD	042098	.0282*	21	240	20	1	D1I1 MAINTENANCE PRO
AC193326	GNVLSCDT60T	WDRFSCXADS0	77 DF DT	042098	.0352*	21	180	20	1	A0A1 48 ON 06-30-98
AC155311	CHTNSCDT60T	BUFTSCXADS0	M- DF ET	042098	.0520*	20	24	20	1	C0A1 UNDER INVESTIGA
AC159210	CHTNSCDT60T	WLBOSCXE01T	MM DF DT	042098	.0869*	21	96	20	3	B0A1 29 TNKS COMP 05
AF135912	NSVLTNMT84T	NWJHTNXARS5	77 DF DT	042098	.0322*	10	96	19	1	D1C1 CABLE FAILURE,

AF103911	CHTGTNNS84T	PKVLTNXADS0	77	AF	DT	042098	.0634*	20	305	8	2	A0A1 +24 4/98 INDEF
AF140458	CHTGTNNS84T	RNGLGAXBDS1	77	AF	DT	042098	.0220*	20	432	8	1	A0A1 +48 INDEP PLANN
AF112334	MMPHTNMA84T	OLBRMSXADS0	77	AF	DT	040698	.1042*	20	840	9	3	A0A1 +72 5/21/98
AF120918	MMPHTNMA84T	BYHLMSXADS0	77	AF	DT	042098	.0675*	20	279	14	8	A0A1 +72; 5/14/98
AF142277	MMPHTNMA84T	ALAMTNXADS1	M-	DF	CA	040698	.0398*	09	24	5	1	A0A2 +24 6/98 INDEF
AF148214	MMPHTNMA84T	ALAMTNXADS1	77	DF	DT	042098	.1453*	20	144	14	14	A0A2 +144 6/98 INDEF
AF136658	KNVLTNMA84T	CNCRTNXADS2	77	AF	DT	042098	.0285*	10	359	19	1	A0A2 +96 4/98 INDEF

* EXCEEDS THRESHOLD OF 2%

LOCAL NETWORK TRUNK GROUP SERVICE REPORT - SUMMARY

LOCAL NETWORK TRUNK GROUP SERVICE REPORT SUMMARY

MONTH: 04 98 PROCESS DATE: 05/04/98

	TOTAL AL	GA	KY	LA	MS	NC	NF	SC	SF	TN	TO
TOTAL TRUNK GROUPS:	381	920	193	438	320	709	407	331	337	442	4
TRK GRPS MEAS/PROC:	374	894	193	437	320	704	398	330	337	442	4
PCT_MF	98.2	97.2	100.0	99.8	100.0	99.3	97.8	99.7	100.0	100.0	9
TOT GRPS > 3% NC THIS REPORT:	11	48	3	7	2	9	6	8	10	12	
PCT1	2.9	5.4	1.6	1.6	.6	1.3	1.5	2.4	3.0	2.7	
DATA_NA	7	26	0	1	0	5	9	1	0	0	
PCT_NA	1.8	2.8	.0	.2	.0	.7	2.2	.3	.0	.0	

LOCAL NETWORK TRUNK GROUP SERVICE REPORT - DETAIL

BELLSOUTH LOCAL NETWORK BLOCKING REPORTS - DETAILED LISTING

INCLUDES LOCAL NETWORK TRUNK GROUPS FOR 02

GROUPS EXCEEDING MBT

PROCESS DATE: 05/04/98

A-END	Z-END	DESCRIPTION	TGSN	STUDY PERIOD	OBSVD BLKG	HR	TKS	VAL DAYS	NBR RPTS	REMARKS
BRHMALEN78E	BRHMALMT0GT	M- DF IR	AF144985	042098	.0411*	16	12	20	1	
BRHMALMT1GT	LEDSALXBDS0	77 AF OG	AF140822	042098	.0784*	20	406	20	3	
BSMRALHTDS0	BRHMALMT0GT	M- DF IR	AF145008	042098	.0370*	20	11	20	1	
BYMNALMARS0	MOBLALAZ0GT	M- DF IR	AF148067	042098	.0456*	12	4	20	1	
CLANALMADS0	JMSNALXADS0	77 DF IE	AF106203	042098	.0338*	20	144	15	1	
CRHLALNMDS0	JSPRALMTDS0	77 DF OG	AF097025	042098	.1032*	20	96	19	3	
HNVIALMT0GT	HNVIALUNDS0	77 AF OG KE	AF121204	042098	.0602*	20	600	20	2	
MOBLALAPDS0	MOBLALAZ0GT	M- DF DA CC	AF143862	042098	.0347*	15	11	19	1	
MTGMALMT26E	MTGMALMT26T	M- DF TO G8	AF073892	042098	.2080*	10	12	20	1	
OPLKALMTDS0	MTGMALMT0GT	M- DF IR	AF106870	042098	.0435*	20	14	20	2	
PHCYALMADS0	CLMBGAMT12T	M- DF TO	AF063485	042098	.3675*	21	360	19	8	
ALBYGAMA12T	ALBYGAMA45A	7- DF TG	AC125698	042098	.1321*	21	504	20	11	
ALBYGAMA45A	ALBYGAMA12T	7- DF TO	AC125697	042098	.1107*	10	93	20	1	
ALPRGAMA47C	ATLNGACSDS3	77 DF IE KE	AC169114	042098	.1301*	15	192	17	6	
	NRCRGAMA01T	77 AF OG KE	AC186591	042098	.2298*	16	252	18	5	
	NRCRGAMA84A	77 DF IE KE	AC145405	042098	.0317*	16	408	20	2	
AMRCGAMA13T	LESLGAXADS1	77 DF OG	AC201051	042098	.0329*	21	168	20	1	
ASTLGAMA94F	ATLNGAAD69F	77 DF IE	AC172457	042098	.0390*	21	120	20	1	
	ATLNGASS1ID	M- DF IR	AC159870	042098	.0503*	16	18	10	1	
ATLNGABU01T	ATLNGABU84C	77 AF OG	AC142635	042098	.4203*	10	192	20	9	
	ATLNGACS33A	77 AF OG	AC146532	042098	.1238*	21	235	20	2	
	ATLNGAEP01T	7- AF MT	AC197383	042098	.4181*	16	60	17	7	
	ATLNGAPP34A	77 AF OG	AC146262	042098	.0451*	21	252	20	4	
	CMNGGAMA88C	77 AF OG	AC187397	042098	.0376*	21	168	20	4	
	CNTNGAXADS0	77 AF OG	AC190581	042098	.1580*	21	240	20	4	
	CNTNGAXADS1	77 AF OG KE	AC192414	042098	.1551*	20	96	20	2	
	FAMTGAXA33A	MM AF OG	AC191961	042098	.0665*	21	48	20	11	
	FLBRGAMADS1	77 AF OG	AC188996	042098	.6267*	16	48	20	9	
	GSVLGAMA53C	77 AF OG	AC187401	042098	.3366*	20	168	20	2	
	MRTTGAEA97F	77 AF OG	AC121949	042098	.2072*	21	312	20	2	
	NRCRGAMA01T	77 AF MT	AC186580	042098	.2477*	16	336	19	9	
	SMYRGAMADS1	77 AF OG	AC174187	042098	.0663*	16	139	20	7	
	WNDRGAXADS0	77 AF OG	AC189212	042098	.1349*	20	360	20	7	
ATLNGACD28F	ATLNGABU01T	7- AF TO	AC106464	042098	.3583*	21	78	14	5	
ATLNGAEP01T	CRTNGAMA83C	77 AF OG	AC197436	042098	.0515*	21	48	20	1	
ATLNGAFP36F	ATLNGAGR24F	77 DF IE	AC123225	042098	.0348*	21	96	20	1	
ATLNGAPP34A	MRTTGAMA42G	77 DF IE KE	AC166380	042098	.0491*	22	96	20	4	
CDTWGAMA74C	ROMEGATL29A	7- DF IE	AC147999	042098	.0306*	21	130	20	1	
CLMBGAMT01T	CLMBGAMT64A	M- DF VR	AC130918	042098	.2110*	11	3	19	1	
CLMBGAMT12T	CLMBGAMT64A	7- DF TG	AC125494	042098	.0397*	16	384	20	11	
CMNGGAMA88C	ATLNGASS1ID	M- DF IR	AC162604	042098	.0351*	10	12	20	1	
	GSVLGAMA53C	77 DF IE	AC186954	042098	.0363*	20	72	20	1	
CVTNGAMT78C	NRCRGAMA01T	77 AF OG KE	AC186711	042098	.1029*	21	120	20	3	
DGVLGAMA94F	ATLNGAEP01T	7- AF TO	AC197615	042098	.3029*	21	72	20	3	
DLTHGAHS47C	NRCRGAMA01T	77 AF OG KE	AC186596	042098	.0463*	16	216	20	6	
DNWDGAMA67A	ATLNGASS1ID	M- DF IR	AC159838	042098	.0319*	10	24	20	1	
	NRCRGAMA01T	77 AF OG KE	AC186597	042098	.0362*	16	252	20	1	
LENXGAXA54A	TFTNGAMA38C	77 DF IE	AC200976	042098	.0694*	21	72	20	4	
MACNGAMT12T	MACNGAVN47C	77 AF OG	AC123796	042098	.0386*	21	192	19	1	
MACNGAMT74C	WRRBGAMA92C	77 DF IE	AC123798	042098	.0947*	21	264	20	2	
MACNGAMT75A	MACNGAMT12T	M- DF ES	AC171759	042098	.0732*	06	3	20	3	
	WRRBGAMA92C	77 DF IE	AC160181	042098	.0765*	22	216	20	4	
MRRWGAMA96F	ATLNGASS1ID	M- DF IR	AC159845	042098	.0395*	10	8	19	2	
MRTTGAEA97F	NRCRGAMA84A	77 DF IE	AC155622	042098	.0951*	21	144	20	2	
NRCRGAMA01T	NRCRGAMA84A	77 AF OG KE	AC186600	042098	.2558*	16	264	19	4	
NRCRGAMA84A	SNMTGALRDS1	77 DF IE KE	AC177287	042098	.0539*	21	120	20	4	
SMYRGAPF95C	WDSTGACR92E	77 DF IE KE	AC152316	042098	.0524*	10	192	20	8	
SVNHGABS23A	SVNHGADE35C	77 DF IE	AC172669	042098	.0536*	21	864	20	3	
SVNHGABS65A	SVNHGAGC96A	77 DF IE	AC161598	042098	.0769*	16	108	20	1	

LSVLKYAP30T	ZNTNKYXADS1	77 AF OG	AF143317	042098	.2596*	20	164	19	3
LSVLKYSMCG0	LSVLKY2677E	M- DF ES	AF134627	042098	.0303*	20	4	19	1
OWBOKYMADS0	RDCLKYXA03T	MM DF OG KE	AF128757	042098	.0364*	21	96	18	2
BTRGLAMA03T	BTRGLAOHDS0	77 AF OG	AF120758	042098	.0559*	21	907	20	2
CWVLLAMADS0	WNBOLAMADS0	77 DF IE	AF102433	042098	.0529*	21	48	20	1
HOUMLAMADS0	MTGTLAMADS0	77 DF IE	AF129331	042098	.0716*	20	288	20	1
KNNRLABRDS0	NWORLAMA0GT	M- DF IR	AF130764	042098	.1055*	15	12	19	1
LKCHLAUNDS0	LFYTLAMA0GT	M- DF DA CC	AF136763	042098	.0427*	08	18	20	1
NWORLAARCG0	NWORLAMA06T	77 AF OG	AF066450	042098	.2709*	21	228	17	4
SHPTLACLDS0	SHPTLAMADS0	M- DF ES	AF150884	042098	.0307*	23	3	20	1
IUKAMSESDS0	GNWDMSMA26T	M- DF IR	AF145472	042098	.0439*	09	4	20	1
NTCHMSMADS0	VDALLAMADS0	77 DF IE	AF148198	042098	.1039*	21	168	20	1
ADVNNCXBDS0	WNSLNCFI12T	77 DF OG	AC183526	042098	.0890*	21	264	20	3
CARYNCCE46G	RLGHNCHO01T	M- DF IR	AC192778	042098	.0945*	17	12	20	1
GNBONCEU05T	KINGNCXA98F	77 DF OG	AC193727	042098	.0338*	17	24	20	1
	RDVLNCMA34F	77 AF OG KE	AC181410	042098	.0492*	21	255	20	1
KGMTNCMA73F	CHRLNCCA05T	M- DF DA CC	AC188568	042098	.0311*	02	12	20	1
MEBNNCXA56F	WNSLNCFI74H	M- DF ES	AC177112	042098	.0591*	09	3	20	1
RFFNNCMA93F	GNBONCEU05T	M- DF IR G1	AC192829	042098	.1139*	09	3	20	1
WNSLNCCL76F	GNBONCEU33G	M- DF ES	AC163811	042098	.0361*	15	3	20	1
WNSLNCVI76F	GNBONCEU33G	M- DF ES	AC163815	042098	.0636*	07	7	20	1
FTWBFLXADS0	HLNVFLMADS1	77 DF IE	AC188974	042098	.1040*	21	168	20	2
FTWHFLXADS0	LKCYFLMADS0	77 DF IE	AC201110	042098	.0369*	19	72	20	2
GLBRFLMCDS0	PNSCFLBL32T	77 AF OG	AC160247	042098	.1848*	20	120	20	4
MCLNFLXADS1	JCVLFLCL05T	M- DF DA	AC196742	042098	.0355*	13	4	20	1
MLTNFLRADS0	PNSCFLBL32T	77 AF OG	AC167522	042098	.0415*	20	497	20	4
PNSCFLBL43E	PNSCFLWADS0	M- DF ES G1	AC202505	042098	.4279*	23	6	20	2
ARSNSCMA22F	STRRSCXA352	77 DF IE	AC168060	042098	.0491*	21	96	20	1
CHSNSCXADS0	SPBGSCMA60T	77 AF OG	AC192742	042098	.0413*	21	48	20	1
CHTNSCDT60T	HLWDSCXADS0	MM AF OG	AC191016	042098	.1618*	21	288	20	3
	SUVLSCMA87E	77 AF OG KE	AC122145	042098	.0885*	20	235	20	4
GNVLSCBE24E	GNVLSCDT60T	77 AF OG	AC154989	042098	.0578*	21	128	20	1
GNVLSCDT60T	SSVLSCXADS0	77 AF OG	AC165564	042098	.0790*	21	394	20	4
MNPLSCES88F	CHTNSCDT60T	M- DF IR G1	AC191906	042098	.0445*	10	5	20	1
SPBGSCMA60T	WDRFSCXADS0	77 AF OG	AC193327	042098	.0326*	20	24	20	2
BYBHFLMADS0	WPBHFLGADS0	77 DF IE KE	AC170299	042098	.0467*	17	12	19	1
	WPBHFLLE58E	77 DF IE	AC170291	042098	.0442*	05	12	20	2
FTLDFLMRDS0	FTLDFLPL13T	77 AF OG KE	AC196723	042098	.0846*	16	403	20	7
FTLDFLPL13T	HLWDFLPEDS0	77 AF OG KE	AC196731	042098	.0741*	21	144	17	1
	PMBHFLMADS0	77 AF OG KE	AC196736	042098	.0536*	16	192	19	3
JPTRFLMA74E	WPBHFLGRDS0	77 DF IE	AC160341	042098	.0319*	10	456	20	2
MIAMFLCADS0	NDADFLGG1ID	M- DF IR	AC158069	042098	.0431*	10	24	20	1
MIAMFLGRDS1	MIAMFLRR1GT	77 AF OG KE	AC182648	042098	.0955*	16	480	17	1
MIAMFLRR1GT	MIAMFLSO59E	77 AF OG	AC182605	042098	.0420*	21	144	19	1
WPBHFLGADS0	WPBHFLHHDS0	77 DF IE	AC157424	042098	.0349*	20	1200	20	4
ADVLTNXA71T	SLMRTNMTDS0	77 DF OG	AF101200	042098	.0650*	20	96	20	2
	SVNHTNMTDS0	77 DF OG	AF123107	042098	.0574*	21	168	20	4
CHTGTNNS90T	OLTWTNXADS1	77 AF OG KE	AF146253	042098	.1547*	20	96	19	3
CLDGTNMADS1	NWTZTNXADS0	77 DF IE	AF139094	042098	.2380*	20	120	19	9
CMDNTNMADS0	PARSTNMADS1	77 DF IE	AF139030	042098	.0304*	19	48	20	1
CNCRTNXADS2	KNVLTNMA90T	77 DF OG KE	AF136673	042098	.1217*	20	888	18	2
DKSNTNMTDS0	NWJHTNXARS5	77 DF OG KE	AF141812	042098	.0350*	16	96	20	1
JFCYTNMADS1	MRTWTNMADS0	77 DF IE KE	AF144066	042098	.0462*	19	264	20	3
LBNNTNMADS0	MTJLTNXADS2	77 DF IE KE	AF135894	042098	.0378*	20	240	10	1
LVRGTNXADS2	NSVLTNMT7GT	77 DF OG KE	AF135806	042098	.0506*	20	502	20	2
MTJLTNXADS2	NSVLTNMT7GT	77 AF OG KE	AF135896	042098	.1060*	20	646	18	1
NSVLTNMT7GT	NSVLTNWCDS0	77 AF OG KE	AF148034	042098	.0480*	20	333	17	1

* EXCEEDS THRESHOLD OF 3%

CLEC TRUNK GROUP SERVICE REPORT SUMMARY

CLEC TRUNK GROUP SERVICE REPORT SUMMARY

MONTH: 04 98 PROCESS DATE: 05/04/98

BST ORDERED

	AL	GA	KY	LA	MS	NC	NF	SC	SF	TN	T
TOTAL TRUNK GROUPS:	13	27	8	6	1	9	17	4	16	14	
TRK GRPS MEAS/PROC:	13	25	8	6	1	9	15	4	16	14	
PCT_MP	100.0	92.6	100.0	100.0	100.0	100.0	88.2	100.0	100.0	100.0	
TOT GRPS > 3% NC THIS REPORT:	1	2	1	0	0	0	1	0	1	2	
PCT1	7.7	8.0	12.5	.0	.0	.0	6.7	.0	6.3	14.3	
TOT GRPS > 3% NC 3 CONSEC MON:	0	1	0	0	0	0	0	0	0	0	
PCT3	.0	4.0	.0	.0	.0	.0	.0	.0	.0	.0	
TOT GRPS > 1% NC 3 CONSEC MON:	1	1	0	0	0	0	1	0	0	0	
PCTD	7.7	4.0	.0	.0	.0	.0	6.7	.0	.0	.0	
DATA_NA	0	2	0	0	0	0	2	0	0	0	
PCT_NA	.0	7.4	.0	.0	.0	.0	11.8	.0	.0	.0	

CLEC ORDERED

	AL	GA	KY	LA	MS	NC	NF	SC	SF	TN	TO
TOTAL TRUNK GROUPS:	54	121	25	32	8	86	37	19	57	78	
TRK GRPS MEAS/PROC:	52	106	25	31	8	80	27	19	57	75	
PCT_MP	96.3	87.6	100.0	96.9	100.0	93.0	73.0	100.0	100.0	96.2	9
TOT GRPS > 3% NC THIS REPORT:	3	2	0	1	0	2	1	2	7	0	
PCT1	5.8	1.9	.0	3.2	.0	2.5	3.7	10.5	12.3	.0	
DATA_NA	2	15	0	1	0	6	10	0	0	3	
PCT_NA	3.7	12.4	.0	3.1	.0	7.0	27.0	.0	.0	3.8	

TOTAL

	AL	GA	KY	LA	MS	NC	NF	SC	SF	TN	TO
TOTAL TRUNK GROUPS:	67	148	33	38	9	95	54	23	73	92	
TRK GRPS MEAS/PROC:	65	131	33	37	9	89	42	23	73	89	
PCT_MP	97.0	88.5	100.0	97.4	100.0	93.7	77.8	100.0	100.0	96.7	9
TOT GRPS > 3% NC THIS REPORT:	4	4	1	1	0	2	2	2	8	2	
PCT1	6.2	3.1	3.0	2.7	.0	2.2	4.8	8.7	11.0	2.2	
DATA_NA	2	17	0	1	0	6	12	0	0	3	
PCT_NA	3.0	11.5	.0	2.6	.0	6.3	22.2	.0	.0	3.3	

Marketing & Sales Support Systems

Pre-Ordering & Ordering Functions

CLEC developed Marketing & Sales Support System

BellSouth provided CLEC gateways: LENS-CGI, EDI, and EC-LITE

Marketing & Sales Support Systems DOE, SONGS and RNS

Pre-Ordering Systems

- RSAG Address Validation
- ATLAS Telephone Numbers
- PSIMS / COFFI Features & Services
- DSAP Installation Calendar
- CRIS Customer Records

LEO → LESOG → SOCS → Service Order

Exhibit _____

Docket No. 980281-TP

DEPOSITION OF WILLIAM STACY

PART I

FLORIDA PUBLIC SERVICE COMMISSION
DOCKET NO. 980281-TP EXHIBIT NO 10
COMPANY/ WITNESS: Stacy
DATE: 8-5-98

ORIGINAL

FLORIDA PUBLIC SERVICE COMMISSION

RECEIVED
JUL 27 1998
Hopping, Green, Sams & Smith

In re: Complaint of MCImetro Access Transmission Services, Inc. against BellSouth Telecommunications, Inc. for Breach of Approved Interconnect Agreement	)	DOCKET NO. 980281-TP

Deposition of **W. N. STACY**, taken by MCImetro Access Transmission Services, Inc., pursuant to notice and agreement of counsel, before R. L. Shelnutt, Certified Shorthand Reporter and Notary Public, at 675 West Peachtree Street, N.E., Atlanta, Georgia, on the 22nd day of July, 1998, commencing at approximately 9:55 a.m.

C O N T E N T S

Page

CROSS-EXAMINATION
[By Mr. O'Roark] 3

E X H I B I T S

Exhibit No. Page

[No Exhibits Marked]

APPEARANCES OF COUNSEL:

For MCImetro Access Transmission Services Inc.:

DULANEY L. O'ROARK III, Esq.
MCI Telecommunications Corporation
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Atlanta, Georgia 30346

For BellSouth Telecommunications, Inc.:

J. PHILLIP CARVER, Esq.
BellSouth Telecommunications, Inc.
675 West Peachtree Street, Suite 4300
Atlanta, Georgia 30375-0001

Also Present [via telephone]:

Ms. Beth Keating
Mr. Wayne Stavanja
Mr. Brian Musselwhite

- - - - - -

MR. CARVER: This will be deposition of William N. Stacy, taken under the rules of the Florida Public Service Commission.

W. N. STACY,

having been first duly sworn, was examined and deposed as follows:

CROSS-EXAMINATION

Q. [By Mr. O'Roark] Mr. Stacy, I assume you have been deposed a few times before?

A. Yes, sir.

Q. And you are familiar with the basic ground rules. If I ask you a question that is unclear in any way, please let me know and I will do

my best to clarify the question for you.

A. Kay.

Q. Do you have your testimony with you?

A. Yes, I do.

Q. Why don't we get started with Count 1 and let me direct you to page three of your testimony.

A. Of the direct?

Q. Your direct testimony, yes.

Under issue one, the first question there has BellSouth provided MCImetro the necessary information relevant to its OSS. I just want to make clear that your response here refers to information on OSS that BellSouth provides to MCImetro?

A. Yes, that is correct.

Q. And then a similar question for the following Q and A at the very bottom of page three. That refers to training concerning OSS that BellSouth provides to MCI and other CLECs, is that right?

A. Yes, that is correct.

Q. Turning to page four, let me direct you to the middle of the page, the question starting, please list the types of information provided directly to ALECs including MCImetro. The manuals

that you refer to in your answer also concern OSS that BellSouth provides to MCI and other CLECs?

A. The manuals and the technical specifications both refer to OSS information -- well, excuse me, as do the business rules and the training, so there are -- all of those documents apply to MCImetro and other CLECs or ALECs.

Q. Is that true also for the information from joint implementation team activities?

A. That is specific to individual carriers with whom we have formed joint implementation teams. There is such a team with MCImetro, but there are not such teams with every carrier.

Q. Then with respect to MCImetro, the information that you provided would concern the OSS that BellSouth has provided to MCImetro?

A. Yes.

Q. Turning to the following page, page five, you were asked about other opportunities that MCImetro has had to learn about BellSouth's OSS. Isn't it true that the only time BellSouth discloses information about the OSS it provides itself is when it's required to do so by Public Service Commissions?

A. Clarify that, please. I'm not following

your question exactly.

Q. All my prior questions have been directed toward information that BellSouth provides to MCI or other ALECs concerning the OSS that BellSouth provides to the ALECs as opposed to specifically the OSS that BellSouth itself has. You would agree there are differences between say RNS and LENS?

A. Yes, I agree with that.

Q. Okay. That's the distinction I'm driving at, the OSS that BellSouth has available to itself and that which it has provided to other ALECs.

A. That is partially true but not completely accurate. Let me explain that just a little bit. The Telecommunications Act and the FCC's order require us to provide access to functions of OSS, and for those particular functions such as preordering and ordering, some knowledge of the OSS that is supplying the function or receiving the information is necessary and has been passed along to the CLECs.

For example, one of the OSS's that BellSouth uses and that we provide functional access to for the CLECs is SOCS which is our order generator. That's SOCS. That system contains a set of edits called business rules that are applicable

to both BellSouth and the CLECs and those edits which are a part of SOCS have been provided to the CLECs, so in certain cases that information has been provided, but in general to follow the tone of your question, BellSouth has not disclosed the scope or the functionality of its internal OSS to MCI, believing that that's appropriate for a commission to have access to if they so choose and to make a judgment about.

Q. When did BellSouth display RNS and DOE for the first time to ALECs? Was that in Florida?

A. I may have the dates wrong or I will not try for the dates. I do not believe it was in Florida. I believe actually the first display of RNS and DOE to the ALECs came either in North Carolina or in Alabama and then following that in Florida.

Q. Any other places where BellSouth has displayed RNS and DOE?

A. Let's see. We have now done that for -- you said to the ALECs, not to the commission staff?

Q. Correct.

A. Florida, North Carolina, Alabama, Tennessee.

Q. When did you do it in Tennessee?

A. There were two two-day workshops or a two-day workshop on OSS in Tennessee maybe in March or April. I've forgotten.

Q. Yes, I recall that.

A. I believe those are all the states but that may not be all inclusive.

Q. In each of those cases, BellSouth gave a demonstration and there was a limited period for questions?

A. No. In each of those cases BellSouth gave a demonstration and in the case specifically of Tennessee and Florida, there was a lengthy period for questions and answers about that. The Tennessee sessions went on for the better part of two days.

Q. I understand that, but the demonstration itself lasted about an hour, didn't it, in Tennessee?

A. That sounds right but, you know, there was no restraint on the questions that could be asked.

Q. And in Florida how long did the demonstration last?

A. None of us -- none of my people were present at the demonstration in Florida. That was conducted by the staff with BellSouth

representatives, so I don't know how long it lasted.

Q. Would you agree with me that cross-examination at a hearing is not the best way to learn the capabilities of an electronic ordering system?

A. I'd agree with you that it's the way that has been set out in the Act and the order to do that. We're ordered to provide functionality to the CLECs. We're not ordered to provide them the same systems. That judgment is for the Commission to make, not for MCI to make, about what they need.

Q. Maybe my question wasn't as clear as it should have been. I was really getting at how good a way is cross-examination at a hearing is to get at the information. Let me try again.

Would you agree with me that cross-examination at a PSC hearing is not the best way to learn about the capabilities of an electronic ordering system?

A. I would agree with you that it's probably not. I would expect that the best way is to do a long series of background research such as the Florida research staff is now conducting to enable them to make their judgment.

Q. And that's research that the ALECs have

not been allowed to do, is that right?

A. To my knowledge, that's true. The Commission has been allowed to do it, the ALECs have not been invited nor should they be invited to do it. Again, it derives from a mistaken assumption on MCI's part that they get to judge what's parity. That's the Commission's job to judge what's parity, not yours.

Q. Would you agree with me that after the Florida demonstration that ALECs learned more about RNS and DOE than they had learned before?

A. Yes.

Q. And that as a result of that they asked for additional functionality in the OSS BellSouth provides to them?

A. Probably true.

Q. You wouldn't contend, would you, that ALECs have learned all there is to learn about the capabilities of BellSouth's OSS, would you?

A. No.

Q. Let's talk a little bit about -- let's go to your rebuttal testimony before we move into the next subject.

A. Okay.

Q. Looking at page three --

A. Yes.

Q. -- starting at line five, you say, because BellSouth's systems contain proprietary information such as marketing and sales information, and I won't continue on with the sentence because what I want to highlight is the proprietary information statement there.

You are aware that MCI would be willing to enter into a proprietary or a protective order concerning this information, aren't you?

A. Generally, but we've never been officially approached with that to the best of my knowledge.

Q. And then from the Q and A at the bottom of page three, I understand that it's BellSouth's position that the better way to address parity is through performance measures?

A. Yes.

Q. Is it your testimony that BellSouth has no duty to disclose information to ALECs about the OSS that BellSouth uses to provide services to its own customers?

A. It's my testimony that BellSouth has a duty to disclose that information to the Commission so that the Commission can then make its proper

findings, and if they chose to order us to disclose it to the ALECs they could do so, but so far no Commission has done that, and that we're not required because of the intellectual property involved to disclose that directly to the ALECs.

Q. So whatever duty there is would arise only by a Commission order?

A. Yes.

Q. And is it your testimony then that performance measures provide the exclusive means of determining whether BellSouth is providing nondiscriminatory access to OSS?

A. No, it's not, and I did not mean to imply that in that answer. It's a way of addressing the issue of parity. The Commission has the resources at their disposal to go as far underneath the performance measurements as they care to go in terms of the functionality and performance of the systems, but that's the public level, if you will, that allows that judgment.

Q. If performance measures do reveal a disparity hypothetically --

A. Yes.

Q. -- is it your testimony that BellSouth would have no duty to disclose information about the

OSS system in question that BellSouth uses for its own customers?

The hypothetical is that performance measures reveal a disparity in the service and under those circumstances would BellSouth have a duty to disclose information about its systems that are causing disparity?

A. Again, I believe our duty is to disclose that information as required by the Commission, not to disclose it to the ALECs.

Q. And so if BellSouth recommended a solution to that hypothetical disparity, MCI would have no way of knowing whether the proposed solution would provide parity of service?

A. They would know from the results but, again, that's the duty of the Commission is to judge parity, not MCI's.

Q. But if MCI is concerned about a disparity in the service and wants to do something about it, it's your testimony that they only find out whether this proposed solution works after the fact?

A. No, that is not true at all. Let me back up because I'm saying that wrong.

There are two mechanisms that work in here. You are talking about one now where something

is -- a hypothetical is identified and the proposed solution to it involves some intellectual property. In that case they find out about it after the fact because that's the fact that it is intellectual property and we're going to keep that proprietary. However, the entire reason that the CLEC change control process was put in place was to allow the CLECs to proactively come to BellSouth and say, we need different functionality or we need to change this functionality or we need to modify this, and to proactively take a role as customers in telling BellSouth what functionality they wanted for their business requirements. So there are actually two methods for MCI to come in there. One is through the Commission if it involves proprietary information and the other one is through the change control process.

Q. Either way though, if there is a disparity in the service, MCI is relying on BellSouth to determine the cause of the disparity, isn't that right?

A. No, not either way. Let me take the second case because it's a little more clear. Let's suppose that MCI came to BellSouth and said -- let me use AT&T for an example because I have a specific

one, came to BellSouth as they did in Georgia and said, we believe you need to provide a due date calculation function, that is also an MCI issue but it was specifically addressed by AT&T.

We believed at the time that the -- that we provided all data to calculate that function and that the methodology for doing that --

MR. CARVER: Off the record.

[A discussion was had off the record.]

THE WITNESS: To go back to my example, they asked us for a specific function that said we want you to calculate the due date for us given certain information. The functionality that they asked for did not require any knowledge of what BellSouth did internally or how BellSouth does it internally, so that the methodology for doing that is now an open subject for discussion in the change control meetings, and yet it came from a feeling that -- an original contention that there was disparity.

When we got through the issue, the contention was not disparity, it was lack of functionality which is not exactly the same thing, so now the CLECs are telling us through the change control process we want this to work, we don't care

how you do it, we want this to work this way for the CLECs.

Q. So in some cases ALECs may know what they want and ask you for it and the change management process is in place to deal with that.

Would you7 agree with me that there would be other situations where there is a disparity say in provisioning in which the ALECs may simply have to rely on BellSouth to get to the root cause of the disparity?

A. Yes, and that is why we have the arbitrations and the hearings is to judge -- I guess the other way to put that, is to judge how far into our business the CLECs are entitled to go to obtain nondiscriminatory access.

Q. Which hearings are you referring to, the 271?

A. The 271 hearings, these complaint cases and the arbitration cases that preceded them.

Q. Let me ask you just a few questions about performance measures since you are relying on those as part of your testimony.

Are you familiar with BellSouth's service quality measurements proposal?

A. Very.

Q. That's what we call a foundational question.

Does BellSouth's proposal include any benchmarks?

A. BellSouth's proposal does not include benchmarks. It includes comparison to retail analogs where they exist in approximately 85 percent of the measures, so for instance in OSS, one of the clearest analogs that exists and that happens to be in the first couple of measurements is preordering system response time. There are results presented for how long it takes the CLECs to do functions and results presented for how long it takes BellSouth to do similar functions.

Q. But no benchmarks?

A. Well, the benchmark there, if you want to call it that, is the legal test of substantially the same time and manner that the FCC has put out, so in that case we don't call them benchmarks, but the legal test does exist that the FCC has laid out.

Q. Does the service quality measurement proposal include any self-executing monetary remedies?

A. It does not. The state Commissions have not ordered them except in the case of Georgia and

they specifically ordered or commended in their performance measurement order that they had the authority to execute any penalties themselves. That in general is how it rests in each of our states.

Q. Is BellSouth willing to agree to any self-executing monetary remedies for a violation of a performance standard?

A. We're not. We believe that's a Commission enforcement item and it's their authority.

Q. So again, BellSouth has not voluntarily agreed to performance standards in the region or in Florida rather?

A. To penalties you mean? I'm sorry.

Q. I'm sorry. My question is not clear.

BellSouth has not voluntarily agreed to performance standards in Florida, has it?

A. To -- I'm confusing this with benchmarks.

Q. Is benchmarks more clear to you than performance standards?

A. No. If you are using them interchangeably, I'm okay.

MR. CARVER: I'm a little confused, too, because you threw penalties in there somewhere also, so I think we have three terms floating around.

MR. O'ROARK: I think penalties and standards are -- I think Mr. Stacy and I understood each other on that.

Q. [By Mr. O'Roark] Let's go back to the benchmark term.

A. BellSouth --

Q. Let me ask you this. Is there a difference between standards and benchmarks in your mind, just so we're communicating?

A. In general, I use the two terms synonymously and I wanted to make sure that is what you were doing because we went past penalties on the way to get there.

Q. Fair enough; fair enough. I'm glad you pointed that out.

BellSouth has not agreed to benchmarks or standards in Florida, has it?

A. We have not. We have asked that the Commission use its judgment in the terms set out by the FCC to make the three appropriate judgments, that we all know substantially the same time and manner, where there's a retail analog efficient competitor or a meaningful opportunity to compete, where there's not a retail analog and interconnection equal in quality for

interconnection, and those three tests are set out in the orders.

Q. And that is BellSouth's position?

A. That is our position region wide.

Q. Excuse me a moment as I find a copy of the complaint. Do you have a copy of that, Mr. Stacy?

A. Of the complaint itself? I believe I do. Just a second. Yes, I do.

Q. Let me refer you to page seven, specifically paragraph 18.

A. Yes.

Q. That's a paragraph where MCI sets out what it is requesting in Count 1. Let me walk through that with you briefly.

Under subpart one MCI is requesting a detail listing of all OSS systems that BellSouth uses. Can you tell me how many systems BellSouth does use for its OSS?

A. Over 400.

Q. And how are you defining systems?

A. Those are individual -- either individual computer platforms or distinct applications.

Q. Does BellSouth have a list of those somewhere?

A. We do not maintain a list of them per se.

Q. You would be able to put that together, though, I gather fairly quickly?

A. It depends on the detail.

Q. Just as far as the names of the systems?

A. To some extent, yes.

Q. And then looking at item two, it talks about the technical specifications for the systems including but not limited to information explaining what functions the systems perform, how the system performs those functions and what databases and other systems it interacts with. Let's just focus on the including but not limited to part.

I take it that it would be possible with those systems to list what functions they perform?

A. It certainly is possible. We're talking to answer -- to respond to that particular request from MCI, we're talking about hundreds of thousands of pages of documentation.

Q. Even to give a general summary of what each system does?

A. No, not to give a general summary, but to perform that -- what databases and other systems it interacts with, whether an interface can be built to the system.

Q. Let's take them one at a time just so we can understand where BellSouth' concerns are.

A. All right.

Q. What functions the system performs.

A. All right. Let me just give you an example there.

Q. Okay?

A. You've seen the functional list to some extent for one of the several functions that SOCS performs which is the SOR edits. That list is 2700 pages long. The service order generation list is probably ten times that long listing the functions that SOCS performs.

Now, if we're talking about at the level SOCS generates service orders that's one thing, but the detailed specification that was asked for is literally hundreds of thousands of pages.

Q. Would it be possible in a paragraph or so to describe generally what -- a paragraph for each system to describe what the system does?

A. In some cases. In some cases it would be considerably more lengthy than that and all of the pertinent systems have already been described.

Again, you have to remember this is where we differ. We're working from the FCC's order that

said the CLECs have access on a bundle basis to five functions. The systems and descriptions of the systems that go with those functions have been in the public record since our South Carolina filing in great detail.

Now, perhaps MCImetro hasn't taken advantage of them but the book that we prepared that went as the Department of Justice book with the first filing takes -- does exactly what has been asked for here at a high level.

Q. Let me make sure that we're communicating. Have you done that for each of your 400 systems?

A. For each of the systems that were involved in the functions, in the five functions. We did not do that for marketing support systems, for instance.

Q. And that goes to my next question because what we're talking about is OSS systems, you say there are 400 of them. How many of them relate to the five functions we're talking about?

A. Sixty or seventy.

Q. And then the ones that don't, how is it they're classified as OSS systems but yet they don't related to the five traditional functions that the

SEC has enumerated?

A. Primarily because they support marketing or functions that have nothing to do with those -- with the five specific FCC functions.

Q. Can you give me an example? I'm not asking you for proprietary information.

A. No, it's not proprietary. There's several listed in that book. For instance, RNS has access to a marketing support system and the acronym is GIMI, G I M I. It's something marketing inventory.

It's function in life is to retain marketing data about consumer customers and to make it available for certain marketing decisions. It has nothing do with the preordering and ordering of consumer services, it is solely a marketing function.

Q. But you would still consider that an OSS system?

A. Yes. Now, that may be -- maybe part of our difference here is in the definition of OSS.

Q. That's what I'm probing.

You define OSS more broadly than the FCC does it sounds like.

A. We interpreted your request as all OSS

systems that BellSouth uses in the broadest sense.

Q. And the 60 or 70 relate to the five functions you have listed and summarized in materials that you have made available publicly?

A. Yes. The most comprehensive guide to that is a document that we published originally for the Department of Justice in the South Carolina -- but it's actually included as part of the South Carolina filing.

It's called -- I'll have to get the name of the document for you, that is one that I did not bring downstairs because we were going in a different direction, but it basically describes the BellSouth processes for preordering and ordering and provisioning maintenance and repair and the systems that those processes interact with in summary level detail all the way through the process until the service is done.

There's additional material that has just been published that reiterates that in the attachments to my FCC affidavit for the Louisiana filing. There are attachments from each of the chief information officers for the various segments that describe that same flow through the systems for their segment and they all become common at a point

down in the system, so maybe we've been talking past each other on this by saying all.

Q. Well, that is why depositions can actually be useful sometimes.

Let me ask you about number three which asks for a detailed listing of each of the databases that are used by BellSouth's OSS systems. How many databases do you have that you use in your OSS?

A. There are also hundreds of databases.

Q. More than a thousand?

A. Yes.

Q. More than 5,000?

A. I don't know.

Q. Probably somewhere between a thousand and 5,000?

A. I'm guessing.

Q. Do you know how many of those are used in connection with the five traditional OSS functions?

A. I have never looked at that in terms of the database list. It's at least several hundred.

Q. Is it fair to say that BellSouth has -- uses more databases in connection with those five functions for its own customers than it provides to ALECs?

The question wasn't beautifully phrased.

I can try again if you like.

A. No, I can try that. I think I understand where you are going.

BellSouth uses a number of databases to manage ordering and provisioning of service and maintenance of service that it does not provide direct access to the ALECs believing that that was not what the FCC ordered. And let me give you an example just to make that clear.

There is a database that all of the CLECs, all of ALECs in BellSouth are familiar with called TIRKS, the trunk integrated record keeping system. It is used as a part of the provisioning process for certain resold designed services and for trunks. There is an ordering method to place orders for that, the system is called EXACT that we all use, and that particular system for inputting orders and receiving information has not been challenged in any of the hearings certainly in many months, nor has access to that database been requested. Everyone understands that the functional process is placing an order and getting order information, not having access to that database itself.

Q. Would you agree with me, though, that if ALECs don't know of the existence of a database it's

impossible for them to know whether they might need access to it?

A. No. Again, that to me is the Commission's judgment. We have outlined the processes, we have gone through the processes from the functional requirements that the FCC started from and we're attempting to meet those functional requirements, not to let the CLECs into running our business for us.

Q. Have you made a list of the databases used for the five traditional functions and published it the way you did for the 400 systems -- excuse me, for the 16 systems?

A. As a part of that same listing, the databases were incorporated by reference. For instance, TIRKS is referred to and explained in that DOJ document.

Q. So all of the 1,000 to 5,000 databases are explained?

A. I can't say all them are explained. It is what we call at a 10,000 foot level of detail. It did not take the databases apart. It said we retained this kind of data here.

Q. So as we sit here today, to the best of your knowledge, there are databases that BellSouth

uses in its own business to serve the five traditional OSS functions, the existence of which it has not disclosed publicly?

A. To the best of my knowledge, that is correct.

Q. Is it common with a database to have a database layout that kind of shows a typical record within the database?

A. It depends on the age of the database. The older it is the less common it is.

Q. For a more recent database, it would be a fairly simple matter typically to provide say one record to explain what one would expect to find in the database?

A. No. It would be typical for a more modern database to provide a thing called a SCHEMA that explains how the fields are used, not a record, but for a more modern database that's true.

Q. Just for the record, what is a database layout?

A. In your terms?

Q. Well, if there is a better --

A. A database SCHEMA is what we refer to them as. It's a listing --

Q. Excuse me. That's what you understood us

to be asking for?

A. Yes. That is what we understood your question for a layout to be.

Q. And can you give us a thumbnail sketch of what a SCHEMA is?

A. It is a listing of the fields of the database, what the possible -- a description of them and what the possible contents are. It's roughly your question four, a database layout with the characteristics of the field.

Q. Let's talk about preordering interfaces for a few minutes.

A. Okay.

Q. We'll talk about EC-Lite, LENS and then LENS enhanced by CGI.

A. All right.

Q. Let's start with EC-Lite. BellSouth developed EC-Lite at the request of AT&T, is that right?

A. Actually at the request of AT&T with an order from the Georgia Public Service Commission. It was jointly.

Q. I'm not really referring to a specific page right now.

A. Okay.

Q. BellSouth made a contract with AT&T to provide the EC-Lite interface?

A. Yes.

Q. AT&T is the only ALEC that uses that interface?

A. Currently, that's correct.

Q. Is there anyone else that's developing to it?

A. To the best of my knowledge no one is. AT&T has declared on a number of occasions that the specifications for it were publicly available, but to the best of my knowledge no one has taken them up on that offer.

Q. EC-Lite is not an industry standard interface, is it?

A. It is not.

Q. And there's no immediate prospect that it will become one?

A. No. In fact, it's more likely that it will not become an industry standard.

Q. That's because it has already been rejected?

A. Yes.

Q. And realistically, it would require an ALEC like MCI several months to implement EC-Lite,

is that fair?

A. I don't know. Now that the development work and the maps are done, we've not tried to estimate a development time. A few months would probably be more correct than several, but not immediately. It's not a year long project. It's probably not a one-month project either.

Q. Somewhere between a month and a year?

A. Yes.

Q. Would you agree with me it would probably cost hundreds of thousands of dollars to implement?

A. Again, I just don't have an order of magnitude on that. It depends on the skills of the CLECs' development department. All the information is already available so there's no back and forth on what does this do or how does it do this, and there's a working interface to copy. In general, that cuts the development time and money down significantly, just no one has done it.

Q. Let's talk about LENS. LENS is proprietary and nonstandard, is that right?

A. Yes, both of those correct.

I'm sorry, let me correct that. LENS is not proprietary in the sense that BellSouth withholds rights to use it or does not provide

information about it to people. It is proprietary in the sense that it is BellSouth's developed interface where no national standard exists and so therefore it is nonstandard.

Q. And LENS is the preordering system that was in place back in November of 1997 when Florida issued its 271 order?

A. Yes, that's correct.

Q. And it's also the system that was in place when the FCC issued its South Carolina order in December of 1997 and its Louisiana order I believe in January of 1998?

A. I will take you on the dates, but, yes, it is the same system.

Q. Do you recall testifying in the 271 case in Tennessee in May of this year?

A. Yes.

Q. Let me ask you -- let me refer you to page 181 of the transcript from May 8th and I'm looking at the first question and answer on the page. I will just refer you to that, I'm not going to ask you to read it.

MR. CARVER: May I take a look at it?

MR. O'ROARK: Sure.

MR. CARVER: What page?

MR. O'ROARK: 181, the first Q and A.

Q. [By Mr. O'Roark] Actually you might want to read the rest of the page, Mr. Stacy, just to take it in context.

A. All right.

Q. Have you had a chance to read it?

A. Yes.

Q. And it's your testimony that BellSouth relies on EC-Lite and LENS enhanced by CGI to show nondiscriminatory access to preordering?

A. That's correct.

Q. And so BellSouth's position is that LENS by itself not enhanced by CGI does not provide nondiscriminatory access to preordering as BellSouth understands the FCC's South Carolina and Louisiana rulings?

A. If you take that entire statement, that's correct. We believe it provides nondiscriminatory access but the FCC made it clear that in addition machine to machine access they believed was required and without the CGI interface LENS does not meet that expectation. With the CGI interface, it does.

Q. Let's talk CGI. CGI stands for common graphical interface?

A. Common gateway interface.

Q. It's based on an HTML script?
A. Yes, it is.
Q. Is that different than screen scraping?
A. Yes, it is.
Q. Did you explain how, please?
A. It will be a fairly technical explanation but let me try. The screen scraping application that some of the CLECs have referred to and in fact the FCC referred to is a misinterpretation of what HTML is and does.

In screen scraping, typically data is delivered to the video memory of a computer where you could actually look at it on the screen and it's formatted as if it goes on the screen, so HTML is taken and processed and put in video memory, and then there is a tool called a screen scraper that extracts information off of that screen out of the video memory and does something with it.

The common gateway interface is different in that the software never goes to video memory, never is put in screen format, even though those commands may exist, but is simply read by the other computer, the screen commands -- the commands that would have caused screen formatting are discarded and the data is provided directly to the second

computer, so there is a detail but a significant technical difference between the two methods.

Q. Just to help us to communicate, let me ask you to refer to Exhibit WNS 19 which is a letter dated March 23rd, 1998 from Cliff Bowers to Brian Green.

A. Yes.

Q. In looking at the bullet points, the first bullet point asks which screen scraper will MCI be using for CGI?

A. Right.

Q. I saw that and was aware that you consider there to be a difference between CGI and screen scraping, and I wonder if you could -- perhaps Mr. Bowers doesn't understand CGI as well as you do.

A. I think it's clear he doesn't understand it at all. Let me just comment on that and I'll finish it.

Q. Okay.

A. This was in response to an MCI letter which spelled out several points having to do with common gateway and our marketing guy, Cliff, used MCI's language in responding which is simply not technically accurate. It's descriptive but it's

just not technically accurate.

Q. CGI has the same functional limitations as LENS, doesn't it?

A. Yes, it does.

Q. And so, for example, if you can only reserve six numbers at a time in LENS you can only reserve six numbers at a time in CGI?

A. That's right. The functionality is exactly the same.

Q. When was the first up-to-date CGI specification provided to MCI? I know there's been some dispute on that.

A. The first specification that we considered up-to-date was provided in June of '97. It's been updated a number of times since then.

Q. My understanding of your testimony in Tennessee was that you agreed that the June specifications were out of date when they were provided. Is that not your understanding today? I don't have --

A. No, that's correct. The June specifications were -- that's true, I'm sorry. The June specifications were out of date by the time they were provided but they were sufficient to begin development with. I misunderstood your up-to-date.

There have been a number of software releases changing LENS since its original release in April of '97. Following in line with each one of those releases, CGI changes have been released, so at any moment in time there is functionality being added to LENS and functionality being added to CGI. I believe what we agreed in Georgia may have been that the first time those two synced up properly was in December but I don't think we ever resolved that dispute.

Q. Would you agree that the first time they synced up was December 15 of 1997?

A. No. I believe the information that's been there to allow MCI to begin developing CGI if they chose to do so has been there since June of '97. Now, it has been updated a number of times since then as changes occurred in LENS.

Q. And you are aware that MCI requested this CGI specifically so it could process CSR data?

A. Yes.

Q. The specifications that were provided lacked a data dictionary, is that correct?

A. The specifications that were provided lacked a data dictionary. We then provided a data dictionary at MCI's request. MCI returned and asked

for a data dictionary for the CSR. We've told them that that is not required to parse and implement the CSR and that we're not going to furnish that.

Q. And the specifications also lack a design layout record for CSRs, is that right?

A. I'm not familiar -- that term in the data dictionary for CSRs are more or less synonymous, but accepting that they're synonymous, that functionality for the CSR has not been provided.

Q. Perhaps I've used the term incorrectly. It was my understanding that they were not synonymous although I don't hold myself out as holding any expertise in the area.

Your understanding is that a data dictionary and a design layout record are the same thing for CSRs?

A. For CSRs.

Q. I see. You are saying the data dictionary for CSRs and the design record layout for CSRs would be basically the same thing?

A. They would be basically the same thing.

Q. So BellSouth has provided neither?

A. Right, that's correct, nor do we believe they're required.

Q. And the reason you believe they're not

required is you believe the CSR data can be parsed without them?

A. Yes.

Q. Let me refer you to the Georgia OSS order. Do you have a copy in your materials there?

A. I do not.

Q. With Mr. Carver's permission I will walk around and look over your shoulder on this because this is my only copy.

I'm directing you to page nine, the first full paragraph, and let me just ask you to take a look at that.

A. Yes.

Q. In fact, Mr. Stacy, if you wouldn't mind, I won't ask you to do this much today but since we have folks listening on who can't see this, would you mind reading that please?

A. All right. Just a second.

Q. Sure. Take a look at it in context if you need to.

A. All right. This is in the discussion of the items in the section titled discussion of the items that BellSouth challenged, and says, further, the LENS CGI specification does not have all of the required information to enable a CLEC to perform the

necessary development effort for integration and BellSouth has not kept that specification current, and it refers to the transcript. In addition, BellSouth's LENS CGI specification requires the use of an underlying hypertext markup language, HTML presentation as part of the data delivery mechanism and this forces CLECs into a slower, less efficient integration than is available to BellSouth for its comparable retail operations.

Q. Can I refer you to footnote 18 which kind of trails along and ask you to read that also, please.

A. Footnote 18 says HTML presentation forces CLEC to proceed through each of the LENS presentation screens rather than being able to use the data independently of the screens as the initial CGI proposal would have allowed. That comes from the AT&T brief in this docket at nine.

Q. Thank you, Mr. Stacy.

Let's take a look at that if we can. I take it you simply disagree with the first sentence of the paragraph concerning the CGI not having all the requested information?

A. Yes.

Q. And the second sentence concerning the

use of HTML, do you agree with that statement?

A. I do not.

Q. Can you explain why you disagree with it, please?

A. There is nothing inherently slower or less efficient in using HTML to deliver a machine-to-machine interface than in many other software methods.

There are now about to be three methods for delivering that -- four methods for delivering that same information. The HTML CGI method, the methodology that EC-Lite proposed and used, the methodology that MCI has requested and is now obtaining called EDI TCPIP and the methodology that industry has recommended as an alternative called CORBA, so there are about to be four different methods, each of which have their own technical advantages and disadvantages and that's where we disagree. To say that what exists today is slower and less efficient simply isn't correct, it's simply different.

Q. Let me make sure I understand you. Is the CGI based on HTML as fast as say RNS?

A. Yes. RNS does a very similar operation using a contract we call a navigator contract. It

brings the data back, it parses it and it presents it to the screen, very similar, although different technically, than the way HTML does that.

Q. Do you agree with the statement in footnote 18?

A. I do agree with the statement in footnote 18. It does require, as does any software, that you follow the protocol about how you access the data, and what that says, let me just finish expanding on that because I've read that footnote many times and argued with AT&T about it, is that to get to the data, and I will use an example that requires you to go to three particular places in that, to get to the data and request a telephone number using LENS, you have to place a call that says, I want to make an inquiry, receive a response to that, place a call that says I want to reserve a telephone number, receive a response to that, and place a call that says, this is the telephone number I want to reserve, so three software calls or operations are required.

In the forthcoming industry standard, three different calls but the same three concept calls are required. You say -- you place a call that says I want to get a code for a valid MPA NXX

to reserve a telephone number against. The second transaction says I want to get a telephone number list to reserve, and the third transaction says, this is the number I want to reserve and for how long, so they're two technically different methods but they're exactly the same number of software calls, and you will find that true in general throughout the specifications that the industry is considering adopting this summer. There are multiple actions required to access information because that's the way the information is structured.

MR. O'ROARK: Off the record.

[A discussion was had off the record.]

Q. [By Mr. O'Roark] Since we're talking about integration, let me ask you just a couple of questions about EDI.

A. Okay.

Q. What evidence, if any, is there that BellSouth's EDI interface is capable of successfully receiving UNE orders?

A. The evidence that exists is our technical demonstration of that to a third-party auditor, Ernst & Young, and in addition to that, commercial usage by two -- three carriers now who are ordering

UNEs using that interface.

Q. Are they ordering using that interface in Florida?

A. The best of my knowledge, there is not a Florida carrier. There are two Georgia -- there are tests going on in Florida with one of the carriers but it's not in commercial usage.

Q. How long has it been in commercial usage by the two or three that are using it?

A. Three months, four months.

Q. With respect to EDI for resale as opposed to PC EDI --

A. Well, no, I'm sorry. Those two terms aren't distinguishable. Go ahead and let me -- let me let you finish.

Q. Why don't we talk about the ground rule before I finish. Can we create a subset of EDI for resale that does not include PC EDI?

A. No. Let me clarify.

Q. Okay.

A. EDI and PC EDI are synonymous. PC EDI is a stand-alone application that runs on a PC. EDI is a mainframe application that runs on a large computer, but functionally they do the same thing. Obviously the management of the data is different

from a PC to a -- but functionally, if an order for a UNE or a resold service is equipped on one of them, it works on the other one.

Q. And I take it that there is one ALEC that is actually using EDI for resale without using PC EDI?

A. Yes. Only AT&T has mainframe EDI up and running. MCI, the last date I had was next month is supposed to come on-line in August.

Q. Is there any evidence as to whether that usage has been successful?

A. As to whether the EDI usage has been successful?

Q. Yes.

A. If you lump the two together and recognize that the functionality of EDI PC and EDI is the same, then there's a considerable amount of evidence in the record that that interface is in commercial use.

Q. But let's not lump them together.

A. But you have to. They're not distinguishable. That's what I'm --

Q. I understand.

A. If you don't lump them together, I have AT&T's track record to go on. They were

successfully ordering resale until they changed their market entry strategy in December and then they stopped. There has been a very small volume of resale orders from them since then and that is all public knowledge.

Q. Is there any evidence from resale testing or otherwise of percentage of EDI orders that drop out for manual processing?

A. Yes, there are flow-through reports presented in several of our filings including the recent FCC filing that demonstrate that.

Q. Is there evidence about how long it takes to return an FOC?

A. Yes.

Q. The same question for rejects?

A. Yes.

Q. And jeopardies?

A. For the jeopardies that we do return there is evidence. There is not a standard for returning jeopardies to an EDI user and, in fact, that subject has been given to the Change Control Committee now to enact.

Q. And for the FOCs, rejects and jeopardies, is it same flow-through? Well, it wouldn't be the flow-through information.

A. No, there are actually separate performance measure reports. There is a performance measure report for FOC timeliness. There's a performance report for reject timeliness and then the flow-through report doesn't deal with time as much as it deals with how many flowed through or what happened to them.

Q. So in each case you are talking about the performance measurement data that BellSouth has provided in the 271 cases and here in Georgia on a monthly basis?

A. And is providing on the Web site on a monthly basis for all nine states.

Q. When did you start doing that?

A. In March.

Q. But that was still based on the old performance measurement set?

A. No, the new set -- let's see. I would have to look at my notes, either March or April the new performance measurement set went up on-line so there are differences. I can't remember if it's between February and March or March and April, but one of those two months the set of data being reported changed.

Q. Do you know whether BellSouth provides

any loss notifications for UNE customers? Let's leave it there.

Do you know whether BellSouth provides any loss notifications for UNE customers?

A. I do not know. We are in discussion with three of the facility based carriers about how to and when to provide loss notifications. I know there is an issue there but I'm not familiar with exactly what we're doing.

Q. The same for resale customers with partial loss notification?

A. Again, we do provide a notice, but I know there is a problem that's -- an issue that is under discussion on partial losses. That has not been successfully resolved between us and the CLECs.

Q. The same question for loss notifications concerning customers serviced by circuit ID?

A. And the same response. There is work being done on that right now.

Q. Is BellSouth developing EDI for LMP orders so that FOCs, rejects, jeopardies, et cetera, will be returned through EDI?

A. Yes, we are. Jeopardies, however, has been given over -- the question of what jeopardies to return and how to return them, we have been asked

to wait for the Change Control Committee of CLECs to come back with a proposal and not to implement it ourselves, so at the moment that particular part of that is in that committee's hands, not in BellSouth's.

Q. Other than the jeopardies which you have kind of --

A. Ordering LMP, providing FOCs, those methods were already agreed to or part of an industry standard, so we are implementing those as Atlanta goes on-line in August.

Q. You anticipated my next question. So that would be contemporaneous with LMPs being put in place?

A. Yes, and the current date -- our first metro in the region is Atlanta which is due to complete converting 8/31 and in that same time frame LMP ordering via EDI is to be tested and on-line.

Q. Do all orders in which a new customer desires a complex directory listing have to be submitted manually?

A. All orders do not. Some do. There are a set of orders, depending on the -- depending on the complexity of the directory listing, EDI Version 7.0 handles some of those listings, but there are some

that do have to be submitted manually.

Q. Can you generally describe which ones?

A. No. The set of rules for describing those, I have tried a couple of times to even get to an English description and it is -- the whole set of complex -- it is very complex to even describe what they are.

If you can imagine a business listing, as I understand it, we're talking about white page listings now, there are options for a large business like NationsBank to submit a listing that has a main corporate number and subheadings and department subheadings, some of which are bolded, some of which are set in different type. Those kind of listings are the ones that require manual work.

Business listings for a four or five line business where there's a main number and three subsequent numbers the EDI specification handled, so there's not even a good description that I've found about -- except to go read the rules for EDI 7.0 and say here is the kind of directory listing you can submit. There's not a general description I've found.

Q. Do all UNE orders for a partial migration have to be submitted manually since BellSouth

requires a separate directory listing order?

A. They don't have to be submitted manually. They do have to be worked manually. We do allow them to be submitted electronically, but then we have to work them because we do not have an automated process to split the account into the two pieces that a partial migration requires.

Q. Let's talk for a minute or two about the Albion project.

A. Uh-huh [positive].

Q. The purpose of the project was to demonstrate that CGI specifications could be used to integrate preordering and ordering interfaces?

A. Yes.

Q. And specifically, it was integrated with PC EDI which we've already discussed?

A. Specifically, that was the integration.

Q. And Albion was asked to do the integration for a specific type of ordering for new service residential?

A. Yes.

Q. And I guess you have also asked to do it for new service business?

A. I have not -- no, I did not ask Albion to do that.

Q. Perhaps I misunderstood your testimony in Tennessee.

Was there not some other work that you have asked them to do?

A. No.

Q. Well, with new service residential, there is no need to extract information about existing service from a CSR, is that right?

A. No, there is. You do need to extract the -- I mean, one of the functions is to look at an existing CSR and extract information from it. That was demonstrated in Tennessee.

With new service residential, you're right. I'm sorry. With new service residential, there is no need to do that. The access and parsing of the CSR, however, was demonstrated as part of this package.

Q. Let's take a look at Exhibit 23 and explore that a little bit more. I believe that is the Albion report.

A. Yes.

Q. Let's take a look at page 11 which just has a single paragraph headed "View CSR."

A. Yes.

Q. My reading of this was that what Albion

did was enable somebody using this package to view a CSR rather than actually obtain it, parse it, and put it into a database. Please correct me if I'm wrong.

A. I can see where you read that this way. That in fact is not what was done. The CSR was obtained, parsed into the fields indicated here and written to a database.

So if you looked at the CSR screen which is page 28, what we did for this order is to parse all of the data on the left so that the listed name, service address, directory delivery information, billing information, that has all been parsed and sent to a database.

We did not parse the line and station listing, it could be parsed similarly, but it required -- the screen view was messy, but this information was actually retrieved from the GRIS database and parsed and written to a local database. I apologize if the words were misleading there.

Q. Do you recall testifying in Tennessee that Albion was given a single point of contact -- excuse me, the same single point of contact as ALECs?

A. Yes.

Q. Let me ask you to turn to page 39 of Exhibit 23.

A. Yes.

Q. It appears that Albion had five contact points, if I'm reading this correctly, and the first one I recognize, Alex Dijon. I take it he reports to you?

A. Yes. It's not proper to categorize him as the point of contract, he was actually running the project on my behalf. The primarily LENS technical contact is Carol Douglas who was the SPOC for this project, and those other people are contacts which she established to work with Albion as a required -- the same ones that are available to the CLECs, not necessarily the same people, I don't want to imply that, but the same function.

Q. So these specific people were assigned to this project?

A. No. Those specific people were used under the single point of contact -- excuse me, assigned is the wrong word. Those specific people were -- provided information to Albion. That same information could come from a different person in the same group. The single point of contact is to coordinate furnishing information the developer

requires --

Q. Okay.

A. -- and there may be -- for instance, I will take the one that says contacts for establishing connections.

Q. Yes.

A. This developer was not already connected to BellSouth's LAN -- wide area network, did not have security done. That same contact is furnished to the CLECs in a different context when they sign up to do business with us, so that contact is already done for the CLECs but it's done in a different manner. It's done when they sign up to be a CLEC and sign up to get access to the systems.

Q. Is an ALEC assigned a particular person or just a number and you may get any one of a number of people?

A. They're assigned two different ways. They're assigned a single point of contact number which gets them 24 hours a day, seven days to somebody in this group, and then they're assigned a customer support manager who is a specific person in addition to that.

Q. Let me direct you to page four of the exhibit, again referring to Exhibit 23. I should

say for the record, when I'm referring to page numbers I'm referring to the page numbers at the top rather than at the bottom, so this is page 4 of 39.

Is this an accurate summary of the hours that were spent on the project, to your knowledge?

A. Yes. To my knowledge, these are the hours they billed us for and that they actually used on the project.

Q. And this project has been completed, is that right?

A. This project has been completed.

Q. And as you can see under time, it says, the total hours required to produce the OPII software was 1007.5 with a total cost of $128,675. Was the $120,000 figure associated strictly with the hours? In Tennessee you talked about software licensing costs as well.

A. In this case, it includes a $40,000 software licensing cost for software that BellSouth did not have a license to use.

Q. So the cost is $120,000, not $160,000?

A. Correct.

Q. And, again, just so I understand, you did not ask Albion to do a similar integration for new business service?

A. I did not. This was a -- as I characterized it in Tennessee, a prototype, a demonstration development, and we asked them to do it for a specific class of service and a specific order.

Q. Do you recall saying in Tennessee that you would make the technical description available to ALEC within two to three weeks?

A. Yes.

Q. Have you done that?

A. Yes. That is what this document proposed to do.

Q. Exhibit 23 is the technical specifications?

A. It's the technical description. No one has asked for any specifications beyond this, to my knowledge, so this is what we intended to provide.

Q. What Albion did --

A. Actually, I'm sorry, let me clarify that. I said that wrong.

Some company, and it may have been MCI, has asked for the code and I believe that has been provided to them already, but that was some point in time maybe a month and a half ago.and I had forgotten about it, but that contact went directly

to Albion and they have the release rights to release the -- actually the code which is the technical specifications if this is not sufficient.

Q. And you said that this project was developed as a demonstration prototype?

A. Yes.

Q. This could not be used commercially, could it?

A. This project could not be used commercially. The software that was used to develop this project could provide the foundation for a company developing their own integrated interface, but this was not intended to be used as a stand-alone interface.

Q. What would need to be done generally to use a software and develop a new commercially viable interface?

A. Let me set some assumptions on that and then I will proceed from there and I will use MCI's assumptions.

Q. Okay.

A. MCI has been working for some time to develop an EDI ordering package with BellSouth, so MCI has already made their decisions about what databases they're going to keep their ordering

information in and how they're going to manage those and how they're going to translate those into an EDI order, so that set of data on the MCI side of the MCI interface already exists.

To take advantage of what was displayed here, MCI would have to take the coding that Albion did which shows them to how to retrieve preordering information, write that code -- incorporate that code into their own system to retrieve the preordering information and to parse the data and then to write the code to push that data into their own databases, so this would have to be modified to work with MCI's databases as it would in any -- I mean, that's the case of integration. We can show you how to do, it but we can't make the choices on your side of the business interface.

Q. Any estimate as to how long that would take?

A. Again, it depends on the number of products that MCI is interested in and the coders. These folks did it for the first product at a cold start in the time shown here, in about three months. Obviously, to do the same product the second time around would be considerably less than that, but it depends on how many products MCI wants to develop

ordering for. It depends on your business plan.

Q. Would you be able to use this software with EDI as opposed to PC EDI? I think I know the answer to that based on our prior discussions but just to be clear.

A. Yes. What you would not need -- if you have already developed EDI, there is half of this software that you don't need because half of this software actually creates an order. In MCI's case, they have already written EDI software to create an order and send it, so that is already done, so they need the preordering half of this.

Q. So you wouldn't have an estimate for how long it would take to develop the software for say migration orders as opposed to say new residential orders?

A. I'm sorry. We're talking about --

Q. Let me start again.

I'm talking about just developing the same sort of software that Albion did for new residential orders. You don't have an estimate for how long it would take to do that for, say, migrate as is orders?

A. Your word fooled me. We call those convert as is instead of migrate as is.

I can give you a rough estimate. For a switch as is order, the only piece of information that's required on the preordering side is a valid address and a valid telephone number which presumably the consumer already has because that's actually the simplest type. That should be literally four or five weeks of development to get that information back if MCI's coders operate at the same efficiency that these folks did because the basic coding to obtain that information out of BellSouth's systems and write it to a database is done, it just has to be modified.

Q. One more question about the contacts --

A. Yes.

Q. -- that the Albion folks used. Were they told who Albion was? What were they told about who Albion was?

A. They were told to treat Albion -- they were told that Albion was a developer employed by us and to treat them as they treat a CLEC. They were treated the same as the team that meets with MCI literally on a weekly basis that is doing EDI joint development.

Q. Other than whatever MCI may be doing with CGI and LENS for CSR information, is there any

company using CGI LENS to place orders today?

A. To place orders, there are not. There are two companies that we know of that are using it to obtain preordering information.

Q. Is MCI one of those two?

A. Two beyond MCI. I'm sorry. MCI is one that we understand is using it to obtain customer service records. We have another CLEC -- did I -- yes, I'm trying to remember if we disclosed their name anywhere, OmniPoint, who is also obtaining CSRs and certain preordering information with CGI, and a second one and I do not recall the other one's name.

Q. Let's talk for a minute about EDI TCPIP SSL3.

MR. CARVER: When you get to a stopping place I would like to take a break.

MR. O'ROARK: That's fine with me. This is a good time.

[A short recess was had.]

Q. [By Mr. O'Roark] Mr. Stacy, before the break we were just beginning to start to talk about the EDI TC PIP SSL3.

A. Yes.

Q. Can you explain briefly what that is?

A. It is, as I mentioned earlier in passing,

it is the third of four technical methods of delivering preordering information from an ALEC OSS to a CLEC. It uses the three technologies that are mentioned. It uses electronic data interchange which is used to package up the information and manage the format of the information. It uses the transmission protocol that is called TC PIP and then uses a security protocol called, SSL3, secure socket layers 3.

It has been one of two proposed national standards for some period of time over a year. It was voted on and approved as a standard I believe last month, but it may have been early this month, I'm not absolutely certain on the date, so it is now one of two national standards in progress for delivering preordering information.

Q. Would you agree that MCI has been requesting BellSouth to jointly implement EDI TC PIP SSL3 since mid 1997?

A. For some period of time. I'm not familiar with when the original request actually started.

Q. Will BellSouth now move forward with the development of this interface?

A. Yes. BellSouth has already committed to

MCI to develop this, as we had earlier, once it was an approved national standard and, in fact, have begun the development work.

Q. How long do you expect that development work to take?

A. It is still in scope right now. I do not have a good answer yet. My anticipation is that we'll have something done prior to the end of this year, but part of that is going to depend on cooperation with MCI in joint development which is just now starting, so we're right at the early stages of understanding what the specification actually means.

Q. MCI and BellSouth have already had one meeting on implementing the interface?

A. I believe one. They may have actually had two, but I'm -- at least one.

Q. That was my understanding. I wasn't trying to --

A. That's correct. I'm not just not sure whether there has been a second one yet or not.

Q. And do you agree that EDI TC PIP SSL3 will provide an industry standard for preordering that would be integrable with EDI?

A. Yes, that is its intent and it is now a

standard.

Q. Is CORBA a standard yet?

A. CORBA is not. The CORBA vote is going on while we speak.

Q. So it could be approved today?

A. Yes, this month. I don't think the vote is actually today physically, but in the next few weeks. They're running on parallel tracks.

Q. And just so it's clear for the record, CORBA is the other emerging --

A. Common object request broker architecture is what that stands for. It's the other emerging national standard for preordering.

Q. Let's go on to Count 2 and talk about the RSAG a little bit. RSAG stands for regional street address guide?

A. That's correct.

Q. And the RSAG is used to validate a street address given to the LEC by a customer?

A. Yes.

Q. The RSAG tells you that the input address actually exists, for example, that there is a residence that actually has the assigned address, is that right?

A. That and a couple more things.

Q. Can you tell me the couple more things, too?

A. It basically tells you -- well, it provides two things. It not only tells you that a residence exists at that address but it provides the key to the rest of BellSouth's databases. It tells you what serving central office is assigned to that address and also gives you two indicators about the status of available facilities at that address.

Q. Does that connect through a KWIK service?

A. That's correct.

Q. Does the RSAG also verify that the person or business that's calling the LEC is at the address?

A. I'm sorry, I'm missing something there.

Q. If I'm Stan Jones calling an ALEC and I say that my address is 135 Maple Street and that information is input and it turns out there's a residence at that address but it's not Jones' address --

A. The RSAG database doesn't tie to the customer name in any way or fashion if that's your question.

Q. It is.

A. No, the customer name does not even

exist. This is a database of addresses and facility availability.

Q. Can you tell us in a nutshell the difference between RSAG and MSAG?

A. In a nutshell, RSAG is specific to what is called the dwelling unit level, that is, the specific street address level and tells you not that there's a house there -- well, excuse me, it can tell you if there is a living unit there, if we've had service there before, that is one of the pieces of information, but it tells you that a specific street address, a lot number, is valid.

MSAG is a broader, more global database that tells you whether a range of street addresses is valid but not whether a specific house address is valid.

Q. Let me ask you to turn to page 13 of your direct testimony. I'm looking at your answer beginning on line 7 --

A. Yes.

Q. -- where it says, based on the volume of data involved, it is inconceivable that BellSouth would ever agree to provide MCImetro or any other ALEC with a download of the RSAG data.

A. Right.

Q. Do you still agree with that statement?

A. I still agree with that statement. As I think you know, we've been ordered to provide such a download in Georgia and are in the middle of doing it, so this question and response is sort of moot at the point because BellSouth has been ordered to do that.

Q. I'm going to direct you to the Tennessee 271 transcript at page 192 where you were also asked about the RSAG. Actually, let me ask you to look at the last Q and A on page 191. You don't need to read it out loud, I'm just trying to refresh your memory at this point.

A. Yes.

Q. My understanding was that in Tennessee you were -- it was no longer your position that it was inconceivable that BellSouth would ever agree to such a thing.

A. No, that is not correct.

Q. Okay.

A. This statement in the Florida testimony, the Q and A, refers to BellSouth's understanding at the time the original contract was entered into with MCI. Obviously in the meantime, when we received a bona fide request from MCI, we did the analysis and

found out that, yes, it is a large amount of data, but it is technically feasible to provide it and we offered MCI a price.

In the meantime subsequent to that, the Georgia Commission ordered us to provide it and then arbitrate the payment for it if there was a dispute.

Q. Let me take one thing out of that last statement. Can you identify the BFR that you say MCI made for the RSAG?

A. It was a specific request during or after the Georgia OSS workshop that MCI asked for the download again and was given a response that included a price.

Q. The Georgia workshop took place in early December of 1997?

A. Yes, and this happened -- I do not have that letter with me, but it happened in -- certainly within two months of that period. It was during the discussions that came out of that. In fact, it may have been right after the workshop.

Q. It's your understanding that there is correspondence from MCI making a bona fide request of BellSouth for the RSAG?

A. And a BellSouth response that quoted a price.

Q. And you have not attached that correspondence to your testimony?

A. No, I haven't. As I said, I guess the thing -- I thought it was at this point in time, now that we've passed the Georgia order, it's sort of a moot point because we have agreed to provide it and we've been ordered to provide it and then either agree on the price or arbitrate it.

MR. O'ROARK: Well, I realize we're laying the game in discovery. I will make an informal request that you provide that document because I -- I'm not aware of its existence and my understanding is that MCI has never made a bona fide request for the RSAG.

MR. CARVER: I'm not in a position to respond to your request right now, but it's on the record and I will get back to you.

MR. O'ROARK: That's fine.

Q. [By Mr. O'Roark] Mr. Stacy, you are aware that the AT&T interconnection agreement says that it can have a download of the RSAG or are you aware of that?

A. I'm aware that theirs says electronic access similar to yours, it does not use the words download to the best of my knowledge, but perhaps it

does. I have never had that request from AT&T.

Q. Is it true that during BellSouth's own internal volume testing that a copy of the RSAG was downloaded onto a mainframe computer?

A. That's true. A copy of a portion of the RSAG database is downloaded into one of the test computers.

Q. What portion was downloaded?

A. The specific states that are being -- the specific addresses of specific states that are being tested. We're running test orders through the system for the volume test, so I would have to go back to my volume test results to look at the number, but let's suppose there are a thousand different test orders, the addresses covering all of those test orders and the ability to search for them from RSAG are downloaded to one of the test computers.

Q. So it was not the addresses, say, for the whole state in question?

A. No, just portions of the database that we needed to test.

Q. Can you give me a summary of the information that is included in the RSAG? And by way of background, BellSouth has discussed providing

extracts from the RSAG that would constitute about five percent of the database.

A. Right.

Q. Obviously that suggests that there's 95 percent that deals with other things. Can you tell me what those other things are?

A. Let me tell you some of the other ones but then suggest that we're in specific negotiations with MCI right now to determine what they want and what they don't want.

The database in large part consists of every known address in BellSouth's serving territory for all nine states, whether or not there is a living unit, a dwelling unit at that address, whether or not we have facilities to that address, and what the status of those facilities is. That's the raw structure of the database.

In addition to that, there are a number of marketing pieces of information that we've discussed before, including contractual arrangements that we have with other companies where we mark their service territory out in our database.

So, for example, there is an entry in the database that describes in some cases what electric power company serves that particular address and

whether or not we have a joint agreement, some obligation with them. There are portions of that database that describe where our cellular company provides coverage that is used for marketing purposes and a number of other pieces of information that relate to marketing services other than basic telephone service but deal with the geography.

Q. What do you mean by marketing services other than basic telephone services?

A. Voice mail service, for instance, which is an enhanced service, BellSouth Dot Net which is an enhanced service. Markers for those kind of services exist in the database.

Q. When you say there are markers for those types of services, what do you mean?

A. That the database indicates whether or not and under what circumstances that service is available at that location.

Q. Is there any other major type of information that you haven't described?

A. No, those are the major types. There are a lot of those. That's not intended to be an inclusive list.

Q. And when you say a lot of those, a lot of things likes voice mail availability --

A. Internet services, et cetera. That's the subject of our discussions now with MCI, and I think they've actually taken the other tact from what I heard in the last meeting. They've said, well, give us everything that is not proprietary or at least tell us everything that is not proprietary, and that's the direction they're working the discussion from right now.

Q. I don't want to get too deeply into this, but it surprises me that the actual addresses only constitute five percent of a database. Intuitively, you would think that would be the bulk of it. Can you explain why it's not?

A. It's my understanding it's simply the way the database was built. Because it was built up around the address structure, there's relatively little text in those fields where some of these marketing things that have been added are literally fairly long text field and have a great deal of English language information in them and that's the reason that the raw database is such a small percentage, but we're not disputing the fact, given the Georgia order, that we're going to let MCI look at that database and we're going to jointly decide what they want out of that extract. That is not in

dispute anymore. In fact, I was trying to figure out the other day if we could remove that issue because as far as I can tell, it is no longer disputed.

Q. I suppose the issue in dispute is still the cost?

A. Yes, which is not in this.

Q. Which we disagree on?

A. Right, we disagree on, and we have a mechanism to go forward with that under the Georgia order.

Q. Right. As you know, just to recap, MCI's position is that we're entitled to the RSAG at no cost and BellSouth's position is, as I understand it, is that MCI should bear some cost for obtaining the download.

A. Developing and obtaining the download, right.

Q. And can you tell me why -- what portion of the cost is simply providing a download of the RSAG? Why is that at all expensive?

A. There's actually two pieces. The code has to be written to segregate the database, and when I talk about database I guess that's part of the misconception, we're not talking about one

database, there are twelve of these spread out over 12 different computers that look like one big database, but when you do anything to try to get -- if you don't use the query mechanism that exists today, whether it's the one that BellSouth uses or the one that LENS uses, getting the data out of those different databases which serve different pieces of different states and put together into a single file that can then be downloaded to somebody is a fairly complex software project. So the process of developing that brings some initial cost with it.

Then the process of setting up the continuing process to do that periodically, and the original discussions with MCI were to do that daily, although I understand that may be taking a slightly different course now during the technical discussions, required BellSouth to invest in disk storage space and machine hardware to extract the data, put it somewhere, cue it up, transmit it to MCI, take care of any problems in moving the data back and forth, and then do that again the next night, and so there was a development cost and a hardware cost for doing that and ongoing cost for the people and the machines to support that

happening every day in the original case, or periodically now I guess.

Q. Is any of the cost allocated to separating out information BellSouth does not want to send to MCI?

A. Yes. Part of that -- part of that first cost is segregating out the information.

Q. Any idea what percentage of the cost that is?

A. No. We won't know until we agree exactly on what information it is.

Q. Let me ask you to turn to your rebuttal testimony, page nine --

A. Okay.

Q. -- where you infer that 79 ALECs are successfully performing address validation via RSAG LENS access.

A. Yes.

Q. I gather that the RSAG is either the biggest or the second biggest cause of rejected orders, or excuse me, address validation problems are the second biggest cause of rejected orders, is that right?

A. It was in the past. It has declined markedly in the last three months.

Q. Where is it now?

A. Address validation is down to -- I believe in the July report it's down to the fifth or sixth most frequent cause and it's caused by people who use RSAG, retrieve it and then overtype it, contrary to the instructions.

Q. Let's talk about Count 3, the due date information.

A. All right.

Q. I just have a few questions there. I think this is territory we have gone over a few times before.

Using the LENS inquiry mode an ALEC representative has to do the due date calculation himself or herself for a new install, is that right?

A. Using the LENS inquiry mode, that's correct.

Q. And the same is true if LENS CGI is being used?

A. That's true, yes.

Q. I brought the Florida 271 order with me. Let me ask you to take a look at page 82 of the order. It's the third full paragraph that discusses due dates.

MR. CARVER: Could you let him see the

whole section that this is part of?

MR. O'ROARK: Sure; sure.

Q. [By Mr. O'Roark] There's pages 81 and 83.

A. Yes.

Q. Has BellSouth made any changes to the due date capability in LENS since that order was issued?

A. BellSouth has not. Those changes, however, are in process as a result of a Georgia order and are being worked with the Change Control Committee right now.

Q. When do you expect -- what will the result of that be, if you know?

A. The result of that will be a calculated due date in the inquiry mode which is what we understand the Georgia order is clear about. We're not clear as to whether that satisfies all of Florida's requirements or not.

Q. When will a due date calculation function be available in the inquiry mode?

A. I believe the scheduled date for that is 12/30 of this year but I would have to verify that. There is a Georgia response that delineates that very specifically.

Q. In RNS when you are doing a new install,

the next available day is highlighted on the screen, is that right?

A. That's correct.

Q. Looking at your rebuttal testimony at page ten --

A. Yes.

Q. -- and looking at the first Q and A under issue three, you take issue with Mr. Green. Would you agree that Mr. Green's statement is correct as applied to new installations?

A. Yes, I would agree that it's correct as applied to new installations.

Q. Now, going back to your direct as we flip back and forth here, going to page 19 --

A. Okay.

Q. -- this question is out of the flow a little bit, but I'm looking at line 17. I just wanted to make clear that the specification that was updated on April 8th, 1998, was from a March 16th release of LENS, is that right?

A. Yes, that's correct.

Q. That's my only question on that.

Let's talk about Count 4 which deals with a telephone number reservation, and let's go to page 24 of your direct testimony.

A. Okay.

Q. I'm looking at the first Q and A on that page beginning at line 14. You agree that using LENS in ALEC is limited to reserving six numbers at a time?

A. Six numbers per transaction. I don't know that I equivocate that with the time. Maybe we're talking past each other.

Q. I think we can agree, I don't think this is really disputed.

You would have to go back to the inquiry screen each time to reserve another batch of six numbers?

A. Yes, but in any one session at the computer you can reserve an unlimited number of numbers.

Q. And a session is when you are obtaining information for a particular customer?

A. That's a good way of characterizing that, yes.

Q. So if an ALEC wanted to reserve 25 numbers this way, it would have to go back and get five batches?

A. Yes.

Q. Is it -- can you guarantee that those

numbers could be in sequence if the ALEC wanted them that way?

A. No, nor can our retail systems guarantee they will be in sequence.

Q. If they were ordered in a batch of 25?

A. You cannot ask for them.

Q. This difference between the six numbers -- let me put the question another way.

The limitations that we just talked about in LENS apply equally to CGI?

A. Yes.

Q. Let's go to page 26 of your direct testimony.

I'm sorry, let me ask you one more question about the number of numbers you can reserve. With RNS and DOE you can reserve 25 numbers at a time?

A. That's correct.

Q. Now, to page 26. Do RNS and DOE enable BellSouth to view NXX codes?

A. They do.

Q. How is it that that is accomplished?

A. The RNS and DOE computers are loaded periodically, and the periodically is generally monthly, with a list of available NXX codes from the

local exchange routing guide and then those codes are made available to the users of those two systems. That's exactly what we've suggested that the CLECs do with their copy of the local exchange routing guide.

Q. Is that a cumulative database that BellSouth has built up over the years?

A. No. The routing guide -- I'm sorry, I don't want to mislead you there. The routing guide is a cumulative database, but it's administered by BELCORP nationally, it is republished every month for every central office in the country showing the existing and the new NXX codes, so at any one point in time if you load it, you get everything that exists.

Q. I think that is where I was getting to.

When you make your updates monthly, do you reload the whole thing?

A. Reload the whole thing.

Q. So it's not an updating process?

A. No, it's a loading process. It is just more efficient that way. There is no sense in updating it.

Q. Are you downloading the whole LER or some subset of it?

A. The available NXX codes per wire center. No, that is not the whole LER by any stretch of the imagination.

Q. How is it that you are able to extract just that information?

A. It comes electronically in a database format on a diskette or a CD-ROM. We use that to load from. Again, that's been our confusion here because the carriers, particularly the inter exchange side of MCI, should be very familiar with that in the electronic form, in fact, has to use it in all of their switches.

Q. Going back to the Florida order, looking at page 82, the first paragraph, the Florida Commission talked about the difference in the numbers that can be reserved. I will ask you to read that.

My question to you is going to be if BellSouth has done anything to rectify the problem identified by the Commission?

A. You do or don't want me to read it?

Q. I do want you to read it.

A. An ALEC cannot reserve --

Q. I'm sorry, not out loud, just to you. I think everybody has got it.

A. BellSouth has not provided a list of available NXXs for a specific address through LENS. It has suggested that the proper method for the CLECs to obtain those is the same method that BellSouth uses for itself which is to electronically load a copy of the LER.

Q. But BellSouth itself has not done anything in response to that paragraph?

A. We have not.

Q. Let me take one question out of order, Mr. Stacy. I apologize. I want to go back to due dates for just a minute.

I'm looking now at page 13 of your rebuttal testimony, the first Q and A on the page. The question is, has BellSouth provided these intervals for unbundled network elements as --

A. I'm sorry. I must be -- rebuttal?

Q. Yes, page 13, dated June 29th, 1998.

A. I'm not -- obviously my page numbers are slightly off here. I don't have the file copy for some strange reason.

Okay. I have the question.

Q. My only question to you is, BellSouth does not provide due date calculations for UNEs, is that right?

A. BellSouth does not provide due date calculations for UNEs. They provide a table of intervals.

Q. Now, let's talk about Count 5 starting at page 27 of your testimony, your direct testimony.

A. Okay.

Q. This is the count concerning USOCs. I gather that BellSouth's systems use the SOR edits to obtain USOC information, is that correct?

A. No, it's not. I'm confused here as to where --

Q. Well, BellSouth's OSS systems are able to obtain USOC information by customers, is that right?

A. For customers. Let me give you the thumbnail sketch. Maybe we can clarify the terms here.

Q. Okay.

A. USOCs are created either on a national scale or specifically by BellSouth to identify a specific product and act as an ordering code for that product.

When they are created they go into a number of different systems. One of the systems that they go into is SOCS which supports -- and the SOR edits which support SOCS which tell you how to

test for valid orders based using that USOC code.

Another place that they go is in the PSIMS and COFFEE databases that we use which tells you whether or not that particular product is available in a given central office. So they're product code that's created and then that product code is placed into the OSS in different places.

Q. And say BellSouth wants to -- a BellSouth rep wants to place an order. How is it that BellSouth's system generates the USOC?

A. They obtain a copy of the valid USOCs for that specific central office from the PSIMS or the COFFEE database, depending on whether they're a residence or a business order, or they remember it from their training and just type it, both of which happen regularly.

Q. And further on the call, can you tell us what FIDS are?

A. Field identifiers. They're pieces of information that modify the usage of a USOC. The most common -- the easiest example to demonstrate is, there is a USOC for a line class of service which determines the basic service you obtain at a residence or business. One of the FIDS, the field identifiers that goes with that USOC is your choice

of long distance carrier for that line.

Q. And so to place a valid order you have got to have a USOC for the product, you need to have any applicable FIDS, and you need to know if the USOC is valid in the state in which you are ordering, is that right?

A. Yes, that's correct.

Q. Do BellSouth reps have access to all of that information electronically?

A. In exactly the same manner the CLECs do. They use the PSIMS database and the COFFEE database to obtain the USOCs and the FIDs. They use an electronic copy of what has been provided to the CLECs as the implementation guide to determine what FIDs -- let me back up.

PSIMS, since it's specific to a geography, tells you what's valid in which state. They then use an electronic copy of the implementation guide that tells you how to use the field identifiers, and all of that is available electronically to the CLECs.

Q. Well, if a BellSouth rep wants to place an order, say a POTS order in Florida with a certain number of features, do they have to go and refer to the manuals or can they type into the system what

they want and then all the information is gathered via computer?

A. Not gathered via -- they can certainly type into the system what they want just as the CLEC can do if they know the proper information, but the computer doesn't gather any information after they type it in. It sends that order downstream to be checked for errors.

Q. Can you tell me how the SOR edits come into play?

A. When the order is sent, one of the systems it is sent to is SOCS and the SOR edits are applied against the order to determine the validity of the USOC and the FIDs and an error can be generated at that point if any of them are improper.

Q. Are the SOR edits used in any way prior to the submission of the order?

A. In one of our systems, the RNS system, a copy of the SOR edits has been taken by that business unit and built into their ordering system so that they actually apply the edits themselves before they send the order, and for that reason those same edits were made available to the CLECs in December so if they want to apply them in advance of sending the order they can.

Q. And so using RNS then the rep does not have to manually check the LEO guide, check the USOC list and then input the information, it can obtain the information electronically?

A. It's a totally different system that could be developed by a CLEC but has not been to my knowledge.

Q. In what respect is it different?

A. All right. The RNS developers did not give their representatives the choice of free typing anything. It's based on a check the box system, so they do not let the representatives remember or free type anything, they make them check a box. That box then generates the proper USOC, but they built all of that from the implementation guide and SOR edit data themselves.

Q. And the SOR edits when printed are about 2700 pages?

A. Approximately.

Q. BellSouth now makes available USOCs that are downloaded in a space value format, is that right?

A. That sounds right. They're available on the Web site in two different formats I believe at the present time to try to make them easier for the

CLECs to incorporate and use.

Q. And that was made available June 8th, 1998?

A. I believe that last format is correct on June the 8th. There was a format before that made available in December that we got questions about that said they wanted a different format, so we changed it.

Q. And the USOC list that's provided does not show the associated FIDs or the states in which the USOCs are valid?

A. It does not. That information is in the implementation guide and has to be cross referenced to build a system.

Q. Does BellSouth plan to provide the same kind of download with FIDs as it did for USOCs?

A. We are trying to determine from the CLECs what sort of capability would work for that, but such a download simply does not exist today. We're open to working with CLECs to give them something better, recognizing again that it doesn't exist today, so it's not a question of something we have.

Q. Where are USOC related orders on the top ten list these days?

A. They're still at the top. Again, mostly

for people who free type the USOC without using the PSIMS database. The top arrow is invalid USOC that just doesn't exist in that wire center which means that they never looked at the database.

Q. So an MCI representative who wants to place an order has to consult the USOC database and then either the LEO guide or the SOR edits?

A. Yes. Or MCI has to do the back office work to produce a mechanized comparison of those two for the types of orders they're interested in.

Q. Which would involve incorporating that 27 hundred pages of edits into --

A. Selected portions of it. Obviously that covers the entire range of services that BellSouth sells, and to the best of my knowledge, MCI is interested in a fairly limited subset of those services, so it's a portion of it.

Q. Do you need USOCs to order unbundled loops?

A. Yes.

Q. For example, if you wanted to only order the unbundled loop, there would be a USOC associated with the loop?

A. Yes, there is.

Q. The same would be true on unbundled

switching?

A. Yes.

Q. And if BellSouth was providing the switching, but the ALEC was providing other elements, you would need USOCs for features and so forth that were associated with the BellSouth switch, is that right?

A. Yes, USOCs or FIDs. It could be either one.

Q. Let's talk about Count 6 for a few minutes. That concerns CSR data.

A. Yes.

Q. BellSouth can electronically obtain CSRs of any length, can't it?

A. No.

Q. What limitation is there on BellSouth?

A. Fifty-four pages.

Q. Is that the limitation in RNS and DOE?

A. Yes. They have to be printed after you pass that page limit.

Q. And then in the case of an ALEC, it would have to be printed and mailed or faxed?

A. That's correct.

Q. What is BellSouth's policy on that? How are printed CSRs transmitted to ALECs?

A. They are mailed at the present, although there is -- actually I can't be specific on the policy. There is a page limit where we said we would not fax them because of the problems with both of the fax machines, that we would actually mail them to the CLEC. I don't remember exactly what that page limit is.

Q. Does BellSouth notify customers of an alleged right to restrict access to CSRs?

A. To the best of my knowledge, we're investigating that now subsequent to a data request from MCI and that investigation is not complete, but to the best of my knowledge at this time, we do not notify the customers other than as required by the FCC's CP&I rules.

Q. And what notification do you understand that to require?

A. I'm having that investigated. I cannot give you a complete answer. The answer will be in the response to that data request.

Q. So, for example, when BellSouth reps talk to customers over the phone, to your knowledge, they do not ask the customer if they want to be -- have their CSR restricted?

A. I can't answer that completely at the

moment. There are different -- there are different requirements in different states and all of those requirements were just modified by the CP&I rules so I'm having that investigated so I can give a complete answer to it in that data response.

Q. As you sit here today, do you know of any practice in any state of --

A. To the best of my knowledge, it is on response to a request from the customer, it is not done proactively but, again, the qualifier is there were states that ordered us to do some things related to that and that's what I've got my researchers trying to sort out is what states ordered what in the past and what changed with the CP&I orders from the FCC.

Q. If a customer does request that access be restricted, what must an ALEC do to gain access to the CSR,?

A. I can't answer that yet. That is what I'm having -- that's part of our research for that response.

Q. You don't know as we sit here today?

A. I do not. I know and I might mention for the record at this point that there's one other issue that has arisen that we're trying to sort out

with that, and that may not get answered in the data request, but let me put it out on the table so you all can think about it also.

If you ask for data where that customer belongs to another ALEC and that ALEC has requested that their record be frozen as the customer of record, who handles that negotiation and what is supposed to happen, and we're not -- I had a situation presented to me dealing with that specific part of this question the other day that hasn't been resolved yet.

Q. Okay. I've noted the issue.

A. Okay.

Q. Let's move to page 34 of your direct testimony. This concerns pricing information on the CSRs.

A. Yes.

Q. And I'm looking at lines 12, 13, 14 and 15, and you talk about pricing information reflecting BellSouth's internal analysis of its customer's needs from a marketing perspective. I think you are talking at the customer level in that perspective. What internal analysis are you referring to there?

A. When we had the initial contact or a

subsequent contact with the customer, the BellSouth retail representative uses a series of sales and marketing guides to determine the customer's needs, customize a package of services for them and sell that package of services to them, and one of the considerations in that packaging in addition to the features and services is pricing. That's what we're talking about in terms of the evaluation of the customer's needs.

Q. Are the prices associated with each of the services provided at the customer level in what you just described publicly available?

A. Yes, they are.

Q. So we're just talking about rates that are at the tariff rates?

A. We're talking about rates that are at the tariff rates and the difference between making them electronically available to the CLECs and making it easy, providing marketing information for them which makes it easier for them to market or not providing them electronically and letting them develop their own package and price for the customer.

Q. At line 14 you talk about ALECs not -- shall not be given BellSouth proprietary marketing information inherent in pricing data at the customer

level.

A. Uh-huh [positive].

Q. Is the proprietary marketing information you talked about there just what you described?

A. Yes, the assembly of the package for the customer including the price.

Q. And, again, we're not talking about CSA arrangements here?

A. No, we're not. We're talking about since they're written contracts, they're not generally available electronically.

Q. When you have a CSA there's not a CSR?

A. There is a CSR, but to the best of my knowledge, the pricing, even if it were available, is reflected only in the contract arrangement, not in the CSR.

Q. Let me direct you to the Georgia order again, this time at page 11. Let me ask you to take a look at the sentence beginning after footnote 28.

Again, since the folks on the phone don't have that in front of them, let me ask you to read that sentence out loud and I will say that that is in the middle of a paragraph.

A. Okay. "BellSouth's claim that the rate information becomes proprietary when included in the

CSR was not adequately supported, was undermined by the facts that BellSouth had previously provided such information in fax format and that the basic rate information is not proprietary and was generally not credible."

Q. They disagreed with you?

A. They disagreed with me. It's a very peculiar sentence. Georgia disagreed with us, they have ordered us to provide such information in Georgia.

Q. But you are going to stand firm in Florida and not provide it there?

A. Yes.

Q. Looking at page 35 of your direct, the Q and A starting at line 13.

A. Yes.

Q. It says that BellSouth plans to include LSI in LENS in July of 1998. Have you started doing that?

A. It goes into production July the 24th. I think -- well, I know the CLECs have the -- that's the electronic systems release called Release 3.0. The information was provided on that about two months ago.

Q. Let's talk about Count 7 which relates to

service jeopardies.

A. Yes.

Q. In the Louisiana testimony, BellSouth said that it often provides jeopardy notices 100 hours in advance of the original due date. Does that strike a cord with you?

A. No.

Q. I'm relaying something that someone told me, so I'm -- is that familiar to you?

A. No, not at all. We provide a report and along with the new reports on how long in advance of the due dates we actually provide the jeopardy reports, but there's no hundred hour criteria that I know of. It's a report that simply compares BellSouth's internal performance with its performance for the CLECs.

Q. And do you know how far in advance of the original due date BellSouth typically provides jeopardies?

A. That's the reason for that performance measurement. There really is not a typically. We provide the jeopardy notice as soon as it is detected, but depending on the reason for the jeopardy, it could be detected a week before the service order is due or it could be detected the day

of the order when the technician actually arrives at the location to do work.

There is no typically. That is why we're providing a measurement to demonstrate that we're doing it in the same time and manner for both parties.

Q. Does BellSouth include -- excuse me. Does BellSouth's data include notices provided through the order status feature of LENS?

A. Yes. Yes, it does.

Q. Does BellSouth's data include orders that should have received a jeopardy but did not?

A. No. I mean, I can't answer that question. Obviously if they should have received a jeopardy and they didn't, they can't be included in any of the information because there's been an error somewhere.

Q. For ALEC orders, who at BellSouth determines that a service jeopardy has occurred?

A. The same as for BellSouth's orders. It's one of the network provisioning centers who's responsible for actually doing the work to provide the service.

Q. And is there a title of the person in those organizations that has that function?

A. There are many different people in different organizations. I can give you a few ideas. If, for instance, we receive an order and there are -- the database says there are no facilities available at that address, there is a technician in a group called a FIG, facilities investigate group, who works on it and places that order in jeopardy once they've done -- they look at the database and make sure there wasn't a computer glitch and that truly there is a problem with number of facilities for that address and then they create a jeopardy at that point. That's the kind that happens several days in advance of the order, or it could go all the way down to the service technician who gets dispatched to the site, finds that the facility that they were going to use is defective and cannot resolve that defective process.

Q. Let me ask you about that last example where the person on site the day that the service is supposed to be turned up finds a problem with the facility. Is the technician able to use his handheld -- his portable computer and transmit that fact back to the office?

A. In part, but not completely. Technician's instructions prompt them to do two

things. They call the customer contact on the order, and in the case of an ALEC order, the ALEC has sent us a contact number for use in that case and also for use in completing the order.

Then they send information that the order has been delayed back to the work management center supervisor, that is done electronically, but then a manual disposition has to be made of that before it gets coded into the service order system.

Q. And by manual, you mean that somebody back at the work service center receives the information electronically and then has to type in a disposition that is then --

A. They had to make a decision about it before they type it in.

Let me give you an example. Suppose that a technician is dispatched on an early morning order and they show up on site at 8:30 and it's a single line business order but the pair is defective. They do two things. One, they contact the customer, tell them we've got a problem but we're still working on it.

Q. The customer or the customer contact?

A. The customer contact. I'm using customer -- the ALEC is the customer of record in

our case. They contact them and tell them the problem, but then he notifies the work maintenance center supervisor that he has that problem.

Q. Is it the work maintenance center or the work management center?

A. They're used interchangeably. It's actually the work management center, I'm sorry. It's an old term.

The work management center then knows that they have an order due that day that has a problem on it. They have several actions they can take to possibly resolve that problem, including moving a cable repair technician to work on that order. So until they have exhausted their course of possible actions, that order isn't put in the status that says we're going to miss it. So that's the difference between the manual and the electronic notification. The electronic notification occurs when the status of the order is confirmed that it is truly in jeopardy and that we can't do anything else about it.

Q. And then talking about the case where the problem occurs on the day that service is turned up, I just want to make sure I'm clear, because you have got a call going to the customer point of contact

and you have a call going to the work management center.

A. An electronic notice going to the work management center.

Q. Excuse me, correct.

And in that case it is not the work management center that transmits anything to the point of contact. I'm trying to figure out how the communication flow works. What I'm hearing you say --

A. Well, the work management center would transmit it back to the point of contact electronically when they've exhausted all of their possible actions.

Q. So when the point of contact is called, the point of contact doesn't know whether it's a surefire jeopardy or whether it can being fixed?

A. Well, they know the order is in jeopardy, but the language says we're working on it but we've got a problem.

Q. And then the work management center sees what it can do, and if it's determined that in fact it's going to have to be done another day --

A. It puts the order in a missed status with an estimated completion date and then sends that

information back upstream if it's available.

Q. And by sending it upstream, let's assume we're talking about a BellSouth customer now. I assume that there is also a BellSouth point of contact?

A. Yes.

Q. You've gone to the work management center, the determination has been made that the order can't be worked that day. Once that decision is made, is something entered into a computer or e-mail or something similar?

A. It is entered into a computer, not even being -- nothing is retyped. The status on the order is changed.

Q. And that is transmitted to someone who is responsible for notifying the customer?

A. Yes, to someone who is responsible for taking whatever action they want to do.

Let me describe that. That action creates a report. That report prints out at several places. It prints out in the resident service centers for BellSouth's consumer representatives at a designated location, it prints out in the LCSC at a designated location, and then those units take the action that has been agreed to.

In the case of the LCSC, we either fax it to or notify the CLEC. In the case of the consumer unit, they decide whether they want to call the customer directly or not.

Q. The consumer unit is for BellSouth, the LCSC is for ALECs?

A. Is for ALECs.

Q. And just so I'm clear, again dealing with the situation where you have a problem on a day that the service is supposed to be turned up, talking about an ALEC customer, the technician would send the message via the portable computer to the work management center, he would also call the point of contact at the ALEC itself --

A. Yes.

Q. -- or attempt to anyway?

A. Yes.

Q. But the ALEC at that point doesn't know -- knows there's a jeopardy, doesn't know what the disposition is going to be, doesn't learn of the disposition until the work management center notifies it?

A. Right. Exactly the same process for BellSouth and the ALEC. You get early notification that there's a problem. Until we've exhausted our

efforts to resolve that problem that day and meet the due date, you don't get a hard notification that there is a problem.

Q. Well, there is a difference, though, in that once the decision is made it is on BellSouth's computer system and automatically prints out or is handled however BellSouth's business system works; whereas, the ALEC is notified via phone or fax, is that right?

A. Although -- except for the LENS users who receive that electronic notification immediately.

Q. Is there a beeper or something that goes off in LENS or they have to check?

A. No, just like the BellSouth units have to go in and call for the report to be printed, the LENS users have to go in and ask for the status on the order. This is the process that the Change Control Committee has now taken under their auspices to resolve and to tell us how and when the CLECs want those jeopardy notices transmitted back to them.

Q. If BellSouth wanted to, it could e-mail its own reps and give them the information electronically because it's accessible that way, is that right?

A. No. There's no individual rep information retained on any of that data. We can tell which business unit originated it and send it back to them, but you would never -- you could never e-mail, build an e-mail out of that system.

Q. Looking at page 39 of your testimony, looking at line 12, you say that these messages, referring to messages from technicians, do not create nor communicate information about service jeopardies which occurred at or about the time of an installation call?

A. Right.

Q. And is that true even somewhere where say there are no facilities, that information cannot be via the handheld terminal?

A. No. The technician would not be there if there were no facilities.

Q. How about a problem with the facilities?

A. Defective facilities?

Q. Yes.

A. No. That's not transmitted through the terminal. He has the ability -- it's a very limited terminal, it's not a computer with a keyboard. He has the ability to say I can't complete this order. Then he has to get on the phone with the work

management center, describe the problem, the supervisor then has to decide what they're going to do with it.

Q. The same page, line 24, you say that BellSouth is, of course, willing to entertain serious inquiry that a possibility of electronic notification via EDI, and then it goes on.

Do you not consider MCI as having made a serious inquiry about this?

A. Not until recently. We could obtain -- we had inquiries from MCI and AT&T, and let me not say that they were not serious, but we did not have a process in place until the Change Control Committee existed, which was just last month, to arrive at any industry solutions to returning service jeopardies.

So I don't mean to say that we haven't gotten serious inquiries, I just didn't mean to imply that by that, but there are no industry standards. If the industry wants to get together and establish something in advance of industry standards, that is what the serious inquiry was tied to.

Q. Let me show you Exhibit BG-8. It is a copy of a September 18th, 1997 letter from Marcel

Henry to Joe Baker that was attached to Brian Green's exhibit as BG-8.

A. I should have it here. Hang on a second.

Q. Do you see that?

A. Yes.

Q. Let me ask you to take a look at that and see if you can agree with me that in that letter MCI was requesting that jeopardy notifications be issued via EDI?

A. Yes.

Q. And you would agree that was a letter from MCI's Vice President Marcel Henry?

A. Yes, it was.

Q. And would you agree with me that was a serious request?

A. No, I wouldn't, and the difference is this. MCI was not an EDI user with BellSouth. They were in the process of coding but were nine months away from their original projected start date. You have to do this in steps. Until you have an EDI system up and functional, talking about things that it doesn't do seems rather early to us.

I don't want to reject it and say this is not a serious inquiry. There have been inquiries all along but no industry participation in

establishing a means to transmit jeopardies back to the CLECs until literally last month.

Q. Well, until last month BellSouth wasn't willing to do it, isn't that right?

A. No, it didn't even come up in the Georgia hearings. We spent two days in the Georgia OSS workshop and out of that set of discussions, jeopardies did not -- electronic transmission of jeopardies did not make the list that came out of that workshop and that was the most comprehensive workshop we've had. It was discussed, but it didn't make the priority list when we got done with it. So we've been back and forth on this for many, many, many times as far as what we were going to do to handle those jeopardies and that particular one was put out as the industry resolution as I recall.

Q. I've got the Georgia order here. Attached to it is Appendix A. I'm going to refer you to page nine. Under ordering status, issue 2(c), I just ask you to take a look at that and confirm that the service jeopardy notification was an issue in the major issues?

A. Right. Yes, I'm sorry, I didn't mean to say it wasn't an issue, but notice the proposed solution. In the interim, BellSouth will work with

carriers on the provision of timely notices, which is what we started doing during that proceedings.

Q. And that wasn't the resolution that MCI wanted, though, is it?

A. No.

Q. I just want to clarify, it was an issue that --

A. Providing electronic jeopardies was not identified as a solution out of the series of Georgia workshops, say it that way.

MS. KEATING: Mr. O'Roark, I apologize for breaking in, but we're running into a scheduling problem here. We're fixing to lose our conference room and our conference phone. I was just wondering how much more you have because, actually, staff has a substantial amount of questions still and as I understood it earlier, Mr. Stacy needs to leave at 1:15. Am I correct?

MR. O'ROARK: Yes. It sounds like we may not finish. I've got another 15 minutes.

MS. KEATING: Well, we've probably got actually about 30 or 40 minutes. I could suggest maybe that we reconvene if that's at all possible.

MR. O'ROARK: Let me see if I can't wrap up very quickly. Would that be all right? We've

got 25 minutes.

MS. KEATING: After your questions, obviously, but perhaps we could reconvene to cover staff's questions.

MR. O'ROARK: That is certainly acceptable to us.

MS. KEATING: We're having to leave this room now, so I'm going to have to break this connection. We do have another phone available down the hall but we're going to lose some of the sound quality. I just wanted to let you all know, we're fixing to drop off the line, if we could have a minute to get down the hall.

MR. O'ROARK: Sure.

MS. KEATING: I greatly appreciate it. Thank you.

[A short recess was had.]

Q. [By Mr. O'Roark] Mr. Stacy, let's take a look at page 31 of your testimony --

A. All right.

Q. -- the Q and A starting at page four. When you talk about the process that BellSouth and MCI have established for handling jeopardies when MCImetro begins to submit orders with EDI, that's an interim process, isn't it?

A. I'm sorry. I've got this strange printed copy here and obviously I'm on the wrong --

Q. It's the question starting, have BellSouth and MCImetro established.

A. Page 30?

Q. It's 31 on my copy.

A. I'm sorry. Okay. We're there, yes.

Q. This process that's referred to is an interim process, isn't it?

A. That's correct.

Q. Let's talk about Count 9. The network blockage information that BellSouth is providing is basically the same as before the November '97 order, isn't that right?

A. Yes. It basically is the same, that's correct.

Q. And then looking at the order at page 59, let me ask you to take a look at the final paragraph.

A. Yes.

Q. My question is, what has BellSouth done to comply with that paragraph? Excuse me while I look over your shoulder.

A. Okay. BellSouth is now providing in a somewhat different form trunk blockage data on a

monthly basis to demonstrate that the blockage levels are comparable between the two types of traffic, and that was not being provided at the time of the Florida order in the same format that it is now.

Q. You say it is not in the same format. Is it substantially the same information?

A. Substantially the same information, complying with what we believe is the FCC's request and, in fact, it is the information we have about trunk blocking and use at BellSouth on a regular basis.

Q. Mr. Stacy, I understand that BellSouth provides certain common transport group data to MCIT, is that right?

A. Yes.

Q. Broken down more specifically than is provided to the ALEC industry?

A. I don't know that it's broken down more specifically. It's data out of the same data set. It may be reported in two different ways, but it's the same data.

Q. Page 43 of your testimony --

A. Yes.

Q. -- the first Q and A concerning ALEC

trunking architecture. You say that in the interest of establishing service with the ALEC as quickly as possible, when BellSouth first began receiving requests from ALECs, BellSouth made a decision to interconnect with ALECs at the intralata tier of the trunk network rather than the local tier even though almost all the calls are local. Did you inform the ALECs of that decision ahead of time?

A. Ahead of time, I mean, we informed them of it in our first series of technical processes beginning back in 1996, so during the arbitration discussions they were certainly aware of that when we were negotiating the contracts.

Q. BellSouth notified ALEC that interconnection would be at the access tandem rather than the local tandem?

A. Yes.

Q. Did you inform the ALECs that there were such things as local tandems?

A. To my knowledge, we didn't specifically talk about the fact that local tandems existed back then but that was before I was in the process. I really can't say what we informed them of back in '96.

Q. The last set of questions, Mr. Stacy, I

want to take another look at the complaint and I'm looking at your rebuttal testimony, page 21, lines 20 and 21, where you say that these reports should satisfy all of MCImetro's trunk blocking requests.

A. Yes.

Q. Let me just refer you to paragraph 66 of the complaint. You will see that the request is broken down into four parts, and let me just ask you, is BellSouth now providing all of that requested information to MCI?

A. No, BellSouth is not. Specifically, we are providing the blockage data on the common transport groups, the blockage data on MCI's interconnect trunks. We're providing aggregated data on the blockage data for all the ALEC interconnection trunks, but not on each trunk because we consider that customer proprietary information, and similarly, we're providing aggregate data on BellSouth trunks, but not detailed specific data on BellSouth trunks.

Q. What is it that you said you considered to be customer proprietary information?

A. The specific data of the various ALEC trunk groups. For instance, Media One's -- the data on Media One's trunks.

MR. O'ROARK: That wraps up my examination, so I will turn it over to the staff.

MS. KEATING: This is me, Mr. Stacy. We've got probably still 30 or 40 minutes worth of questions. I will put it out there for all of you how you would rather handle that.

MR. CARVER: It seems to me like there are two possibilities. One is if you have time we can do it now, if not, we probably need to reconvene by telephone next week I would think because you are going to be tied up tomorrow all long and you are going to be tied up today all day and next week you will be on vacation.

THE WITNESS: I've got to leave here about 1:15 to make it to that flight.

MR. CARVER: Let's go off the record.

[A discussion was had off the record and the proceedings were adjourned for the day, to be reconvened at a future date pursuant to agreement of counsel and the witness.]

C E R T I F I C A T E

STATE OF GEORGIA,

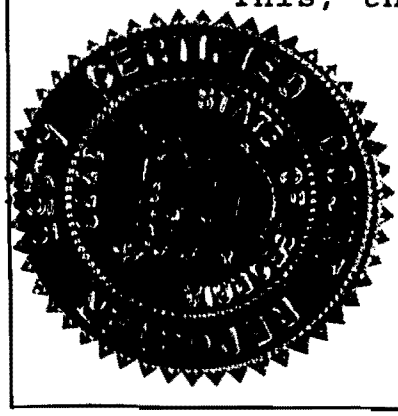
COUNTY OF COBB:

I do hereby certify that the above and foregoing deposition was taken down, as stated in the caption, and the questions and the answers thereto were reduced to typewriting under my direction.

I do further certify that the witness was duly sworn by me, that the exhibits attached are true and correct as furnished to me, and that the foregoing 121 pages represent a true and correct transcript of the evidence given by said witness upon said hearing.

I do further certify that I am not of kin or counsel to the parties to the case; am not in the regular employ of counsel for any of said parties; nor do I have any interest, financial or otherwise, in the final result of said case.

This, the 23rd day of July, 1998.



R. L. Shelnutt, Notary Public
My Commission Expires 5/5/02
Certified Shorthand Reporter
Certificate Number A-153

Exhibit _____

Docket No. 980281-TP

DEPOSITION OF WILLIAM STACY

PART II

FLORIDA PUBLIC SERVICE COMMISSION
DOCKET NO. 980281-TP EXHIBIT NO. 11
COMPANY/ WITNESS: Stacy
DATE: 8-5-98

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Complaint of MCImetro Access Transmission Services, Inc., against BellSouth Telecommunications, Inc. for breach of approved interconnection agreement.) DOC NO.980281-TP

DEPOSITION OF:	WILLIAM STACY
TAKEN AT THE INSTANCE OF:	MCImetro
DATE:	Tuesday, July 28, 1998
TIME:	Commenced at 11:40 a.m. Concluded at 12:45 p.m.
REPORTED BY:	Debra Krick

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ALSO PRESENT:

WAYNE STAVANJA, FPSC Staff
BRIAN MUSSELLWHITE, FPSC Staff

* * * *

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* * * *

EXHIBITS

NUMBER		IDENTIFIED
2	OSS case order	21
3	Florida trunk reports	43

D E P O S I T I O N

Whereupon,

WILLIAM N. STACY

was recalled as a witness, having been previously duly sworn to speak the truth, the whole truth, and nothing but the truth, was examined and testified as follows:

MR. CARVER: There was a request for late filed exhibit during the first part of Mr. Stacy's deposition last week. I believe it was a document that would constitute a bona fide request for RSAG data. And we have searched, and have not been able to find that. You can ask Mr. Stacy about it if you want. But as far as we can tell, it doesn't exist.

MR. O'ROARK: That's fine.

MS. KEATING: Okay. I am glad you clarified that. Actually, I had a question about that myself.

(Discussion off the record.)

EXAMINATION (continued)

BY MS. KEATING:

Q Let's go ahead and get started.

This is the continuation of the deposition of William Stacy.

And Mr. Stacy, you were sworn in the original part of this deposition?

A Yes.

Q Okay. And you will forgive me if I backtrack a little bit over some areas that you already covered. I am trying to make sure that I don't do that as much as possible, but there may be some areas that we have to go over twice.

A That's fine.

Q I am going to begin first working from your rebuttal.

A All right.

Q And looking on page 6, lines 13 through 17, you're indicating there that BellSouth's currently developing the API interface using the Corba protocol, because the ECICs, indicated that Corba is the likely long-term preordering standard?

A Yes.

Q Could you just clarify when will the API interface be available in ALECs?

A The Corba version of the API interface is available this year in two phases. The preordering portion of it is available August 30th. The ordering portion is available November 1st.

Q All right. Preordering August 30th, and ordering November 1st?

A Right.

Q Okay.

A We have just begun the implementation of the TCP/IP version of the same interface, and are discussing that with MCI, but I don't have dates on that yet.

Q Okay. You don't have dates on the TCIP?

A Right.

Q Okay.

MR. CARVER: Did someone just join us?

THE WITNESS: I thought I heard two come in.

MR. CARVER: Yes, I did, too.

MS. KEATING: Did anyone besides staff just join us?

MR. CORDIANO: This is Victor Cordiano with staff.

MS. KEATING: Okay.

MR. STAVANJA: Keep it on mute, Vick.

MR. CORDIANO: Okay.

BY MS. KEATING:

Q Stay on this discussion about the API. Could you explain what preordering benefit or function, API, using the Corba protocol will provide that LENS and EC-Light don't currently provide?

A None.

Q It is no difference?

A It is a technically different solution to exactly the same processes.

Q What do you mean by "technically different," is it just the set up is different?

A No. The software -- the software methods used to implement an application program interface are very different than the software used to implement LENS Common Gateway Interface or EC-Light, but the functionality remains exactly the same.

Q Why was the software difference necessary?

A The software is different because the industry -- there was no industry standard when we developed LENS and the common Gateway interface or when AT&T asked for EC-Light. The industry has just gone down a different track on its use of the software, and did not use either of the two methods that we have put out there in 1997.

Q Okay.

A So -- I guess -- I want to make sure I am clear there. The functionality is the same. You obtain the same preordering information. You obtain it in a fashion that can be integrated with a CLECs application. But the software methodology is very different. It's a piece of software called an application program interface, and it is installed differently, responds differently and acts differently. But it doesn't have any different information.

Q Okay. And just to be a little more clear, the software difference was necessitated by industry usage or industry standard?

A Yes.

Q Okay.

A Yes.

Q Well, is the API interface that's being developed a BellSouth proprietary interface that incorporates the Corba protocol?

A No. It is being developed in line with the industry standard, which is being voted on right now.

Q Okay.

A Literally as we are having these calls.

Q Do you have any expectations as to the result of that vote?

A The vote -- the vote on the EDI version of the same thing was 23 in favor and 8 abstaining. We believe the vote on the Corba version is going to be exactly the same.

Q Okay. Now, I would like to refer you to Witness Green's direct testimony.

Are you familiar with that testimony?

A Yes, I am.

Q Okay. Well, on page 11 and lines 20 through 22 --

A Just a second. Page 11. All right.

Q Witness Green states there that BellSouth informed MCI that the API interface would be designed for medium-sized ALECs that do not use the EDI ordering interface; is that correct?

A In general, that is correct.

Q Why is that?

A It can, however, be used -- well, let me explain, and I will see if this makes -- if I can make it clear.

The -- there is one industry standard that exists today, and that's the EDI standard for ordering. There are two developing standards for preordering, specifically the Corba and the EDI TCP/IP vendors.

There is BellSouth's API at the request of our mid-sized customers, includes Corba preordering and Corba based ordering. So that was our target market. If a carrier such as MCI wants to use half of it -- in other words, use API for preordering information and EDI for ordering, it certainly can be used that way. The components are all interchangeable.

But when we actually set out to develop this late last year, we developed it for a specific group of customers in the mid-sized market who had asked for it before the national standard existed.

So as it stands in August, any carrier will be able to mix and match out of several preordering and two different ordering interfaces to design their system.

Q How difficult will that be?

A It's --

Q I mean, will it be any more difficult than using one --

A No more difficult. No. Again, it's just different. If you have an EDI system taking the Corba or the EDI preordering and integrating into it, it's the same level of difficulty as integrating any other kind of software.

Q And you indicated that this -- that the API was developed for certain medium-sized customers?

A Yes.

Q Can you give us any specifics or the reason that they wanted that?

A Well, the reason they wanted it? Yes.

Our lead carrier in that particular development is a group of companies called the ComSouth companies. They do business in Florida as Florida ComSouth, and several others doing business as in different states.

Their back office operation, where they do there order entry, is set up in a client server architecture, where they have a large number of PCs that their

operators use that are connected to a network server.

They do not use EDI as a means of sending orders back and forth to their vendors, including us, and are rather violently opposed to it in technical terms, believe it's obsolete, which it is. And it's a 20-year old method for sending orders and is not correct. They asked us beginning late 1997 to develop an application program interface for them to transmit their orders to us and for them to obtain preordering information to integrate into this system.

So we began that development in October or November of '97. While we were doing that, the standards committees began to look at the same type of architecture for obtaining preordering information. And so we modified our proposals to coincide with the standards where we could, but the development really started for that group of mid-sized companies who didn't want to use EDI.

Q Okay. Well, let's talk about EDI TCIP for a minute.

A Okay.

Q Now, will that also be able to integrate with LENS?

A Not with LENS.

Q Okay.

A It will be able to integrate with the carrier's choice of ordering mechanisms.

Q Okay.

A So it can be integrated with EDI.

Q And only EDI.

A Well, that's the only standard ordering mechanism we have at the moment.

Q Okay. Well, could you explain a little bit more some of the other differences that exist between API and the EDI TCIP?

A Right. Again, let me just -- let me back up to the top and try to make a list, and maybe that will make it clearer.

Q Okay.

A Let's talk about preordering first. 1996, 1997, just so far -- up until last month in 1998, no industry standard existed. So there were a number of developments on BellSouth's side. The first system we developed was a system called LENS common Gateway interface, and that lets you get into our systems and get to preordering information, and bring it back to your computer if you were a CLLI.

The second system we developed was a system that AT&T wanted to be a national standard, but got turned down, named EC-Light. So we developed that for AT&T.

Then the national standard -- by then, the national standard bodies were moving, and we developed the application program interface in the Corba version for our mid-sized customers, which complies with the emerging national standard.

And in parallel with that, MCI was pushing a different national standard called EDI TCP/IP/SSL3.

So what you have, in essence, are now two methods that BellSouth developed in 1996 and '97, LENS Common Gateway Interface and EC-Light, that are clearly not going to be national standards; they have not been adopted, but we have customers using those and are going to have to maintain them.

And we have two that clearly are going to be national standards, the Corba, slash, API interface, and the EDI TCP/IP interface.

All of those can be used completely interchangeably. So any of those allow a CLEC to go into the BellSouth system and retrieve preordering information and pull it back into their computer system and use it. But they are all very different technically as far as the methods and the software they use.

Q So ultimately, do you expect LENS to be completely replaced?

A Yes. At some point in time, our guess right

now is late 1999 or maybe 2000; but in the next 18 to 24 months, LENS will be replaced by something which isn't real clear yet, but it will go away.

And we will be maintaining EC-Light's solely for the benefit of AT&T, unless they convert to one of these other standards. So these two standards are clearly the direction -- Corba and EDI TCP/IP are clearly the direction the industry has chosen to go long-term.

Q Let's talk a little bit now about the ECIC committee?

A Yes.

Q Now, what role does BellSouth play in that committee?

A We are a member of that committee along with most of the other RBOCs and most of the interchange carriers and a few of the CLECs. We are voting members just like anyone else.

Q Do you have any other particular responsibilities?

A At the -- in this particular term, we do not. The chairmanship for those standard bodies rotates through the different members. And at one point in time two or three years ago, our member was the chairman, but is not right now.

Q Well, what authority does the ECIC committee

have exactly for setting national standards?

A No authority, but a lot of responsibility, if I can put it that way.

The telecommunications industry association is a voluntary body made up of the interexchange carriers and the RBOCs and the CLECs to try to resolve standards issues at the national level. And although they have no legal authority, we all give them the responsibility to develop standards that the members then agree to implement.

So, for instance, BellSouth has contractual obligations in a number of its interconnection agreements to implement national standards within a certain time frame after they are adopted by these committees with agreement from both parties to the contract. And we use that sort of mechanism to give them the authority to set the standards and then say, we are going to comply by them.

Q Okay.

A But no -- you know, they are not a regulatory body, they don't have legal authority. They have granted authority, I guess is the right way to put that, from us, as members.

Q And does BellSouth always adopt the standards that are developed by the committee?

A We do not always. In this particular case, however, we are obligated to in one or more of our interconnection agreements.

Q Okay. But there are some circumstances where you might not necessarily?

A Yes.

Q Okay. And would that be due to some provision in the interconnection agreement?

A It could be due to a provision in the interconnection agreement. It could be -- for instance, we are now managing our systems through a process called change control where there is a regional committee, if you want to call it that, of the CLECs and BellSouth, that agree on changes.

If that committee said, well, for BellSouth's territory, we don't want to adopt this change right now, then that would -- I started to say the wrong word -- that would create a condition where BellSouth wouldn't comply with a national standard, but it would be on a much majority agreement of all the participants included -- well, the CLECs and BellSouth.

Q Okay.

A And I think we are -- let me just go on to add a little bit. I believe we are about to come to a specific case of that in the region. It has not been voted on by

the change control committee yet, but we have a contractual agreement that would say that we have to implement a particular version of ordering software seven months after it's approved. And that particular seven-month period runs out November of this year.

The committee met last week and has not voted yet, but their preliminary discussion said that the committee wanted to, in essence, relieve us of our contractual obligation and wait until June of 1999 and implement two versions of that software at the same time.

But that's what the change control process is all about. We meet jointly with the CLECs. They actually have the majority of the votes, and they need to determine when they want software changes implemented.

Q Okay. Thanks.

A Uh-huh.

Q Let's talk about address validation next and RSAG.

A All right.

Q And I am going to refer you again to Witness Green's direct testimony?

A Yes.

Q And on page 13, at the top, lines three and four.

A Uh-huh.

Q He states that BellSouth's address validation system has a scheduled outage totalling 42 hours a week; is that correct?

A No, it isn't. And I don't know where that came from. Scheduled outage is less than four hours a week.

Q Why is the scheduled outage necessary?

A This runs on a large mainframe computer.

Q Yes.

A There is data cleanup required. And when it's out of service, it's out of service for BellSouth and the CLECs.

Q Okay. Well, on the next page of Witness Green's testimony, he states that BellSouth claims that the RSAG technical specifications are proprietary.

A Yes.

Q And do you know why BellSouth considers those specifications proprietary?

A Yes. They are BellSouth property.

Q There was something that you mentioned last week, MSAG?

A Uh-huh.

Q What does that stand for?

A Metropolitan street address guide.

Q And what's the difference between that and RSAG?

A They are -- in BellSouth's case, they are parts

of the same database. The MSAG data tells you what the range of valid house numbers is on a given street. So it will tell you that a range between 100 and 300 is valid on that -- on a particular street.

The RSAG data tells you at the living unit level that this is a valid house number, and we have it in our database, and we know what facilities go to it. So RSAG is a more detailed version of MSAG.

Q Okay. Going back now to your rebuttal testimony.

A All right.

Q Looking at page 10, lines one through seven. You state there that the Georgia PSC ordered BellSouth to provide a download of entire regionwide RSAG to MCI?

A Yes.

Q And I believe y'all discussed this last week. But when did that order come down?

A I do not have the date in front of me. I will have to -- the order in the OSS case, the order, I believe, came out mid-May, but I do not have the date in front of me.

MS. KEATING: We would like to ask for that as a late filed deposition exhibit.

THE WITNESS: Okay.

MR. CARVER: The order itself?

MS. KEATING: Just the order itself, that will be fine. And I am not sure which one this would be.

MR. CARVER: Basically, the one he refers to in his testimony; just do it that way?

MS. KEATING: Yes. I was just referring to which late filed deposition exhibit number.

MR. CARVER: Oh, okay. I thought you meant which order.

MS. KEATING: Yeah. But the order that he refers to.

MR. CARVER: I think this would be number two for him, because the first one was the one we discussed earlier.

MS. KEATING: Okay.

(Whereupon, Exhibit No. 2 was marked for identification at a late-filed exhibit.)

MR. CARVER: I think this was one for Milner and one for Stacy. And that was it, I think.

MR. O'ROARK: One exhibit, you mean?

MR. CARVER: Late filed request?

MR. O'ROARK: Right.

MS. KEATING: Okay.

BY MS. KEATING:

Q Well, when do you expect the RSAG to be provided to MCI?

A Roughly the end of September. We are -- have had at least one meeting with them about that now, and we are in the middle of discussing how to provide it and exactly what data they want, so on and so forth. But the end of September is the approximate date.

Q So they may not necessarily want the entire thing?

A Well --

Q The entire RSAG?

A There are some fields that we have acknowledged we are not going to supply them with that are unrelated to address validation, that are proprietary marketing data of BellSouth. For instance -- and I think I went through some of this last week -- but for instance, we have that -- they have marks in that database that indicates where we have our -- an alliance with a cellular company, BellSouth Cellular Company or something, or nonBellSouth cellular company. And that's accessible to the BellSouth retail unit.

That information is proprietary to BellSouth and would not be furnished to MCI and other marketing data like that. But all of the address validation and facility availability data is going to be furnished to them. And that meeting -- the first of those meetings was to sit down and say, here's the data, here's the

format it's available in, here's what we propose in terms of a download, what bytes you take it from, how big the files are, when you get it at night. Those are the details that are now being worked out.

Q Well, do you know whether the interconnection agreements between BellSouth and MCI in Georgia and Florida -- are they both the same?

A They are similar. I don't know if they are the same. This is in dispute still in a different case in Florida.

It was not settled as part of the interconnection case in Georgia. It was ordered as part of the -- an OSS case that spun off of the 271 case, so it's a very convoluted web.

The MCI interconnection case in Georgia, or complaint about the interconnection agreement, to my knowledge, has not been settled or voted on by the commission. This order came out of a series of OSS workshops.

Q So you don't know for sure whether the -- at least the RSAG provisions in the two agreements are the same?

A No. I believe they are. It's my belief they are the same, but I have not compared the two contracts directly.

Q Well, do you believe that the Georgia order completely resolves this issue between BellSouth and MCI?

A I believe it does, except for the resolution of who and how they pay -- who and how gets paid for it, which Georgia gave us a mechanism to resolve. But to my belief, it completely resolves the issue.

Q But the payment issue has not been resolved?

A The payment issue has not been resolved. Georgia ordered us specifically -- gave us a methodology to address that.

We basically go back to arbitration and through the process in Georgia to address how it gets paid for.

Q Well, do you feel like that's something that the Florida commission needs to take a look at as the cost issue, for providing that type of information?

A Since we are providing it on a regional basis -- I believe we are going to settle it regionally in Georgia, because of the way their order was constructed. Florida would not have to deal with it separately. But I am not a cost expert in terms of how the costs get apportioned or applied between the states on a regional system that has a regional impact like this. So I will have to qualify my answer with that.

Q Okay. Let's move on in your rebuttal testimony. I am looking at page 12. And the discussion is about the

installation calendar?

A Yes.

Q And lines 5 through 10 of that page, you state that lands for display and installation calendar for the specific central office serving an end-use customer location, including the work schedule for the office, the current employment intervals and any dates that are already closed.

A Uh-huh.

Q Now, just to be clear, that doesn't also display the dates that are available; is that correct?

A It does not. It displays simply the dates that are not available in this case.

Q And on that same page, you state that MCI's been provided with tables of standard intervals that can be used by MCI systems to calculate due dates?

A Yes.

Q Well, what form is that provided in?

A It has been provided both in letter and electronic form.

Q So this -- would it require MCI to actually convert that information --

A Yes.

Q -- for its own usage?

A MCI would have to convert and program that

information for their own usage in their own ordering system.

Q So they would have to manually retype at least some of the information?

A No. I am misleading you there. It's in electronic form. So if they want to import the table that exists and use that in their calculations, it's possible to do that. They would have to do programming work to make that happen.

Q Okay. Turning over to page 15 of your rebuttal?

A Uh-huh.

Q Looking at lines 10 through 14, you state that ALECs can reserve more telephone numbers than BellSouth retail can, because ALECs using LENS can reserve six numbers at a time.

Now, I realize that you went over this a little bit last week. But just to clarify, if MCI wants to order or reserve 25 numbers --

A Yes.

Q -- they have to make five orders?

A Five requests.

Q Five requests. Now, could you clarify the difference for that? I mean, do they have to start completely over from the opening page?

A No. They start from the inquiry screen. And if they are using LENS, they start from the inquiry screen, go to the reserve telephone numbers and reserve six at a time.

Q But they don't have to go all the way back out of LENS?

A No. They do not have to back out of LENS. They just have to start at the top of that menu, if you will, which is the --

Q So does it show up then still as five separate orders or --

A When you reserve -- when you're reserving telephone numbers, they have nothing to do -- at that stage, they have nothing to do with an order. They are simply marked as reserved for MCI use in the database.

Then when an order is placed, it checks to make sure that that number was reserved for MCI, and then moves it from reserved to a status called working.

So you are just putting a checkmark by them, if you want to think about it that way, with the reservation that says, these are on hold for MCI, no other CLEC or BellSouth user can reserve them until MCI either releases them or uses them.

Q Well, do you know how long it would take to go back to the beginning to start reserving another batch of

numbers?

A From the end of the reservation screen, two clicks, maybe three seconds.

Q Okay. Now, I am going to refer to your direct testimony a little bit.

A All right.

Q And I am looking now at page 29?

A Yes.

Q And we are talking about the Excel spreadsheet?

A Yes.

Q And you state there that BellSouth's looking at creating a USOC file in an Excel spreadsheet or alternatively creating a text file format if Excel is not a usable medium?

A Right.

Q Has BellSouth provided the USOC file in either an Excel or text format to MCI already?

A We have provided it in a text format already, yes. This is a request that we find a better format, I guess is the answer -- is the right word that's agreeable to both parties.

Q And has BellSouth found a better format?

A We have not yet. We are trying a new one this month for a -- not for the USOC file, but for another file called a comma space value format that seems to be

agreeable to MCI for a different report.

And if that proves out, then we will move back and look at using that same format for the USOCs. But I guess the point is it's there today, it's usable. MCI asked for a different format, we will be glad to provide them that, but we have got to agree on a limited number of formats. We can't have 20 different copies of it.

Q Okay. Well, moving on to pages 31 and 32?

A Okay.

Q And there you just list the data elements --

A Yes.

Q -- that BellSouth provides?

A Yes.

Q Are there data elements that are not listed that are currently provided to ALECs?

A The data element that's not listed, that is -- excuse me, that is not listed, but is currently provided manually is, in Georgia, we just received an order to provide the price of the product or service. And that is being provided manually. It will be provided electronically later this year, I believe on August 14th to the CLECs. That's the only data element that's not listed.

Q Do you know how it's going to be provided electronically?

A The price? In the services and equipment section of the listing, each product will have the BellSouth tariff retail price indicated at the end of the first line, which is the line that has the universal service order code on it.

And then it will be presented again in a form called the local service itemization, which is at the end of the customers service record, more or less a summary of the customer service record.

Q What data elements does an unedited CSR have that aren't listed here or that are not provided to ALECs?

A There are -- let's see. That are not listed here. And I am sorry I am backing up when you made me remember that we were also ordered in certain states, and Florida is one of those states, to provide credit information, customer credit history. And that is not shown on this list, because that's not universally true.

Those are the -- those are the primary elements of the customer service record that are not on this list, are those dealing with the customer's credit worthiness, their payment history with BellSouth, their credit rating with BellSouth, things to do with that.

And we have been ordered to provide parts of that in Florida and parts of -- different parts of it in

other states. That's the only substantial pieces I can think of.

The one exception would be, again, marketing information. For instance, if this customer is a customer of BellSouth dot net, our Internet provider, that information is contained in the customer service record, but is not forwarded to the CLEC.

Q And just to be clear, those are the things that show up on the unedited CSR?

A Yes.

Q Okay. Looking now over on page 35 of your direct?

A All right.

Q And you talk there about BellSouth's plans to include local service itemization in LENS in July of '98?

A Yes.

Q And you also indicate that it's going to be available in EC-Light?

A Uh-huh.

Q Could you explain a little bit more what is local service itemization?

A Sorry, if you haven't seen one, it's probably difficult. If you could imagine -- I will give you a simple example. You're a small business that has five lines from BellSouth. If you look at the detailed

listing, you see a listing for each individual line that specifies the features and services that it has on it.

The local service itemization is simply a summary that says this business has five 1FBs or five touch tone features, four call forwarding features and four hunting features. So it's a summary of all of the detailed items in a very short form.

Q So why did BellSouth decide to include LSI in LENS and EC-Light?

A A request from the CLECs. They have been asking us for many months now to provide this particular function electronically.

Q Well, you indicate that pricing information is going to be excluded from LSI?

A Yes, except in Georgia.

Q Except in Georgia?

A Yes.

Q And why is that?

A We have been ordered to provide it in Georgia. We continue to believe that it's marketing data, because it's BellSouth's retail pricing. It makes it easier for the CLEC to market the service, and it has no other purpose and that is unrelated to their market price they offer to their customers.

We lost that particular case in Georgia, so we

are having to provide it. We are going to continue to contend it on a state-by-state basis until we are ordered to provide it in any state.

Q Is there anything else that's excluded from LSI, besides the pricing information?

A No. Well, again, other than those services that are not telecommunication services that BellSouth provides, if they are cellular service on the account or if there is BellSouth dot net service on the account, they would not be in the service.

Q And is the order in which Georgia required that you provide the pricing information through LSI, is that the same order that we discussed earlier?

A Yes, it is. The pricing information, they did not specifically mention LSI.

Q Okay.

A That's the same order we discussed earlier.

Q Well, regarding the CSR information, can BellSouth service representatives only view and print CSR information, or is that data fielded so that the rep can use the data to actually generate an order? And I am referring to your exhibit WNS one.

A All right. Let me make sure I am clear.

The BellSouth rep can do all three things you mentioned. Let me be very specific about that. The data

can certainly be viewed and printed. The data comes back in a form, as we have indicated to MCI multiple times now, that allows the recipient of the data to parse it and populate an order with it. And BellSouth systems do exactly that on the receiving end, not on the sending end. And let me give you an example.

When the data for the subscriber's listed name comes out of the customer record inventory system, CRIS, it comes out of that system as a string of data that starts with the characters LN, which stand for listed name. It's followed by three spaces. Then the subscriber's last name is listed, a comma, the subscriber's first name and middle initial or middle name are listed.

That's what BellSouth's systems get back. And BellSouth systems, in essence, take that string of data apart and parse it in orders to MCI we have been using, and then use that data to create an order.

So it doesn't exist fielded or broken apart in the basic record system, except it is broken apart as a single line of data that has the listed name on it.

Does that make sense?

Q Somewhat.

A Okay.

Q Let me just try to clarify it.

So the BellSouth representative can't just block and copy the information from that and input it into an order?

A No. The computer that they use actually goes through, receives the data and then parses it.

Q And is that the same way that an MCI representative would receive that information?

A Yes.

Q Okay. Let's move on, then, to page 39 of your direct?

A All right.

Q And I am looking at the bottom of the page, and I believe the discussion goes on over to page 40.

And you are talking about developing an electronic notification through EDI?

A For service jeopardies.

Q For service jeopardies, right.

How long does BellSouth think it will take to develop such capability?

A The last such development we did, which was electronic error rejection, took us about four-and-a-half months from start to finish. We estimate that this one will take about the same amount of time.

This has been given to the change control committee a week ago to -- for them, the CLECs, to

prioritize and tell us how they want to -- how they want us to handle it, rather than BellSouth doing it unilaterally.

So at the moment, this particular one is in the hands of the CLEC change control committee.

Q What all goes into developing this type of capability?

A Now, since there are partners, you have to think about this one as a trading partner. Right at the moment, AT&T is the only EDI trading partner BellSouth has that's using its own software. We have a number of others that are using a PC EDI software that BellSouth provides.

But all of those parties -- and as it stands right now, AT&T and MCI and the BellSouth -- the people who are using BellSouth software, all have to agree we want to get a jeopardy back in this kind of transaction, which will probably be in an 865 EDI transaction.

We want it when it comes to us to have these five pieces of data in it. And that's what we have got to agree on. It has to be, obviously, the order number that the jeopardy is related to, the time it was sent, the type of jeopardy it contains, maybe an estimated completion date when the jeopardy could be cleared. But those partners all have to agree on how to send the

information back, what information to send back and what codes are going to be used in sending the information back and forth.

BellSouth uses a series of two letter codes; for instance, like CF, means that the order has been put in jeopardy because BellSouth doesn't have company facilities to provide that order. And so all of those partners have to agree on those things, and then we can write the software.

Q But BellSouth will be the one that actually wrote it?

A BellSouth will have to write it, but AT&T and MCI specifically, because they have been receiving software on their end, will have to write complimentary software to take the data and do something with it. Otherwise, we would just be sending it into a vacuum. So it takes both sides -- in EDI, it takes both sides developing software at the same time.

Q And that's -- the developing of software for the ALECs, is that also part of the coordinated effort?

A Yes.

Q Well, on that same page, page 40, you indicate that if interim codes for service jeopardies were defined and implemented, all parties would be forced to rewrite and recode their respective sides of the EDI interface

when the industry standards are developed?

A Right.

Q Do you know whether or not an EDI industry standard for service jeopardies is currently being developed?

A It's being considered. It is not being developed yet.

Q Okay. Do you know what that might be?

A It is part of the software that's now called version 10.

Q Do you have any idea when that might go into development?

A That is -- that would be voted on sometime in early 1999, maybe as early as the first quarter, for implementation, late 1999 or early year 2000. But we are -- I caution to say there -- we are way out at the edge of that committee structure as far as voting and firming things. But the issue of jeopardies and return notification of jeopardies has come up, and is an issue to be dealt with in the future. It's my speculation that those are about the time frames.

Q Well --

A I will add that's one of the reasons we want this to go back to the change control committee. If the CLECs want us to implement an interim solution,

BellSouth's agreeable to do that. We think that in -- supposedly, we implemented it and supposedly it was done in the order of '99, in 12 months, we might have to redo it, which means both of us rewriting our software.

Q Is that a likely possibility?

A I did not get a feeling from the change control committee meeting. Obviously, from this proceeding, MCI believes that they would like to have that implemented. Whether they have enough leverage in the change control committee to bring AT&T and the other partners, the other EDI users along with them, I don't know.

Q Okay. Well, I am going to refer you now to Witness Martinez' direct testimony?

A Yes.

Q And are you familiar with that?

A Yes, I am.

Q I am looking at page 16, lines 11 through 20?

A Okay. Just a second. Yes.

Q And he lists there four types of blockage information that MCI is requesting from BellSouth, so that it can check for comparable blockage in its traffic?

A Uh-huh.

Q Do you have copies of these reports?

A Do I have copies of these records?

Q That are provided by BellSouth to MCI?

MR. CARVER: So you are not referring to Martinez' testimony. You mean the reports that Stacy talks about, that we provide?

MS. KEATING: Actually, Witness Martinez refers to four of them right here, of the types of blocking reports.

MR. CARVER: Okay.

MS. KEATING: And I am just wondering if BellSouth has versions of these. Do you keep copies of the same reports?

MR. CARVER: In Stacy's testimony, he lists what we provide to them. And off the top of my head, I am not sure if his references to them match up with Martinez' or not. So you might want to tell him what Martinez says.

BY MS. KEATING:

Q Are they the same thing?

A I have Martinez in front of me.

MR. CARVER: Okay. So does that -- I am sorry, go ahead.

BY MS. KEATING:

Q Are these the same reports?

A Yes, these are the same reports. The names are slightly different. BellSouth provides -- and let me take you through the performance measures data. We have

actually been providing this particular data on trunking since April of last year.

Q Well, could we get copies of those as a late filed deposition exhibit?

A Yes. Or you can get them -- someone in your group should be collecting them off the web site already. But we can certainly provide them.

THE WITNESS: Phil, what we are talking about is the Florida trunk reports in the SQM format.

MS. KEATING: Yeah. I am not sure whether we have a member of staff that has done that. So I would like to go on and ask that.

MR. CARVER: These -- I just want to ask for a clarification. I think these come out periodically.

THE WITNESS: They come out on the 15th of each month.

MR. CARVER: Do you want all of them or just an example or for a particular time frame.

MS. KEATING: The most recent ones. We are just looking to see what they look like.

MR. CARVER: Okay.

THE WITNESS: I know the June report is posted out of QA, so it's --

MR. CARVER: Okay. So if you would, Bill, if you could just go through -- you mentioned the trunk

reports and SQM. Could you just list the other things that we will be providing?

THE WITNESS: Well, in the trunk reports, we provide the -- we provide a summary of the blockage data for the common trunk groups used for ALEC traffic. That's Martinez, little I, number one. And that's referred to in the BellSouth report as the CTTG measurements, common transport trunk groups.

Number two in the Martinez blockage data on the MCI interconnection trunks; we refer to that as the BellSouth to CLEC trunk group blockage, and we provide that on a monthly basis.

Number three, the blockage data on all ALEC interconnection trunk groups, we provide as a summary. We do not provide -- we provide each individual company with their own data, and then we provide a summary of the Florida data. And that's in that same report, BellSouth to CLEC data.

And then item four, similar blockage on all trunks carrying BellSouth local traffic, there is a separate report that's provided called BellSouth local network blocking.

So everything that Martinez has asked for, we have provided and have been providing since April of last year.

BY MS. KEATING:

Q Well, in providing those reports, could you also indicate in the exhibit just what you have said here, which parts of the reports provide the information that MCI requested in that December 24th letter?

A Yes, yes, we can.

(Whereupon, Exhibit No. 3 was marked for identification as a late-filed exhibit.)

BY MS. KEATING:

Q Thank you.

You can just title that, blocking reports provided by BellSouth, that's the exhibit.

THE WITNESS: And, Phil, if you will go directly to Ray Lee and fill him in on what else he needs to -- how he needs to annotate those.

MR. CARVER: Okay.

BY MS. KEATING:

Q Just to clarify, do these reports provide the information that MCI needs to determine whether BellSouth's providing the same trunking capacity to MCI that it does to itself?

A Yes, they do.

Q Then in that exhibit, could you also make one more indication and just highlight which report provides that information?

A Okay.

MR. CARVER: Okay.

THE WITNESS: And let me give you a brief explanation, because that is easy to talk about when you have a report in your hand. It's difficult to write down.

There are two methods that a call from a BellSouth subscriber can get to a CLEC end user on a CLEC switch. It can go over a direct trunk route from a BellSouth end office to the CLEC switch, or it can go through a tandem connection from a BellSouth end office to the CLEC switch.

Getting an exactly accurate picture is possible for any one geography. I could go in and look at the Jacksonville switching complex and tell you exactly what's happened. But when you try to roll up the comparisons above that, you are making some approximations. And I will outline that in the writing.

So if you want to talk about Jacksonville specifically, it's pretty easy to talk about. If you want to talk about comparable results in the state of Florida, it's a little harder to talk about, because you're generalizing something that can only be dealt with at a very specific level.

And trunk reports have both. They do generally demonstrate that we are providing interconnection equal end quality, and they also go down to a very specific level to let you look at individual offices.

BY MR. CARVER:

Q So, now, do the blockage reports, do those include the trunking information?

A Yes.

Q With the percent blocking, styles of trunk groups and the busy hour?

A Right.

Q I am just trying to be clear. Okay.

A Right.

Q Okay. I am looking on page 45, now, of your direct?

A Okay.

Q And at lines 20 through 24, you state that for interconnection measurement, final trunk groups are subdivided into two components, one for BellSouth trunk groups and the other for ALEC trunk groups?

A Yes.

Q Are the trunk groups ordered and administered by ALECs for dedicated or for common transport?

A They are for common transport.

Q Okay.

A The difference is that BellSouth does not control, in that case, the number of trunks provided.

Q Could you explain that a little bit?

A All right.

You need to think of this situation, and the easiest way to think of this is to think of two one-way connections; a connection that runs from BellSouth to the CLEC, MCI in this case, as a totally separate connection that runs from the CLEC to BellSouth.

In the direction from BellSouth to the CLEC, BellSouth orders, determines the number and provides the trunks in sufficient quantities to minimize blocking.

In the reverse direction, the CLEC has exactly that same responsibility, and BellSouth merely accepts their order. We don't tell them how many or when or to where. They make that judgment solely on their own as a traffic engineering decision.

Q Well, if the trunk groups are ordered by MCI to carry local traffic --

A Yes.

Q -- are they ordered out of the interconnection agreement or out of the access tariff?

A They are ordered out of the interconnection agreement. They are local, they are local interconnection trunks.

Q Is there any instance where they might allow them out of the tariff?

A Those -- not those trunks to the best of my knowledge. I guess they could, but -- let me think. No. Those trunks are not from the interconnection tariff.

Q Okay. Does BellSouth keep all of its own traffic on separate trunk groups, or does BellSouth allow ALEC traffic to be carried over BellSouth trunk groups?

A Where there is a case of common transport, BellSouth carries both ALEC and BellSouth traffic on common groups.

And in the case of the common transport groups that we were talking about earlier, BellSouth traffic to the tandems as well as ALEC traffic as well as interexchange carrier traffic all share a common group.

Q Okay. Could you explain to me what meet point traffic is?

A I can try. There are situations which originally began with the independent companies and are now beginning to be negotiated, and I think in some cases already implemented with the ALECs, where we each agree to build half of a facility connecting two switches together.

So instead of the situation I have described earlier where BellSouth has a one-way connection from

BellSouth to the CLEC and the CLEC has a one-way connection the other way, we agree to meet in the middle. And the ALEC would build half of the facilities required. BellSouth would build half of the facilities that are required. We would meet at a common point, and then negotiate some method for calculating and exchanging compensation and expenses for the traffic involved.

And that's called meet point traffic where we each build half of it.

Q Okay. That helps.

MS. KEATING: Thank you, Mr. Stacy. That's all the questions that we have.

THE WITNESS: All right.

Phil, anything else for us to wrap up for --

MR. CARVER: No, I don't have any questions.

THE WITNESS: Okay.

MR. O'ROARK: I would like to ask one.

THE WITNESS: I will go ahead and call Ray about these two reports. But if you will pass them on back to him, he can be expecting them.

MR. CARVER: Okay.

MS. KEATING: Can we expect them at a set time, maybe a week, two weeks? When is the hearing?

MR. CARVER: Yeah. The hearing is the fifth.

Do you know offhand, Bill, how long it should

take for Ray to get that.

THE WITNESS: It's basically printed. It's sitting on the web site.

MR. CARVER: Okay. Well, we -- okay. I will call ahead. And hopefully, we will get it by the end of the week.

MR. O'ROARK: I do have one follow-up question, Mr. Stacy, that concerns the questioning on Mr. Martinez' testimony at page 16, if you can flip back to that.

MR. CARVER: By the way, Bill, this is counsel for MCI speaking.

MR. O'ROARK: This is D. O'Roark, Mr. Stacy.

THE WITNESS: Good morning, D.

MR. O'ROARK: Good morning.

THE WITNESS: Page 16, you said, I am sorry.

EXAMINATION

BY MR. O'ROARK:

Q Yes.

You had looked at it before. It concerns the four categories --

A Yes.

Q -- of blockage information that MCI had requested.

A Yes.

Q And I believe you had testified a little while ago that BellSouth was already providing it.

Just for clarification, BellSouth provides that information above certain blockage thresholds; is that right?

A Yes. That is correct. We do provide it above a standard blockage threshold.

Q Which is 2 or 3 percent?

A One, two or three percent, depending on the group.

Q And, in fact, BellSouth has access to trunk blockage information from 0 percent to whatever the blockage threshold is; is that right?

A That's correct.

MR. O'ROARK: That's all I have.

MR. CARVER: Well, I have a follow-up to that.

EXAMINATION

BY MR. CARVER:

Q Just to clarify, Bill -- and I am sure someone will correct me if they think I am misstating this.

In his deposition last week, Mr. Martinez said that what MCI wants is information on any blockage of any amount. You know, .005 or whatever.

A Right.

Q Is that practical to do, is that something that

could be done?

A It is technically feasible to do it. We are a little puzzled, because no trunk engineers anywhere in the industry consider it practical to do.

You establish a blocking threshold, and then look at the data when it crosses that threshold, and -- instead of looking at every group every week. But it's technically feasible. The more groups we are talking about, the more data we are talking about, the more burdensome it becomes.

And, in fact, our interpretation, which is, again, differs with MCI's, is that the law requires us to provide interconnection equal end quality, and that the methods and procedures we use for determining the adequacy of our own trunk groups are those that we offered MCI.

So there is the root of our difference. They want something that we don't use and do not look at on a weekly or daily basis. We look at the exception reports, and then we go do analysis. That's exactly what we have given to MCI.

Q So just to clarify, are you saying that our engineers don't use the blockage data below the thresholds that we are offering to MCI?

A They do not use that data on a daily, weekly or

monthly basis. They use that data when analysis is required after a blockage has occurred, and that's exactly what we offered MCI.

MR. CARVER: Okay. Thanks. That's all I have.

THE WITNESS: Unless there is something else, I am gone.

MR. CARVER: Well, hold it. I think we may need one more clarification.

MS. KEATING: I think I know what he is asking.

FURTHER EXAMINATION

BY MS. KEATING:

Q This is Beth Keating again, Mr. Stacy.

A Yes, ma'am.

Q So you offered MCI the analysis of the blockage information between 0 and 3 percent?

A I say, offered. We actually give that to them.

Q You do give that to them.

A When a trunk group experiences blockage, the next thing that happens is one of our trunk engineers goes to MCI's trunk engineers and says, okay, what happened to this group, why did it block in this time period; here is the data we have got, do we need to increase the number of trunks in this group, and, if so, by how many.

So during that discussion, MCI gets every bit of

data that he would have got about the trunk group, because that's how the trunk engineers work together on a daily basis.

FURTHER EXAMINATION

BY MR. CARVER:

Q I know the procedure is getting muddled a little bit here, but I think we may need to clarify this.

Let me just follow-up. Bill, this is a Phil Carver again.

A Yes.

Q When you say when there is a blockage, we provide MCI with the data, are you defining the blockage as being when there is blockage at the threshold?

A Yes.

Q Okay.

A You simply don't -- you don't look at a trunk group -- once you set the thresholds, you don't look at trunk groups that are operating below the thresholds, because the traffic engineering data says you don't need to look at them, they are operating normally.

Q So if, for example, we had data that showed blockage on an MCI trunk of one-tenth of 1 percent, just to throw out a number, that would not be conveyed to them?

A That would not be conveyed to them.

MR. CARVER: Okay. Thank you.

MS. KEATING: I think that's it. Thank you, Mr. Stacy.

THE WITNESS: All right. I will see you all next week.

MR. CARVER: Thanks.

(Whereupon, the deposition was concluded at 12:45 p.m., and reading and signing by the witness was not waived.)

TRANSCRIPT CERTIFICATE

STATE OF FLORIDA)

COUNTY OF LEON)

I, DEBRA R. KRICK, Court Reporter, hereby certify that the foregoing transcript was taken down as stated in the caption, and the questions and answers thereto were reduced to typewriting under my direction;

That the foregoing pages 4 through 54 represent a true, correct, and complete transcript of the evidence given upon said hearing;

And I further certify that I am not of kin or counsel to the parties in the case; am not in the regular employ of counsel for any of said parties; nor am I in anywise interested in the result of said case.

Dated this 30th day of July, 1998.

_____

DEBRA R. KRICK

Court Reporter and Notary Public

State of Florida at Large

C O R R E C T I O N S

Corrections to the deposition of WILLIAM STACY, taken in the case of BellSouth Telecommunications, Inc., Docket No. 980281-TP, taken on July 28th, 1998.

Page-Line	Correction

Date Signature

AS TO SIGNATURE ONLY

IN WITNESS WHEREOF, I have set my hand and affixed my seal this _____ day of _____, 1998; said instrument was acknowledged before me by _____ who is personally known or identified himself to me.

Notary Public

Exhibit 12

Docket No. 980281-TP

DEPOSITION OF WILLIAM STACY

DEPOSITION EXHIBITS 1 & 2

FLORIDA PUBLIC SERVICE COMMISSION
DOCKET NO. 980281-TP EXHIBIT NO. 12
COMPANY/
WITNESS: Stacy
DATE: 8-5-98

REQUEST:

Provide copy of Georgia order adopting OSS Report

RESPONSE:

Attached is copy of Georgia order in Docket No. 8354-U adopting OSS Report

Order Book
DOCKET# 8354
DOCUMENT# 23378

COMMISSIONERS:

DAVID N. BAKER
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Docket No. 8354-U

ORDER ADOPTING OSS REPORT

In re: Investigation into Development of Electronic Interfaces for BellSouth's Operations Support Systems

Record Submitted: March 20, 1998 Date Decided: April 21, 1998

APPEARANCES

On behalf of the Commission Staff:
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BY THE COMMISSION:

The Georgia Public Service Commission ("Commission") issues this Order regarding the operations support systems ("OSS") of BellSouth Telecommunications, Inc. ("BellSouth"). The Commission established this case to discuss and propose any necessary enhancements to BellSouth's operations support systems which will aid entry by competitive local exchange companies ("CLECs") into the local market, and to ensure that the systems meet the spirit and the intent of the Telecommunications Act of 1996.

In its October 30, 1997 Order in Docket No. 7253-U, the Commission directed the Staff to conduct a Technical Workshop and to subsequently submit a report to the Commission.[1] The Staff submitted the report on December 23, 1997 as directed by the Commission. BellSouth and intervenors expressed their positions regarding the Staff Report. As a result, the Commission decided to hold a hearing to determine whether to adopt the Staff Report, which was presented as GPSC Staff Exhibit 1 in the hearing, and attached as Appendix A to this Order.

I. JURISDICTION AND BACKGROUND

The federal Telecommunications Act of 1996, which amended the Communications Act of 1934, imposes various duties on incumbent local exchange

1 GPSC Docket No. 7253-U relates to the Commission's review of BellSouth's Statement of Generally Available Terms and Conditions pursuant to Section 252(f) of the Telecommunications Act of 1996. The Commission affirmed its directive, and made explicit reference to this docket, in its January 15, 1998 Order Regarding Revised Statement, Docket No. 7253-U, at p. 29 & n. 36.

companies ("LECs") to enable new competitors to enter the local market without necessarily having to build redundant physical networks. These duties include, among other things, the duties to provide new entrants with access to unbundled elements of the incumbents' networks, and to offer to new entrants at wholesale rates any telecommunications service provided by the incumbents on a retail basis. *See* 47 U.S.C. § 251(c)(3), (4).

Pursuant to Section 251 of the Act, 47 U.S.C. § 251, the Federal Communications Commission ("FCC") evaluated operations support systems in its *Local Competition First Report and Order*.[2] The FCC determined that, because OSS includes the information necessary to obtain other network elements or resold services, providing access to OSS functions falls squarely within an incumbent LEC's duty under Section 251(c)(3) to provide unbundled network elements under terms and conditions that are nondiscriminatory and just and reasonable, and its duty under Section 251(c)(4) to offer resale services without imposing any limitations or conditions that are discriminatory or unreasonable. The FCC additionally identified OSS itself as a network element and stated that it consists of five functions: (1) pre-ordering; (2) ordering; (3) provisioning; (4) maintenance and repair; and (5) billing.[3] For purposes of this docket, this Commission has considered some provisioning issues under the topic of ordering; other provisioning issues have been addressed in the Commission's separate proceeding on performance measurements, GPSC Docket No. 7892-U.

An incumbent LEC such as BellSouth uses OSS to provide services to its end user (retail) customers. The term OSS refers to the computer systems, databases, and personnel functions that incumbent LECs use for many internal operations necessary to provide service. Competitive LECs ("CLECs") must be able to access the incumbent's OSS in various ways. For example, CLECs must be able to access data necessary to sign up customers, to place orders for services or facilities provided by the incumbent, track the progress of that order to completion, receive relevant billing information from the incumbent, and obtain prompt repair and maintenance for the elements and services they obtain from the incumbent. CLECs must also be able to obtain the information and training necessary to make effective use of their access to the incumbents' OSS.

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2 *Implementation of the Local Competition Provisions in the Telecommunications Act of 1996*, CC Docket No. 96-98, First Report and Order, 11 FCC Rcd 15499 ("*Local Competition First Report and Order*"), *aff'd in part and vacated in part sub nom. Competitive Telecommunications Ass'n v. FCC*, 117 F.3d 1068 (8th Cir. 1997) and *Iowa Utilities Bd. v. FCC*, 120 F.3d 753 (8th Cir. 1997), *writ of mandamus issued sub nom. Iowa Utilities Bd. v. FCC*, No. 96-3321 (8th Cir. Jan. 22, 1998), *petition for cert. granted*, Nos. 97-826, 97-829, 97-830, 97-831, 97-1075, 97-1087, 97-1099, and 97-1141 (U.S. Jan. 26, 1998) (collectively, *Iowa Utils. Bd.*), Order on Reconsideration, 11 FCC Rcd 13042 (1996), Second Order on Reconsideration, 11 FCC Rcd 19738 (1996), Third Order on Reconsideration and Further Notice of Proposed Rulemaking, FCC 97-295 (rel. Aug. 18, 1997), *further recons. pending*.

3 *Local Competition First Report and Order*, 11 FCC Rcd at 15660-61, 15763, ¶¶ 316, 516-17; 47 C.F.R. § 51.319(f). The Eighth Circuit Court of Appeals upheld the FCC's determination that OSS is an unbundled network element. *Iowa Utilities Bd.*, 120 F.3d at 809.

The OSS functions include functions provided by the incumbent's databases, computer systems, and personnel. The databases contain information, such as the types of telecommunications services available to customers, address validation, telephone number availability, available dates for service installation, and other information necessary to formulate and process a customer's order for service. Various systems and databases have also been developed to resolve customer complaints about service, to handle maintenance and repair, and to ensure accurate and timely billing.

Georgia's Telecommunications and Competition Development Act of 1995 was a precursor to the federal requirements, and it also mandated opening the local exchange markets to competition with obligations imposed upon the incumbent LECs. Thus the Commission's actions in this docket also serve to meet relevant requirements in the Georgia Act. For example, all LECs must permit reasonable interconnection with other LECs; and this includes all or portions of such services as needed to provide local exchange services. O.C.G.A § 46-5-164(a). Such interconnection services shall be provided for intrastate services on an unbundled basis similar to that required by the FCC[4] for services under the FCC's jurisdiction. O.C.G.A § 46-5-164(d). Once the Commission has authorized resale of services (as in the case of BellSouth in Docket No. 6352-U), the Commission shall determine the reasonable conditions such that no LEC or telecommunications company gains an unfair market position. O.C.G.A § 46-5-164(e). The Commission has the authority to require LECs to provide additional interconnection services and unbundling. O.C.G.A § 46-5-164(g).

As evidenced in previous proceedings before this Commission,[5] BellSouth has already made progress in developing electronic interfaces for CLECs to access its OSS. The Commission recognizes that this is a substantial and evolutionary undertaking that is vital to the development of competition in Georgia's local exchange market. The Commission has not limited itself to a strict analysis or application of the so-called "parity" requirements of Sections 251 and 271 of the federal Act. The Commission does not intend that its decision in this docket be rigidly applied as part of any determination whether BellSouth has met particular requirements of Sections 251 and 271. Instead, the Commission in this docket has focused upon the practical aspects of meeting the spirit and intent of the Act in general, and in particular the identification of any necessary enhancements to BellSouth's OSS which will aid entry by CLECs into the local market.

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4 The Commission notes that the FCC has established a proceeding that includes OSS issues, *In the Matter of Performance Measurements and Reporting Requirements for Operations Support Systems, Interconnection, and Operator Services and Directory Assistance*, CC Docket No. 98-56, RM-9101. The FCC recently issued a Notice of Proposed Rulemaking in that proceeding (adopted April 16, 1998, released April 17, 1998).

5 *See* GPSC Docket No. 6352-U (discounts for resale of BellSouth services), wherein the parties and the Commission initially addressed electronic interfaces for access to OSS relevant to resale; and the consolidated Dockets No. 6863-U/7253-U (relating to BellSouth's potential application for Section 271 interLATA authority, and BellSouth's Statement of Generally Available Terms and Conditions, respectively). *See also* GPSC Docket No. 7061-U (setting cost-based rates for BellSouth's interconnection and unbundled network elements and related items, including use of OSS), and Docket No. 7892-U (regarding performance measurements for BellSouth).

II. STATEMENT OF PROCEEDINGS

The Commission established this proceeding by its October 30, 1997 Interim Order in Docket No. 7253-U. The Staff issued the first Notice of Technical Workshop Schedule on November 14, 1997, which was sent by first-class mail and where possible by facsimile to the parties in GPSC Dockets No. 6863-U/7253-U (Section 271 & SGAT), 7061-U (interconnection and unbundled network elements cost proceeding), and 7892-U (performance standards docket). The schedule set November 20, 1997 as the date for technical comments by companies such as CLECs having an interest in using BellSouth's electronic interfaces in Georgia; December 2, 1997 as the date for BellSouth's response; and December 9-10 as the dates for the Technical Workshop.

The following parties filed comments on November 20, 1997: American Communications Services, Inc. ("ACSI"), AT&T Communications of the Southern States, Inc. ("AT&T"), Intermedia Communications, Inc. ("ICI"), LCI International Telecom Corp. and its affiliates ("LCI"), MCI Telecommunications, Inc. ("MCI"), and Sprint Communications Company, L.P. ("Sprint"). On December 2, 1997, BellSouth filed a set of responses to the technical issues raised in the prefiled comments. On December 4, 1997, the Staff issued a detailed Agenda Notice for the Technical Workshop with an attached Matrix summarizing the technical issues raised in the prefiled comments. This Agenda Notice with Matrix was sent to those parties who prefiled comments and intervention notices in this docket, and to all persons who received the original Notice of the Technical Workshop. The workshop was held on December 9-10, 1997, in the hearing room of the Commission's offices, Room 507-II, at 47 Trinity Avenue in Atlanta.

The Staff prepared a Matrix of the technical issues based upon the prefiled comments, and this Matrix formed the foundation and format for the workshop discussions, proposed solutions, and proposed implementation dates. The Matrix grouped the issues into the following five topic categories:

Topic Number 1:	Pre-Ordering
Topic Number 2:	Maintenance and Repair
Topic Number 3:	Ordering & Provisioning
Topic Number 4:	Billing
Topic Number 5:	General (including provision of information and training)

The Staff subsequently filed its Report regarding the OSS Technical Workshop on December 23, 1997, including in the Matrix format both proposed solutions and implementation time frames for the issues within these five topics. As part of the recommendations contained in the Report, the Staff requested that the Commission consider accepting the Staff Report and its proposed procedures at its Administrative Session on January 20, 1998. Pursuant to the recommended procedures, BellSouth filed its responses to the Report on January 9, 1998, agreeing with many of the

recommendations but disagreeing or offering different implementation deadlines as to other aspects of the solutions proposed in the Staff Report. BellSouth filed a revised response on January 14, 1998. AT&T filed a response to the Staff Report on January 13, 1998. On January 20, 1998, the Commission considered the Staff Report along with the comments filed by BellSouth and AT&T, and decided to establish a date for comments from other interested parties. Pursuant to the Commission's Order setting January 27, 1998 as a date for objections to the Staff Report, additional responses were filed on that date by ACSI, BellSouth, Intermedia, MCI, and Sprint.

On February 6, 1998, the Commission issued a Procedural and Scheduling Order establishing a hearing process through which to resolve certain matters pertaining to the provision by BellSouth of access to its Operations Support System for CLECs, and specifically, whether to adopt the recommendations presented in the Staff Report. The Commission also ordered that a pre-hearing conference be conducted by Hearing Officer Philip J. Smith of the Commission Staff on February 13, 1998 in the Commission's hearing room. The purpose of the pre-hearing conference was to determine whether the number of issues identified by the Commission Staff in its Report could be pared.

Pursuant to the Commission's directive, the Hearing Officer conducted the pre-hearing conference and filed the results on February 16, 1998. The following parties were recognized as having intervened: ACSI, AT&T, BellSouth, the Consumers' Utility Counsel Division of the Governor's Office of Consumer Affairs ("CUC"), ICI, LCI, Low Tech Designs, Inc. ("LTD"), MCI, MGC Communications ("MGC"), NEXTLink, Powertel, and Sprint. The Commission Staff also participated in the case, including the pre-hearing conference.

The pre-hearing conference showed that most of the issues identified by the Commission Staff, and the solutions and implementation time frames proposed by the Commission Staff, remained as issues for at least some of the parties. Some of the parties at the pre-hearing conference indicated dissatisfaction with the proposed solutions recommended by the Staff or with the alternative solutions, where applicable, proposed by BellSouth. No party objected to this scope of the issues for the hearings scheduled March 18-19, 1998.

On March 5, 1998, the Commission issued a Supplemental Procedural and Scheduling Order altering the schedule to include two additional days of March 20 and 23, 1998. The hearing was held March 18-20, 1998. Briefs were filed by the Commission Staff and the parties on March 30, 1998.

III. DISCUSSION OF THE ITEMS BELLSOUTH CHALLENGED

The Commission Staff presented the Staff Report and testified that the recommendations contained therein were based upon industry consensus where possible. Where there was no apparent consensus, the Staff developed reasonable compromises based upon the Staff's professional judgment, taking into account the comments and

recommendations but disagreeing or offering different implementation deadlines as to other aspects of the solutions proposed in the Staff Report. BellSouth filed a revised response on January 14, 1998. AT&T filed a response to the Staff Report on January 13, 1998. On January 20, 1998, the Commission considered the Staff Report along with the comments filed by BellSouth and AT&T, and decided to establish a date for comments from other interested parties. Pursuant to the Commission's Order setting January 27, 1998 as a date for objections to the Staff Report, additional responses were filed on that date by ACSI, BellSouth, Intermedia, MCI, and Sprint.

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The Commission Staff presented the Staff Report and testified that the recommendations contained therein were based upon industry consensus where possible. Where there was no apparent consensus, the Staff developed reasonable compromises based upon the Staff's professional judgment, taking into account the comments and

information submitted by the parties.[6] The Staff expressed strong belief that the Report is accurate and correct and will aid CLEC entry into the local market.

BellSouth raised objections to certain proposed solutions as recommended by the Commission Staff in its report filed December 23, 1997. These will be discussed in turn in the following sections. For each of these items, the "potential issue" identified in the Commission Staff's Report (Appendix A hereto) is shown along with the accompanying proposed solution from the Staff Report, followed by a brief discussion.

A. Pre-Ordering

The pre-ordering OSS function allows a CLEC to gather and confirm information necessary to place an accurate order for its end use customer. In general, pre-ordering consists of several functions including street address validation, telephone number reservation, feature availability, service availability, due date information, and customer service records. Like BellSouth, many CLECs retrieve pre-ordering information from BellSouth's databases while a customer is on the line. Therefore timely access to pre-ordering information is critical to a CLEC's ability to enter and compete in the local exchange market. Similarly, the CLEC must be able to incorporate the relevant pre-ordering information into an order both quickly and accurately.

Item I.d.
Issue: Human to machine interface requires dual entry of information.
Solution: Proposed API interface will alleviate many of these problems.

BellSouth provides a proprietary terminal-type interface called Local Exchange Navigation System ("LENS"), and offers it as a system predominantly for access to pre-ordering OSS functions.[7] LENS also includes ordering functions, but these functions are less well developed. LENS is a Graphic User Interface or "GUI"-based[8] interface that allows a CLEC to use a browser software program to retrieve information from a BellSouth server on a real-time basis. Competing carriers can connect to LENS through dedicated local area network (LAN-to-LAN) connections, through dial-up connections, or through the public Internet.

Much attention has been focused on further development of Electronic Data Interchange or "EDI"-based[9] interfaces. BellSouth offers EDI as a system predominantly

6 Staff Direct at 8.
7 BellSouth witness Stacy, Tr. 87; BellSouth Brief at 2.
8 GUI-based interfaces are widely recognized as much easier for people to use because they employ graphics (*e.g.*, icons) rather than relying solely upon rote usage of typed verbal commands. Virtually all modern software programs, especially for consumers and small business users, are GUI-based.
9 The EDI standard is defined by the Telecommunications Industry Forum. *See Local Competition First Report and Order*, 11 FCC Rcd at 15761, ¶ 513, n. 1238.

for access to ordering OSS functions.[10] This has engendered contention between BellSouth and CLECs who argue, among other things, that BellSouth has not done enough to provide a seamless interface that minimizes human intervention for pre-ordering and ordering functions. For example, CLECs must "cut and paste" information from LENS (a pre-ordering interface) to EDI (an ordering interface), while BellSouth is able to automatically bring up a Customer Service Record ("CSR"), and the CSR information is populated into the order.[11] Integration of the pre-ordering functions with the ordering functions of either BellSouth's or the CLEC's OSS is important because it minimizes manual processes that add costs, delays, and errors.[12]

The Staff determined and stated in the Staff Report that the Application Program Interface ("API"), as presented and discussed by BellSouth and the other parties at the Technical Workshop, is a start in the right direction to resolving the human to machine interface problem. API will enable greater integration of the pre-ordering and ordering functions. A lack of integration engenders errors, is costly, and ultimately affects the end user customers. An integrated pre-ordering/ordering system eliminates the need for re-keying information, so that whichever company uses it - BellSouth for its internal ("legacy") systems, or CLECs for the new interfaces - can enter information once and then transfer the information electronically from one system to another.

BellSouth's proposed API Gateway will provide a pre-ordering interface and an ordering interface, which will both be machine-to-machine, use a common protocol, and therefore will be easily integrated with the CLECs' own OSS. Among the benefits of API will be less need for dual entry of information into the systems. The current need for dual entry, and hence the additional human intervention, also results in unduly high fallout rates in which orders are not accurately processed. Based upon the comments and information provided by the parties, the Staff stated that the proposed API interface will alleviate many of the problems indicated by the parties.[13]

BellSouth's objection was that other methods are already available for CLECs to integrate pre-ordering and ordering functionality, and to integrate this functionality with their own customer service and billing records, eliminating any need for dual entry of data. For example, BellSouth provided an updated CGI-LENS[14] specification (Stacy's Ex. WNS-1) to MCI on December 15, 1997.[15] BellSouth also made EC-Lite, a machine-to-machine pre-ordering interface, available on December 30, 1997. According to

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10 BellSouth witness Stacy, Tr. 87; BellSouth Brief at 2. For interested CLECs, BellSouth has made available the EDI-PC Harbinger software and training manual, as one way to use an EDI interface on a personal computer ("PC") system. BellSouth also offers the Exchange Access Control and Tracking ("EXACT") interface as a system primarily for ordering functions.

11 *See* Sprint Comments, November 21, 1997; and Sprint Comments Regarding Staff Report, January 27, 1998.

12 Tr. 545.

13 Commission Staff testimony at 7-8; Commission Staff Ex. 1 (Matrix p. 1).

14 The term "CGI-LENS" refers to BellSouth's Common Gateway Interface ("CGI") to its Local Exchange Navigation System ("LENS"). Stacy Direct at 10.

15 Stacy Direct at 4-5.

BellSouth, CLECs can integrate EC-Lite with EDI and/or with their own OSS.[16] However, these approaches suggested by BellSouth impose upon CLECs the burden of attempting to perform the integration of the pre-ordering systems (CGI-LENS or EC-Lite) with ordering systems. This is exacerbated by the fact that the interfaces and the associated software, specifications, and manuals are revised from time to time. In addition, this is especially burdensome for the smaller CLECs.

Further, the LENS-CGI specification does not have all of the required information to enable a CLEC to perform the necessary development effort for integration, and BellSouth has not kept that specification current.[17] In addition, BellSouth's LENS-CGI specification requires the use of an underlying Hyper Text Markup Language ("HTML") presentation as part of the data delivery mechanism, and this forces CLECs into a slower, less efficient integration than is available to BellSouth for its comparable retail operations.[18]

BellSouth stated that the API is simply another form for providing the same pre-ordering and ordering functions provided by the other interfaces mentioned above. API does not create any new functionality above that which already exists in those interfaces. The BellSouth Wholesale API gateway will provide a machine-to-machine interface between BellSouth's back office systems and CLECs.[19] The point is not, however, whether API will create a new functionality, but whether API will mitigate the integration problems and help to resolve the problems experienced due to dual entry or re-keying of information. As BellSouth stated, API will provide the pre-ordering and ordering functions previously provided by separate interfaces. This represents a significant step forward.

The development of API will generally alleviate many of the concerns raised by CLECs in this proceeding. BellSouth has agreed to develop API, and the CLECs have voiced interest in API throughout this case. API is based on one of the two industry standards for pre-ordering identified by the Electronic Communication Implementation Committee ("ECIC"). It also uses Common Object Request Brokering Architecture ("CORBA") as its base software technology.[20] CORBA is a very popular and widely used software technology outside of the telecommunications industry. Consequently, personnel skilled in CORBA are more readily available, which makes CORBA software less expensive to develop and maintain, and increases the probability and speed of technological advancements.[21]

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16 Stacy Direct at 5.
17 Tr. 547; 715-17, 724-25.
18 HTML presentation forces CLECs to proceed through each of the LENS presentation screens, rather than being able to use the data independently of the screens as the initial CGI proposal would have allowed. AT&T Brief at 9.
19 Stacy Direct at 10.
20 Tr. 591-93; 621.
21 Tr. 622.

The implementation date Staff proposed in the Report is by December 31, 1998, which is based upon BellSouth's projection of the length of time needed to contract with a vendor, conduct testing, and make API available. While it is possible that API may be on-line and available by September or October, 1998, it is important to allow sufficient time for testing to ensure that the interface will be as reliable as possible. Moreover, the CLECs should have an opportunity to provide their input at the development and testing stages, to ensure that the functionalities they need are included in the API interface. The proposed implementation date allows reasonable time for these efforts. The Commission agrees that it is reasonable to allow December 31, 1998 as the date by which BellSouth shall develop and test API and make it available for the CLECs' use.

Item 2.b.
Issue: Rates of services and equipment items displayed on Customer Service Record ("CSR") are not presented in LENS.
Solution: BST shall make this information available via fax and electronically through LENS.

BellSouth began providing rates for products and services to Georgia CLECs via facsimile ("fax") during 1997, as part of the Customer Service Records ("CSRs"). BellSouth then began stripping away the rates of services and equipment items from the CSR when providing the CSR through LENS.[22] This was one of the issues presented by CLECs in this docket. The FCC has also recognized the significance of CSR information as part of the pre-ordering OSS function.[23]

As BellSouth admitted, the rate information is not proprietary.[24] There is a demand for the rate information to be included with the CSRs.[25] This case is focused upon technical concerns, and there is no dispute that including the rate information in CSRs is technically feasible. There is no technical impediment to providing rates on

22 BellSouth witness Stanley, Tr. 379-80.

23 *In the Matter of Performance Measurements and Reporting Requirements for Operations Support Systems, Interconnection, and Operator Services and Directory Assistance*, CC Docket No. 98-56, RM-9101, Notice of Proposed Rulemaking (FCC 98-72, rel. Apr. 17, 1998) ("*FCC OSS NPRM*"), at ¶ 43, n. 53. The FCC has stated that "although an incumbent carrier is not required to disclose [customer proprietary network information] CPNI pursuant to section 222(d)(1) or section 222(c)(2) absent an affirmative written request, local exchange carriers may need to disclose a customer's service record upon the oral approval of the customer to a competing carrier prior to its commencement of service as part of the LEC's obligations under sections 251(c)(3) and (c)(4)." The FCC also stated that "a carrier's failure to disclose CPNI to a competing carrier that seeks to initiate service to a customer that wishes to subscribe to the competing carrier's service, may well, depending upon the circumstances, constitute an unreasonable practice in violation of section 201(b)." *In the Matter of Implementation of the Telecommunications Act of 1996: Telecommunications Carriers' Use of Customer Proprietary Network Information and Other Customer Information: Implementation of the Non-Accounting Safeguards of Sections 271 and 272 of the Communications Act of 1934, as Amended*, CC Docket No. 96-115 and 96-149, ¶¶ 84-85 (rel. Feb. 26, 1998).

24 Stanley Direct at 3, Tr. 87-88; Tr. 367, 369-70. *See also* BellSouth Brief at 3.

25 *See, e.g.*, MCI Brief at 9-10.

CSRs.[26] In fact, the rate information is already contained in the CSRs, and BellSouth's proposal is to remove it when providing the CSRs to CLECs.[27] BellSouth's testimony claiming marketing reasons for removing the rate information before passing it through the CSRs was not credible.[28] BellSouth's claim that the rate information becomes proprietary when included in the CSR[29] was not adequately supported, was undermined by the facts that BellSouth had previously provided such information in fax format and that the basic rate information is not proprietary, and was generally not credible. In addition, CLECs cannot randomly browse through the CSRs to locate potential customers because they must obtain explicit customer approval before viewing a CSR.[30]

The Commission concludes that BellSouth should make this information in the CSRs available via fax and electronically[31] (*i.e.*, through LENS and other electronic interfaces) with an implementation date originally set as of January 30, 1998.[32] The Commission notes that the use of fax rather than electronic means (such as through LENS) must be at the option of the CLEC, since some CLECs choose not to use the LENS interface.

Item 3.h.
Issue: LENS is limited to a maximum of six lines per residence or business request and a maximum of 20 features per line.
Solution: The proposed API interface will eliminate these limitations.

BellSouth is able to reserve 25 telephone numbers per order electronically, but CLECs are limited to six telephone numbers through LENS.[33] LENS has a similar limitation of 20 features per line. This limits the CLECs in the pre-ordering functions, compared with BellSouth's internal pre-ordering capabilities.

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26 This was acknowledged by BellSouth's witnesses Mr. Stacy, Tr. 263, and Mr. Stanley, Tr. 383.

27 Tr. 383.

28 Tr. 383-385.

29 *See* BellSouth Brief at 3-4.

30 Tr. 369.

31 In addition, pursuant to item 3(b) under the Pre-Ordering section of the OSS Report Matrix, it is the Commission's understanding that BellSouth has made available electronically, via web interface, the information on its promotional offerings. The ability of CLECs to access the promotional offerings information electronically via BellSouth's web pages is another step in compliance with the OSS Report that will aid entry into the local exchange market.

32 As discussed subsequently with respect to implementation dates, this should be implemented immediately with a follow-up report since this date has passed.

33 Tr. 707; MCI Brief at 11. BellSouth witness Mr. Stacy testified that CLECs may reserve 12 numbers "per session" in LENS. (Tr. 119.) Aside from this factual dispute, it is certain that there is a substantial discrepancy in the number of telephone numbers that can be ordered. Mr. Stacy also testified that a CLEC may order 25 telephone numbers through EC-Lite. (Tr. 119.) However, it is not clear that EC-Lite is practically available to CLECs other than AT&T. EC-Lite is a proprietary interface developed by BellSouth for AT&T, has not been adopted as a potential industry standard by the Electronic Communication Interface Committee ("ECIC") (Tr. 211, 704), and it appears that other CLECs do not intend to use that interface (Tr. 717).

The continued development of API, along with input from the parties, should start to alleviate these concerns. In general, API more closely replicates the methods by which BellSouth's own internal OSS interfaces operate than any other interface BellSouth offers to CLECs.[34] Based upon the information provided at the Technical Workshop, the Staff submitted that the proposed API interface will not contain this limitation which is in the LENS interface. The Commission finds that the Staff's recommendation is appropriate and should be adopted. BellSouth should implement the API solution by December 31, 1998.

B. Ordering

Item 1.i.
Issue: CLEC orders placed through LENS are currently limited to a maximum of six lines per residence or business request, and a maximum of 20 features per line.
Solution: Issue addressed in 3.h. of Pre-Ordering (the proposed API interface will eliminate these limitations).

This item and the Commission's determination of it are the same as for Pre-Ordering Item 3.h (above).

In its Brief, BellSouth also addressing Ordering Item 1.b. regarding electronic mail ("email") capabilities for complex services. The Staff Report proposed that BellSouth provide email capabilities for pre-ordering and ordering of complex services, on an initial basis. This would be an interim step toward a more long-term capability for electronically ordering complex services. BellSouth stated that developing the email capability is a "worthwhile business goal," but balked at the Staff's recommended time frame for implementation on the basis that it would require "discussion among all parties about the type of form or email to be used, the data required on the form, where the form is to be sent, etc.[35] The Commission is not persuaded by BellSouth's arguments regarding this item. The email solution is merely an interim step, and requires minimally that the same form currently being used on paper (for example, sent to BellSouth by fax) be made available as an electronic document that CLECs can fill out as a word processing document and return to BellSouth by email. It does not require that the form be converted to an electronic form filled out interactively at this time. Permitting the CLECs to use the word processing version of the form for ordering complex services and returning it to BellSouth's designated representative(s) by email does not impose a burden or complexity on BellSouth. The Commission agrees that the Staff's recommendation on this item is reasonable and should be adopted.

C. Billing

Item 1.f.
Issue: BellSouth has failed to provide systems for accessing usage data for flat rate calls.

34 Stacy, Tr. 198-199.
35 Stacy, Tr. 88-89; BellSouth Brief at 5-6.

Solution: BellSouth will add capability in central offices to capture data for flat rate calls.

The Staff recommended that BellSouth add the capability in each of its central offices to capture data for flat rate calls. BellSouth currently records flat rate customer usage data, such as the frequency and geographical destination of customer calls, where capacity is available; and BellSouth has the necessary capacity in 80 to 90 percent of its switches.[36] BellSouth objected to the Staff's recommendation on this point.

The collection of this data is technically feasible.[37] BellSouth does not currently process the flat rate data for itself or any CLEC. BellSouth drops the records from further handling since it does not currently bill charges based on them, and its switches do not record any information to determine whose records belong to whom.[38] Mr. Scollard testified that there is a difference between simply recording the data, and performing the value-added processing activities that transform the raw recorded data into useful information (*i.e.* industry standard usage record formats).

There is a demand for the usage data for calls that are currently flat-rated. For example, CLECs could use the data to develop and offer innovative services. CLECs could also use the information to better determine where and in what manner to build their own facilities. It may be that only certain CLECs would request such usage data for their own local telephone customers.[39] Mr. Scollard asserted that there would be substantial costs to deploy the hardware and software necessary to process the data into a usable format available to CLECs.[40] However, he acknowledged that the costs would be pro-rated for each state in the BellSouth region, by central office.[41]

The Commission notes that the proceedings in this docket were based upon technical feasibility rather than cost issues.[42] In addition, BellSouth has already agreed in interconnection agreements to provide usage data for flat rate calls. For example, BellSouth has agreed to the following:

> BellSouth shall provide the Customer Usage data recorded by BellSouth. Such data shall include complete AT&T Customer usage data for Local Service, including both local and intraLATA toll service (e.g., call detail for all services, including flat-rated and usage-sensitive features) ....

36 Scollard, Tr. 288.
37 BellSouth witness Mr. Scollard, Direct at 2.
38 Scollard Rebuttal at 2.
39 AT&T Brief at 17-18. Moreover, no CLEC had requested that BellSouth process this information through its entire billing system rather than simply sort the raw recorded data, a task BellSouth witness Scollard admitted had not necessarily been analyzed by BellSouth. Tr. 332. According to AT&T, processing usage data through BellSouth's entire system is not necessary nor is it desired. AT&T Brief at 18; AT&T witness Bradbury, Tr. 568.
40 Scollard Direct at 3.
41 Tr. 343.
42 Tr. 48.

BellSouth-AT&T Interconnection Agreement, Part I, Section 28.8 (Feb. 3, 1997), approved by the Commission in *Order Approving Arbitrated Interconnection Agreement*, Docket No. 6801-U (March 5, 1997).

Processing flat rate call records only far enough to convert them into standard industry format is much less expensive than processing such records through BellSouth's entire billing system.[43] In addition, the cost of complying with the Staff's proposed solution on this item will be borne by those carriers, including BellSouth, which request and receive such data.[44] These are additional reasons why the cost to implement the proposed solution should not be unduly burdensome.

BellSouth witness Mr. Scollard acknowledged that BellSouth has a structure of charges to the CLECs for obtaining similar data, established in Docket No. 7061-U. In the Commission's Order in Docket No. 7061-U, *Review of Cost Studies, Methodologies, and Cost-Based Rates for Interconnection and Unbundling of BellSouth Telecommunications Services* (December 16, 1997), at page 57, BellSouth was afforded the opportunity to file further information in that docket on its proposed OSS cost recovery amounts. The Commission stated in that Order:

> The Commission addressed the question of cost recovery for BellSouth's development of electronic interfaces for OSS in its Supplemental Order in Docket No. 6352-U. The Commission ruled therein that all costs incurred by BellSouth to implement these interfaces shall be recovered from the industry; although the Commission added that it would resolve any disputes regarding this matter. The Commission concludes that the CLECs should be required to pay for at least some portion of BellSouth's costs of developing the OSS electronic interfaces. However, it is true that little documentation was provided in the record regarding the reasonableness of the total amounts now sought to be recovered. The Commission will direct BellSouth to file further information on its proposed OSS cost recovery amounts, so that the Commission and its Staff may further review these costs and the associated rate design, after BellSouth has implemented the long-term electronic interfaces that were projected for completion by December 1997. The Commission Staff may make a recommendation to the Commission as to whether any further proceedings would be appropriate, following such review.

Order Establishing Cost-Based Rates, Docket No. 7061-U, at 57 (Dec. 16, 1997). The Commission then proceeded to establish the rates that BellSouth shall charge CLECs at this time, in order to recover OSS costs. *Id.* The Commission ruled that following the implementation of long-term electronic interfaces for OSS functions that were scheduled

43 Tr. 568.
44 Tr. 567.

for the end of December 1997, BellSouth shall submit a detailed report of its electronic interface costs for the Commission's review. *Id.* at 65. The Commission will determine an appropriate rate recovery mechanism for BellSouth's continued recovery of OSS costs following such review.

Thus for this item, and for any other item in this case as to which BellSouth expressed concerns regarding cost recovery, the Commission has already afforded BellSouth an opportunity to provide information on proposed cost recovery amounts, for the Commission's review. That is the appropriate avenue for BellSouth to pursue its OSS cost recovery concerns.

The Commission concludes that BellSouth should add the hardware capability in the remaining central offices to capture data for flat rate calls, and to deploy the software necessary to process the data into a usable format available to CLECs. BellSouth should implement this solution by December 31, 1998.

D. General

Items 2.a. through 2.d.
Issues: 2a. Interim interface.
2b. Not compatible with industry standard EDI interfaces.
2c. CLECs cannot integrate pre-ordering and ordering at parity with BellSouth.
2d. Need for machine-to-machine or API for pre-ordering.
Solution: EDI and API will be based on industry standards and therefore can be integrated and available for machine-to-machine use.

The development of the EDI and API interfaces will occur in conjunction with the continued development of industry standards. BellSouth stated that its development of future EDI software releases will conform to the available industry standards, and the development of the ordering section of the API will conform to these standards.[45] However, the development of the pre-ordering section of the API, and sections relating to other data, including rejects, errors, jeopardies, order status, etc., cannot be based on industry standards at this time because they do not yet exist.[46]

BellSouth witness Mr. Stacy added that BellSouth is committed to developing these portions of the API jointly with the CLECs, but all parties must recognize that this development may not be consistent with standards that are adopted in the future. However, BellSouth is committed to developing interfaces that do conform to national standards.[47]

Mr. Stacy testified that API will allow CLECs to obtain pre-ordering information and to place orders in exactly the same manner that LENS CGI, EC Lite, and EDI

45 Stacy Direct at 13.
46 BellSouth January 9, 1998 Comments; Stacy Direct at 13.
47 Stacy Direct at 13.

function now.[48] Mr. Stacy also testified that the Wholesale API Gateway will provide a machine-to-machine interface between BellSouth's back office systems and CLECs.[49] The EDI and API interfaces will be available for machine-to-machine use.

Mr. Stacy provided as Exhibit 3 to his rebuttal testimony a Bellcore report regarding BellSouth's software solutions process framework ("SSPF"). The report describes and uses a process maturity framework developed by the Software Engineering Institute, called the capability maturity model ("CMM").[50] The CMM is a methodological foundation for SSPF.[51] The CMM for software has standardized the measurement of software process maturity of organizations, and it is intended to help software organizations improve their processes through five different levels of maturity.[52] At the initial level (level 1), the software development environment is undefined (ad hoc) and unstable. The software processes are constantly being changed or modified as the work progresses. The software process capability at level 1 is unpredictable.[53] The Bellcore report indicated that BellSouth's SSPF is a first step toward achieving CMM level 2.[54] Mr. Stacy acknowledged that this means BellSouth has not yet achieved CMM level 2.[55]

The Commission finds that the Staff's recommendation regarding this item is appropriate and should be adopted. The Staff Report originally showed March 16, 1998 as the implementation date for EDI version 7.0; therefore, this should be implemented immediately with a follow-up report since this date has passed. The implementation date for API should be December 31, 1998. This implementation date should also allow BellSouth sufficient time to evaluate its software adequately, with the aid of Bellcore, and to achieve CMM level 5 (or an appropriately high level) of software process maturity for this interface.

IV. IMPLEMENTATION ISSUES

BellSouth stated that it would adopt certain proposed solutions as recommended by the Staff Report, with adjustment to the proposed implementation dates, as indicated in the following sections. BellSouth added that some of these changes were requested by AT&T.[56]

The Commission finds that BellSouth has not provided sufficient reason for changing the proposed implementation dates. The Commission also finds that AT&T

48 Stacy Rebuttal at 15.
49 Stacy Direct at 10.
50 Stacy Ex. WNS-3, section 2.2, page 2-2.
51 Tr. 190-191.
52 Tr. 191.
53 Stacy Ex. WNS-3, section 2.2.1, page 2-3.
54 Stacy Ex. WNS-3, section 2.1.1, page 2-1.
55 Tr. 192.
56 *See* BST witness Mr. Stacy's Exhibit WNS-5.

should not be in the position of unilaterally changing these dates. Furthermore, AT&T is only one of many CLECs in Georgia. The Commission finds that the proposed implementation dates in the original Staff Report were reasonable and appropriate.

Since the Staff-recommended implementation dates for these items have passed or will have passed at the time of the Commission's Order, the Commission concludes that it is reasonable to require BellSouth to comply immediately and submit a report within 30 days from the date of the Commission's Order, stating exactly what BellSouth has done to implement these solutions contained in the Staff Report.

The following sections show the implementation dates in the Staff Report which BellSouth proposed to adjust. The Staff recommended that for these dates which have passed as of the date of this Order, BellSouth should be directed to comply immediately and to submit a report within 30 days after the Order, stating what BellSouth has done to implement the proposed solutions.

A. Pre-Ordering

1c. Proposed implementation date of January 30, 1998. BellSouth adjusted to February 2, 1998 (Completed).

3b. Proposed implementation date of December 17, 1997. BellSouth adjusted to January 30, 1998 (Completed).

3c. Proposed implementation date of March 30, 1998. BellSouth adjusted to June 30, 1998 for EC-Lite, August 30, 1998 for API and December 31, 1998 for LENS.

3d. Proposed implementation date of January 30, 1998. BellSouth adjusted to June 30, 1998 for LENS and August 30, 1998 for API.

3f. Proposed implementation date of March 30, 1998. BellSouth adjusted to June 30, 1998 originally and then to December 31, 1998.

4a. Proposed implementation date of January 5, 1998. BellSouth adjusted to January 30, 1998 (Completed).

B. Maintenance and Repair

1a. Proposed implementation date of February 2, 1998. BellSouth adjusted to March 2, 1998 at AT&T's request.

1b. Proposed implementation date of February 2, 1998. BellSouth adjusted to March 2, 1998 at AT&T's request.

2b. Proposed implementation date of February 2, 1998. BellSouth adjusted to March 2, 1998 at AT&T's request.

2c. Proposed implementation date of February 2, 1998. BellSouth adjusted to March 2, 1998 at AT&T's request.

4a. Proposed implementation date of February 2, 1998. BellSouth adjusted to March 2, 1998 at AT&T's request.

C. Ordering

1b. Proposed implementation date of January 30, 1998. BellSouth adjusted to April 30, 1998.

2d. Proposed implementation date of January 5, 1998. BellSouth adjusted to January 12, 1998 (Completed).

2e. Proposed implementation date of December 19, 1997. BellSouth adjusted to January 30, 1998 (Completed).

2g. Proposed implementation date of March 31, 1998 (First Quarter 1998). BellSouth adjusted to December 31, 1998 (Fourth Quarter 1998).

2h. Proposed implementation date of March 31, 1998 (First Quarter 1998). BellSouth adjusted to November 1, 1998 for API and December 31, 1998 for EDI.

2j. Proposed implementation date of December 19, 1997. BellSouth adjusted to January 30, 1998 (Completed).

3a. Proposed implementation date of December 19, 1997. BellSouth adjusted to January 30, 1998 (Completed).

Since the Staff-recommended implementation dates for all of these items have passed as of the date of this Order, the Commission concludes that BellSouth should be ordered to comply immediately and to submit a report within 30 days from this Order, stating exactly what BellSouth has done to implement the Staff Report's proposed solutions.

D. Progress Reports

The Staff recommended that BellSouth and interested CLECs be directed to work together in developing and submitting progress reports to the Commission. The Commission finds that this is a reasonable method of monitoring the progress in implementing the solutions adopted herein. Directing the industry participants to work together in this effort will also assist in fostering collaborative efforts to resolve disputes and move OSS development forward.

The core members of the participants who shall file these joint reports should be BellSouth and the following intervenors: AT&T, ICI, LCI, MCI, and Sprint. All other CLECs are also expected to share responsibility for participating in this process, and are invited to add information or comments to the joint reports.

The schedule for submitting the joint progress reports should be altered from the Staff's original December 23, 1997 recommendation, because the need for hearings postponed the Commission's adoption of solutions. The Commission finds that the schedule and procedures set forth in the attached Appendix B are reasonable and should be adopted for the joint reports.

V. CONCLUSION AND ORDERING PARAGRAPHS

The Commission finds and concludes that the Staff Report contains feasible and reasonable solutions to the technical issues raised during the Technical Workshop process in this docket. The Commission concludes that it is reasonable and appropriate to adopt the Staff Report attached hereto as Appendix A and incorporated herein by reference. For those implementation dates in the Staff Report which have passed as of the date of this Order, BellSouth is directed to comply immediately and to submit a report within 30 days from the date of this Order, stating exactly what BellSouth has done to implement the Report's proposed solutions. The Commission also adopts the procedures and changes in the schedule for progress reports by the parties contained in Appendix B hereto. The Commission therefore adopts the Staff Report, and these slight modifications regarding implementation dates and progress report dates, as its OSS Report. The Commission directs BellSouth to comply fully with the OSS Report as adopted by this Order.

WHEREFORE IT IS ORDERED, that the Commission adopts the OSS Report reflected in Appendices A and B in their entirety.

ORDERED FURTHER, that BellSouth is directed to comply fully with the OSS Report as adopted by this Order. For those implementation dates in Appendix A which have passed as of the date of this Order, BellSouth is directed to comply immediately and to submit a report within 30 days from the date of this Order, stating exactly what BellSouth has done to implement the Report's proposed solutions.

ORDERED FURTHER, that the Commission directs BellSouth and the parties to file progress reports in this docket, to apprise the Commission of the status of implementation of the solutions in the Report. Each of these reports should be a joint report submitted by all interested industry participants according to the procedures and schedule set forth in Appendix B. The core members of the participants who shall file these joint reports are BellSouth and intervenors AT&T, ICI, LCI, MCI, and Sprint. All other CLECs are also expected to share responsibility for participating in this process, and are invited to add information or comments to the joint reports.

ORDERED FURTHER, that all findings, conclusions, and statements set forth in the preceding sections of this Order are adopted as findings of fact, conclusions of law, and statements of regulatory policy of this Commission.

ORDERED FURTHER, that a motion for reconsideration, rehearing, or oral argument or any other motion shall not stay the effective date of this Order, unless otherwise ordered by the Commission.

ORDERED FURTHER, that jurisdiction over these matters is expressly retained for the purpose of entering such further Order or Orders as this Commission may deem just and proper.

The above by action of the Commission in Administrative Session on April 21, 1998.

Helen O'Leary
Executive Secretary

June 2, 1998
Date

Robert B. Baker, Jr.
Chairman

June 3, 1998
Date

APPENDIX A

Docket No. 8354-U
Georgia Public Service Commission OSS Workshop
Summary of Staff Recommendations
December 23, 1997

PRE-ORDERING

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME
1. RSAG/LENS		
a. Download of RSAG has not been provided.	a. BST shall make download of RSAG available, and provide for periodic updates of information.	a. January 30, 1998
b. Information provided to BST (e.g. Connect Through and QuickServe) is not provided to CLECs.	b. Not an issue (BST providing through LENS browser, CGI interface, and EC-LITE).	b. N/A
c. Requires multiple screen process and repeated address validation.	c. BST has stated that it will revise this inquiry process.	c. January 30, 1998
d. Human to machine interface requires dual entry of info.	d. Proposed API interface will alleviate many of these problems.	d. January 28, 1998 (Vendor selected) (Implementation by the end of 1998)
2. Customer Service Record		
a. Not given access to the same CSR information BST uses and are limited to printing 50 pages.	a. BST currently limits its retail operation to a 54 page print limit. The proposed API interface will eliminate this current limitation.	a. January 28, 1998 (Vendor selected) (Implementation by the end of 1998)
b. Rates of services and equipment items displayed on CSR are not presented in LENS.	b. BST shall make this information available via fax and electronically through LENS.	b. January 30, 1998
c. No "refer to" number is provided on certain CSRs. CLECs must call LCSC to obtain the number.	c. Not an issue.	c. N/A

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PRE-ORDERING

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME
3. Linked Products and Services		
a. A complete list of all valid "USOCs" has not been provided to the CLECs.	a. BST shall make a complete list of valid USOCs available to CLECs and provide monthly updates to this information.	a. January 30, 1998
b. Failure to provide information regarding promotional offerings.	b. BST is currently providing this information in a paper format and will determine whether an electronic version can be provided.	b. December 17, 1997 (Notice of availability)
c. Failure to provide blocks of DID numbers and DID trunk inquiry.	c. BST shall make blocks of ten DID numbers available electronically.	c. March 30, 1998
d. Lack of accurate PSIMS information and is received by batch file.	d. BST shall make accurate information available in PSIMS.	d. January 30, 1998
e. LENS is not designed to accommodate Unbundled loop and certain complex resale orders.	e. This issue is addressed in 1a of Ordering.	e. March 16, 1998 for Version 7.0 January 30, 1998 for LEO, LESOG and SOER
f. PIC information is not listed in an efficient manner.	f. BST shall add a search capability for PICs in LENS.	f. March 30, 1998
g. ESSX and MultiServe information is not available.	g. This issue is addressed in 1g of Ordering.	g. March 30, 1998
h. LENS is limited to a maximum of 6 lines per residence or business request and a maximum of 20 features per line.	h. The proposed API interface will eliminate these limitations.	h. End of 1998

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PRE-ORDERING

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME
4. Telephone Number Resources		
a. Limits number reservation to six numbers/LENS session and 100 numbers/end office.	a. BST is removing 100 number limit for LENS and EC-Lite.	a. January 5, 1998
b. BST's RNS system automatically generates a telephone number to offer a customer but CLECs must use telephone number reservation in LENS.	b. BST is providing telephone number availability in a sufficient manner.	b. N/A
c. CLECs cannot determine NXX codes available to offer customers.	c. This information is currently provided in LERG. The proposed API interface will also make this information available.	c. N/A
d. BST does not provide parity of access to vanity numbers.	d. BST is providing vanity number availability in a sufficient manner.	d. N/A
e. BST does not enable CLECs to hold a telephone number for 30 days without using cumbersome (firm order mode) of LENS. In the (inquiry mode) CLECs may only make reservations for 9 days.	e. BST shall make 30 day number reservation available to CLECs.	e. March 30, 1998
f. ATLAS information is received by a periodic file data transfer.	f. Not an issue.	f. N/A

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PRE-ORDERING

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME
5. Due Dates		
a. Access for calculation of due date is not available.	a. BST shall provide a full due date calculation capability in the pre-ordering mode of LENS.	a. April 30, 1998
b. Dates given are not firm, also the date is assigned by BellSouth after it is entered into BellSouth's system.	b. This issue is addressed in 2i of Ordering.	b. January 30, 1998
c. If technician is needed, it would not be known to the CLEC. Technician time could be wasted.	c. Not an issue (Connect-Through and Quick Serve will solve the problem).	c. N/A
d. Limited appointment time.	d. BST is providing this information in a sufficient manner.	d. N/A
e. Access to dedicated facilities info available only after due date is assigned.	e. This information is presently being provided through Quick Serve, and the proposed API interface will address this issue long-term.	e. N/A
f. Changes to due date requires a phone call to LCSC.	f. This issue is addressed in 4a of Ordering.	f. N/A
g. Firm Order Confirmation delays.	g. This issue is addressed in 2i of Ordering.	g. January 30, 1998
6. Editing Capabilities		
a. BellSouth relies upon machine to human interactions.	a. This issue is addressed in 4a of Ordering.	a. March 16, 1998 for Version 7.0 January 30, 1998 for LEO, LESOG and SOER
b. Prevent on-line edit checks, order rejects and must be resubmitted.	b. This issue is addressed in 4a of Ordering.	b. March 16, 1998 for Version 7.0 January 30, 1998 for LEO, LESOG and SOER

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PRE-ORDERING

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME
7. System Capacity		
a. RSAG and LENS lack sufficient capacity to meet reasonable demand.	a. BST is installing new software to resolve this problem.	a. December 12, 1997
b. System Lock-Out or Time-Out.	b. BST is installing new software to resolve this problem.	b. December 12, 1997
8. Systems Integration		
a. LENS is an interim system that does not provide machine to machine access to BST's legacy systems.	a. Closed issue (BST will provide system specifications so that CLECs can build their own interfaces to integrate).	a. LENS specifications provided December 12, 1997
b. LENS pre-ordering interface is not integrated with its EDI ordering interface.	b. Closed issue (BST will provide system specifications so that CLECs can build their own interfaces to integrate).	b. CGI specifications available December 15, 1997
c. BST has failed to provide real-time machine to machine access to Direct Order Entry Support Applications Program ("DSAP").	c. Closed issue (BST will provide system specifications so that CLECs can build their own interfaces to integrate).	c. December 31, 1997
d. Technical specifications have not been provided to CLECs so they can transfer information into their systems without manual intervention.	d. Closed issue (BST will provide system specifications so that CLECs can build their own interfaces to integrate).	d. December 31, 1997

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MAINTENANCE AND REPAIR

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME
1. Limited Application		
a. Electronic Bonding Interface (EBI) only provides full service for access special circuits.	a. BST is implementing EBI with AT&T.	a. February 2, 1998
b. TAFI only supports basic local exchange services. All others require manual intervention by BST personnel.	b. EBI will accommodate all services.	b. February 2, 1998
2. Electronic Capabilities		
a. BST has not provided EBI for telephone number-based service.	a. BST shall provide TAFI specifications to CLECs.	a. January 30, 1998
b. No electronic capability to send/receive status on any local telephone service.	b. Implementation of EBI will address this issue.	b. February 2, 1998
c. Electronically issued orders are manually entered into BST system.	c. Implementation of EBI will address this issue.	c. February 2, 1998
3. System Capacity		
TAFI lacks sufficient capacity to meet demand (i.e. simultaneous users).	BST will add capacity to accommodate more users as needed.	As needed
4. Long Term Solution		
EBI-long term is not in place.	BST shall implement EBI. BST is not required to make enhancements to TAFI.	February 2, 1998

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MAINTENANCE AND REPAIR

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME
5. Integration		
a. BST failed to provide technical specifications for CLECs' TAFI integration.	a. BST will provide specifications for TAFI to CLECs.	a. January 30, 1998
b. TAFI and LENS are not integrated.	b. BST does not integrate TAFI with its retail pre-ordering and ordering systems. BST will provide specifications for TAFI and LENS to CLECs so that they may perform their own system integration.	b. January 30, 1998

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ORDERING

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME
1. Limited Product and Services		
a. LENS is not designed to accommodate unbundled loop and certain complex resale orders.	a. BST shall provide business rules to CLECs for Version 7.0 of EDI, LEO, LESOG and SOER.	a. March 16, 1998 for Version 7.0 January 30, 1998 for LEO, LESOG and SOER
b. Limited pre-ordering and ordering gateway interface (provided by LENS and EDI) to the BellSouth resources that link to its legacy systems.	b. BST shall provide e-mail capabilities for pre-ordering and ordering complex services initially. This is in addition to the current fax capability.	b. January 30, 1998
c. LENS and EDI support only some resale services.	c. BST in conjunction with carriers will present this issue of mechanized complex orders to OBF.	c. March 30, 1998
d. Failure to use industry standard feature identification codes.	d. Not an issue.	d. N/A
e. Failure to provide a fully automated system for placing complex orders.	e. BST in conjunction with carriers will present this issue of mechanized complex orders to OBF.	e. March 30, 1998
f. Inability of new entrants using Phase I EDI to order all services that BST now orders electronically to support its retail operations, i.e., cannot be used to order private line, Centrex, ISDN, or complex business services or unbundled network elements.	f. Issue addressed in 1a, 1b, and 1c.	f. March 16, 1998 for Version 7.0 January 30, 1998 for LEO, LESOG and SOER
g. No provision for ordering capabilities for Centrex, some ISDN, MultiServ, complex services, private line services other than Synchronet, or all unbundled network elements when Phase II EDI interface is implemented.	g. BST in conjunction with carriers will present this issue of mechanized complex orders to OBF.	g. March 30, 1998
h. EXACT designed for access, not local service, thus only part of the customers service, such as the loop, can be ordered electronically; the remainder of the customers order, for items such as E911, directory listings, interim number portability, etc. must be ordered through another interface such as EDI or via fax.	h. Not an issue.	h. N/A

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ORDERING

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME
1. Ordering (Continued)		
i. CLEC orders placed through LENS are currently limited to a maximum of six lines per residence or business request, and a maximum of twenty features per line.	i. Issue addressed in 3h of Pre-Ordering.	i. End of 1998
2. Order Status		
a. LENS and EDI have not led to faster provisioning of simple LSRs.	a. Not an issue at this time.	a. N/A
b. Communication processes fail to adequately advise CLECs of the status of the orders placed via the electronic gateways.	b. Not an issue at this time.	b. N/A
c. Sufficient notices not provided to CLEC e.g. service jeopardies, rejects, competitive disconnects, circuit based services.	c. In the interim, BST will work with carriers on the provision of timely notices.	c. January 30, 1998
d. Treatment of CLEC orders as two orders - one to disconnect and one to reconnect.	d. BST is installing software to resolve this issue. BST will verify memory call item is resolved also.	d. January 5, 1998
e. Failure to provide adequate flow-through for POTs resale and UNE orders.	e. BST will share edits and all scenarios which produce order fall out for manual processing.	e. December 19, 1997
f. Failure to disclose internal editing and data formatting requirements.	f. BST shall provide business rules to CLECs for Version 7.0 of EDI, LEO, LESOG and SOER.	f. March 16, 1998 for Version 7.0 January 30,1998 for LEO, LESOG and SOER
g. Failure to provide sufficient order summaries and/or an order summary screen.	g. BST and the CLECs have committed to resolve this issue.	g. First Quarter 1998
h. No means for CLECs to access and view pending orders.	h. BST and the CLECs have committed to resolve this issue.	h. First Quarter 1998
i. Lack of a system that provides adequate FOC information - the 'soft' FOC before facility availability is determined is inadequate.	i. BST shall provide the same guarantee of FOC information to CLEC that it provides to its retail operations.	i. January 30, 1998

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FPSC Docket No. 980281-TP
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Exhibit WNS-1
July 21, 1998

ORDERING

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME
2. Order Status (Continued)		
j. EDI not fully automated, e.g., more than two-thirds of orders placed through its electronic interfaces fall out for manual processing.	j. BST will share edits and all scenarios which produce order fall out for manual processing.	j. December 19, 1997
k. EDI not capable of electronically transmitting necessary provisioning notices, i.e., error notices, reject notices jeopardy notices, status reports.	k. In the interim, BST will work with carriers on the provision of timely notices.	k. January 30, 1998
l. All necessary business rules not provided to CLECs; rules in LEO Guide in error or internally inconsistent.	l. BST shall provide business rules for CLECs for Version 7.0 of EDI, LEO, LESOG and SOER.	l. March 16, 1998 for Version 7.0 January 30, 1998 for LEO, LESOG and SOER
m. Batch processing is not real-time or near real-time for ordering.	m. BST will explore event-driven EDI with AT&T and MCI.	m. First Quarter 1998
n. Access to dedicated facility information is available only after the due date is assigned and not before which would enable a representative to immediately offer the same-day service on a new install that does not require an additional line.	n. BST shall provide a full due date calculation capability in the pre-ordering mode of LENS.	n. April 30, 1998

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ORDERING

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME
3. Level of Manual Intervention		
a. Substantial number of LSRs placed via EDI being handled manually.	a. Issue addressed in 2e and 2j.	a. December 19, 1997
b. No working EDI interface for ordering.	b. Not an issue.	b. N/A
c. EDI-PC not fully automated.	c. Not an issue at this time.	c. N/A
d. Process for ordering unbundled network elements through LENS (information is entered into the "Remarks" section of the order screen and is manually retrieved and re-entered by BST).	d. BST shall provide business rules to CLECs for Version 7.0 of EDI, LEO, LESOG and SOER.	d. March 16, 1998 for Version 7.0 January 30, 1998 for LEO, LESOG and SOER
e. Availability of an electronic interface that does not require manual intervention for the provisioning of unbundled loops.	e. BST shall provide business rules to CLECs for Version 7.0 of EDI, LEO, LESOG and SOER.	e. March 16, 1998 for Version 7.0 January 30, 1998 for LEO, LESOG and SOER
4. Edit Capabilities		
a. Failure to provide electronic edit capabilities with ordering and provisioning at parity with BST. Edit to comply with OBF ordering form requirements or BST business rules.	a. BST shall provide business rules to CLECs for Version 7.0 of EDI, LEO, LESOG and SOER.	a. March 16, 1998 for Version 7.0 January 30, 1998 for LEO, LESOG and SOER
b. Inability to submit change orders (in case of errors, customer changes order, and adding or removing features).	b. BST shall provide business rules to CLECs for Version 7.0 of EDI, LEO, LESOG and SOER.	b. March 16, 1998 for Version 7.0 January 30, 1998 for LEO, LESOG and SOER

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ORDERING

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME
5. System Capacity		
a. Failure to provide systems with sufficient capacity to meet anticipated or reasonable demand.	a. BST has agreed to provide the methodology utilized to calculate present system capacity and its proposed plan for expanding system capacity.	a. December 31, 1997
b. Insufficient testing of systems and test documentation.	b. Issue addressed in 1a and 1b of the General Section.	b. January 30, 1998
c. Inadequate field for directory listings.	c. Issue addressed in 1a and 1b of the General Section.	c. January 30, 1998
Note: Applies to both EDI and EDI-PC for items 5a thru 5c.		
6. Integration		
a. LENS, EDI, and EDI-PC interfaces are not integrated to provide direct, unmitigated access to BST's legacy systems for pre-ordering and ordering functions.	a. Closed issue (BST will provide system specifications so that CLECs can build their own interfaces to integrate).	a. December 31, 1997
b. LENS must be utilized in combination with additional interfaces, such as the TAFI system and EDI-PC in order to meet additional CLEC needs.	b. Not an issue.	b. N/A
c. Insufficient information provided new entrants to develop a system compatible with BST's Phase II EDI.	c. Issue addressed in 2f of Ordering and 1a and 1b of the General Section.	c. March 16, 1998 for Version 7.0 January 30, 1998 for LEO, LESOG and SOER
d. LENS, EDI, and EDI-PC require dual entry by entrants into their own ordering/customer records systems.	d. Closed issue (BST will provide system specifications so that CLECs can build their own interfaces to integrate).	d. December 31, 1997

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BILLING

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME
1. System Capability		
a. BST has failed to provide systems relating to detailed access usage data for UNEs for billing purposes.	a. BST will provide access daily usage file (ADUF).	a. December 31, 1997
b. BST has failed to provide systems to bill for UNEs, including local loops, local transport and switching via CABs or using a CABs format.	b. This is a contractual issue and therefore no proposed solution is offered in the context of this technical workshop.	b. N/A
c. BST does not have the capability to record usage data or generate mechanized bills for many network elements. BST is not capable of providing usage sensitive billing for those UNEs that have usage sensitive pricing such as transport, switching, and signaling.	c. BST shall furnish an accurate paper bill in accordance with interconnection agreements.	c. February 15, 1998
d. BST cannot electronically transmit originating and terminating recording information for interstate calls and does not know when it will be able to do so.	d. BST will provide access daily usage file (ADUF).	d. December 31, 1997
e. BST has failed to provide systems that accurately produce bills for resold services.	e. Not an issue	e. N/A
f. BST has failed to provide systems for accessing usage data for flat rate calls.	f. BST will add capability in central offices to capture data for flat rate calls.	f. December 1998
g. BST is not providing usage rates for Information Service Provider (e.g. N11) calls even though BST agreed to in middle 1996 and are required to by the AT&T/BST Interconnection Agreement.	g. CLECs have the ability to negotiate their own contracts with ISPs.	g. N/A
h. BST has failed to provide systems for mechanically generated billing statements.	h. BST shall furnish an accurate paper bill in accordance with interconnection agreements.	h. February 15, 1998
2. Billing Accuracies CABs - formatted bills were to be implemented by August 2, 1997. AT&T still has not received accurate CABs bills and remains in testing with BST.	This is a contractual issue and therefore no proposed solution is offered in the context of this technical workshop.	N/A

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GENERAL

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME
1. Notice of Changes a. Insufficient notice of changes b. Insufficient documentation of specifications	a and b: BellSouth, AT&T, MCI and Sprint started a series of meetings on December 11, 1997 to develop a Process Document addressing and resolving these "change management" issues. This series of meetings and development of the document are supposed to conclude by January 31, 1998. One additional CLEC will also be notified so that they can have some input. The parties view this as positive, interactive solution.	a and b: January 30, 1998
2. Proprietary Interface a. Interim interface. b. Not compatible with industry standard EDI interfaces. c. CLECs cannot integrate preordering and ordering at parity with BST. d. Need for machine-to-machine or Application Programming Interface for preordering.	a thru d: EDI & API will be based on industry standards and therefore can be integrated and available for machine-to-machine use.	a thru d: EDI version 7.0 by March 16, 1998 API by December 31, 1998
3. Training a. Usable specs not made available. b. Documentation incomplete, has errors. c. BST personnel lacks adequate training.	a. Issue addressed in 1a and 1b. b. Issue addressed in 1a and 1b. c. Issue addressed in 1a and 1b. Also, BST to provide feedback on orders submitted for CLEC information in training their own staff.	a. January 30, 1998 b. January 30, 1998 c. January 30, 1998

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GENERAL

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME
4. **Information** Information is not provided to show parity (i.e. CLEC tour of BST facilities).	Not a technical issue to be resolved in this docket.	N/A

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BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION

In re: Investigation into Development of Electronic Interfaces for BellSouth's Operational Support Systems	)))	Docket No. 8354-U

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Staff Report – Investigation into Development of Electronic Interfaces for BellSouth's Operational Support Systems was filed with the Commission's Executive Secretary and copies were served upon all parties and persons listed below by U.S. first-class mail:

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So certified this 23rd day of December, 1997.

David L. Burgess
Director, Telecommunications

Appendix B

Schedule for Progress Reports by the Parties

The OSS Report calls for the parties in the industry to file reports in this docket, to apprise the Commission of the status of implementation of the solutions. Each of these reports should be a joint report submitted by all interested industry participants. The process of developing such joint reports should be an additional means of facilitating productive communications among all the affected parties.

The format of the reports should follow the Matrix in the OSS Report, with the addition of a fourth column showing whether (and when) implementation milestones have been accomplished. These joint reports should be filed under Docket No. 8354-U with the Commission's Executive Secretary, with both an electronic version and 25 paper copies, on specified dates. The Staff's original schedule for these reports must be modified to allow for the hearings that have been concluded. Therefore, the Commission adopts the following modified schedule:

Original Recommended Schedule	Modified Schedule
February 10, 1998	June 10, 1998
March 10, 1998	July 10, 1998
April 10, 1998	August 10, 1998
May 10, 1998	September 10, 1998
June 10, 1998	October 10, 1998
July 10, 1998	November 10, 1998
October 10, 1998	February 10, 1999
January 10, 1999	May 10, 1999

BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION

In re: Investigation into Development of Electronic Interfaces for BellSouth's Operational Support Systems	)))	Docket No. 8354-U

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Staff Direct Testimony in the above referenced docket was filed with the Commission's Executive Secretary and copies were served upon all parties and persons listed below by U.S. first-class mail:

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Replacement for WNS-2 originally filed July 31

BellSouth Telecommunications, Inc.
Deposition of William N. Stacy
FPSC Docket No. 980281-TP
July 30, 1998
Late Filed Deposition Exhibit WNS-2

REQUEST: Please provide the BellSouth Service Quality Measurement Reports for Trunking Reports for MCI for June 1998 with an explanation of each report.

RESPONSE: Please find attached the reports requested and an explanation of what each report displays. The BellSouth Service Quality Measurements (SQM) Reports that respond to those described in Mr. Martinez's testimony on pages 15-17 are as follows:

(i) "blockage data on all common trunk groups utilized for ALEC traffic that experienced blockage;" - Trunk Group Performance Report: Trunk Group Service (Summary) BellSouth Common Transport Trunk Group (CTTG) identifies the number of trunks with >2% blockage. The Trunk Group Performance Report: Trunk Group Service (Detail) identifies the specific trunks and the observed blockage.

(ii) "blockage data on all of MCI's interconnection trunk groups form BellSouth's end offices and tandems to MCI's points of termination that experienced blockage;"- The CLEC Specific Trunk Group Perfornance Report: Trunk Group Service (Summary) identifies the number of trunks with >3% blockage. The Trunk Group Performance Report: Trunk Group Service (Detail) identifies the specific trunks and the observed blockage.

(iii) "blockage data on all ALEC interconnection trunk groups forn BellSouth's end offices and tandems to ALEC points of termination that experienced blockage;"- The Trunk Group Performance Report: Trunk Group Service (Surnmary) CLEC Aggregate identifies the number of trunks with >3% blockage for both BST administered and CLEC administered trunks. The Trunk Group Performance Report: Trunk Group Service (Detail) identifies the specific trunks and the observed blockage.

FLORIDA PUBLIC SERVICE COMMISSION
DOCKET NO. 980281-TP EXHIBIT NO. 13
COMPANY/ WITNESS: Stacy
DATE: 8-5-98

(iv) "similar blockage data on all trunks carrying BellSouth local traffic." - The Trunk Group Performance Report: The Trunk Group Service (Summary) BellSouth Local Network identifies the number of trunks with >3% blockage for both BST administered trunks. The Trunk Group Performance Report: Trunk Group Service (Detail) identifies the specific trunks and the observed blockage.

INFORMATION PROVIDED BY:

William N. Stacy
VP Interconnection Services
675 West Peachtree Street
Atlanta, GA 30375

BellSouth produces three blocking measurements as a part of its Service Quality Measurements package which incorporate all four of the reports requested by MCI. These reports are located on page 34 of BellSouth's current SQM and are described as follows:

1. Comparative Trunk Group Service Summary: Provides comparative measurements of the trunk groups which exceed the blocking threshold during their busy hours, as well as the total number of trunk groups measured.

2. Trunk Group Service Report: Contains the service performance results of all final trunk groups (both BST administered trunk groups and CLEC administered trunk groups) between Point of Termination (POT) and BST tandems or end offices, by region, by CLEC, CLEC Aggregate, and BST aggregate.

Specifically measures the total number of trunk groups, number of trunk groups measured, and the number of trunk groups which exceed the blocking threshold during their busy hours.

3. Trunk Group Service Detail: Provides a detailed list of all final trunk groups between POTs and BST end offices or tandems (A-end and Z-end for BST Local trunks) including the actual blocking performance when blocking exceeds the measured blocking threshold. The blocking performance includes the observed blocking number for a particular Trunk Group Serial Number (TGSN).
Blocking thresholds for all trunk groups are 3%, except BST CTTG, which is 2%.
Measured Blocking =[(Total number of Blocked Calls)/(Total number of Attempted Calls)] X 100.

BellSouth began providing aggregate blocking reports in February and ALEC specific reports on June 15, 1998. This information is posted on the BellSouth ALEC Performance Measurement Internet web page by the fifteenth of each month for the previous months data.

Trunk Group Performance

REPORT: TRUNK GROUP SERVICE (SUMMARY)
REPORT PERIOD: 05/25/1998 - 06/19/199
Attachment 1a WNS-2

	AL	GA	KY	LA	MS	NC	NF	SC	SF	TN	REGION TOTAL
CLEC 1[1]											
BST ADMINISTERED											
- TOTAL TRUNK GROUPS											
- TRK GRPS MEAS/PROC											
- TOT GRPS > 3% OBSERVED BLOCKING											
CLEC 1[1] ADMINISTERED[2]											
- TOTAL TRUNK GROUPS											
- TRK GRPS MEAS/PROC											
- TOT GRPS > 3% OBSERVED BLOCKING											
CLEC AGGREGATE											
BST ADMINISTERED											
- TOTAL TRUNK GROUPS	13	38	8	6	1	16	18	5	16	27	148
- TRK GRPS MEAS/PROC	13	38	8	6	1	15	18	5	16	26	146
- TOT GRPS > 3% OBSERVED BLOCKING	2	1	0	0	0	0	1	0	0	0	4
CLEC ADMINISTERED[2]											
- TOTAL TRUNK GROUPS	56	165	24	33	9	126	39	21	57	109	639
- TRK GRPS MEAS/PROC	56	155	24	33	9	113	27	20	57	106	600
- TOT GRPS > 3% OBSERVED BLOCKING	1	4	1	0	1	2	1	0	4	4	18
BELLSOUTH COMMON TRANSPORT TRUNK GROUP(CTTG)											
BST ADMINISTERED											
- TOTAL TRUNK GROUPS	376	278	182	501	379	420	356	220	291	510	3513
- TRK GRPS MEAS/PROC	371	275	182	501	379	420	355	220	291	510	3504
- TOT GRPS > 2% OBSERVED BLOCKING	2	5	0	4	5	0	2	1	0	2	21
BELLSOUTH LOCAL NETWORK											
BST ADMINISTERED											
- TOTAL TRUNK GROUPS	332	900	155	418	286	551	286	271	352	344	3895
- TRK GRPS MEAS/PROC	329	897	155	418	286	549	283	270	348	344	3879
- TOT GRPS > 3% OBSERVED BLOCKING	8	30	0	3	3	2	4	1	8	0	59

Note 1: CLEC 1 information will be populated & distributed on an individual CLEC basis.

Note 2: BST does not have all the traffic data measurement from CLEC switches to accurately compute the blocking on CLEC administered trunk groups: In this case inferred blocking is determined from the traffic usage collected on BST switches.

Trunk Group Performance

REPORT: TRUNK GROUP SERVICE (DETAIL)
REPORT PERIOD: 05/25/1998 - 06/19/1998

CLEC 1[1]										
ADMINISTERED	TGSN	BST SWITCH	CLEC POT	DESCRPT	OBSVD BLKG	HR	TKS	VAL DAYS	NBR RPTS	RMKS
BST										
CLEC 1[1]										

BST Common Transport Trunk Group										
ADMINISTERED	TGSN	TANDEM	END OFFICE	DESCRPT	OBSVD BLKG	HR	TKS	VAL DAYS	NBR RPTS	RMKS
	AF124738	HNVIALUN0GT	HNVIALPWDS0	77 AF DT	5.35%	20	240	19	1	D1K1 ISP AND CLEC TRF.
	AF124765	MOBLALAZ0GT	MOBLALSKDS0	77 AF DT	3.52%	10	168	19	1	B0A1 72 TKS ON 062998
	AC185228	ATLNGABU01T	ATLNGABUDS2	77 AF DT	4.75%	15	72	19	1	A0J1 SUBTEND GRP NEED AUGMENT
	AC175327	ATLNGABU01T	ATLNGAEL37C	7- AF DD	9.21%	21	144	19	1	D1I2 IC MTCE PROBLEM
	AC185156	ATLNGABU01T	LLBNGAMADS1	77 AF DT	2.95%	16	600	19	1	B0A1 24 TRK ADD 061098
	AC185428	ATLNGABU01T	LLBNGAMADS1	77 AF DT	21.87%	22	48	16	1	D1I1 MAINTENANCE PROBLEM
	AC200289	ATLNGAEP01T	PTCYGAMA48C	77 AF DT	2.78%	9	288	18	1	D1I1 MAINTENANCE PROBLEM
	AF122547	LFYTLAMA0GT	LFYTLAVMCG0	M- DF DD	2.38%	16	36	19	2	D1C1 CABLE FAILURE 6/16-ABN.REPT.-C
	AF122579	LKCHLADT03T	LKCHLAUNDS0	M- DF DD	2.15%	15	48	19	1	D1I1 MAINTENANCE PROBLEM 6/16-CLEAR
	AF122514	NWORLAMA0GT	NWORLASCCG0	M- DF DD	3.29%	24	48	14	1	D1C2 CXR FAILURE 6/17-ABN.REPT-CLEA
	AF133408	NWORLAMT01T	KNNRLAHNDS0	77 AF DT	4.23%	13	120	17	2	B0A1 48 TKS.COMP.6/3-NO BLKG SINCE
	AF125409	GNWDMSMA26T	IUKAMSESDS0	M- DF ET	4.85%	7	5	19	1	D1I1 MAINTENANCE PROBLEM
	AF125444	GNWDMSMA26T	RPLYMSMADS0	M- DF ET	4.72%	10	4	19	1	D1I1 MAINTENANCE PROBLEM
	AF125383	JCSNMSCP36T	SHBTMSMADS0	M- DF ET	2.84%	15	4	19	1	D1I1 MAINTENANCE PROBLEM
	AF131642	MRDNMSTL07T	SHBTMSMADS0	MM AF DT	2.08%	15	6	18	1	D1I1 MAINTENANCE PROBLEM
	AF121113	TUPLMSMA07T	RPLYMSMADS0	77 AF DT	2.16%	10	192	18	1	D1I1 MAINTENANCE PROBLEM
	AC119457	ORLDFLMA04T	EGLLFLIHDS0	M- DF ET	3.44%	11	51	19	1	D1I1 MTNC USG 6-16-98.
	AC183959	PNSCFLWA01T	PNSCFLFPDS0	77 DF DT	3.38%	9	48	19	1	C0A1 DATA UNDER INVESTIGATION.
	AC202883	CLMASCSA60T	ORBGSCMA563	MM DF DT	4.86%	24	5	18	1	D1I1 MTCE PROBLEM
	AF120426	JCSNTNMA84T	HNTGTNMADS0	77 AF DT	2.97%	10	190	18	1	D1C4 6/9 EQPT FAILURE
	AF126988	MMPHTNMA84T	MMPHTNGTDS0	MM AF DT	3.15%	16	24	19	1	D1I1 18/24 BOT 6/2/98

BST Local Network										
ADMINISTERED	TGSN	A-END	Z-END	DESCRPT	OBSVD BLKG	HR	TKS	VAL DAYS	NBR RPTS	RMKS
	AF148345	BOAZALMADS0	GTVLALNMRS0	77 DF IE KE	13.09%	21	120	20	1	
	AF127469	BRHMALMT1GT	BRHMALMT25E	77 AF OG	3.09%	15	864	19	1	
	AF148064	BYMNALMARS0	MOBLALAZ0GT	M- DF DA CC	4.08%	16	9	19	1	
	AF148067	BYMNALMARS0	MOBLALAZ0GT	M- DF IR	3.91%	16	4	19	1	
	AF106652	MOBLALPR45E	MOBLALAZ0GT	M- DF IR	3.12%	17	12	20	2	
	AF143949	MTGMALMTDS0	MTGMALMT0GT	M- DF DA CC	7.74%	15	25	20	1	
	AF073892	MTGMALMT26E	MTGMALMT26T	M- DF TO G8	4.08%	14	12	20	3	
	AF063485	PHCYALMADS0	CLMBGAMT12T	M- DF TO	21.66%	21	456	18	10	
	AC125698	ALBYGAMA12T	ALBYGAMA45A	7- DF TG	12.91%	21	504	19	13	
	AC125697	ALBYGAMA45A	ALBYGAMA12T	7- DF TO	46.02%	15	93	19	3	
	AC186591	ALPRGAMA47C	NRCRGAMA01T	77 AF OG KE	16.58%	16	252	19	7	
	AC145405	ALPRGAMA47C	NRCRGAMA84A	77 DF IE KE	7.21%	16	408	18	4	
	AC142423	ATHNGAMA02T	MDSNGAMA34E	M- DF VR	4.08%	21	10	16	1	
	AC159816	ATLNGABH34F	ATLNGASS1ID	M- DF IR	4.23%	17	13	19	1	
	AC142635	ATLNGABU01T	ATLNGABU84C	77 AF OG	35.38%	15	192	12	11	
	AC146532	ATLNGABU01T	ATLNGACS33A	77 AF OG	4.40%	22	235	18	4	

Trunk Group Performance

REPORT: TRUNK GROUP SERVICE (DETAIL)
REPORT PERIOD: 05/25/1998 - 06/19/1998

	AC106410	ATLNGABU01T	ATLNGAIC29A	7- AF TG	7.28%	22	96	19	1	
	AC188996	ATLNGABU01T	FLBRGAMADS1	77 AF OG	57.27%	17	48	19	11	
	AC187401	ATLNGABU01T	GSVLGAMA53C	77 AF OG	18.97%	16	168	17	4	
	AC121949	ATLNGABU01T	MRTTGAEA97F	77 AF OG	22.51%	21	312	19	4	
	AC186580	ATLNGABU01T	NRCRGAMA01T	77 AF MT	5.86%	16	576	13	11	
	AC174187	ATLNGABU01T	SMYRGAMADS1	77 AF OG	13.63%	16	139	19	9	
	AC106464	ATLNGACD28F	ATLNGABU01T	7- AF TO	31.83%	21	78	15	7	
	AC186594	CHMBGAMADS0	NRCRGAMA01T	77 AF OG KE	3.21%	16	146	19	1	
	AC130918	CLMBGAMT01T	CLMBGAMT64A	M- DF VR	23.84%	10	3	19	3	
	AC132234	CLMBGAMW56C	CLMBGAMT01T	A- DF IR	5.68%	17	20	19	1	
	AC186954	CMNGGAMA88C	GSVLGAMA53C	77 DF IE	3.37%	10	96	19	1	
	AC188221	CMNGGAMA88C	NRCRGAMA84A	77 DF IE KE	6.19%	16	144	19	1	
	AC186710	CRVLGAMA38C	NRCRGAMA01T	77 AF OG KE	23.03%	21	120	19	1	
	AC202366	DLTHGAHS47C	ATLNGAEP11T	M- DF ES G678	4.34%	5	4	19	1	
	AC186596	DLTHGAHS47C	NRCRGAMA01T	77 AF OG KE	10.33%	16	216	18	8	
	AC186597	DNWDGAMA67A	NRCRGAMA01T	77 AF OG KE	16.96%	16	252	13	3	
	AC132239	LGRNGAMA88C	CLMBGAMT01T	A- DF IR	3.59%	10	13	19	1	
	AC159845	MRRWGAMA96F	ATLNGASS1ID	M- DF IR	7.61%	10	8	19	1	
	AC186600	NRCRGAMA01T	NRCRGAMA84A	77 AF OG KE	25.57%	15	264	17	6	
	AC200240	PANLGAMA98F	ATLNGAPP12T	M- AF ES	6.78%	3	3	19	2	
	AC045554	RVDLGAMA99A	ATLNGABH34F	7- DF IE	4.61%	22	76	19	1	
	AC161598	SVNHGABS65A	SVNHGAGC96A	77 DF IE	13.72%	15	108	19	3	
	AF136363	LFYTLAVMCG0	LFYTLAMA0GT	M- DF DA CC	3.24%	15	16	19	2	
	AF136794	MTHRLAMADS0	NWORLAMA20T	M- DF DA CC	5.79%	24	3	18	1	
	AF093929	RCLDLAMADS0	NWORLAMA0GT	M- DF IR	5.22%	20	7	19	1	
	AF136578	IUKAMSESDS0	GNWDMSMA26T	M- DF DA CC	3.22%	15	6	19	1	
	AF145389	JCSNMSRWDS0	JCSNMSCP36T	M- DF IR	3.41%	11	8	19	1	
	AF148191	NTCHMSMADS0	JCSNMSBLDS0	M- DF ES	4.99%	12	3	18	2	
	AC192778	CARYNCCE46G	RLGHNCHO01T	M- DF IR	4.67%	17	19	20	3	
	AC188523	WNSLNCLE78F	GNBONCEU05T	M- DF DA CC	10.09%	7	24	8	1	
	AC179553	DELDFLMADS0	DYBHFLPODS0	77 DF IE MR	3.38%	13	96	19	1	
	AC113467	FTPRFLMACG0	PTSLFLMADS0	77 DF IE	4.30%	20	672	19	2	
	AC153771	JCVLFLCL55T	JCVLFLRV38E	77 AF OG	5.73%	16	552	18	1	
	AC146906	PNVDFLMADS0	JCVLFLSMDS0	M- DF ES	5.39%	4	5	19	2	
	AC191876	CLSNSCMA65E	GNVLSCDT60T	M- DF IR G1	3.83%	18	10	19	1	
	AC196722	FTLDFLJADS0	FTLDFLPL13T	77 AF OG KE	9.92%	16	144	19	1	
	AC196728	FTLDFLPL13T	FTLDFLWNDS0	77 AF OG KE	9.20%	21	96	19	1	
	AC196731	FTLDFLPL13T	HLWDFLPEDS0	77 AF OG KE	10.40%	21	144	19	1	
	AC196732	FTLDFLPL13T	HLWDFLWHDS0	77 AF OG KE	7.38%	12	120	17	1	
	AC182642	MIAMFLAL63E	MIAMFLRR1GT	77 AF OG	3.13%	10	96	19	1	
	AC182648	MIAMFLGRDS1	MIAMFLRR1GT	77 AF OG KE	16.57%	16	648	17	1	
	AC182628	MIAMFLPB88E	MIAMFLRR1GT	77 AF OG	3.16%	15	96	19	1	
	AC182632	MIAMFLRR1GT	PRRNFLMADS0	77 AF OG KE	4.00%	21	264	19	1	

Note 1: CLEC 1 information will be populated & distributed on an individual CLEC basis.

REPORT: TRUNK GROUP SERVICE Deposition Exhibit WNS-2
REPORT PERIOD: 05/25/1998 - 06/19/1998 Attachment 1b

BST ADMINISTERED FOR WUA

	GA	NC	SF	TN	TOTAL
TOTAL TRUNK GROUPS:	2	1	5	1	9
TRK GRPS MEAS/PROC:	2	1	5	1	9
TOT GRPS > 3% OBSERVED BLOCKING:	0	0	0	0	0

CLEC ADMINISTERED BY WUA

	GA	NC	NF	SF	TN	TOTAL
TOTAL TRUNK GROUPS:	7	4	5	22	5	43
TRK GRPS MEAS/PROC:	7	4	5	22	5	43
TOT GRPS > 3% OBSERVED BLOCKING:	1	0	0	1	0	2

NOTE: BST DOES NOT HAVE ALL THE TRAFFIC DATA MEASUREMENTS FROM THE CLEC SWITCHES TO ACCURATELY COMPUTE THE BLOCKING ON CLEC ADMINISTERED TRUNK GROUPS: IN THIS CASE INFERRED BLOCKING IS DETERMINED FROM THE TRAFFIC USAGE COLLECTED ON BST SWITCHES.

REPORT: TRUNK GROUP SERVICE (DETAIL)
REPORT PERIOD: 05/25/1998 - 06/19/1998

TRUNK GROUP LISTING FOR: WUA

CXR_ID	ADMIN	TGSN	BSTOFC	CLECOFC	DESCRPT	AB HOUR	TKS	DAYS	NBR_RPTS	RMKS
WUA	CLEC	AC195294	ATLNGABU01T	ATLNGACS1KD	7- AF TD JKE	.0474	13	384	11	1
		AC197772	NDADFLGG01T	MIAMFLGR2KD	77 AF TD JZTG3KE	.1735	12	24	14	1

TRUNK GROUP PERFORMANCE

Function:	Interconnection Trunk Performance
Measurement Overview:	In order to ensure quality service to the CLECs as well as protect the integrity of the BST network, BST collects traffic performance data on the trunk groups interconnected with the CLECs as well as all other trunk groups in the BST network.
Measurement Methodology:	1. **Trunk Group Service Summary**: Contains the service performance results of all final trunk groups (both BST administered trunk groups and CLEC administered trunk groups) between Point of Termination (POT) and BST tandems or end offices, by region, by CLEC, CLEC Aggregate, and BST aggregate. Specifically measures the total number of trunk groups, number of trunk groups measured, and the number of trunk groups which exceed the blocking threshold during their busy hours. 2. **Trunk Group Service Detail:** Provides a detailed list of all final trunk groups between POTs and BST end offices or tandems (A-end and Z-end for BST Local trunks) including the actual blocking performance when blocking exceeds the measured blocking threshold. The blocking performance includes the observed blocking number for a particular Trunk Group Serial Number (TGSN). Blocking thresholds for all trunk groups are 3%, except BST CTTG, which is 2%. Measured Blocking =[(Total number of Blocked Calls)/(Total number of Attempted Calls)] X 100

Reporting Dimensions:	**Excluded Situations:**
• BST Trunk Group Aggregate • CLEC Trunk Group Aggregate • CLEC Trunk Group Specific • State and Region Level	• Trunk Groups for which valid traffic data measurement unavailable.
Data Retained Relating to CLEC Experience:	**Data Retained Relating to BST Performance:**
• Report Month • Total Trunk Groups • Total Trunk Group for which data available • Threshold exceptions • Exceptions percent of the total • State and Region Level • Exception Trunk detail	• Report Month • Total Trunk Groups • Total Trunk Group for which data available • Threshold exceptions • Exceptions percent of the total • State and Region Level • Exception Trunk detail

TRUNK GROUP PERFORMANCE

1. Trunk Group Service Summary

CLEC 1

BST Administered	AL	GA	KY	LA	MS	NC	NF	SC	SF	TN	Region TOTAL
Total Trunk Groups:	x	x	x	x	x	x	x	x	x	x	x
Trk Grps Meas/Proc:	x	x	x	x	x	x	x	x	x	x	x
Tot Grps > 3% observed blocking	x	x	x	x	x	x	x	x	x	x	x
CLEC Administered											
Total Trunk Groups:	x	x	x	x	x	x	x	x	x	x	x
Trk Grps Meas/Proc:	x	x	x	x	x	x	x	x	x	x	x
Tot Grps > 3% observed blocking	x	x	x	x	x	x	x	x	x	x	x

CLEC Aggregate

BST Administered	AL	GA	KY	LA	MS	NC	NF	SC	SF	TN	Region TOTAL
Total Trunk Groups:	x	x	x	x	x	x	x	x	x	x	x
Trk Grps Meas/Proc:	x	x	x	x	x	x	x	x	x	x	x
Tot Grps > 3% observed blocking	x	x	x	x	x	x	x	x	x	x	x
CLEC Administered											
Total Trunk Groups:	x	x	x	x	x	x	x	x	x	x	x
Trk Grps Meas/Proc:	x	x	x	x	x	x	x	x	x	x	x
Tot Grps > 3% observed blocking	x	x	x	x	x	x	x	x	x	x	x

TRUNK GROUP PERFORMANCE

BellSouth CTTG Trunk Group											
											Region
BST Administered	AL	GA	KY	LA	MS	NC	NF	SC	SF	TN	TOTAL
Total Trunk Groups:	x	x	x	x	x	x	x	x	x	x	x
Trk Grps Meas/Proc:	x	x	x	x	x	x	x	x	x	x	x
Tot Grps > 2% observed blocking	x	x	x	x	x	x	x	x	x	x	x

BellSouth Local Network											
											Region
BST Administered	AL	GA	KY	LA	MS	NC	NF	SC	SF	TN	TOTAL
Total Trunk Groups:	x	x	x	x	x	x	x	x	x	x	x
Trk Grps Meas/Proc:	x	x	x	x	x	x	x	x	x	x	x
Tot Grps > 3% observed blocking	x	x	x	x	x	x	x	x	x	x	x

3. Trunk Group Service Detail

CLEC

ORDERED	TGSN	BST SWITCH	CLEC POT	DESC	OBSVD MAX BLKG	HR	TKS	VAL DAYS	NBR RPTS	RMKS
X	X	X	X	X	X	X	X	X	X	X

BST Common Transport Trunk Group

ORDERED	TGSN	TANDEM	END OFFICE	DESC	OBSVD MAX BLKG	HR	TKS	VAL DAYS	NBR RPTS	RMKS
X	X	X	X	X	X	X	X	X	X	X

BST Local Network

ORDERED	TGSN	A-End	Z-End	DESC	OBSVD MAX BLKG	HR	TKS	VAL DAYS	NBR RPTS	RMKS
X	X	X	X	X	X	X	X	X	X	X

TRUNK GROUP PERFORMANCE

Trunking Definitions

Field Name	Description	Data Type
Switch	Identifier for the BellSouth end of the Trunk Group. Part of 37 character Common Language Location Identifier(CLLI) code.	AlphaNum(11)
POT	Identifier for the CLEC Point of Termination(POT)of the Trunk Group. Part of 37 character Common Location Language Identifier(CLLI) code.	AlphaNum(11)
TGSN	Unique trunk group identifier. (Trunk Group Serial Number)	AlphaNum(8)
TANDEM	Identifier for the BellSouth Tandem end of the Trunk Group. Part of 37 character Common Language Location Identifier(CLLI) code.	AlphaNum(11)
END OFFICE	Identifier for the BellSouth End Office of the Trunk Group. Part of 37 character Common Location Language Identifier(CLLI) code.	AlphaNum(11)
A-END	Identifier for the BellSouth Originating/Low Alpha end of the Trunk Group. Part of 37 character Common Language Location Identifier(CLLI) code.	AlphaNum(11)
Z-END	Identifier for the BellSouth Terminating/High Alpha end of the Trunk Group. Part of 37 character Common Location Language Identifier(CLLI) code.	AlphaNum(11)
DESCRPT	Describes function/operation of the Trunk Group. Part of 37 character Common Language Location Identifier(CLLI) code.	AlphaNum(15)
OBSVD BLKG	Blocking ratio determined from traffic data measurement.(Total number of calls blocked/Total number of calls attempted)	Numeric
HR	Time of day when the maximum observed blocking was recorded.	Numeric

TRUNK GROUP PERFORMANCE

Trunking Definitions (Continued)

Field Name	Description	Data Type
TKS	Total number of trunks in service in a trunk group	Numeric
VAL DAYS	Total number of valid days of measurement	Numeric
NBR RPTS	Number of consecutive monthly reports for which the trunk group exceeded the measured blocking threshold	Numeric(2)
RMKS	Cause of blocking and/or release plan	AlphaNum

Legal Department

NANCY B. WHITE
Assistant General Counsel - Florida

BellSouth Telecommunications, Inc.
150 South Monroe Street
Room 400
Tallahassee, Florida 32301
(305) 347-5558

August 4, 1998

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

Re: Docket No. 980281-TP MCI Complaint

Dear Ms. Bayó:

Enclosed is BellSouth Telecommunications Inc.'s Late-File Deposition Exhibit No. WNS-2, Supplemented on August 4, 1998 for William N. Stacy, which we ask that you file in the captioned matter.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,

Nancy B. White

Nancy B. White (pw)

NBW/vf

cc: All parties of record
A. M. Lombardo
R. G. Beatty
William J. Ellenberg II

FLORIDA PUBLIC SERVICE COMMISSION
DOCKET NO. 980281-TP EXHIBIT NO. 14
COMPANY/ WITNESS: Stacy
DATE: 8-5-98

REQUEST: Please provide the BellSouth Service Quality Measurement Reports for Trunking Reports for MCI for June 1998 with an explanation of each report. **Please also provide a method of determining that BellSouth is providing interconnection to MCI that is equal in quality to that it provides to its retail customers.**

RESPONSE: Please refer to the reports attached to this response. The Trunk Group Detail Report was inadvertently left off the original filing. The Trunking Reports are measures of network performance. BellSouth's obligation under the provisions of the Telecommunications Act of 1996 is to provide CLECs interconnection that is equal in quality to that BellSouth provides its own retail customers. As stated in previous testimony, BellSouth's trunk groups are engineered to standards set by BellCore. These same standards are followed by other LECs in the US. The procedures used by BellSouth are those used and accepted by the entire industry. Trunk Groups that experience greater than the threshold blocking have not "failed". There can be many reasons that might cause a trunk group to exceed its threshold during a particular busy hour. These reasons range from a cut cable, a radio call in prize, the first snow flakes of the season, or Mother's Day. Trunking Engineers must begin the process to reinforce a trunk group or add a group when the blockage is caused by excessive load.

An approximation of the **worse case** blocking experienced by a CLEC customer in comparison to the blocking experienced on the BellSouth local network can be determined using a formula as follows:

A= blocking on BST administered to CLEC trunk groups = TOT GRPS > 3% OBSERVED BLOCKING/TOTAL TRUNK GROUPS X WORSE CASE BLOCKAGE ON THAT GROUP.

B= blocking on CTTG trunk groups = TOT GRPS > 2% OBSERVED BLOCKING/TOTAL TRUNK GROUPS X WORSE CASE BLOCKAGE ON THAT GROUP.

C= BellSouth Local Network blocking experience = TOT GRPS > 3% OBSERVED BLOCKING/TOTAL TRUNK GROUPS X WORSE CASE BLOCKAGE ON THAT GROUP.

A+B ≅ C

This formula provides the probability of a customer experiencing blocking when making a call into a trunk group that had blockages that exceed a threshold.

A review of the trunk blocking data for Florida furnished on the reports will reveal the following:

CLEC Aggregate Reports
June- BST Administered - 34 Total Trunk Groups with 1 having >3%
May- BST Administered - 33 Total Trunk Groups with 0 having >3%

BST CTTG
June- BST Administered - 647 Total Trunk Groups with 2 having >2%
May- BST Administered - 650 Total Trunk Groups with 1 having >2%

BST Local Network
June- BST Administered - 638 Total Trunk Groups with 12 having >3%
May- BST Administered - 741 Total Trunk Groups with 9 having >3%

CLEC (MCI) SPECIFIC
June- BST Administered - 9 Total Trunk Groups with 0 exceeding 3%
June- MCI Administered - 43 Total Trunk Groups with 2 exceeding 3%

JUNE
(A)(1 / 34 X .173*) + (B) (2 / 647 .0344*) compared to (C) 12 /638 X .166*
(A) 0.0051 + (B) 0.0001 = **0.0052** ≅ **(C) 0.0031**

MAY
(A)(0 / 33 X .0*) + (B) (1 / 650 .0238*) compared to (C) 9 / 741 X .0988*
(A) 0.0 + (B) 0.00004 = **0.00004** ≅ **(C) 0.0012**

In the month of June in Florida an MCI CLEC customer would have had less than a .5% probability of calling into a trunk group that experience blocking greater than the threshold and a caller using the BST Local Network would have had a .3% probability. These numbers will vary each month. For May a CLEC Customer had less than a 0.004% probability and the customer using the local network had a 0.12% probability of being blocked.

- These numbers are the worse case observed blocking percentages from the Detail Trunk Group Service Report for the trunks used in the applicable case.

INFORMATION PROVIDED BY:

William N. Stacy
VP Interconnection Services
675 West Peachtree Street
Atlanta, GA 30375

Trunk Group Performance

REPORT: COMPARATIVE TRUNK GROUP SERVICE SUMMARY
REPORT PERIOD: 04/27/1998 - 05/22/1998

		16	639	24	4335	80	4496

Note 1: CLEC 1 information will be populated & distributed on an individual CLEC basis.

Trunk Group Performance

REPORT: TRUNK GROUP SERVICE
REPORT PERIOD: 04/27/1998 - 05/22/1998

	AL	GA	KY	LA	MS	NC	NF	SC	SF	TN	REGION TOTAL
BST ADMINISTERED											
- TOTAL TRUNK GROUPS											
- TRK GRPS MEAS/PROC											
- TOT GRPS > 3% OBSERVED BLOCKING											
CLEC 1[1] ADMINISTERED											
- TOTAL TRUNK GROUPS											
- TRK GRPS MEAS/PROC											
- TOT GRPS > 3% OBSERVED BLOCKING											
TOTAL CLEC 1[1]											
- TOTAL TRUNK GROUPS											
- TRK GRPS MEAS/PROC											
- TOT GRPS > 3% OBSERVED BLOCKING											
BST ADMINISTERED											
- TOTAL TRUNK GROUPS	13	33	8	6	1	10	17	4	16	17	125
- TRK GRPS MEAS/PROC	13	31	8	6	1	10	15	4	16	16	120
- TOT GRPS > 3% OBSERVED BLOCKING	1	0	0	0	0	0	0	0	0	0	1
CLEC ADMINISTERED											
- TOTAL TRUNK GROUPS	55	150	25	33	8	110	38	19	57	85	580
- TRK GRPS MEAS/PROC	55	140	25	32	8	81	27	19	57	75	519
- TOT GRPS > 3% OBSERVED BLOCKING	2	3	1	0	1	1	1	1	4	1	15
TOTAL CLEC AGGREGATE											
- TOTAL TRUNK GROUPS	68	183	33	39	9	120	55	23	73	102	705
- TRK GRPS MEAS/PROC	68	171	33	38	9	91	42	23	73	91	639
- TOT GRPS > 3% OBSERVED BLOCKING	3	3	1	0	1	1	1	1	4	1	16
BST ADMINISTERED											
- TOTAL TRUNK GROUPS	378	272	182	502	379	421	356	220	294	510	3514
- TRK GRPS MEAS/PROC	371	271	182	502	379	421	355	220	294	510	3505
- TOT GRPS > 2% OBSERVED BLOCKING	0	1	0	2	0	1	1	0	0	4	9
INDEPENDENT ADMINISTERED											
- TOTAL TRUNK GROUPS	110	158	53	66	72	97	39	89	0	155	839
- TRK GRPS MEAS/PROC	105	157	53	66	72	96	39	89	0	153	830
- TOT GRPS > 2% OBSERVED BLOCKING	5	2	0	0	1	1	0	1	0	5	15
TOTAL BELLSOUTH CTTG											
- TOTAL TRUNK GROUPS	488	430	235	568	451	518	395	309	294	665	4353
- TRK GRPS MEAS/PROC	476	428	235	568	451	517	394	309	294	663	4335
- TOT GRPS > 2% OBSERVED BLOCKING	5	3	0	2	1	2	1	1	0	9	24
BST ADMINISTERED											
- TOTAL TRUNK GROUPS	385	962	195	439	321	710	402	333	339	442	4528
- TRK GRPS MEAS/PROC	376	958	195	439	320	704	392	333	338	442	4496
- TOT GRPS > 3% OBSERVED BLOCKING	6	36	3	4	6	8	4	1	5	7	80

Note 1: CLEC 1 information will be populated & distributed on an individual CLEC basis

Trunk Group Performance

REPORT: TRUNK GROUP SERVICE (DETAIL)
REPORT PERIOD: 04/27/1998 - 05/22/1998

ADMINISTERED	TGSN	BST SWITCH	CLEC POT	DESCRPT	OBSVD BLKG	HR	TKS	VAL DAYS	NBR RPTS	RMKS
BST										
CLEC 1[1]										

ADMINISTERED[2]	TGSN	TANDEM	END OFFICE	DESCRPT	OBSVD BLKG	HR	TKS	VAL DAYS	NBR RPTS	RMKS
BST	AC200278	ATLNGAEP01T	ATLNGAWE75F	7- AF TC	5.78%	9	48	9	1	A0A1 72 TRKS PEND ON 061098
BST	AF133408	NWORLAMT01T	KNNRLAHNDS0	77 AF DT	5.74%	10	72	20	1	B0A1 +48 TRKS COMPLETED 6/3/98
BST	AF122547	LFYTLAMA0GT	LFYTLAVMCG0	M- DF DD	4.41%	11	36	20	1	D1C2 CARRIER FAILURE-ABNORMAL REPT
BST	AC183907	RLGHNCHO01T	GLBONCAD77F	MM AF MD	2.77%	19	8	20	1	D1I1 MAINTENANCE PROBLEM
BST	AC181098	ORLDFLCL01T	SNFRFLMADS0	77 AF DT	2.38%	10	72	19	1	D1I1 MTNC MAY 6, 7, 8, 11, 18 ON 36
BST	AF105385	NSVLTNMT86T	WHBLTNMTDS0	M- DF ET	2.62%	22	14	19	1	D1C2 5/13-EQUIPMENT FAILURE
BST	AF124411	NSVLTNMT86T	CLVLTNMADS0	M- DF ET	3.10%	23	6	18	1	D1I1 5/6 BOT 5/15/98
BST	AF142840	MMPHTNMA84T	MMPHTNSTDS0	77 AF DT	23.31%	10	96	15	3	B0A1 +48 COMPLETED 5/19/98
BST	AF075559	KNVLTNMA84T	KNVLTNYHCG0	77 AF DT	2.22%	15	264	20	1	D1I1 120/264 BOT 5/13/98

ADMINISTERED[2]	TGSN	A-END	Z-END	DESCRPT	OBSVD BLKG	HR	TKS	VAL DAYS	NBR RPTS	RMKS
BST	AF133286	CLMNALMADS0	HNVIALUNDS0	M-DFES	4.63%	4	5	18	1	
BST	AF106772	CLMNALMADS1	HNVIALUN0GT	M-DFIR	4.34%	19	7	19	1	
BST	AF106652	MOBLALPR45E	MOBLALAZ0GT	M-DFIR	4.43%	10	10	18	1	
BST	AF073892	MTGMALMT26E	MTGMALMT26T	M-DFTOG8	27.97%	13	12	19	2	
BST	AF063485	PHCYALMADS0	CLMBGAMT12T	M-DFTO	32.93%	21	360	17	9	
BST	AC125698	ALBYGAMA12T	ALBYGAMA45A	7-DFTG	12.85%	21	504	19	12	
BST	AC125697	ALBYGAMA45A	ALBYGAMA12T	7-DFTO	43.80%	16	93	20	2	
BST	AC186591	ALPRGAMA47C	NRCRGAMA01T	77AFOGKE	11.30%	16	252	20	6	
BST	AC145405	ALPRGAMA47C	NRCRGAMA84A	77DFIEKE	3.51%	16	408	20	3	
BST	AC172457	ASTLGAMA94F	ATLNGAAD69F	77DFIE	8.55%	22	120	20	2	
BST	AC142635	ATLNGABU01T	ATLNGABU84C	77AFOG	39.77%	15	192	14	10	
BST	AC146532	ATLNGABU01T	ATLNGACS33A	77AFOG	4.61%	22	235	20	3	
BST	AC188996	ATLNGABU01T	FLBRGAMADS1	77AFOG	61.66%	17	48	20	10	
BST	AC187401	ATLNGABU01T	GSVLGAMA53C	77AFOG	38.78%	21	168	20	3	
BST	AC121949	ATLNGABU01T	MRTTGAEA97F	77AFOG	17.86%	21	312	20	3	
BST	AC186580	ATLNGABU01T	NRCRGAMA01T	77AFMT	34.63%	16	336	18	10	
BST	AC174187	ATLNGABU01T	SMYRGAMADS1	77AFOG	9.72%	16	139	20	8	
BST	AC106464	ATLNGACD28F	ATLNGABU01T	7-AFTO	33.16%	21	78	18	6	
BST	AC175868	ATLNGALADS1	ATLNGASS1ID	M-DFIR	8.31%	16	16	19	1	
BST	AC166380	ATLNGAPP34A	MRTTGAMA42G	77DFIEKE	4.21%	22	120	20	5	
BST	AC200567	ATLNGATH78A	ATLNGAFP12T	M-AFES	4.21%	3	5	10	1	
BST	AC159826	BRMNGAES53A	ATLNGASS1ID	M-DFIR	4.10%	11	12	20	1	
BST	AC130918	CLMBGAMT01T	CLMBGAMT64A	M-DFVR	14.62%	12	3	20	2	
BST	AC186595	CNYRGAMA48F	NRCRGAMA01T	77AFOGKE	3.14%	20	216	20	1	
BST	AC197615	DGVLGAMA94F	ATLNGAEP01T	7-AFTO	23.66%	21	72	20	4	
BST	AC186596	DLTHGAHS47C	NRCRGAMA01T	77AFOGKE	6.17%	16	216	20	7	
BST	AC186597	DNWDGAMA67A	NRCRGAMA01T	77AFOGKE	5.70%	16	252	19	2	
BST	AC084770	GSVLGAMA02T	GSVLGAMA53C	M-DFVR	3.22%	1	3	19	1	
BST	AC123798	MACNGAMT74C	WRRBGAMA92C	77DFIE	7.37%	16	264	18	3	

Trunk Group Performance

REPORT: TRUNK GROUP SERVICE (DETAIL)
REPORT PERIOD: 04/27/1998 - 05/22/1998

BST	AC171759	MACNGAMT75A	MACNGAMT12T	M-DFES	4.83%	15	3	20	4
BST	AC155622	MRTTGAEA97F	NRCRGAMA84A	77DFIE	5.16%	21	144	19	3
BST	AC186609	NRCRGAMA01T	NRCRGAMA84A	77AFOGKE	26.96%	15	264	20	5
BST	AC200240	PANLGAMA98F	ATLNGAPP12T	M-AFES	33.38%	6	3	9	1
BST	AC161598	SVNHGABS65A	SVNHGAGC96A	77DFIE	9.99%	16	108	20	2
BST	AF145815	LSVLKYBRDS0	LSVLKYAP2GT	M-DFDACC	4.14%	13	20	19	1
BST	AF136363	LFYTLAVMCG0	LFYTLAMA0GT	M-DFDACC	4.70%	11	16	20	1
BST	AF086450	NWORLAARCG0	NWORLAMA06T	77AFOG	8.17%	21	228	8	5
BST	AF086442	NWORLAMC04T	NWORLABMDS0	7-AFTG	3.32%	17	120	18	1
BST	AF040084	NWORLAMRCG0	NWORLAMA06T	7-AFTO	3.43%	21	153	13	1
BST	AF136570	GNWDMSMADS0	GNWDMSMA26T	M-DFDACC	3.42%	7	10	19	1
BST	AF121055	JCSNMSBL17T	JCSNMSNRDS0	77DFOGKE	3.61%	20	120	18	1
BST	AF120552	JCSNMSCB16T	JCSNMSNRDS0	77DFOG	4.24%	20	96	15	1
BST	AF086882	MAGEMSMADS0	MNDNMSMADS0	77DFIE	3.33%	20	118	15	1
BST	AF148191	NTCHMSMADS0	JCSNMSBLDS0	M-DFES	4.89%	16	3	19	1
BST	AF148198	NTCHMSMADS1	VDALLAMADS0	77DFIE	4.30%	21	168	18	2
BST	AC192778	CARYNCCE46G	RLGHNCHO01T	M-DFIR	4.47%	10	16	20	2
BST	AC192781	GLBONCAD77F	RLGHNCHO01T	M-DFIR	4.46%	19	6	20	1
BST	AC148810	MLTNNCMA23F	DAVLVADA03T	A-DFIR	5.37%	16	3	18	1
BST	AC192829	RFFNNCMA93F	GNBONCEU05T	M-DFIRG1	8.37%	9	3	20	2
BST	AC192791	RLGHNCMO85F	RLGHNCHO01T	M-DFIR	3.61%	9	10	20	1
BST	AC163811	WNSLNCCL76F	GNBONCEU33G	M-DFES	4.36%	24	5	20	2
BST	AC113467	FTPRFLMACG0	PTSLFLMADS0	77DFIE	3.59%	20	672	20	1
BST	AC202505	PNSCFLBL43E	PNSCFLWADS0	M-DFESG1	9.88%	7	6	13	3
BST	AC146906	PNVDFLMADS0	JCVLFLSMDS0	M-DFES	7.79%	2	5	20	1
BST	AC172390	BYBHFLMADS0	WPBHFLGR02T	M-DFIR	4.18%	14	2	20	1
BST	AC170291	BYBHFLMADS1	WPBHFLLE58E	77DFIE	6.36%	3	24	19	3
BST	AC196734	FTLDFLPL13T	PMBHFLFECG0	77AFOG	3.01%	10	120	19	1
BST	AC182620	MIAMFLRR1GT	NDADFLBR62E	77AFOG	3.13%	17	192	20	1
BST	AC149416	WPBHFLHHDS0	WPBHFLLE58E	77DFIE	3.20%	20	432	20	1
BST	AF139030	CMDNTNMADS0	PARSTNMADS1	77DFIE	36.87%	21	48	19	2

Note 1: CLEC 1 information will be populated & distributed on an individual CLEC basis

Note 2: Independent carriers detail Trunk Group information not shown to maintain their confidentiality

Trunk Group Performance

REPORT: TRUNK GROUP SERVICE (SUMMARY)
REPORT PERIOD: 05/25/1998 - 06/19/199
Attachment 1a WNS-2

	AL	GA	KY	LA	MS	NC	NF	SC	SF	TN	REGION TOTAL
BST ADMINISTERED											
- TOTAL TRUNK GROUPS											
- TRK GRPS MEAS/PROC											
- TOT GRPS > 3% OBSERVED BLOCKING											
CLEC 1[1] ADMINISTERED[2]											
- TOTAL TRUNK GROUPS											
- TRK GRPS MEAS/PROC											
- TOT GRPS > 3% OBSERVED BLOCKING											
BST ADMINISTERED											
- TOTAL TRUNK GROUPS	13	38	8	6	1	16	18	5	16	27	148
- TRK GRPS MEAS/PROC	13	38	8	6	1	15	18	5	16	26	146
- TOT GRPS > 3% OBSERVED BLOCKING	2	1	0	0	0	0	1	0	0	0	4
CLEC ADMINISTERED[2]											
- TOTAL TRUNK GROUPS	56	165	24	33	9	126	39	21	57	109	639
- TRK GRPS MEAS/PROC	56	155	24	33	9	113	27	20	57	106	600
- TOT GRPS > 3% OBSERVED BLOCKING	1	4	1	0	1	2	1	0	4	4	18
BST ADMINISTERED											
- TOTAL TRUNK GROUPS	376	278	182	501	379	420	356	220	291	510	3513
- TRK GRPS MEAS/PROC	371	275	182	501	379	420	355	220	291	510	3504
- TOT GRPS > 2% OBSERVED BLOCKING	2	5	0	4	5	0	2	1	0	2	21
BST ADMINISTERED											
- TOTAL TRUNK GROUPS	332	900	155	418	286	551	286	271	352	344	3895
- TRK GRPS MEAS/PROC	329	897	155	418	286	549	283	270	348	344	3879
- TOT GRPS > 3% OBSERVED BLOCKING	8	30	0	3	3	2	4	1	8	0	59

Note 1: CLEC 1 information will be populated & distributed on an individual CLEC basis.

Note 2: BST does not have all the traffic data measurement from CLEC switches to accurately compute the blocking on CLEC administered trunk groups. In this case inferred blocking is determined from the traffic usage collected on BST switches

Trunk Group Performance

REPORT: TRUNK GROUP SERVICE (DETAIL)
REPORT PERIOD: 05/25/1998 - 06/19/1998

ADMINISTERED	TGSN	BST SWITCH	CLEC POT	DESCRPT	OBSVD BLKG	HR	TKS	VAL DAYS	NBR RPTS	RMKS
BST										
CLEC 1'										

ADMINISTERED	TGSN	TANDEM	END OFFICE	DESCRPT	OBSVD BLKG	HR	TKS	VAL DAYS	NBR RPTS	RMKS
	AF124738	HNVIALUN0GT	HNVIALPWDS0	77 AF DT	5.35%	20	240	19	1	D1K1 ISP AND CLEC TRF.
	AF124765	MOBLALAZ0GT	MOBLALSKDS0	77 AF DT	3.52%	10	168	19	1	B0A1 72 TKS ON 062998
	AC186228	ATLNGABU01T	ATLNGABUDS2	77 AF DT	4.75%	15	72	19	1	A0J1 SUBTEND GRP NEED AUGMENT
	AC175327	ATLNGABU01T	ATLNGAEL37C	7- AF DD	9.21%	21	144	19	1	D1I2 IC MTCE PROBLEM
	AC185156	ATLNGABU01T	LLBNGAMADS1	77 AF DT	2.95%	16	600	19	1	B0A1 24 TRK ADD 061098
	AC185428	ATLNGABU01T	LLBNGAMADS1	77 AF DT	21.87%	22	48	16	1	D1I1 MAINTENANCE PROBLEM
	AC200289	ATLNGAEP01T	PTCYGAMA48C	77 AF DT	2.78%	9	288	18	1	D1I1 MAINTENANCE PROBLEM
	AF122547	LFYTLAMA0GT	LFYTLAVMCG0	M- DF DD	2.38%	16	36	19	2	D1C1 CABLE FAILURE 6/16-ABN.REPT -C
	AF122579	LKCHLADT03T	LKCHLAUNDS0	M- DF DD	2.15%	15	48	19	1	D1I1 MAINTENANCE PROBLEM 6/16-CLEAR
	AF122514	NWORLAMA0GT	NWORLASCCG0	M- DF DD	3.29%	24	48	14	1	D1C2 CXR FAILURE 6/17-ABN.REPT-CLEA
	AF133408	NWORLAMT01T	KNNRLAHNDS0	77 AF DT	4.23%	13	120	17	2	B0A1 48 TKS.COMP.6/3-NO BLKG SINCE
	AF125409	GNWDMSMA26T	IUKAMSESDS0	M- DF ET	4.65%	7	5	19	1	D1I1 MAINTENANCE PROBLEM
	AF125444	GNWDMSMA26T	RPLYMSMADS0	M- DF ET	4.72%	10	4	19	1	D1I1 MAINTENANCE PROBLEM
	AF125383	JCSNMSCP36T	SHBTMSMADS0	M- DF ET	2.84%	15	4	19	1	D1I1 MAINTENANCE PROBLEM
	AF131642	MRDNMSTL07T	SHBTMSMADS0	MM AF DT	2.08%	15	6	18	1	D1I1 MAINTENANCE PROBLEM
	AF121113	TUPLMSMA07T	RPLYMSMADS0	77 AF DT	2.16%	10	192	18	1	D1I1 MAINTENANCE PROBLEM
	AC119457	ORLDFLMA04T	EGLLFLIHDS0	M- DF ET	3.44%	11	51	19	1	D1I1 MTNC USG 6-16-98.
	AC183959	PNSCFLWA01T	PNSCFLFPDS0	77 DF DT	3.38%	9	48	19	1	C0A1 DATA UNDER INVESTIGATION.
	AC202883	CLMASCSA60T	ORBGSCMA563	MM DF DT	4.86%	24	5	18	1	D1I1 MTCE PROBLEM
	AF120426	JCSNTNMA84T	HNTGTNMADS0	77 AF DT	2.97%	10	190	18	1	D1C4 6/9 EQPT FAILURE
	AF126988	MMPHTNMA84T	MMPHTNGTDS0	MM AF DT	3.15%	16	24	19	1	D1I1 18/24 BOT 6/2/98

ADMINISTERED	TGSN	A-END	Z-END	DESCRPT	OBSVD BLKG	HR	TKS	VAL DAYS	NBR RPTS	RMKS
	AF148345	BOAZALMADS0	GTVLALNMRS0	77 DF IE KE	13.09%	21	120	20	1	
	AF127469	BRHMALMT1GT	BRHMALMT25E	77 AF OG	3.09%	15	864	19	1	
	AF148064	BYMNALMARS0	MOBLALAZ0GT	M- DF DA CC	4.08%	16	9	19	1	
	AF148067	BYMNALMARS0	MOBLALAZ0GT	M- DF IR	3.91%	16	4	19	1	
	AF106652	MOBLALPR45E	MOBLALAZ0GT	M- DF IR	3.12%	17	12	20	2	
	AF143949	MTGMALMTDS0	MTGMALMT0GT	M- DF DA CC	7.74%	15	25	20	1	
	AF073892	MTGMALMT26E	MTGMALMT26T	M- DF TO G8	4.08%	14	12	20	3	
	AF063485	PHCYALMADS0	CLMBGAMT12T	M- DF TO	21.66%	21	456	18	10	
	AC125698	ALBYGAMA12T	ALBYGAMA45A	7- DF TG	12.91%	21	504	19	13	
	AC125697	ALBYGAMA45A	ALBYGAMA12T	7- DF TO	46.02%	15	93	19	3	
	AC186591	ALPRGAMA47C	NRCRGAMA01T	77 AF OG KE	16.58%	16	252	19	7	
	AC145405	ALPRGAMA47C	NRCRGAMA84A	77 DF IE KE	7.21%	16	408	18	4	
	AC142423	ATHNGAMA02T	MDSNGAMA34E	M- DF VR	4.08%	21	10	16	1	
	AC159816	ATLNGABH34F	ATLNGASS1ID	M- DF IR	4.23%	17	13	19	1	
	AC142635	ATLNGABU01T	ATLNGABU84C	77 AF OG	35.38%	15	192	12	11	
	AC146532	ATLNGABU01T	ATLNGACS33A	77 AF OG	4.40%	22	235	18	4	

Trunk Group Performance

REPORT: TRUNK GROUP SERVICE (DETAIL)
REPORT PERIOD: 05/25/1998 - 06/19/1998

	AC106410	ATLNGABU01T	ATLNGAIC29A	7- AF TG	7.28%	22	96	19	1	
	AC188998	ATLNGABU01T	FLBRGAMADS1	77 AF OG	57.27%	17	48	19	11	
	AC187401	ATLNGABU01T	GSVLGAMA53C	77 AF OG	18.97%	16	168	17	4	
	AC121949	ATLNGABU01T	MRTTGAEA97F	77 AF OG	22.51%	21	312	19	4	
	AC188680	ATLNGABU01T	NRCRGAMA01T	77 AF MT	5.86%	16	576	13	11	
	AC174187	ATLNGABU01T	SMYRGAMADS1	77 AF OG	13.63%	16	139	19	9	
	AC106464	ATLNGACD28F	ATLNGABU01T	7- AF TO	31.83%	21	78	15	7	
	AC188594	CHMBGAMADS0	NRCRGAMA01T	77 AF OG KE	3.21%	16	146	19	1	
	AC130918	CLMBGAMT01T	CLMBGAMT64A	M- DF VR	23.84%	10	3	19	3	
	AC132234	CLMBGAMW56C	CLMBGAMT01T	A- DF IR	5.68%	17	20	19	1	
	AC188654	CMNGGAMA88C	GSVLGAMA53C	77 DF IE	3.37%	10	96	19	1	
	AC188221	CMNGGAMA88C	NRCRGAMA84A	77 DF IE KE	6.19%	16	144	19	1	
	AC186710	CRVLGAMA38C	NRCRGAMA01T	77 AF OG KE	23.03%	21	120	19	1	
	AC202366	DLTHGAHS47C	ATLNGAEP11T	M- DF ES G678	4.34%	5	4	19	1	
	AC186596	DLTHGAHS47C	NRCRGAMA01T	77 AF OG KE	10.33%	16	216	18	8	
	AC186597	DNWDGAMA67A	NRCRGAMA01T	77 AF OG KE	16.96%	16	252	13	3	
	AC132239	LGRNGAMA88C	CLMBGAMT01T	A- DF IR	3.59%	10	13	19	1	
	AC159845	MRRWGAMA96F	ATLNGASS1ID	M- DF IR	7.61%	10	8	19	1	
	AC186600	NRCRGAMA01T	NRCRGAMA84A	77 AF OG KE	25.57%	15	264	17	6	
	AC200240	PANLGAMA98F	ATLNGAPP12T	M- AF ES	6.78%	3	3	19	2	
	AC045554	RVDLGAMA99A	ATLNGABH34F	7- DF IE	4.61%	22	76	19	1	
	AC161598	SVNHGABS65A	SVNHGAGC96A	77 DF IE	13.72%	15	108	19	3	
	AF136383	LFYTLAVMCG0	LFYTLAMA0GT	M- DF DA CC	3.24%	15	16	19	2	
	AF136794	MTHRLAMADS0	NWORLAMA20T	M- DF DA CC	5.79%	24	3	18	1	
	AF093929	RCLDLAMADS0	NWORLAMA0GT	M- DF IR	5.22%	20	7	19	1	
	AF136578	IUKAMSESDS0	GNWDMSMA26T	M- DF DA CC	3.22%	15	6	19	1	
	AF145389	JCSNMSRWDS0	JCSNMSCP36T	M- DF IR	3.41%	11	8	19	1	
	AF148191	NTCHMSMADS0	JCSNMSBLDS0	M- DF ES	4.99%	12	3	18	2	
	AC192778	CARYNCCE46G	RLGHNCHO01T	M- DF IR	4.67%	17	19	20	3	
	AC188523	WNSLNCLE78F	GNBONCEU05T	M- DF DA CC	10.09%	7	24	8	1	
	AC179553	DELDFLMADS0	DYBHFLPODS0	77 DF IE MR	3.38%	13	96	19	1	
	AC113467	FTPRFLMACG0	PTSLFLMADS0	77 DF IE	4.30%	20	672	19	2	
	AC153771	JCVLFLCL55T	JCVLFLRV38E	77 AF OG	5.73%	16	552	18	1	
	AC146906	PNVDFLMADS0	JCVLFLSMDS0	M- DF ES	5.39%	4	5	19	2	
	AC191876	CLSNSCMA65E	GNVLSCDT60T	M- DF IR G1	3.83%	18	10	19	1	
	AC196722	FTLDFLJADS0	FTLDFLPL13T	77 AF OG KE	9.92%	16	144	19	1	
	AC196728	FTLDFLPL13T	FTLDFLWNDS0	77 AF OG KE	9.20%	21	96	19	1	
	AC196731	FTLDFLPL13T	HLWDFLPEDS0	77 AF OG KE	10.40%	21	144	19	1	
	AC196732	FTLDFLPL13T	HLWDFLWHDS0	77 AF OG KE	7.38%	12	120	17	1	
	AC182642	MIAMFLAL63E	MIAMFLRR1GT	77 AF OG	3.13%	10	96	19	1	
	AC182648	MIAMFLGRDS1	MIAMFLRR1GT	77 AF OG KE	16.57%	16	648	17	1	
	AC182628	MIAMFLPB88E	MIAMFLRR1GT	77 AF OG	3.16%	15	96	19	1	
	AC182632	MIAMFLRR1GT	PRRNFLMADS0	77 AF OG KE	4.00%	21	264	19	1	

Note 1: CLEC 1 information will be populated & distributed on an individual CLEC basis

REPORT: TRUNK GROUP SERVICE Deposition Exhibit WNS-2
REPORT PERIOD: 05/25/1998 - 06/19/1998 Attachment 1b

BST ADMINISTERED FOR WUA

	GA	NC	SF	TN	TOTAL
TOTAL TRUNK GROUPS:	2	1	5	1	9
TRK GRPS MEAS/PROC:	2	1	5	1	9
TOT GRPS > 3% OBSERVED BLOCKING:	0	0	0	0	0

CLEC ADMINISTERED BY WUA

	GA	NC	NF	SF	TN	TOTAL
TOTAL TRUNK GROUPS:	7	4	5	22	5	43
TRK GRPS MEAS/PROC:	7	4	5	22	5	43
TOT GRPS > 3% OBSERVED BLOCKING:	1	0	0	1	0	2

NOTE: BST DOES NOT HAVE ALL THE TRAFFIC DATA MEASUREMENTS FROM THE CLEC SWITCHES TO ACCURATELY COMPUTE THE BLOCKING ON CLEC ADMINISTERED TRUNK GROUPS: IN THIS CASE INFERRED BLOCKING IS DETERMINED FROM THE TRAFFIC USAGE COLLECTED ON BST SWITCHES.

REPORT: TRUNK GROUP SERVICE (DETAIL)
REPORT PERIOD: 05/25/1998 - 06/19/1998

TRUNK GROUP LISTING FOR: WUA

CXR_ID	ADMIN	TGSN	BSTOFC	CLECOFC	DESCRPT	AB	HOUR	TKS	DAYS	NBR_RPTS	RMKS
WUA	CLEC	AC195294	ATLNGABU01T	ATLNGACS1KD	7- AF TD JKE	.0474	13	384	11	1	
		AC197772	NDADFLGG01T	MIAMFLGR2KD	77 AF TD JZTG3KE	.1735	12	24	14	1	

CERTIFICATE OF SERVICE
Docket No. 980281-TP

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BELLSOUTH

Local Competition

Operational Readiness

Prepared for:

United States
Department of Justice

FLORIDA PUBLIC SERVICE COMMISSION
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Section I



General

Introduction

I. General Introduction:

A. Purpose

1-01 This document has been prepared to respond to the informal Department of Justice (DOJ) questionnaires which have been provided to BellSouth during early 1997. The document is structured to address the four process flows which have been defined and listed in various FCC documents, BellSouth testimony and filings, and in the DOJ informal questionnaires themselves, namely:

- Preordering
- Ordering & Provisioning
- Repair — Service Assurance
- Billing

1-02 In order to make the document more understandable, the material is not presented in question-and-answer format, responding to each question on the informal DOJ questionnaires. Instead, we have attempted to describe each process as it exists at the present answering the questions within the content of the description. The following approaches were incorporated into the design of this document:

- The process flow is first described using both text and graphical exhibits.
- The process description is simplified to include "backbone" elements, both Operations System (OS) elements and work group elements of the flow.
- The Competitive Local Exchange Carrier (CLEC) interfaces are described at appropriate points in the document to improve the flow of the descriptive text for the reader.
- BellSouth cannot answer some DOJ questions. Some DOJ questions cannot be answered precisely as asked.

1-03 By "backbone" elements, we mean those OS or work group elements that are fundamental to the process flow. If these elements become backlogged or if the function of these elements should break down, the "pipeline" will backlog or cease to flow. In other words, these are the most critical elements in the pipeline flow.

1-04 If we actually tried to include every OS, every work flow, and every work group which *could* be involved in the ordering & provisioning flow or in the service assurance flow, there would be literally hundreds of OSs and scores of work groups. The result would be an extremely complex and probably unintelligible tangle of conditional

flows and complex interrelationships. The value of such an attempt would be dubious at best. The primary "pipeline" (to stick with the same analogy used by DOJ) is accurately portrayed by this document, and those elements which truly have major impact on the overall system capacity as defined by the DOJ are included.

1-05 If additional questions arise regarding any minor or conditional elements or flows, BellSouth can address those specific questions directly.

1-06 This document is intended for publication to the Department of Justice and to any other parties with a bona fide need for the information contained. This document and the information within are not considered proprietary.

1-07 All OS acronyms and product/service names or acronyms contained in this document are trademarked or service marked although the ® symbol has not been used for every occurrence.

B. Changes in This Version

1-08 This document is being revised to update several exhibits and tables to include the most current data available. Exhibits II-1, II-2, II-3, IV-3, IV-4, IV-5, V-1, V-2, VI-1, and VI-7 and Tables 3-8, 6-3, 7-2, and 8-1 have been updated from the last issue dated August 22, 1997. Also, several paragraphs in sections 4 and 5 have been reworded to provide clarafication and to reflect the most current information.

C. Glossary

1-09 Before an acronym or term is used in this document, an attempt has been made to spell-out the full name or to explain the term in the text where it is first used. A glossary of included and related terms and systems has been included at the end of the document as well.

D. General Points

1-10 Processes, systems, and policies will rapidly evolve. By nature, the contents of this document will soon be out of date. This document is a "snapshot" as of August 31, 1997.

1-11 As will be described in later sections, once CLEC business transactions pass beyond the interface, the work downstream is fully integrated with all other work

into BellSouth Operational Systems and workloads. Generally, items are handled on a "first-in, first-out" basis. Where priorities are applied, such priorities are generally set based on considerations that have always been used in the industry.

1-12 The OSs and processes covered in this document are ubiquitous. They apply to all BellSouth operating areas whether or not any portion of an operating area is currently providing such services to a CLEC customer.

Section II



Preordering Process

II. Preordering:

A. Description of Process Flow

2-01 This section will describe the preordering flow depicted on Exhibits II-1 and II-2. The reader should refer to those process flow diagrams while reading the following:

Preorder Transaction Flow from CLEC to BellSouth:

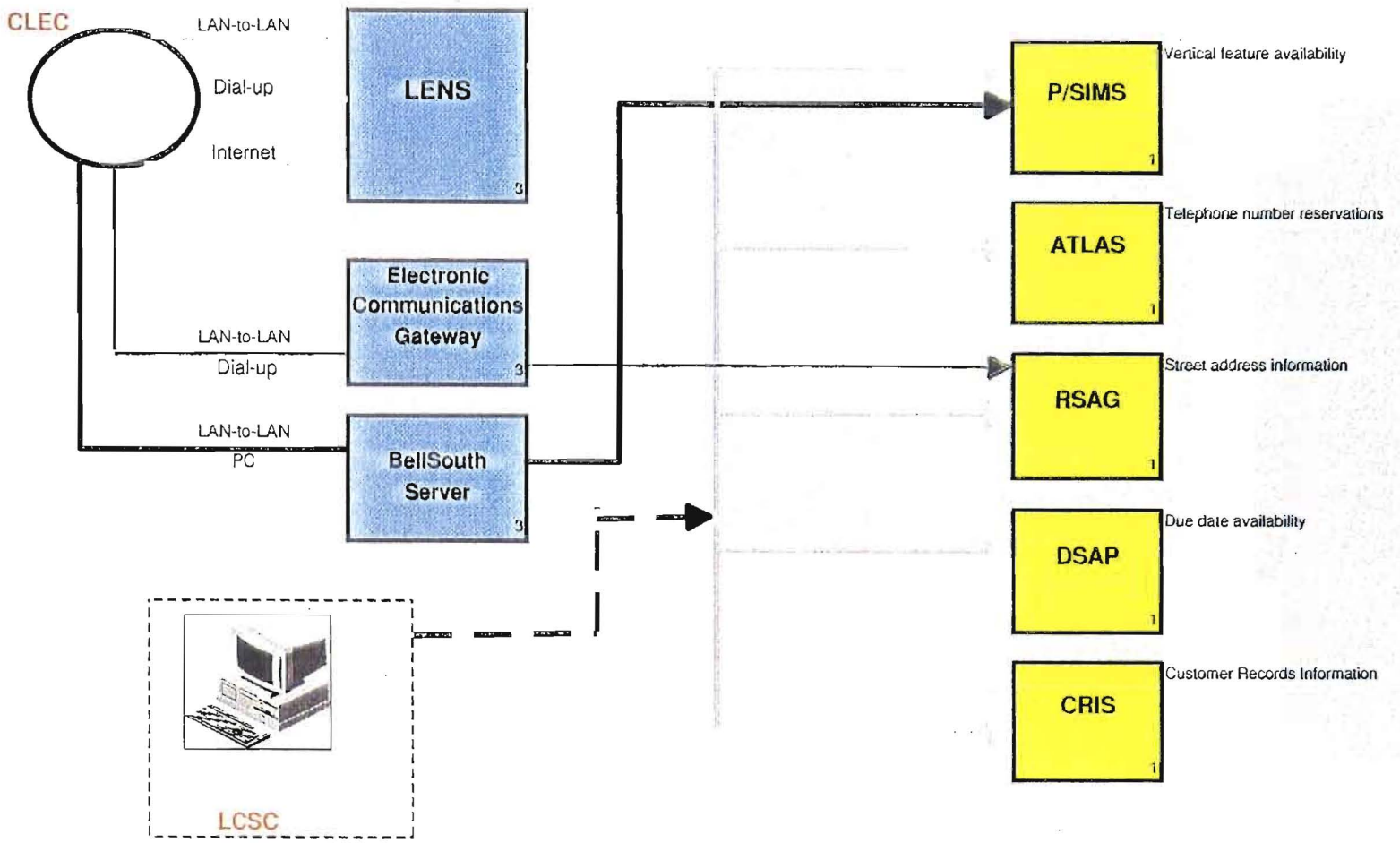
2-02 On August 31, 1997, the CLEC community can use either of two interfaces with BellSouth in the preordering process as described below. The same preordering interfaces and process are used to support all types of Local Service Requests (LSRs) placed with BellSouth. The preordering flow provides access to several types of information which may or may not apply to any given Local Service Request (LSR). The information and functions available through the preordering are important to help a CLEC ensure the accuracy and quality of their LSRs.

LENS Interface:

2-03 On August 31, 1997, BellSouth offers a Local Exchange Negotiation System (LENS) interface to any CLEC who chooses to use this option. Using LENS, the CLEC will be able to perform preordering functions electronically without assistance or intervention from BellSouth personnel. This is the same electronic interface which is available for CLECs to use in the ordering process as discussed in Section III. Therefore, the CLEC can enjoy a single combined electronic interface for both preordering and ordering if so desired. Continuing development of LENS capabilities will be a phased approach with ongoing enhancements. Nevertheless, the Phase I LENS capabilities support all of the preordering functions which have so far been identified to BellSouth by CLECs, regulatory agencies, and discussions in industry forums.

2-04 When a CLEC uses one of the direct interface options, LENS will allow the CLEC to enter a preordering transaction in interactive mode using prompts and screen displays. LENS will then convert the CLEC inputs into support system commands and database queries as appropriate to obtain the information from a number of BellSouth OSs and corporate databases.

MECHANIZED PREORDERING FLOW
- ORGANIZATIONS / CENTERS -
Exhibit II - 1



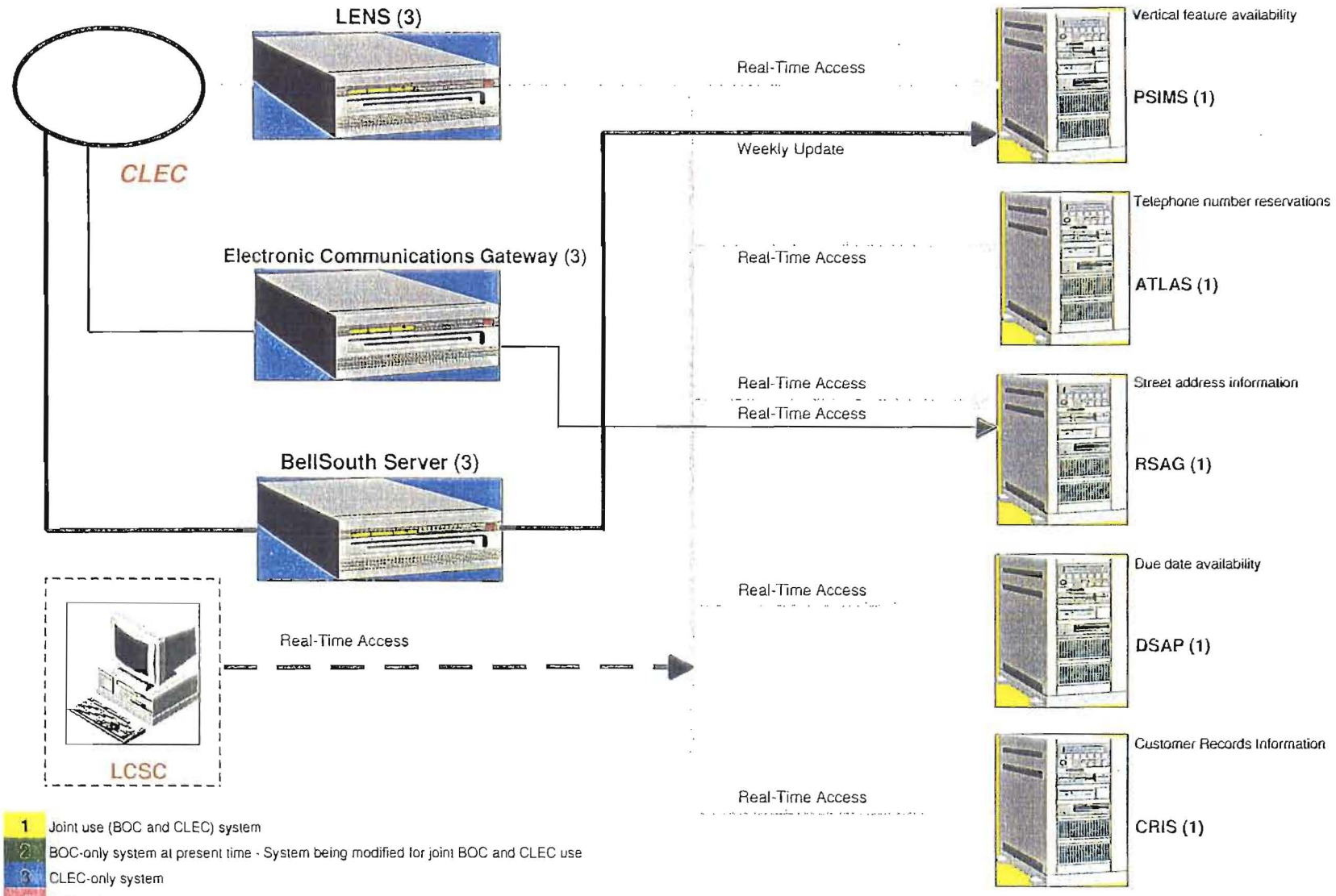
1 Joint use (BOC and CLEC) system

2 BOC-only system at present time - System being modified for joint BOC and CLEC use

3 CLEC-only system

4 BOC-only system

PREORDERING FLOW
- MECHANIZED PROCESS -
Exhibit II - 2



2-05 When the information is collected from the various sources in response to a CLEC preordering transaction, the information will be presented to the CLEC "on screen", and the CLEC can capture or print such responses using their own access capabilities.

Manual Interface:

2-06 The CLEC can transmit requests for preordering information to BellSouth using telephone, facsimile, or mail services. These service requests will be received and answered by Local Carrier Service Center (LCSC) personnel using their access to various BellSouth support systems and databases. The LCSC will respond to the CLEC in the manner agreed upon with that CLEC, typically in the same manner in which the CLEC request was transmitted to BellSouth. In practice, however, the LCSC typically performs preordering activities during the data validation steps of the ordering process for those CLECs who use manual interfaces with BellSouth.

Interim Solutions:

2-07 BellSouth has offered short-term interim access solutions to CLECs already conducting business with BellSouth. These *interim solutions* were offered before availability of the Local Exchange Negotiation System (LENS) interface. CLECs using these interim solutions are expected to migrate, or transition, to the LENS preordering interface. However, since these interim solutions remain in operation with certain CLECs on August 31, they are briefly mentioned here for background.

2-08 An *interim* access into the Regional Street Address Guide database (RSAG) was provided via the ICREF (InterLATA Carrier REFerral) presentation manager. The CLEC can access ICREF via dial up or LAN-to-LAN facilities. An *interim* electronic access directly to Application for Telephone number Load Administration and Selection (ATLAS) has been established on a LAN-to-LAN connection. An *interim* electronic access directly to Product/Services Inventory Management System (P/SIMS) has been established on a LAN-to-LAN basis. No *interim* electronic access has been provided to any CLEC for DOE Support APplication (DSAP). Each of these interim interfaces is separate and, unlike the long-term LENS interface, these interim solutions require the CLEC to know how to use the BellSouth OSs.

Special Interface:

2-09 Upon special request, BellSouth is developing a special application-to-application interface with one of the major CLECs. At the current time, this CLEC has provided partial preliminary requirements and negotiations continue. The current schedule projects for development and testing to complete by February, 1998. This

planned interface is called EC-LITE. Until EC-LITE is ready for production, this CLEC plans to use LENS for preordering functions.

Preordering Flow Within BellSouth:

2-10 The following discussion of preordering functions does not specifically mention the *interim solutions* described in Paragraphs 2-07 and 2-08 above. The functions made available via the former *interim solutions* are the same functions provided via the LENS and manual preordering interfaces.

Address Validation:

2-11 The CLEC can validate that his customer has provided a valid street address through the preordering interface. If the CLEC initiates an address verification request through the LENS interface, that server will launch a query into the BellSouth Regional Street Address Guide database (RSAG) and present the results to the CLEC "on line". RSAG is a corporate database containing addresses which have been validated by BellSouth with state and local governments. RSAG also contains cross-referencing capabilities which can relate various standard abbreviations and formatting conventions to obtain the proper "hit" on the target address.

2-12 If the CLEC transmits such a request to the LCSC through the manual interface, the LCSC personnel will access RSAG and provide the information to the CLEC. As stated earlier in Paragraph 2-07, CLECs using the manual interface typically expect the LCSC to perform data validation upon receipt of the LSR; therefore, it is unusual to receive an address validation request manually.

2-13 It is important to the CLEC (and to BellSouth) that a valid RSAG address be included on the service request for two primary reasons:

1. Downstream assignment systems (e.g. LFACS & TIRKS) will, during the ordering and provisioning process, attempt to match available facilities to the address(es) contained in the service request. If those addresses cannot be matched, the order will fall-out of the provisioning process for manual intervention. This will introduce delays and added costs due to the extra manual processing for correction.
2. Downstream dispatch systems will use the address(es) contained in the service request to dispatch field technicians and to provide driving instructions for outside technicians. If the address(es) cannot be found and matched properly, the order will fall-out of the provisioning

process for manual intervention. This will introduce delays and added costs due to the extra manual processing required.

Telephone Number Reservations:

2-14 The CLEC can select and reserve a telephone number (or "directory number", DN) via the LENS preordering interface. The DN can be used by the CLEC to satisfy either a new service or number change request from his customer. If the CLEC initiates a telephone number search request through the LENS interface, LENS will launch an command to the Application for Telephone number Load Administration and Selection (ATLAS).

2-15 ATLAS is a support system which administers "spare" telephone numbers which are available for assignment. ATLAS will present a list of numbers from the pool of available numbers in a wire center from which the user can select. If the user is looking for a "vanity" number or an "easy to remember" number, additional queries will present additional lists until all available telephone numbers have been reviewed. When a telephone number is selected and reserved for assignment, that number is removed from the pool pending initiation of a service request.

2-16 In response to the query, ATLAS returns a list of available DNs to the CLEC via LENS. If the CLEC selects a telephone number(s) to reserve for his customers' use, LENS will issue the appropriate OS commands to ATLAS, allowing the CLEC to reserve selected numbers for his own use.

2-17 Each CLEC will be allowed to reserve a limited number of telephone numbers over-and-above the number required for LSRs which have been placed on BellSouth. This is to prevent disproportionate reservations by any party, ensuring that BellSouth and all CLECs have equal access to the pool of spare telephone numbers.

2-18 It is important to the CLEC that a reserved telephone number be used on a service request for new service or for a number change. Even though a spare telephone number may be available when a check is initially made, that number can be selected and used for another service request by BellSouth or any other CLEC until it has been reserved. When reserved, ATLAS will remove the number from its pool of available numbers.

2-19 If the CLEC transmits a request for a DN to the LCSC through the manual interface, the LCSC personnel will access the (ATLAS) system and provide the reserved number.

Switch Port Feature Availability:

2-20 The CLEC can verify that a switch port feature which has been requested by his customer — or which he wishes to offer to his customers — is available in a switch. The CLEC can verify feature availability in either of two ways through LENS:

- The CLEC can enter a ten digit DN, and LENS will present the feature list applicable to that number.
- The CLEC can enter a street address, and LENS will present the feature list for the switch(es) serving that address.

2-21 The feature information available to the CLEC via LENS is extracted from the Product/Services Inventory Management System (P/SIMS) and the Central Office Features File Interface (COFFI) system on a weekly basis. P/SIMS is a database containing feature availability information based on software and hardware capabilities of the central office switches. As office capacity allows and as system upgrades permit, features are activated in BellSouth switches, and the availability date is reflected in P/SIMS. The related Universal Service Order Code (USOC) information based on current tariffs is maintained in COFFI. The snapshot database kept in LENS relates these two sets of information.

2-22 The weekly snapshot database is updated through a batch process run in the BellSouth Information Technologies corporate data center each Monday. The groups which input data to P/SIMS are responsible for ensuring P/SIMS database updates are scheduled accordingly. Although BellSouth retail sales groups do have access to the actual P/SIMS and COFFI databases and do not use this LENS snapshot image, the data in these systems does not change frequently. Nevertheless, based on the weekly process, LENS users will be using data up to seven days old.

2-23 When the CLEC verifies features via LENS in either fashion discussed in Paragraph 2-20, LENS presents a combined table reflecting the availability, English name, and USOC information about each feature in the switch(es) of interest. If the CLEC queries using a DN, the feature list for the switch which serves that NPA-NXX will be shown. This is true even if the wire center is a multi-switch central office. However, if the CLEC queries using a street address, LENS will present the list of available features for every switch which can serve that address.

2-24 If the CLEC transmits such a request to the LCSC through the manual interface, the LCSC personnel will access P/SIMS directly to verify whether a desired feature(s) is available in a given switch. The LCSC will provide the requested information via the agreed-upon manual process, either facsimile, phone, or mail service.

2-25 It is important that the CLEC verify feature availability for the following reasons:

1. Not all features are available in all switches. For example, a number of features available in digital switching systems (e.g. Number 5 ESS® and Digital Multiplex System 100®) are not available in analog switches (e.g. Number 1A ESS® and Number 2B ESS®). Not all digital switch features and services can be offered in certain smaller digital switches (e.g. Digital Multiplex System 10®, Digital Community Office®).
2. A multi-switch wire center can have more than one switch type. Features and service capabilities can be available in one of these switches, but not in another. In this case, the feature capabilities must be available for the NXX of the telephone number selected in ATLAS, or the order will fall-out for manual intervention and revision during service provisioning.
3. Some switch features and capabilities depend on traffic-load-sensitive components of the switching system. Some have software or hardware limitations restricting the number of lines which may use the feature/capability. Therefore, a feature or service capability may become unavailable due to traffic-capacity limitations or system design limitations. Features and services can become unavailable without notice; therefore, it is important to verify availability in P/SIMS prior to making a customer commitment.

Installation Intervals and Scheduling:

2-26 The CLEC can obtain, via the LENS preordering interface, information helpful in negotiating customer commitments for non-designed service installations. In response to a CLEC preordering query, LENS will display calendar information showing:

- What days of the week are open and which, if any, are closed.
- The current appointment intervals being offered by BellSouth for each type of service which requires field work.
- Upcoming dates which have been restricted and the reason for the restrictions.

2-27 When the CLEC queries for this information in LENS, LENS accesses the DOE Support APplication (DSAP) system. DSAP is a support system which assists order-taking groups in the establishment of customer commitments with regard to provisioning of non-designed service (in the case of CLECs, for resale services and non-designed UNEs). DSAP will, through linkages to the Line Maintenance Operations System (LMOS), reflect dates which have been closed by the Work Management Center

because the provisioning load has exceeded field force capabilities — or because of special events such as switch cutovers, for instance. DSAP will, through linkages with the Loop Facilities Assignment Control System (LFACS), reflect restricted serving areas due to lack of available plant facilities. DSAP will, through linkages with LFACS, "know" whether a loop facility has been dedicated in-place to a given RSAG address — a "CT (Connect-Through facility) — in which case a same-day provisioning appointment is often possible.

2-28 Only the date information is available as of August 31, 1997, through a LENS preordering inquiry. However, during entry of an LSR as discussed in Section III, LENS will use all of this DSAP information to establish the BellSouth commitment due date to the CLEC. Thus, if the CLEC is dealing with a prospective customer, the LENS preordering query will provide information to discuss probable installation intervals. And while the CLEC is taking an actual order for service and inputting the data into an LSR via LENS, LENS will provide the best commitment in real time based on the very same DSAP data and logic used by BellSouth retail sales units.

2-29 If the CLEC transmits a request to the LCSC through the manual interface for current installation interval information, the LCSC personnel will access DSAP in order to respond to the request.

2-30 It is important that the CLEC obtain the best due date scheduling assistance possible via the preordering interface to avoid missed commitments. If the CLEC makes unrealistic commitments — unrealistic because of no available plant facilities, field workload exceeding available force capacity, dates that have been closed due to special activities such as switch cutovers, etc. — then missed commitments and dissatisfaction will result.

Customer Records Information:

2-31 The CLEC can obtain, via the LENS preordering interface, Customer Service Record information. Using this capability, the CLEC can obtain account information on-line for customers with 25 lines or less. Because of volume, larger account information will be provided electronically via a batch process. Also, large requests for multiple records can be processed via batch. Customers who notify BellSouth to restrict their account information will be excluded from CLEC access; otherwise, the CLEC can access information on any BellSouth customer account electronically, including his own. The CLEC cannot access any other CLEC's account or customer information.

2-32 The data elements in the customer's BellSouth account available in this electronic access capability are:

- Telephone Number or other Account Identification

- Listed Name
- Listed Address
- Directory Listing Information
- Directory Delivery Information
- Billing Name
- Billing Address
- Service Address
- Product and Service Information

2-33 All product and service data elements necessary for a CLEC to provision the customer's service are included in the LENS display or batched record. LENS keeps a "footprint" of records access by each CLEC as an audit trail in the event of questions. With the availability of this LENS capability, the CLEC should have no need to interact with BellSouth employees regarding customer records unless the CLEC has an unusual request or issue. In such cases, the CLEC will contact the LCSC.

Service Inquiry Process:

2-34 Frequently complex services and applications require additional information or analysis before a firm commitment is made to the end user. This is true for BellSouth retail sales as well as for similar sales by CLECs. BellSouth has long used a Service Inquiry process for such customer requests, and BellSouth will handle all Service Inquiries in the same way.

2-35 Some examples of customer requests which require a service inquiry are:

- Establishment of a large number of lines in a new ESSX or ACD customer group, for instance.
- Availability of special local loop facilities to serve a specified address for ISDN or high-speed data applications.
- Availability of interoffice facility capacity for dedicated rings or unusual circuit demands.
- Service to a customer premise using a specified type or design of loop facility.
- Special construction.
- Availability of special diversity, protection, or SONET services to a customer premise.

2-36 This same information is not available to BellSouth internal retail customer interface groups or to the CLEC on a mechanized basis. In many cases, the request must be investigated and analyzed by engineering personnel to determine the best way and best schedule they can devise to satisfy the potential order.

2-37 The CLEC will contact the InterConnection Services (ICS) Account Team to initiate a Service Inquiry. If the CLEC contacts the LCSC, the LCSC will hand-off the request to the ICS Account Team. The Account Team will work with the CLEC to prepare the Inquiry, collecting all necessary information to ensure that the Inquiry process will address all needs. The ICS Account Team will route the Inquiry to internal BellSouth organizations for a written response. The Account Team collects the responses of all involved BellSouth organizations to which the Inquiry was directed and provides the final response to the CLEC. Service Inquiry response intervals depend on the nature and details of the individual inquiry, but are handled as expeditiously as possible. Responses are typically provided within one to three days.

2-38 The Service Inquiry process is not a part of the preordering process as that process is currently defined. However, for complex requests, the Service Inquiry process is a related, parallel process which occurs prior to Firm Order Confirmation. Therefore, it is covered here for clarity. BellSouth does not anticipate that the preordering process will take the place of Service Inquiries where those are necessary. The Service Inquiry process that has long been used for BellSouth retail customers is the same process which BellSouth will use for CLEC Inquiries.

B. Points of Manual Intervention

2-39 The following tables reflect two kinds of manual work which must be handled in the various work groups that comprise the provisioning pipeline. The first kind of manual work is planned and required as an integral part of the process. The second kind of work results when some problem or condition in the mechanized support systems causes an item to "fall-out" into the work group for manual intervention. The first type of work is called "planned" in the following tables, and the second type of work is called "fall-out". Refer also to Exhibit II-3.

Table 2-1: Local Carrier Service Center (LCSC):

Type Manual Work Planned vs. Fall-Out	*Operational System Involved*	*Cause of Manual Intervention*	*How Can the CLEC Control?*
Planned	RSAG, P/SIMS, ATLAS, DSAP	Election of CLEC to use Manual Ordering Interface. Requires LCSC Service Rep to manually collect requested information and provide response to CLEC.	The CLEC can implement the LENS electronic interface.
Planned	LENS	CLEC requests for preordering information not supported by the electronic interface. Requires LCSC Service Rep to manually collect requested information and provide response to CLEC. Analogous to a Service Inquiry for BellSouth retail sales units.	n/a
Fall-out	LENS	System problems or conditions which prevent the system from completing its function. The LCSC will handle the preordering request and provide response to the CLEC. LENS or OS problems will be referred to the Information Technologies department by the LCSC for resolution.	n/a

C. CLEC Interface Options

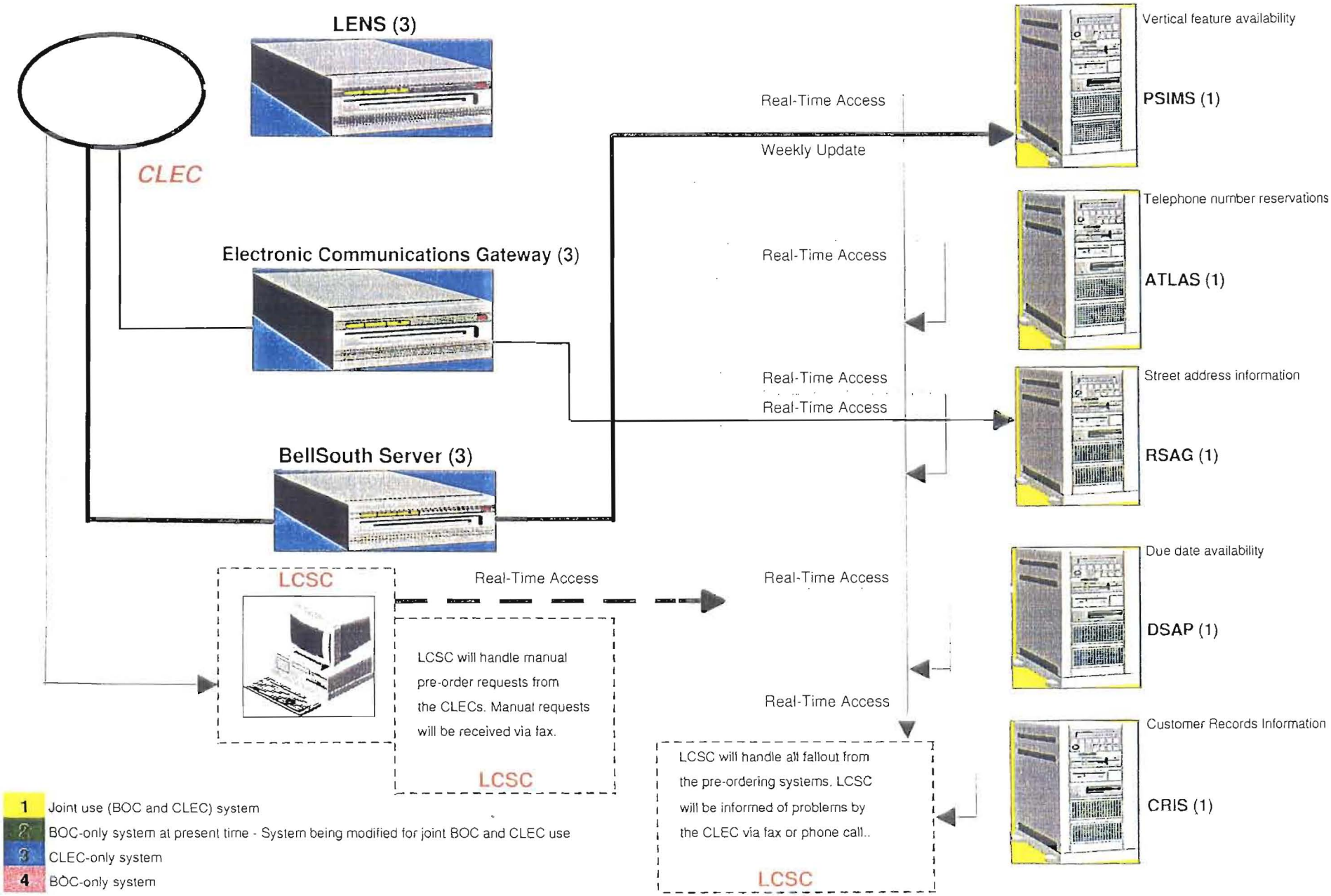
Options:

LENS Interface:

2-40 An electronic interface using widely available transmission protocols (TCP/IP) is available to the CLEC community. The Local Exchange Negotiation System (LENS) alternative will allow interactive access into BellSouth's preordering systems. BellSouth plans three alternative ways for a CLEC to access the BellSouth LENS:

i. The CLEC can establish dedicated LAN-to-LAN access into the BellSouth LENS for reliable, high-speed dedicated access.
ii. The CLEC can use dial-up connections directly into BellSouth LENS.
iii. The CLEC can access BellSouth LENS via the Public Internet.

PREORDERING FLOW
- MECHANIZED PROCESS FALLOUT-
Exhibit II - 3



2-41 The LENS interface application will be enhanced in an ongoing phased-development approach, with each release passing exhaustive testing prior to entering "production". As of August 31, 1997, LENS supports all preordering functions as discussed earlier in Paragraphs 2-11 through 2-33.

2-42 BellSouth intends for the LENS interface to provide small-to-medium sized CLECs an attractive, interactive access to BellSouth operating systems in the preordering flow. However, for the larger CLECs who wish to integrate this interface into their own customized presentation management software applications, BellSouth has published transaction specifications. These specifications provide for data labels which can be used by a CLEC presentation management application to communicate via transactions with LENS. This capability is called LENS-Computer Gateway Interface (CGI). Thus, LENS provides considerable flexibility through a number of interconnection options.

2-43 BellSouth has completed testing on the Phase I LENS interface. Testing included functional testing and capacity stress testing to verify that the interface could handle the planned volumes (see Section VI for forecast and capacity information). Details on final test results are available upon request. As of August 31, 1997, LENS is being used by twenty-four CLECs for preorder activity. Seven additional CLECs have completed training on the use of LENS and established the necessary connectivity to begin using LENS. The interface has been for testing and use by CLECs since April; however, historical data is limited at the time this issue. Historical data regarding operational metrics will be provided upon request.

Manual:

2-44 A manual interface will remain available for those CLECs who do not elect to implement the electronic interface, as well as to provide a contingency process in the event that such a backup should become necessary. The CLEC can pass preordering information requests to the BellSouth Local Carrier Service Center (LCSC) via facsimile, telephone, or a mail service. Service Representatives in the BellSouth LCSC will collect the requested information from internal OS and database systems as covered in Section II.A of this document.

Conformance to Applicable Industry Standards:

2-45 There are no Ordering & Billing Forum (OBF) standards covering preordering requests. In the design of the interface, BellSouth has employed widely-available and already-proven standards such as TCP/IP protocol, for example. Interconnection can

be established through a number of options using widely-available commercial devices and software. BellSouth has also openly published transaction format specifications, including data element labels, which will permit any CLEC who chooses to customize their own presentation software for their own business needs.

Section III



Ordering & Provisioning Process

III. Ordering & Service Provisioning:

A. Description of Process Flow

Non-Designed Services

3-01 This section will describe the ordering and service provisioning flow depicted on Exhibits III-1 through III-4. The reader should refer to those process flow diagrams while reading the following:

Order Transmittal from CLEC to BellSouth:

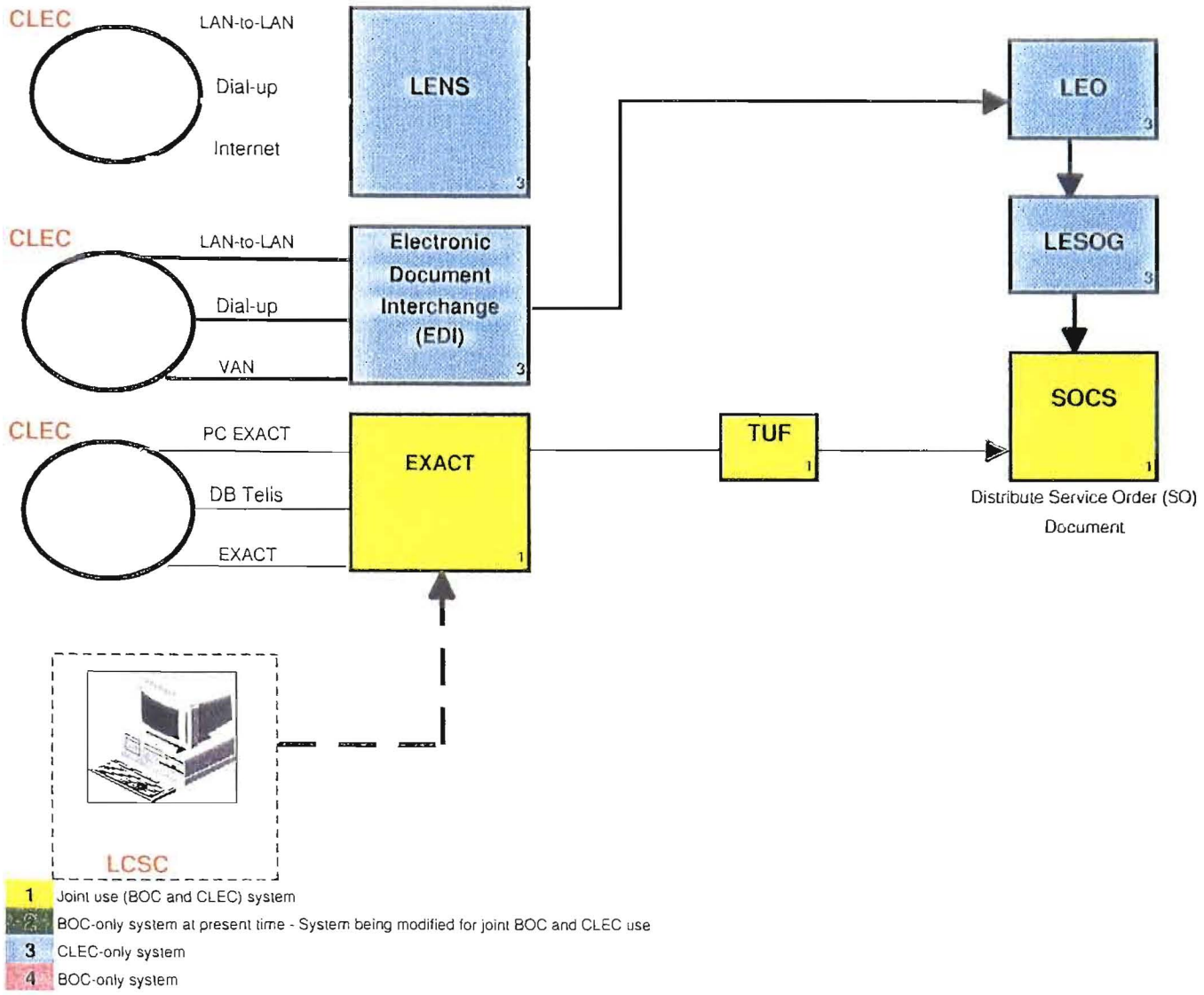
3-02 As of August 31, 1997, the CLEC community can select from three optional LSR interfaces (EDI, LENS, manual) and two ASR interfaces (EXACT, manual) with BellSouth in the ordering and provisioning process:

Electronic Data Interchange (EDI):

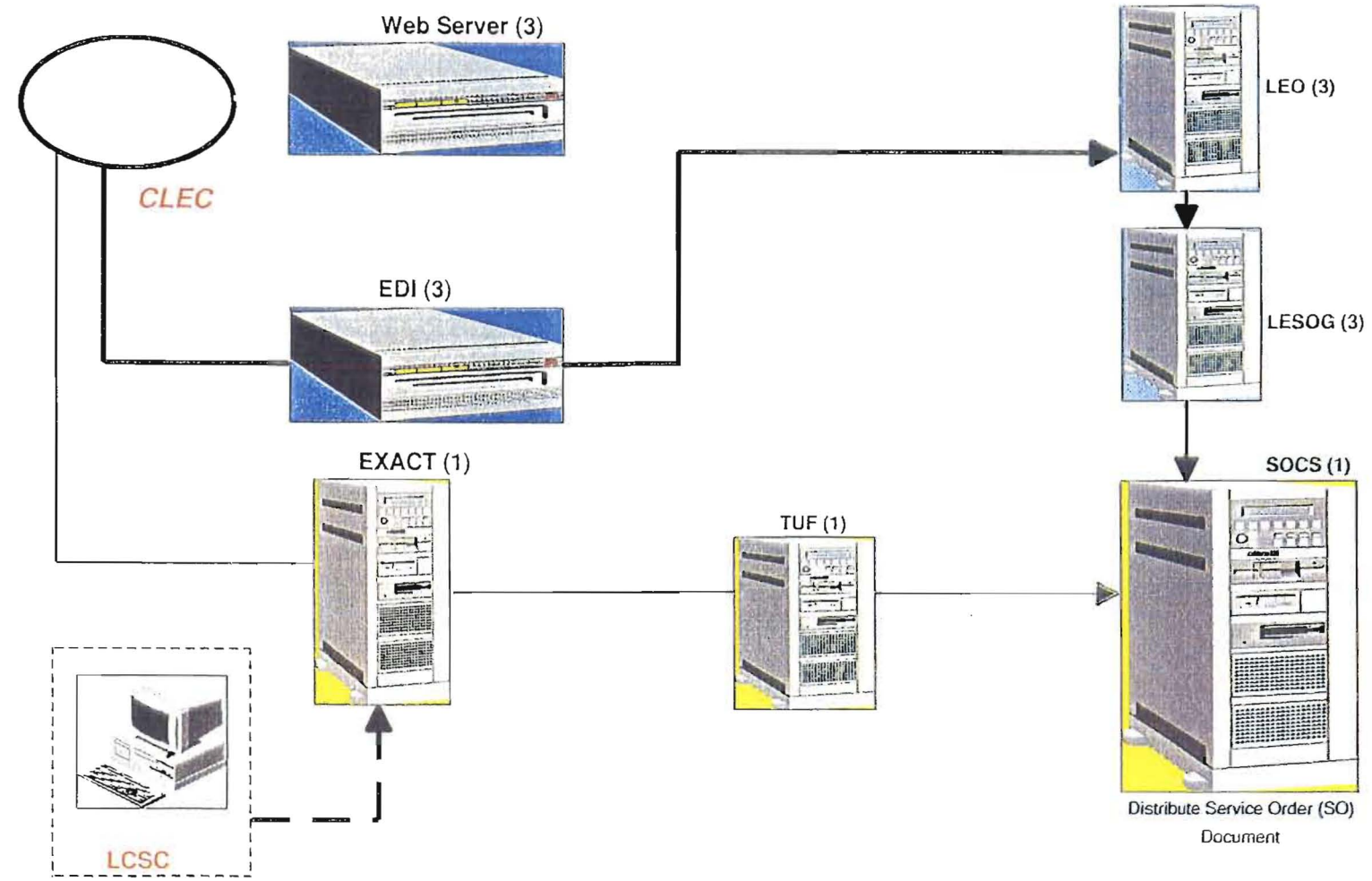
3-03 EDI is the electronic interface sanctioned by the OBF for Local Service Request communications. Using this interface, the CLEC will transmit service requests in OBF standard format to BellSouth. EDI is basically a file transfer control module, allowing an EDI module on the CLEC side of the interface to pass formatted data to the EDI module on the BellSouth side of the interface. Thus, EDI is not an interactive system; it is a "batch process" file-transfer interface, although there is considerable flexibility in how the CLEC chooses to configure the file transfer software. LSRs successfully received and processed by EDI will be passed to the Local Exchange Ordering (LEO) system.

3-04 LEO will perform certain edit checks and data formatting checks to help ensure a complete and correct order entry. If the request fails the edit checks, it will be electronically returned to the CLEC for correction via EDI. If the request passes the edit and data formatting checks, LEO will return a Firm Order Confirmation electronically to the CLEC via EDI and pass the service request on to the Local Exchange Service Order Generator (LESOG). LESOG will format the service request into BellSouth service order record formats which can be handled by downstream systems. LESOG will use terminal emulation to input the order into the BellSouth Service Order Control System (SOCS).

MECHANIZED ORDERING FLOW
- ORGANIZATIONS / CENTERS -
Exhibit III - 1

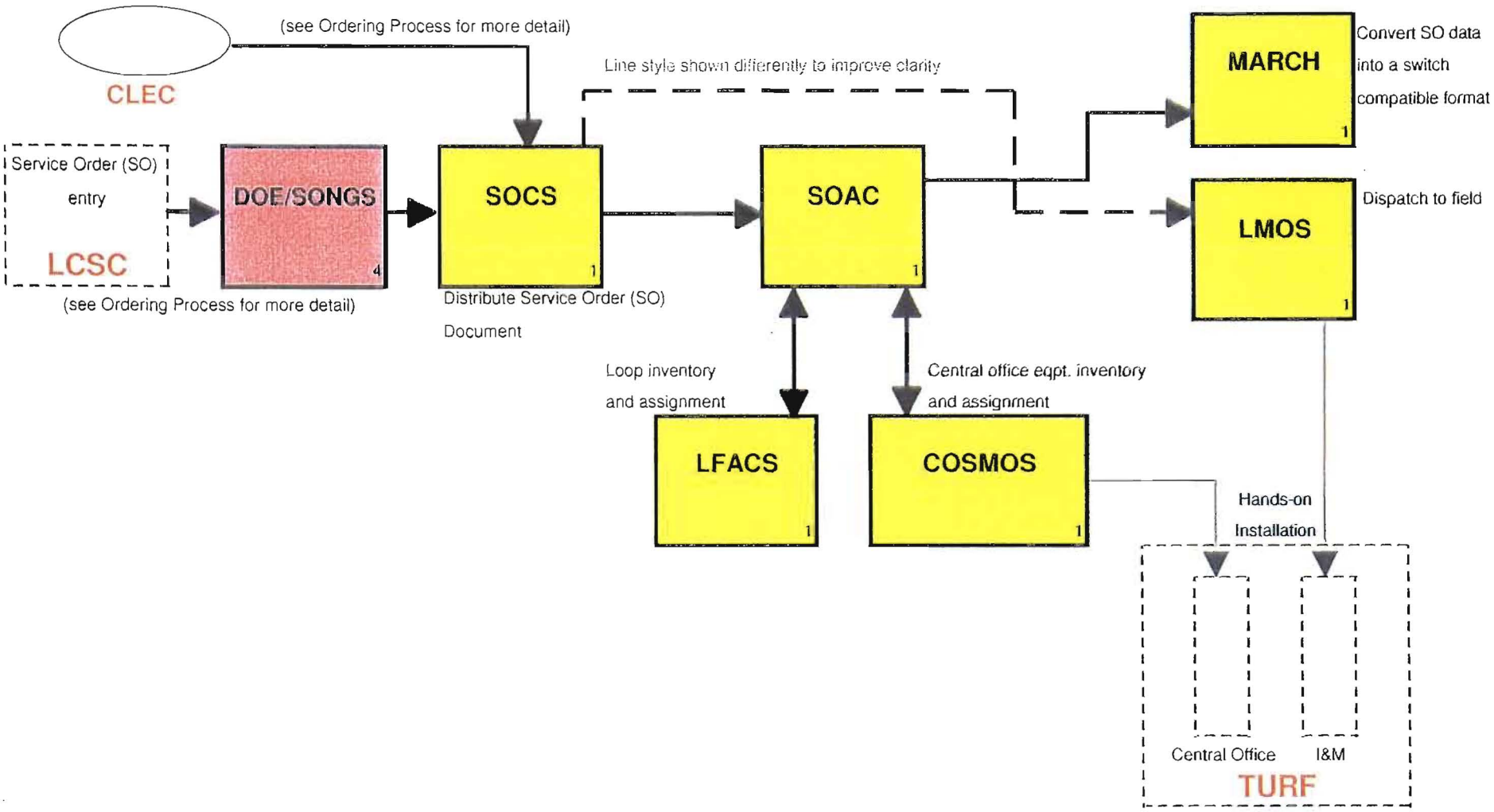


ORDERING FLOW
- MECHANIZED PROCESS -
Exhibit III - 2



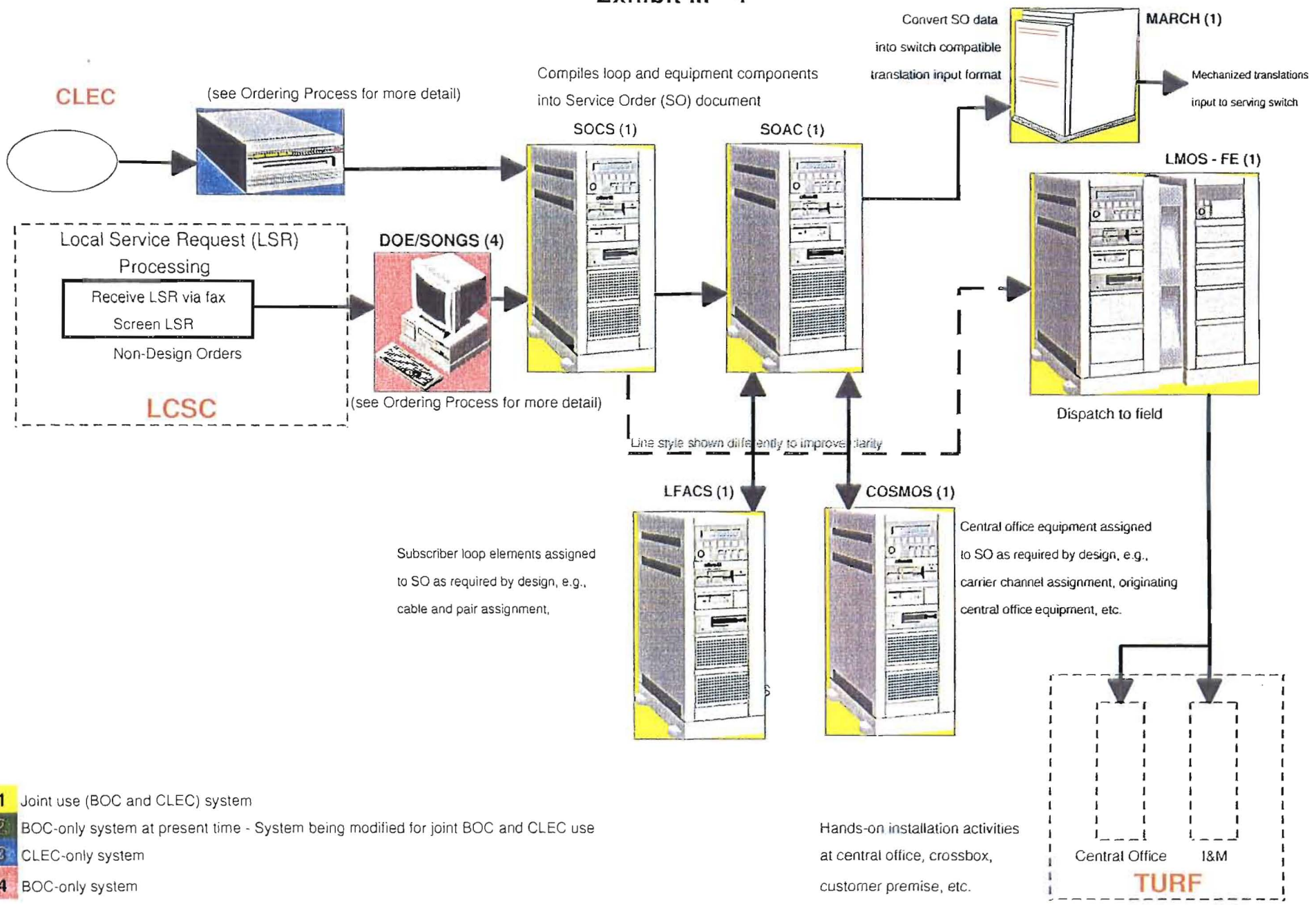
1 Joint use (BOC and CLEC) system
2 BOC-only system at present time - System being modified for joint BOC and CLEC use
3 CLEC-only system
4 BOC-only system

MECHANIZED NON-DESIGN PROVISIONING FLOW
- ORGANIZATIONS / CENTERS -
Exhibit III - 3



1 Joint use (BOC and CLEC) system
2 BOC-only system at present time - System being modified for joint BOC and CLEC use
3 CLEC-only system
4 BOC-only system

NON-DESIGN PROVISIONING FLOW
- MECHANIZED PROCESS -
Exhibit III - 4



1 Joint use (BOC and CLEC) system
2 BOC-only system at present time - System being modified for joint BOC and CLEC use
3 CLEC-only system
4 BOC-only system

3-05 Since December 31, 1996, BellSouth has had the capability to begin implementing an EDI interface with any CLECs who wished to do so. BellSouth completed functional and capacity stress testing on the EDI interface, and those test results are available upon request. Although EDI is generally available, as of August 31, 1997, only one major CLEC has begun using EDI to transmit LSRs to BellSouth. Four other CLECs are testing an EDI interface. BellSouth fully supports the use of EDI by the CLECs.

3-06 Ongoing enhancement of EDI will be developed in phases. Those resale services or UNEs which are not supported by EDI in the first phase (see Table III-8) will be handled through the LCSC using the manual interface.

LENS Interface:

3-07 BellSouth also offers a Local Exchange Negotiation System (LENS) interface to any CLEC who chooses to use this option. Using LENS, the CLEC can order certain resale services and UNEs electronically. The LENS interface will also comply with OBF ordering standards for those resale services and UNEs which it supports at any point in time. Development of LENS capabilities will be a phased approach; the Phase I capabilities are available for CLECs to implement as of August 31, 1997. Any resale services or UNEs which are not supported by LENS in Phase I (see Table III-8) will be handled through the LCSC using the manual interface.

3-08 LENS will perform a number of data formatting checks on the service request. As the LSR is entered into LENS, LENS will also automatically perform the following data validation functions:

- LENS will first access RSAG and verify the street address.
- Once the street address is valid, LENS will present a list of features available in the switch(es) which serve that address.
- Once the desired features have been selected, LENS will either allow a search in ATLAS for a DN or allow the CLEC to enter a DN which had previously been reserved through preordering transactions.
- Finally, LENS will attempt to honor the Due Date which the CLEC requests but will validate the availability of that DD in DSAP. If a commitment date is returned different from the requested date, LENS will (in Phase II) provide an explanation for the difference.

3-09 Once the LSR has been entered and all edits and validations are passed, LENS will provide an Acknowledgment for the CLEC and send the service request to the

Local Exchange Ordering (LEO) system.

3-10 LEO will format the service request into BellSouth service order record formats which can be handled by downstream systems. LEO will also apply further editing and formatting checks to help ensure a valid order. If the LSR fails these checks, the LSR will fall-out in the LCSC for manual intervention. LENS will also provide the CLEC with a list of all LSRs which are in error status and the associated errors.

3-11 If the LSR passes the LEO edits, LEO will generate a Firm Order Confirmation (FOC) — which is available to the CLEC via the LENS interface — and then electronically pass the service request into the Local Exchange Service Order Generator (LESOG). LESOG will use terminal emulation to input the order into the BellSouth Service Order Control System (SOCS).

3-12 Finally, LENS provides the CLEC with access to key status information regarding the BellSouth service order which is related to his LSR. The CLEC can see if the service order is pending assignment by downstream OSs (e.g. LFACS, COSMOS as described later in this section), if assignment functions are complete and the order is pending installation, and, finally, if the order has been completed. Moreover, when the order is completed in the Service Order Control System (SOCS), a formal Completion Notice will be passed to LENS and will be available to the CLEC on line.

Exchange Access Control & Tracking (EXACT) Interface:

3-13 The CLEC can input Local Interconnection Access Service Requests (ASRs) directly into EXACT, just as the InterLATA Carriers (IC) have long been operating. Using this interface, the CLEC will enter Local Interconnection ASRs in OBF standard formats. EXACT will perform certain edit checks and data formatting checks to help ensure a complete and correct order entry. If the request fails the checks, it will be electronically returned to the CLEC for correction.

3-14 If the request passes the EXACT checks, EXACT will return a Firm Order Confirmation to the CLEC and pass the request to the Translation of USOCs and FIDs (TUF) system. TUF will format the service request into BellSouth service order records formats which can be handled by downstream systems. TUF will then electronically pass the service request directly into the BellSouth Service Order Control System (SOCS).

3-15 EXACT was designed originally for the InterLATA Carrier ordering processes associated with IC Switched Access and Special Access. EXACT conforms to OBF standards for Local Interconnection and is used by a number of CLECs to order Local Interconnection trunks. EXACT will not be enhanced to support local resale

services and local service UNEs — local services should be ordered on LSRs through one of the LSR interfaces (EDI or LENS).

Manual Interface:

3-16 Finally, the CLEC can transmit local service requests to BellSouth using facsimile or mail services. These service requests will be received and input into front-end service provisioning systems — either the Direct Order Entry (DOE) or the Service Order NeGotiation System (SONGS) system, depending upon the geographic area where the service is located— by the BellSouth Local Carrier Service Center (LCSC). For service in Florida, Georgia, North Carolina, and South Carolina, all local service requests for non-designed services will be entered into DOE by the LCSC. For service in Alabama, Kentucky, Louisiana, Mississippi, and Tennessee, orders will be entered into SONGS.

3-17 During entry, preordering-type data validations are performed, and DOE performs various data edit and formatting checks as well. If the order passes all edit checks and data validation, DOE will pass the service order to the Service Order Control System (SOCS). At this point, the LCSC furnishes a Firm Order Confirmation manually to the CLEC.

3-18 If errors are detected, the order is presented to the LCSC personnel for correction. The LCSC will make the correction if the error resulted from an input error. If the CLEC provided erroneous or improperly formatted information, the LCSC will contact the CLEC (by phone or facsimile) to resolve the problem.

3-19 Local service requests will be accepted by BellSouth on standard forms developed through the Ordering & Billing Forum (OBF). Where OBF forms are not finalized or where BellSouth has identified the need to add fields to certain types of service requests for additional data needed to work the order, BellSouth has created interim forms. Instructions for using these interim forms are included (along with instructions for using all other OBF manual service request forms) in BellSouth filings and publications. BellSouth has provided these publications directly to CLECs who have established master accounts with BellSouth. BellSouth has also provided input and proposals related to all deviations from OBF standards to the Ordering and Billing Forum. BellSouth intends to conform to OBF standards.

Complex Services:

3-20 Local service requests for *complex* resale services or *complex* UNEs will require extra handling outside the service provisioning pipeline. Complex requests are those which:

- require complex translations work involving customer groups (e.g. ESSX, MultiServ®, Automatic Call Distribution groups, etc.) or changes to switch configurations (e.g. turning on new switch software features)
- involve any customized switch or network routing changes
- involve the Public Packet Switch Network (i.e. PulseLink®)
- involve broadband offerings (e.g. Asynchronous Transfer Mode data networking)

3-21 If the local service request is for complex resale services, the CLEC will contact the ICS Account Team directly. The ICS Account Team, depending upon the nature of the LSR, will collect the necessary data to perform the complex translations and configurations and then pass this information to the Data Customer Service Center (DCSC) if broadband or packet data services are involved. Otherwise, the ICS Account Team will pass this information to the Vendor Services Center (VSC). The DCSC or VSC will enter the service orders into SOCS and forward information needed by BellSouth work groups outside the service order flow as appropriate.

3-22 If the LSR is for complex UNEs or UNE combinations, the LCSC will "hand-off" the request to the appropriate BST organization. For instance, if the LSR involves broadband UNEs, the LCSC will refer the LSR to the Data Customer Service Center (DCSC). Otherwise, the LCSC will involve the ICS Account Team. Either the DCSC or LCSC, depending on the specific nature of the LSR, will issue the necessary service orders into the Service Order Control System (SOCS) and forward information needed by BellSouth work groups outside the service order flow as appropriate.

3-23 This is the same kind of handling that a BellSouth retail service request would follow in other BellSouth Customer Operating Units (e.g. BBS) when complex functions are involved. When complex services are involved, additional work items must be handled outside of the primary service order pipeline.

Order Distribution and Assignment Functions Within BellSouth:

3-24 The primary function of the Service Order Control System (SOCS) is to route the service order to all recipients who/which require the information. The primary destination is the next downstream service provisioning system, Service Order Analysis & Control (SOAC). If the service order can be processed without problem by SOCS, it will be passed electronically to SOAC. If SOCS has a problem with the service order routing function, the order will "fall-out" in the LCSC for manual intervention. The LCSC will resolve the problem and resend the order to SOCS.

3-25 SOAC will determine from information in the service order image which

downstream assignment and control systems require information in order to perform their functions. SOAC will then route the necessary service order data to the downstream assignment systems. The next system in the provisioning pipeline for non-designed orders is the Loop Facility Assignment Control System (LFACS).

3-26 LFACS will use certain data from the service order to select and assign the loop facilities. To perform this function, LFACS will primarily use the address data for the customer location, selecting the best loop facility which can serve the address. If the customer is transferring existing service from BellSouth to the CLEC, a "reuse field identifier" will cause LFACS to reassign the same loop facility to the CLEC order. If LFACS encounters an error or condition which prevents the successful assignment of a loop facility, the order will "fall-out" and be presented to an employee in the Network Infrastructure Support Center — Address & Facility Inventory Group (NISC-AFIG) for manual intervention. Otherwise, LFACS will mechanically complete the loop facility assignment and pass this information along with certain other parameters back to SOAC.

3-27 SOAC will next route the service order to the COmputer System for Mainframe OperationS (COSMOS) system. COSMOS will make the terminal assignments on the main distributing frame in the central office to cross connect the BellSouth switch port or the CLEC port/facility-termination to the loop facility assigned by LFACS. If COSMOS is successful in this function, COSMOS will issue a frame work order to the field central office personnel to perform the frame cross-connect wiring functions in accordance with the service order. COSMOS will also return the frame assignment information (particularly the "OE" assignment) to SOAC for entry into the service order assignment section. If COSMOS encounters a problem, the order will "fall-out" into the NISC-AFIG for manual intervention.

3-28 Once SOAC receives the completed assignment information from COSMOS, SOAC will route the order to MARCH. If the order requires software changes to be made in a BellSouth switching network element (e.g. to activate dial tone and the assigned telephone number, to activate line vertical service features, or to implement other line-assigned, switch-based services), MARCH will handle that function. If no switch recent change inputs are required, MARCH will simply list the order on a "no work" log for record keeping and historical data.

Service Activation and Dispatch Functions:

3-29 When switch software line attribute changes are required, MARCH will convert the information contained in the service order image to switch "Recent Change" format — the input/output language format appropriate for the type of switching network element involved (e.g. Number 5 Electronic Switching System®, Digital Multiplex

System 100®, etc.). MARCH will control the release of the switch recent changes and check for acceptance/activation messages returned by the switch. If all goes well, MARCH retains a record of the order transactions. If the recent change messages cannot be properly constructed from the service order image received from SOAC, or if the switch does not return the expected acceptance messages, MARCH will cause the order to "fall-out" to the Network Infrastructure Support Center — Recent Change Memory Administration Group (NISC-RCMAG) for manual intervention.

3-30 Meanwhile, SOAC transmits a copy of the service order back to SOCS. SOCS routes a copy of the service order image to the Line Maintenance Operations System (LMOS). LMOS has two primary functions: (a) to maintain a record of the service and assignments which is referenced by other operating systems and personnel during maintenance & repair activities over the life of the service and (b) to effect a dispatch of a field technician if field work is required on the order. In this latter function, LMOS generates a work order which is used by the Work Management Center (WMC) Load Control Group to dispatch field technicians.

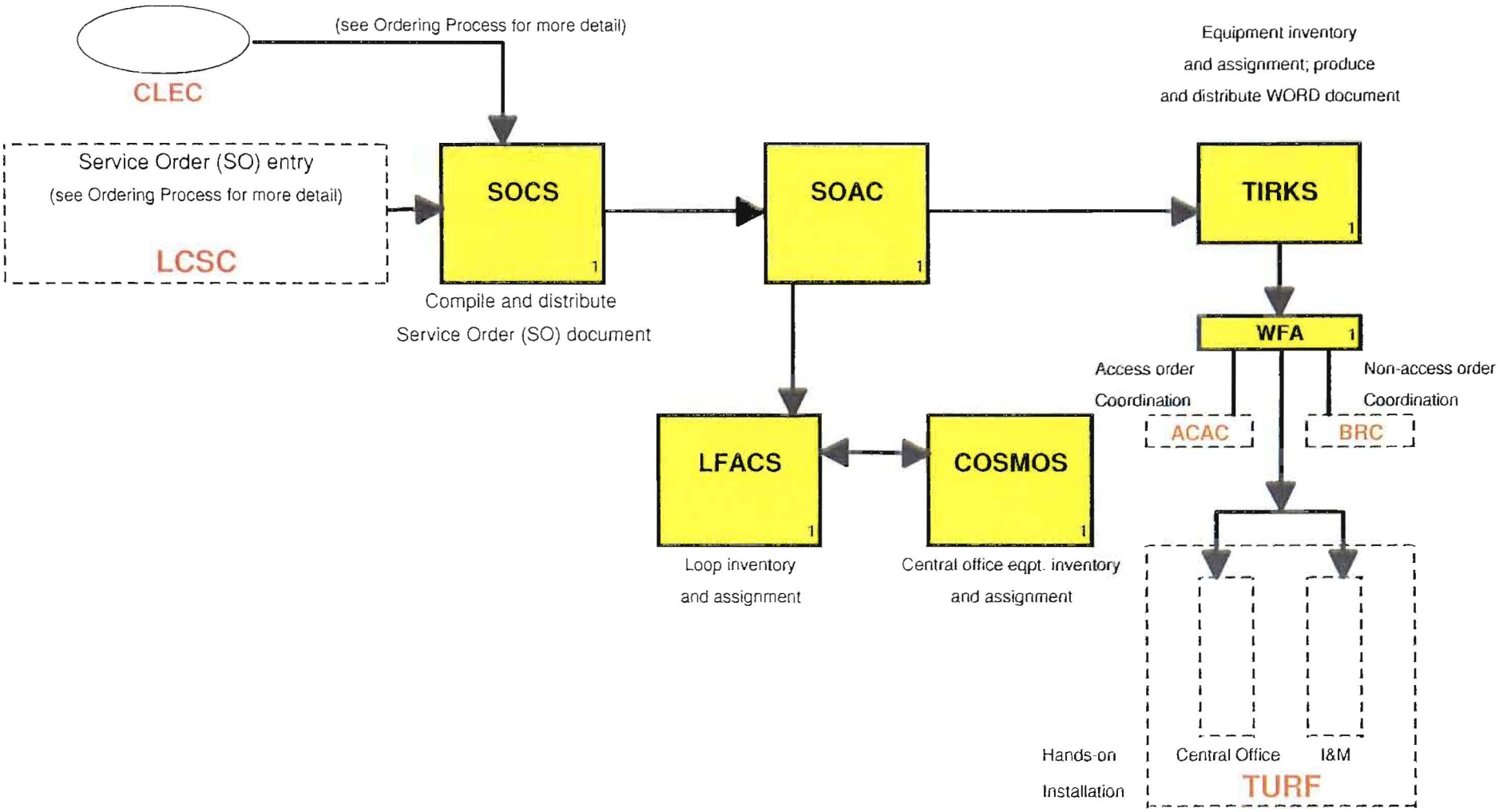
3-31 When the field work has been completed in cases where a field dispatch was required, LMOS sends a completion notice back to SOCS. If no field dispatch was required on the order, LMOS sends a completion notice back to SOCS when its maintenance database has been updated based on the service order image ("autocompletion"). SOCS forwards the completion notice to the Customer Record Information System (CRIS), which begins the billing process.

3-32 At the same time, SOCS will pass the completion notice to LESOG which will forward it to LEO. For LSRs that were transmitted via EDI, LEO will deliver completion notices via EDI to the CLEC. For LSRs placed through LENS, the LENS interface will display Completion Notices interactively on line. The LCSC will not normally furnish Completion Notices manually to the CLEC.

Designed Services

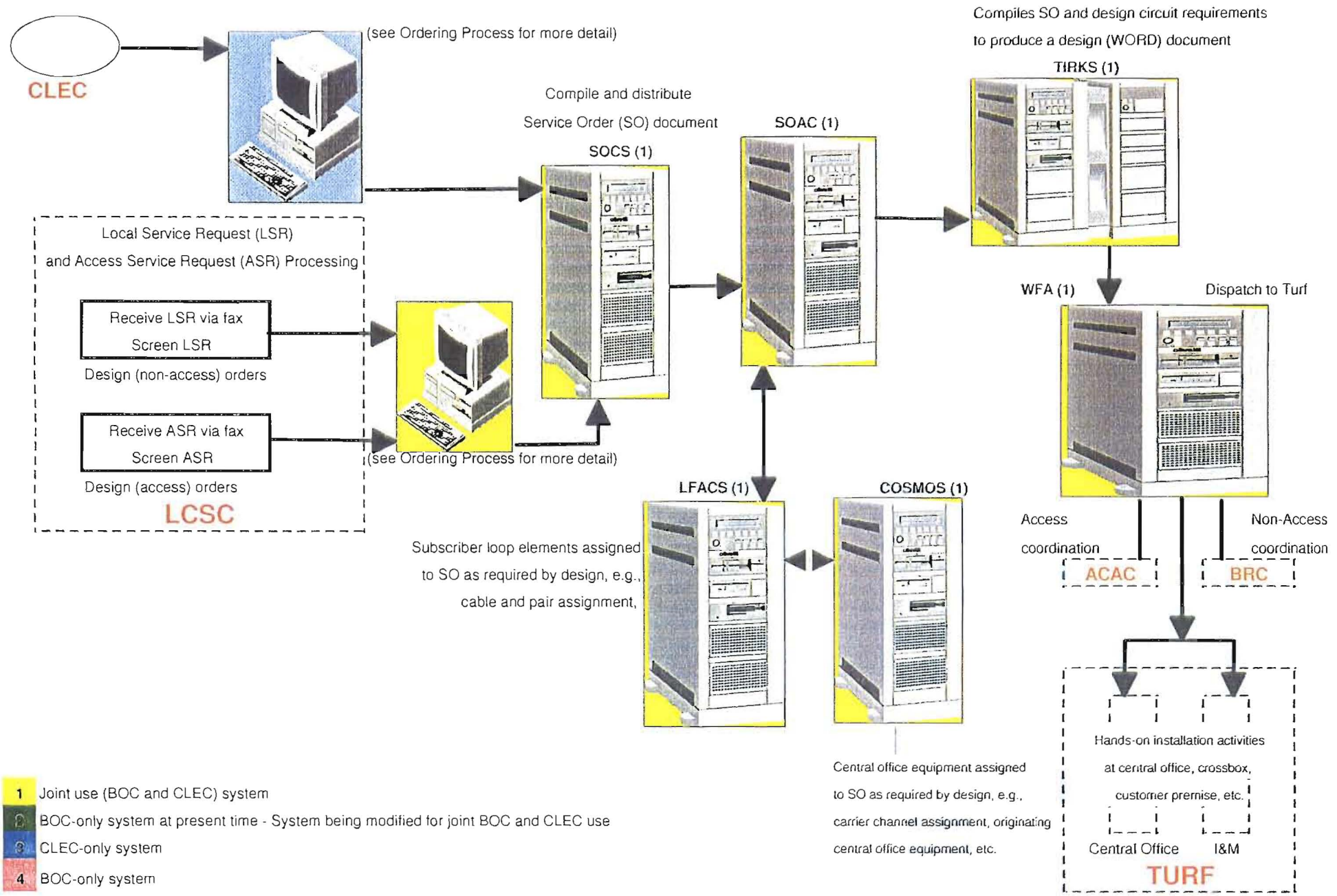
3-33 This section will describe the ordering and service provisioning flow for designed resale and UNE local service requests as depicted on Exhibits III-5, & III-6. The reader should refer to those process flow diagrams while reading the following:

MECHANIZED DESIGN PROVISIONING FLOW
- ORGANIZATIONS / CENTERS -
Exhibit III - 5



1 Joint use (BOC and CLEC) system
2 BOC-only system at present time - System being modified for joint BOC and CLEC use
3 CLEC-only system
4 BOC-only system

DESIGN PROVISIONING FLOW
- MECHANIZED PROCESS -
Exhibit III - 6



Order Transmittal from CLEC to BellSouth:

3-34 The systems flow and interfaces for accepting local service requests for designed services and passing the service order to the Service Order Control System (SOCS) are the same as described in Paragraphs 3-02 through 3-23 for non-designed services.

Order Distribution and Assignment Functions Within BellSouth:

3-35 The primary function of the Service Order Control System (SOCS) is to route the service order to all recipients which require the information. The primary destination is the next downstream service provisioning system, Service Order Analysis & Control (SOAC). If the service order can be processed without problem by SOCS, it will be passed electronically to SOAC. If SOCS has a problem with the service order routing, the order will "fall-out" in the LCSC for manual intervention. The LCSC will resolve the problem and resend the order to SOCS.

3-36 SOAC will determine from information in the service order image which downstream assignment and control systems require information in order to perform their functions. SOAC will then route the necessary service order data to the downstream assignment systems. The next system in the provisioning pipeline for designed orders is the Loop Facility Assignment Control System (LFACS) if the loop facility is inventoried there.

3-37 LFACS will use certain data from the service order to select and assign the loop facilities. To perform this function, LFACS will primarily use the address data for the customer location, selecting the best loop facility which can serve the address. If LFACS encounters an error or condition which prevents the successful assignment of a loop facility, the order will "fall-out" and be presented to an employee in the Network Infrastructure Support Center — Address & Facility Inventory Group (AFIG) for manual intervention. Since this is a designed order, a special field identifier will be present in the service order image alerting LFACS to send the order with the necessary loop information back to SOAC and on to TIRKS.

3-38 SOAC will next route the service order to the Trunks Integrated Record Keeping System (TIRKS) for circuit design. TIRKS will attempt to automatically design the order using standard models for common circuit configurations which are developed by BellSouth staff support organizations with the support of Bell Communications Research when necessary. If the service order matches with a TIRKS design model, mechanized design processes proceed. If the necessary design elements (e.g. circuit

electronics, switching element terminations, interoffice facility elements, etc.) are available, TIRKS will make the necessary assignments and issue the Work Order Record Details (WORD) document into the next downstream systems. If TIRKS cannot match the order with an appropriate design model or if any of the necessary design elements are unavailable, the order will "fall-out" in the Network Infrastructure Support Center — Circuit Provisioning Group (NISC-CPG) for manual intervention.

3-39 TIRKS will distribute copies of the WORD to designated receiving printers or terminals. But the primary flow will send the WORD to the Work Force Administration (WFA) system modules and the Network Services DataBase (NSDB). WFA is actually a single operations support system; however, three software modules of WFA are used by different work groups:

- The WFA — Control module is used by the designated control office [either the Business Repair Center (BRC) for resale services, the UNE Center for UNEs and UNE-combinations, or the Access Customer Advocacy Center (ACAC) for interconnection trunks] to coordinate the installation, testing, and turn-up of the designed services.
- The WFA — Dispatch Out (DO) module is used by the Work Management Center to dispatch field Special Services Installation & Maintenance (SSI&M) technicians. WFA-DO is also used by these field technicians to obtain a copy of their work order information and to complete their work when accomplished.
- The WFA — Dispatch In (DI) module is used to dispatch central office ("inside") technicians. It is also used by those central office technicians to obtain their work orders and to report completion of their work.

3-40 When the work is reported complete by all dispatched technicians, the final completion is entered for the order into WFA-C by the control office. WFA-C reports the completion back to TIRKS, which updates its database and passes the completion notice back to SOCS. SOCS distributes it, passing a copy either to the Customer Record Information System (CRIS) if the order was for resale services or UNEs or to the Carrier Access Billing System (CABS) if the order was for Local Interconnection services or CABS-billed UNEs — initiating the billing process.

3-41 At the same time, SOCS will pass the completion notice to LESOG which will forward it to LEO. For LSRs that were transmitted via EDI, LEO will deliver completion notices via EDI to the CLEC. For LSRs placed through LENS, the LENS interface will display Completion Notices interactively on line. EXACT will not furnish Completion Notices to the CLEC for ASRs.

3-42 The BellSouth Control Office (either the BRC, UNEC, or ACAC depending on the particular resale service or UNE) will coordinate final BellSouth testing and turn-up of designed services with the CLEC. Therefore, for designed services, the CLEC will always know the order has been completed through the normal Control Office coordination and turn-up functions. BellSouth will not customarily furnish written Completion Notice documentation to the CLEC for LSRs placed manually.

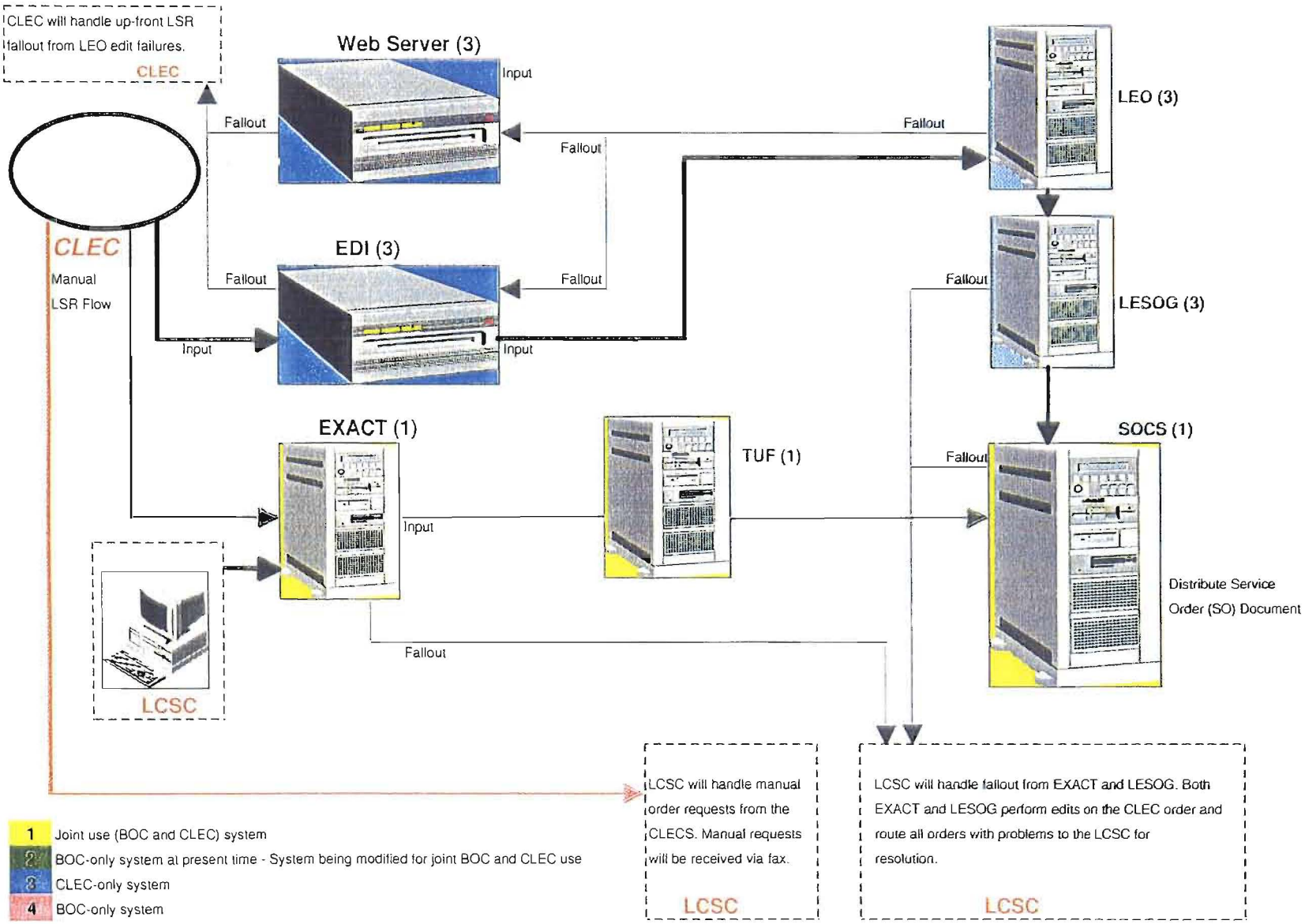
B. Points of Manual Intervention

3-43 The following tables reflect two kinds of manual work which must be handled in the various work groups that comprise the provisioning pipeline. The first kind of manual work is planned and required as an integral part of the process. The second kind of work results when some problem or condition in the mechanized support systems causes an item to "fall-out" into the work group for manual intervention. The first type of work is called "planned" in the following tables, and the second type of work is called "fall-out". Refer also to Exhibits III-7, III-8, and III-9.

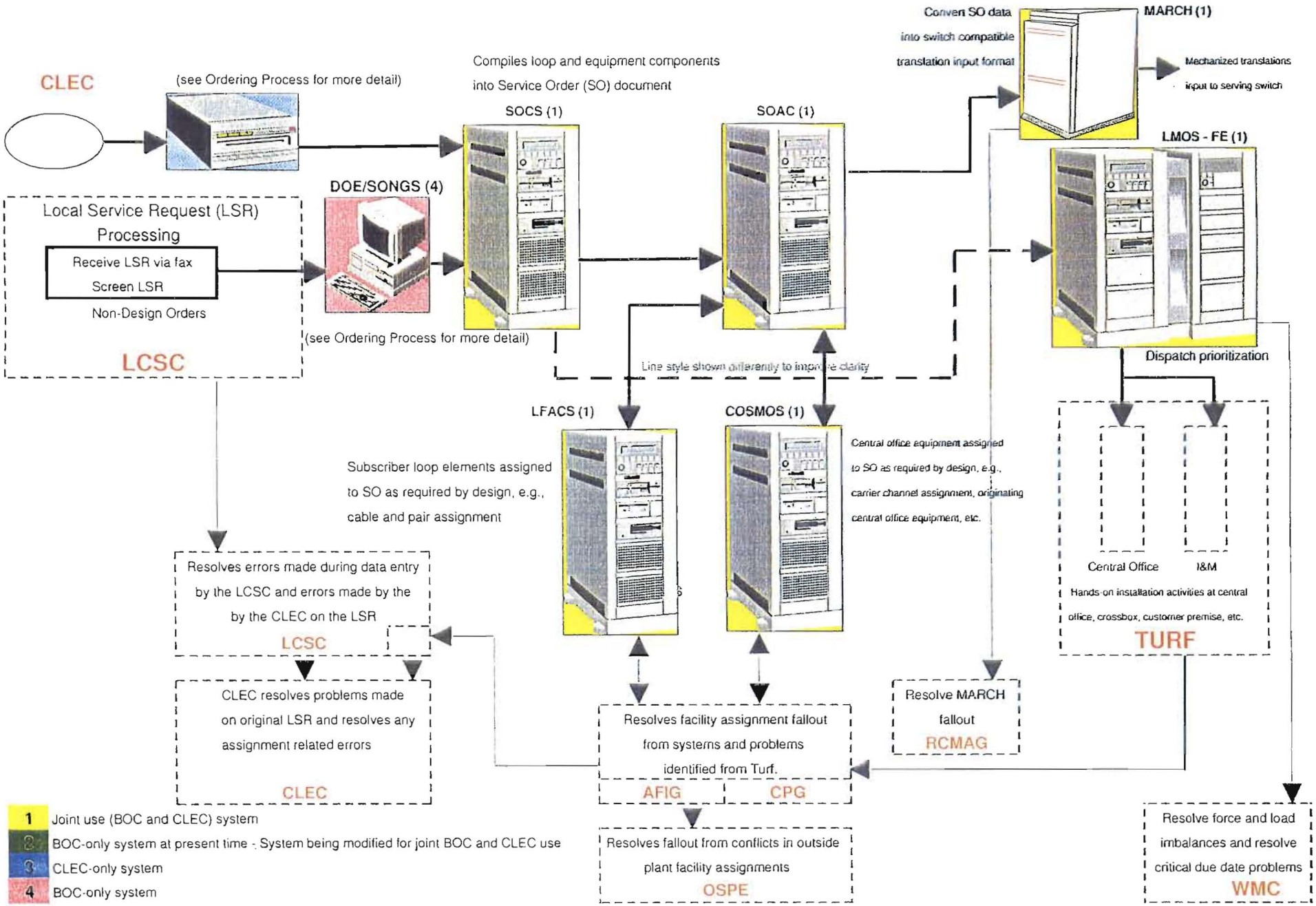
Table 3-1: Local Carrier Service Center (LCSC):

Type Manual Work Planned Vs. Fall-Out	*Operational System Involved*	*Cause of Manual Intervention*	*How Can the CLEC Control?*
Planned	DOE/SONGS	Election of CLEC to use Manual Ordering Interface. Requires LCSC Service Rep to manually enter order.	The CLEC can implement an electronic interface.
Fall-out	DOE/SONGS	Data or formatting errors on Local Service Requests received from CLEC. LCSC will contact CLEC to resolve the problems.	Control errors on CLEC LSRs. Validate data through Preordering interfaces.
Fall-out	DOE/SONGS	Input errors made by LCSC Service Representatives. The LCSC will correct the errors and re-release the request in the system.	The CLEC can implement an electronic interface.
Fall-out	LEO	Data or formatting errors on Local Service Requests received from CLEC. **LSR mechanically returned to CLEC for correction.**	Control errors on CLEC LSRs. Validate data through Preordering interfaces.
Fall-out	LEO/LESOG	Service requests for resale services or UNEs for which LEO/LESOG are not currently able to generate a service order record from the LSR/ASR. The LCSC will input the order into the appropriate system (either DOE or SONGS)	n/a
Fall-out	LEO or LESOG	System problems or conditions which prevent the system from completing its function. The LCSC will input the order into the appropriate system (either DOE, SONGS, or EXACT).	n/a
Fall-out	SOCS or SOAC	Input errors made by LCSC Service Reps. The LCSC will correct the errors and re-release the request in the system.	The CLEC can implement an electronic interface.

ORDERING FLOW
- MECHANIZED PROCESS FALLOUT -
Exhibit III - 7



NON-DESIGN PROVISIONING FLOW
- MECHANIZED PROCESS FALLOUT -
Exhibit III - 8



DESIGN PROVISIONING FLOW
- MECHANIZED PROCESS FALLOUT -
Exhibit III - 9

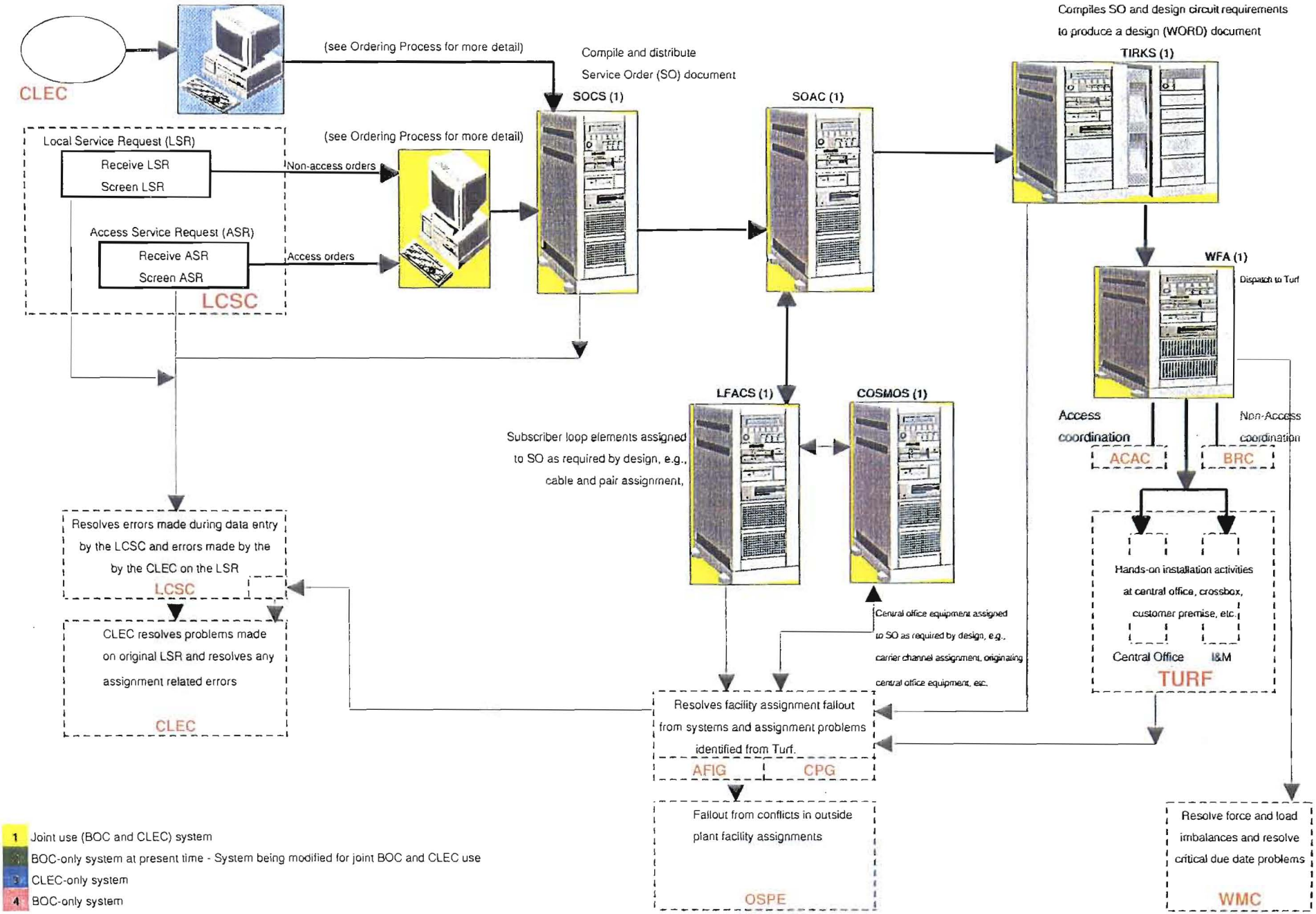


Table 3-2: Address & Facility Inventory Group (AFIG):

Type Manual Work Planned Vs. Fall-Out	*Operational System Involved*	*Cause of Manual Intervention*	*How Can the CLEC Control?*
Fall-out	LFACS	Address error or discrepancy prevents LFACS from locating the address in its database and making a loop assignment, resulting in a Request for Manual Assistance (RMA). AFIG will query the order back to the LCSC who must contact the CLEC and resolve the address discrepancy.	CLEC can validate the address data through Preordering interfaces.
Fall-out	LFACS	LFACS finds no local loop available to serve the local service request, even after attempting Line Station Transfers (LSTs). The order will fall-out to the AFIG who will attempt to work Line-Station Transfers (LSTs) to make a suitable facility available. If this is not possible, the AFIG will refer the problem to Outside Plant Engineering (OSPE) for a job or other appropriate action to resolve the problem. If facilities are not available, the order is placed in PF (Plant Facilities) jeopardy status.	The CLEC can use the scheduling capabilities of the Preordering process to help avoid missed due date commitments.
Fall-out	LFACS	Database error prevents the system from performing its functions. The order will fall-out to AFIG who will resolve the problem and move the order forward in the process. AFIG will refer persisting or recurring problems to the Information Technologies department for resolution.	n/a[1]
Fall-out	COSMOS	Lack of necessary tie pair or other frame cross-connect component. The order will fall-out to the AFIG who will manually select a workable cross-connect assignment. If this is not possible, AFIG will work with the central office work group, Capacity Management, etc. to take appropriate actions.	n/a[1]
Fall-out	COSMOS	Database error prevents the system from performing its functions. The order will fall-out to the AFIG who will work with the regional COSMOS database administration group to resolve the problem.	n/a[1]

1. Fallout for these causes will impact BellSouth retail COUs in the same way as the CLEC.

Table 3-3: Recent Change Memory Administration Group (RCMAG):

Type Manual Work Planned Vs. Fall-Out	*Operational System Involved*	*Cause of Manual Intervention*	*How Can the CLEC Control?*
Fall-out	MARCH	Incompatible features specified on the local service request which cannot be accepted by the switch. The order will fall-out in RCMAG who will query it back to the LCSC. The LCSC will contact the CLEC to resolve the problems and reissue the order.	CLEC can control their sales and LSR errors on the front-end of the process.
Fall-out	MARCH	MARCH cannot get access to the switching network element to deliver the necessary RC messages, or the switching network element rejects the transactions, or the switching network element never returns acceptance. RCMAG will refer access problems to the Information Technologies department for resolution. Hot, escalated orders will be manually input via manual-access switch I/O ports normally used for other functions.	n/a[1]
Fall-out	MARCH	Telephone number already in use on another customer service. The RCMAG will query the order back to the LCSC. The LCSC will contact the CLEC to resolve the problem and reissue the order.	The CLEC can validate and reserve telephone numbers through Preordering interfaces.
Fall-out	MARCH	Working switch port (Office Equipment, "OE") assigned to the service order. The RCMAG will query various corporate databases to determine the cause of the assignment error and resolve it. RCMAG will work with AFIG to correct the COSMOS database.	n/a[1]
Fall-out	MARCH	Database error or system problem prevents MARCH from performing its functions. RCMAG will refer system problems to the Information Technologies department for resolution. Hot, escalated orders will be manually input via manual-access switch I/O ports normally used for other functions.	n/a[1]

1. Fallout for these causes will impact BellSouth retail COUs in the same way as the CLEC.

Table 3-4: Circuit Provisioning Group (CPG):

Type Manual Work Planned Vs. Fall-Out	*Operational System Involved*	*Cause of Manual Intervention*	*How Can the CLEC Control?*
Fall-out	TIRKS/SOAC	LSR errors (e.g. inconsistent circuit points of interface or termination, unknown location identifications). The order will fall-out to CPG who will query the order back to the LCSC. The LCSC will contact the CLEC to resolve problems and reissue the order.	CLEC can control their sales and LSR errors on the front-end of the process.
Fall-out	TIRKS	Inconsistency between TIRKS records and the service order information on a working Circuit ID being changed by an LSR. The order will fall-out to CPG who will cross-check corporate databases to determine how to resolve the problem. If necessary, the CPG will work with field forces to verify wiring in the field in order to resolve database discrepancies.	CLEC can control their sales and LSR errors on the front-end of the process.
Fall-out	TIRKS	Database error or system problem prevents TIRKS from performing its functions. CPG will refer system problems to the Information Technologies department for resolution. Hot, escalated orders will be manually designed & assigned using information obtained by contacting Circuit Capacity Management and field work groups. The field forces are directed to work the order and report any changes in assignments to the CPG upon completion so that TIRKS can be updated with the correct information.	n/a[1]
Fall-out	TIRKS	Service request cannot be matched to a standard design model. The order will fall-out to a CPG Provisioning Specialist who will manually design the circuit(s). If expected volume of such designs warrants development of a new mechanized model or adjustment of an existing model, CPG will issue request to the regional support staff.	n/a[1]

Type Manual Work Planned Vs. Fall-Out	*Operational System Involved*	*Cause of Manual Intervention*	*How Can the CLEC Control?*
Fall-out	TIRKS	Required plug-in units for TIRKS design are not available in stock, and an alternate design must be issued to use available plug-ins. The order will fall-out in the CPG, and a Provisioning Specialist will either select a different alternative model design or manually design the circuit to use available plug-ins to meet the due date. If this cannot be accomplished, CPG will escalate to the Plug-In Control (PICS) regional group for expedited procurement of necessary plug-ins.	n/a[1]

1. Fallout for these causes will impact BellSouth retail COUs in the same way as the CLEC.

Table 3-5: Work Management Center (WMC):

Type Manual Work Planned Vs. Fall-Out	*Operational System Involved*	*Cause of Manual Intervention*	*How Can the CLEC Control?*
Fall-out	WFA	System cannot match work to be dispatched with an available technician. The WMC will review the available resources and the pending work to reassign work, arrange for movement of field resources, arrange for overtime, etc.	CLEC can monitor appointment data through preordering interfaces. CLEC can take actions to help level-load where work can be planned or flexibly scheduled.
Planned	LMOS	Load Control group reviews and adjusts dispatches to minimize travel and other lost time and to maximize overall efficiency & results.	CLEC can monitor appointment data through preordering interfaces. CLEC can take actions to help level-load where work can be planned or flexibly scheduled.
Fall-out	WFA	Critical date jeopardy or field work jeopardy must be resolved. The Control Office will escalate to the appropriate organizations in order to expedite corrective actions being taken to resolve jeopardy. If the jeopardy is a field work group problem, the WMC will work with field management to resolve.	n/a[1]
Fall-out	WFA or LMOS	Database error or system problem prevents system from performing its functions. WMC will refer system problems to the	n/a[1]

Type Manual Work Planned Vs. Fall-Out	*Operational System Involved*	*Cause of Manual Intervention*	*How Can the CLEC Control?*
		Information Technologies department for resolution. Orders will be manually dispatched until system problems are resolved.	

1. Fallout for these causes will impact BellSouth retail COUs in the same way as the CLEC.

Table 3-6: Field or Central Office Work Groups:

Type Manual Work Planned Vs. Fall-Out	*Operational System Involved*	*Cause of Manual Intervention*	*How Can the CLEC Control?*
Planned	WFA	Perform installation, wiring, repair, and manual testing dispatched activities.	n/a[1]
Planned	LMOS	Perform installation, wiring, repair, and manual testing dispatched activities.	n/a[1]

1. Fallout for these causes will impact BellSouth retail COUs in the same way as the CLEC.

Table 3-7: Control Office (BRC, UNEC, or ACAC):

Type Manual Work Planned Vs. Fall-Out	*Operational System Involved*	*Cause of Manual Intervention*	*How Can the CLEC Control?*
Planned	WFA	Perform installation and turn-up testing on designed local and access services.	n/a[1]
Planned	WFA, MARCH	Perform LNP cut-over coordination for transfers of subscribers to facility-based CLECs.	n/a[1]

1. Fallout for these causes will impact BellSouth retail COUs in the same way as the CLEC.

C. CLEC Interfaces

Issuance of Service Request

Order Issuance:

3-44 BellSouth will provide four interfaces by which the CLEC can pass Service Requests to BellSouth. These interfaces are shown on Exhibit III-1.

Electronic Data Interchange:

3-45 In accordance with previous regulatory orders, BellSouth has been preparing to deliver an electronic interface to support the LSR ordering process. The EDI interface is generally available as of August 31, 1997, to any CLEC who elects to implement this process. EDI involves functionality on the CLEC side of the interface with complementing functionality on a BellSouth server. There will be three options for interconnecting the CLEC EDI systems with BellSouth EDI systems:

i. The CLEC can establish dedicated point-to-point interconnection into the BellSouth EDI for reliable, high-speed dedicated access.
ii. The CLEC can use dial-up connections into BellSouth EDI.
iii. The CLEC can use a Value-Added Network (VAN) connection between his systems and BellSouth EDI.

3-46 EDI is being enhanced and implemented in a phased approach. The initial implementation, generally available August 31, will handle simple resale services and certain unbundled network elements (See Section III.D). For those Local Service Requests which are supported by EDI, use of this interface will provide the CLEC with batch process input of service requests to BellSouth operating systems in the ordering and provisioning flow as well as batch process receipt of both Firm Order Confirmations and Completion Notices.

3-47 Using EDI, the CLEC can input the LSR and pass it to BellSouth electronically. In response, the CLEC will receive either a Firm Order Confirmation (FOC) or a notification of edit-check/data-validation errors, returned electronically without manual intervention within BellSouth. EDI is designed to minimize the possibility of downstream fall-out and delays due to LSR data errors.

3-48 One major CLEC has begun using EDI to transmit LSRs to BellSouth. Four other CLECs are testing an EDI interace. Testing will consist of passing correctly formatted and data-filled LSRs through the interface as well as passing LSRs containing various errors to ensure that edit checks and data validation functions operate properly. Functional and volume/capacity testing was successfully completed earlier by BellSouth, and detailed test results are available upon request.

LENS Interface:

3-49 An electronic interface based upon TCP/IP protocols is also available to the CLEC community as of August 31, 1997. The Local Exchange Negotiation System (LENS) electronic interface will allow interactive access into BellSouth's provisioning systems and process. BellSouth offers three alternative ways for a CLEC to access LENS:

i. The CLEC can establish dedicated LAN-to-LAN interconnection into the BellSouth LENS for reliable, high-speed dedicated access.
ii. The CLEC can use dial-up connections into BellSouth LENS.
iii. The CLEC can choose to access BellSouth LENS via the Public Internet.

3-50 The LENS interface application will be enhanced in an ongoing phased-development approach, with each release passing exhaustive testing prior to entering "production". As of August 31, 1997, LENS supports LSRs for resale services and UNEs as reflected in Table III-8.

3-51 BellSouth intends for the LENS interface to provide small-to-medium sized CLECs an attractive, interactive access to BellSouth operating systems in the preordering flow. However, for the larger CLECs who wish to integrate this interface into their own customized presentation management software applications, BellSouth has published transaction specifications. These specifications provide for data labels which can be used by the CLEC presentation management application to communicate via transactions with LENS. Thus, LENS provides considerable flexibility through a number of interconnection options.

3-52 BellSouth has completed testing on the Phase I LENS interface. Testing included functional testing and capacity stress testing to verify that the interface could handle the planned volumes (see Section VI for forecast and capacity information). Details on final test results are available upon request. As of August 31, 1997, LENS is being used by twenty-four CLECs for preorder activity and order entry. seven additional CLECs have completed training on the use of LENS and established to necessary connectivity to begin using LENS. The interface has been for testing and use by CLECs since April; however, historical data is limited at the time this issue. Historical data regarding operational metrics will be provided upon request.

EXACT Interface:

3-53 An electronic interface which complies with OBF standards is available to the CLECs for placing Access Service Requests (ASRs). This interface, the EXchange Access Control & Tracking (EXACT), has been in service for quite some time with the InterLATA Carriers who use it to order switched and special access services. EXACT will also support the ordering of Local Interconnection ASRs, and several CLECs are using it for that purpose as of August 31, 1997

3-54 BellSouth offers three alternative ways for a CLEC to interface through EXACT:

- Network Data Mover (NDM) — NDM uses a direct, dedicated point-to-point interconnection via CONNECT:Direct® with the CLEC for batch file transfers.
- TELIS-PC — Uses personal computer software for accessing BellSouth EXACT via a dial-up connection.
- TELIS-UNIX — Uses UNIX software for accessing BellSouth EXACT via a dial-up connection.

3-55 Since these have been long-standing interface options for InterLATA Carrier customers, no additional testing was conducted before offering these capabilities to the CLEC community.

Manual Interface:

3-56 A manual interface is available for those CLECs who do not elect to implement one of the electronic interface alternatives, as well as to provide a contingency process in the event that such a backup becomes necessary. The CLEC can pass Local Service and Interconnection Requests to the BellSouth Local Carrier Service Center (LCSC) via facsimile, telephone, or a mail service. Service Representatives in the BellSouth LCSC will input the LSR information into front-end service order entry systems as covered in section III.A of this document.

Order Statusing:

3-57 LENS will provide the following status information automatically to the CLEC regarding LSR/ASR provisioning steps:

- List of LSRs in error status with error messages
- Order Acknowledgment
- Firm Order Confirmation
- Order Pending Assignment Status

- Order Pending Installation Status
- Order Completed Status
- Completion Notice

3-58 When the CLEC elects to use the manual interface, the LCSC will provide no further status reporting to the CLEC subsequent to Firm Order Confirmation (FOC). If the CLEC desires to know the status of an order, the CLEC will contact the LCSC who will query the BellSouth support systems to determine status and call downstream organizations if necessary to clarify status.

Order Completion:

3-59 A Completion Notice will be automatically provided to the CLEC for LSRs entered via EDI or LENS. The LCSC will not manually provide formal Completion Notices for orders taken manually. The BellSouth internal SOCS completions as described in the process flow description do not flow to the CLEC except via the EDI or LENS mechanized interfaces. No BellSouth work group will manually provide Completion Notice documentation to the CLEC. If the CLEC desires to know whether a manually transmitted order has been completed, the CLEC will contact the LCSC who will query the BellSouth operations systems to determine the status.

3-60 As was also discussed earlier in this document: In the case of designed services, the BellSouth Control Office (either the BRC, UNEC, or ACAC depending on the particular resale service or UNE) will coordinate final BellSouth testing and turn-up of the service with the CLEC. Therefore, for designed services, the CLEC will know the order has been completed through the normal Control Office coordination and turn-up functions. This process covers all designed service LSRs as well as Local Interconnection ASRs. The BellSouth control office will not manually furnish formal Completion Notice documentation, however, to the CLEC.

Conformance to Applicable Industry Standards

3-61 All three electronic interface options, EDI, LENS, and EXACT, will conform with Ordering and Billing Forum (OBF) standards. The EDI interface development was begun in April, 1996, following recommendations from OBF of the associated standards. Since OBF standards have not been finalized for the full range of resale services and unbundled network elements, BellSouth is taking steps to provide instructions and LSR formats which will provide the data fields necessary for the ordering and provisioning of certain services. Information and guidelines for all ordering forms

and inputs has been published by BellSouth and has been provided to those CLECs who have business contracts with BellSouth. BellSouth also provides input and proposals regarding such pending standards to the OBF.

3-62 BellSouth is committed to interfaces which conform to industry standards developed or sanctioned through the OBF. The BellSouth electronic interfaces employ no proprietary or non-standard data transmission protocols.

D. Resale Services and Unbundled Network Elements Ordered Through This Process:

3-63 The following table reflects the resale services and UNEs with the highest projected demand volumes in order to illustrate what types of services will be handled under these processes and interfaces as of August 31, 1997:

Table 3-8: Resale Svc. & UNE Interfaces:

		Is Resale Service or UNE Supported Through CLEC Interface Options?			
Product Name	*Simple/ Complex*	*Manual*	*EXACT*	*EDI*	*LENS*
Centrex/ESSX	C	Y	N	N	N
Hunting	C	Y	N	Y	N
DID	C	Y	N	Y	N
Megalink	C	Y	N	N	N
Flat Rate PBX TRUNKS/NARS	C	Y	N	Y	N
Synchronet	C	Y	N	Y	N
E-911/SALI	C	Y	N	N	N
Basic Rate ISDN	C	Y	N	Y①	N
Primary Rate ISDN	C	Y	N	N	N
Off Premises Extension (OPX)	C	Y	N	N	N
Megalink ISDN	C	Y	N	N	N
FrameRelay and CDS	C	Y	N	N	N
SmartRing DS1	C	Y	N	N	N
SmartRing	C	Y	N	N	N
Flexserv	C	Y	N	N	N
Msg/Meas Rate PBX TRUNKS/NARS	C	Y	N	Y	N
Multiserv/Multiserv Plus	C	Y	N	N	N
Lightgate	C	Y	N	N	N
Native Mode LAN Interconnection	C	Y	N	N	N
Accupulse	C	Y	N	N	N
Visual Director	S	Y	N	Y	Y
Flat Rate Residence	S	Y	N	Y	Y
Custom Calling-Speed Calling 8 & 30	S	Y	N	Y	Y
Custom Calling- 3 Way Calling	S	Y	N	Y	Y

Product Name	Simple/ Complex	Is Resale Service or UNE Supported Through CLEC Interface Options? Manual	EXACT	EDI	LENS
Custom Calling-Call Forwarding Variable	S	Y	N	Y	Y
Custom Calling-Remote Access to CF	S	Y	N	Y	Y
RingMaster	S	Y	N	Y	Y
Message Telephone Svc (MTS)	S	Y	N	Y	Y
Touchstar-Call Tracing	S	Y	N	Y	Y
Touchstar-Call Block	S	Y	N	Y	Y
Touchstar-Call Selector	S	Y	N	Y	Y
Touchstar-Call Return	S	Y	N	Y	Y
Touchstar-Repeat Dialing	S	Y	N	Y	Y
Touchstar-Preferred Call Forwarding	S	Y	N	Y	Y
Measured Rate Residential	S	Y	N	Y	Y
Touchtone	S	Y	N	Y	Y
Optional Calling Plan (OCP)	S/C	Y	N	Y	Y
MemoryCall	S	Y	N	Y	Y
MemoryCall Answering Service	S	Y	N	Y	Y
Caller ID	S	Y	N	Y	Y
Call Waiting	S	Y	N	Y	Y
Call Waiting-Deluxe	S	Y	N	Y	Y
Integrated Pkg-Area Plus, Area Plus w/ Complete Choice & Complete Choice	S	Y	N	Y	Y
Independent Payphone Provider	S	Y	N	Y	Y
Enhanced Caller ID	S	Y	N	Y	Y
Flat Rate/Basic Local Exchange	S	Y	N	Y	Y
Measured Rate Bus	S	Y	N	Y	Y
Georgia Community Calling	S	Y	N	Y	Y
Remote Call Forwarding (RCF)	S	Y	N	Y	Y
Area Plus	S	Y	N	Y	Y
800 Database Access UNE	C	Y	Y	N	N
Line Information Database Access UNE	C	Y	N	N	N
2-wire Analog Voice Grade Loop UNE	S	Y	N	Y	Y②
4-wire Analog Voice Grade Loop UNE	S	Y	N	N	N
4-wire DS-1 & PRI Digital Loop UNE	C	Y	N	N	N
2-wire ISDN Digital Loop UNE	C	Y	N	N	N
ADSL - 2-wire Asymmetrical Digital Subscriber Line Loop UNE	C	Y	N	N	N
HDSL - 2-wire & 4-wire High-Bit-Rate Digital Subscriber Line Loop UNE	C	Y	N	N	N
Loop Channelization System UNE	C	Y	N	N	N
CO Channel Interfaces 2-wire Voice UNE	C	Y	N	N	N
CO Channel Interfaces 4-wire Voice UNE	C	Y	N	N	N
Loop Feeder UNE	C	Y	N	N	N
Loop Concentration UNE	C	Y	N	N	N
Operator Call Processing - OPCH, FACH, BLV, EI, ECT UNE	C	Y	N	N	N
Operator Call Processing - Facility-Based OPCH, FACH, ECT UNE	C	Y	N	N	N

Product Name	Simple/ Complex	Is Resale Service or UNE Supported Through CLEC Interface Options? Manual	EXACT	EDI	LENS
Operator Call Processing - Facility-Based BLV, EI UNE	C	Y	N	N	N
Directory Assistance Access Service (DAAS) UNE	C	Y	N	N	N
Directory Assistance Call Completion (DACC) UNE	C	Y	N	N	N
Directory Assistance Number Services Intercept (DANSI) UNE	C	Y	N	N	N
Directory Assistance Transport UNE	C	Y	N	N	N
Directory Assistance Database Service (DADS) UNE	C	Y	N	N	N
Directory Access to DA Svc (DADAS) UNE	C	Y	N	N	N
NID to NID Cross-Connect 2-wire UNE	S	Y	N	N	N
NID to NID Cross-Connect 4-wire UNE	S	Y	N	N	N
NID Spare Capacity UNE	S	Y	N	N	N
Open AIN (OAIN) Tool Kit UNE	C	Y	N	N	N
Open AIN (OAIN) Service Management System Access UNE	C	Y	N	N	N
CCS-7 A-Link Signaling UNE	C	Y	N	N	N
CCS-7 D-Link Signaling UNE	C	Y	N	N	N
STP UNE	C	Y	N	N	N
Common/Dedicated Interoffice Transport UNE	C	Y	N	N	N
Interoffice Transport Analog Line Grade UNE	C	Y	N	N	N
Interoffice Transport DS-0 UNE	C	Y	N	N	N
Interoffice Transport DS-1 UNE	C	Y	N	N	N
Interoffice Transport DS-3 UNE	C	Y	N	N	N
Optical SONET OC-n Interoffice Transport UNE	C	Y	N	N	N
Digital Cross-Connect System DCS 1/0 UNE	C	Y	N	N	N
Digital Cross-Connect System DCS 3/1 UNE	C	Y	N	N	N
Digital Cross-Connect System DCS 3/0 UNE	C	Y	N	N	N
Customized Call Routing (Selective Routing - LCC) UNE	C	Y	N	N	N
Tandem Switching UNE	C	Y	N	N	N
2-wire Analog Line Switching Port UNE	S	Y	N	Y	Y②
Hunting UNE	C	Y	N	N	N
4-wire Analog Line Switching Port (2-wire Port with 4-wire Termination) UNE	S	Y	N	N	N
2-wire Analog DID Trunk Switching Port UNE	C	Y	N	N	N
2-wire ISDN Digital Line Side Port UNE	C	Y	N	N	N
4-wire ISDN DS-1 Digital Trunk Port UNE	C	Y	N	N	N
Switching Functionality UNE	C	Y	N	N	N
Unbundled Local Usage (entire local calling area) UNE	C	Y	N	N	N
Preordering - Unbundled Access to OSS	C	Y	N	N	N
Ordering/Provisioning - Unbundled Access to OSS (EDI, LEO, LESOG, LENS)	C	Y	N	N	N

Product Name	Simple/ Complex	Is Resale Service or UNE Supported Through CLEC Interface Options? Manual	EXACT	EDI	LENS
Maintenance/Repair (Service Assurance) Unbundled Access to OSS (TAFI)	C	Y	N	N	N
1-way Trunking Interconnection	C	Y	Y	N	N
2-way Trunking Interconnection	C	Y	Y	N	N
Multiple Tandem Interconnection	C	Y	Y	N	N
Switched Local Channel Interconnection (SLCI) Analog Grade	C	Y	N	N	N
SLCI 2-wire	C	Y	N	N	N
SLCI 4-wire	C	Y	N	N	N
SLCI DS-1	C	Y	N	N	N
SLCI DS-3	C	Y	N	N	N
Dry Fiber UNE	C	Y	N	N	N
Number Portability RCF UNE	S	Y	N	Y	Y②
Number Portability DID UNE	S	Y	N	N	N
Loop with Interoffice Transport UNE Combination	C	Y	N	N	N
Analog port-loop UNE combination/Digital port-loop UNE combination	S	Y	N	N	N
Analog loop with iLNP-RCF UNE Combination	S	Y	N	Y	Y
Loop Cross-Connect with Unbundled Interoffice Transport	C	Y	N	N	N

NOTES:

1. Basic Rate ISDN can be ordered via EDI for DMS100 and 5ESS central offices only. Other types of central offices will require manual order entry.
2. These products can be ordered via LENS using Remarks.

3-64 The resale services and UNEs listed in Table 3-8 above are those for which BellSouth has implemented M&Ps and systems support to be operationally ready as of August 31, 1997. The electronic interfaces will be enhanced to support all offerings on a phased development schedule. All offerings can be ordered through the manual interface as of August 31, including any desired offerings not listed. BellSouth will be ready to accept any bona fide CLEC service request via the manual interface and will provide special handling as necessary.

E. Cut-Over Coordination:

3-65 Service provisioning coordination has always been an integral part of designed services, traditionally called "special services". For designed services, coordination is a function of the control office. This will, generally, remain true with the introduction of CLEC resale and UNE provisioning. Many of the UNEs and UNE-combinations will, indeed, be handled by BellSouth as designed services. In some cases, this will always be true due to the nature or complexity of the circuits or services involved. In certain cases, however, UNEs and UNE-combinations must currently be

handled as designed services due to OS design constraints in BellSouth's legacy support systems. As OSs are enhanced or replaced to support improved processes which will better serve a "wholesale/retail" marketplace for BellSouth, UNEs and UNE-combinations will migrate to the same process in which their counterpart retail services are handled. This will cause some UNEs and UNE-combinations to transition over time into the non-designed flow.

3-66 Whether designed or non-designed, new interim Local Number Portability (iLNP) cut-over coordination requirements have been imposed either through contractual negotiations between BellSouth and individual CLECs, or in some instances through regulatory order. Where a subscriber is transferred from BellSouth to a facility-based CLEC and desires to retain his current telephone number, this new cut-over coordination becomes necessary. Different contracts and different regulatory edicts have imposed various constraints on the amount of time that a subscriber being transferred with or without iLNP can be out-of-service or can experience degraded service[2].

2 An *example* of degraded service would be where a subscriber has been transferred to the CLEC facilities, but the LNP has not yet been activated. Thus, the subscriber has dial tone, outgoing call capabilities, vertical features (from the CLEC switch), etc. But callers who dial his published directory number cannot reach the subscriber until the LNP is activated.

3-67 LSRs which transfer subscribers from BellSouth to a facility-based CLEC currently involve multiple cross-referenced (CROd) service orders. In order to ensure that the short allowable cut-over interruption limit is met, special cut-over coordination is currently necessary. All of the associated service order functions must be synchronized to meet time constraints. A coordination point or control office must currently handle this synchronization of activities manually. The UNE Center or Project Management Group presently performs this function for UNE services as well as iLNP. The group responsibility is determined by the number of lines associated with its CLEC order.. The decision where to perform iLNP cut-over coordination over the longer term will be influenced by OS enhancement schedules, business strategies and decisions, and changing contractual & regulatory requirements.

3-68 As of August 31, 1997, and for the foreseeable future, BellSouth will handle iLNP cut-over coordination in the Unbundled Network Element Center (UNEC). The UNEC is a new specialty center developed to perform provisioning and maintenance functions for CLECs. The UNEC will be involved with the CLECs on local service provisioning and trouble reports (as covered in Section IV

3-69 In order to provide consistent, specialized services for CLECs, a new work group is being formed in the ACAC. This new specialty center is currently called the Unbundled Network Element Center, or UNEC. This center is predominantly staffed by top grade technicians and will provide the following primary functions:

- iLNP cut-over coordination

- CLEC designed services Control Office functions
- CLEC non-designed UNE and UNE-combination local services repair

3-70 Normally, the UNEC handles cut-over coordination as follows. On the day prior to the due date for a transfer of subscriber service to a facility-based CLEC with iLNP, the UNEC will ensure that they have a paper copy of all service orders associated with the transfer of service. The UNEC will contact the CO to ensure that the same CO technician has been loaded all CO work associated with all the orders. The UNEC will ensure that the CO has all of the necessary information and documentation on hand. The UNEC will inform the technician of a conference bridge number which will be used to coordinate the cut-over activities on the due date. The UNEC will instruct the CO technician what time-of-day to call into the specified conference bridge.

3-71 If the transfer requires a visit to the customer premise or to any remote loop facility work site by an outside technician, the UNEC will contact the WMC on the day prior to the due date. The UNEC will inform the WMC of the scheduled cut-over time. The UNEC will confirm how many outside technicians that the WMC will dispatch to perform the field work. The UNEC will arrange for the WMC to instruct the outside technician(s) to call into the conference bridge number at the scheduled time.

3-72 At the scheduled cut-over time, the UNEC will ensure that expected field technicians, as discussed in Paragraphs 3-70 & 3-71 above, have joined the conference bridge. The UNEC will ensure that the appropriate and pre-arranged CLEC representatives have joined the conference bridge. The UNEC will orchestrate the activities of the BellSouth field technicians to effect the transfer. The UNEC will, using MARCH access, release the BellSouth switch recent changes to effect the iLNP using Remote Call Forwarding or the UNEC will coordinate with the Recent Change Memory Administration Group (RCMAG) for recent change release.

3-73 As the cut-over work is accomplished, the UNEC coordinator logs the start time and end time to document performance. The UNEC coordinator concludes the log and releases the conference bridge when the service has been accepted by the CLEC representative.

3-74 This coordination process and methods are subject to change as the requirements, systems, etc. evolve. As stated earlier, the above text describes BellSouth's typical iLNP cut-over coordination scenario as of August 31, 1997.

F. Expedites and Escalations:

Expedites

3-75 The CLEC will have access to the current interval and due date commitment information in the DOE Support APplication (DSAP) system through the Preordering process as discussed in Section II. If a CLEC using EDI is not satisfied with the due date offered by DSAP, the CLEC can place their desired due date on the local service request and request that the order is to be expedited. A CLEC using LENS can mark the LSR for expedited handling.

3-76 The LCSC will give expedited LSRs special handling. The LCSC will contact downstream organizations, typically the UNEC (in the ACAC) if the service is a designed service and the Work Management Center (WMC) if the service is non-designed. The LCSC will attempt to negotiate an expedited due date. The LCSC will provide a Firm Order Confirmation to the CLEC with the best negotiated date they have been able to obtain. This is fundamentally the same way that an expedite request from any customer would be handled by BellSouth.

Escalations

3-77 If the CLEC is displeased with the due date commitment on a Firm Order Confirmation (FOC), they will escalate to the LCSC by phone. If the CLEC is displeased with the progress on a non-designed local service request, they will escalate to the LCSC. If the CLEC is displeased with the progress on a designed LSR or with a due date jeopardy or miss, they will escalate to the UNEC. If the CLEC is displeased with the progress on a local Interconnection ASR or with a due date jeopardy or miss, they will escalate to the UNEC. The LCSC or UNEC (as the case may be) will escalate internally to BellSouth — up the lines of management in the function(s) and organization(s) in which the problem exists until the escalation is resolved. The LCSC will provide duty-manager coverage on a twenty-four hours a day, seven days a week, basis (24x7) to receive and handle CLEC escalations. The UNEC operates on a 24x7 basis. This is fundamentally the same way that any customer escalation would be handled by BellSouth.

Section IV



Service Assurance

(Repair)

Process

IV. Service Assurance (Repair) Process:

A. Description of Process Flow

Non-Designed Services

4-01 This section will describe the service assurance flow depicted on Exhibit IV-1. The reader should refer to that process flow diagram while reading the following:

Trouble Reporting from CLEC to BellSouth:

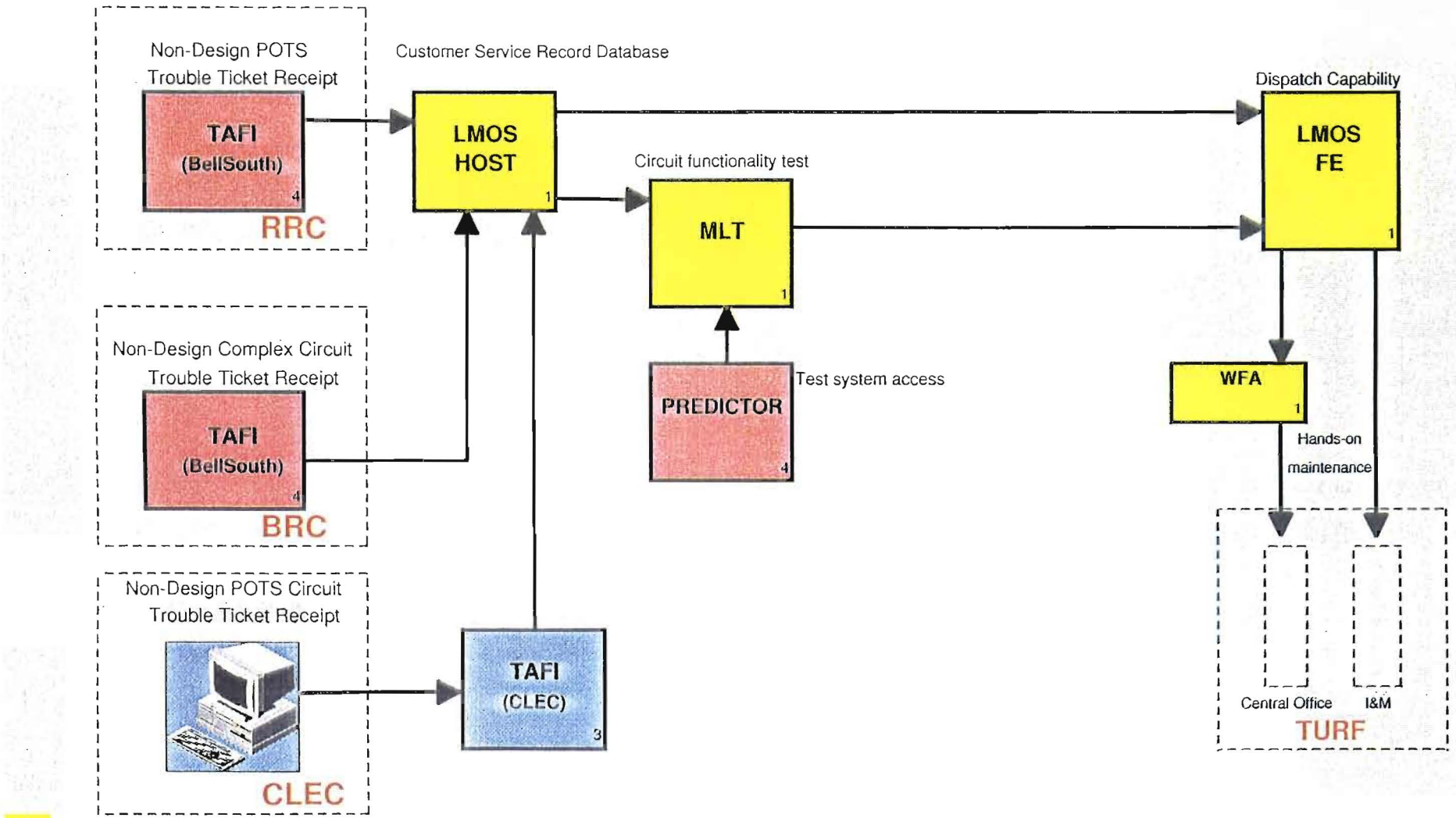
4-02 As of August 31, 1997, the CLEC community can select from two options to interface with BellSouth in the non-designed trouble reporting and maintenance process:

CLEC Trouble Analysis Facilitation Interface (TAFI):

4-03 BellSouth offers an electronic trouble processing interface for non-designed resale services and select UNEs using a CLEC version of the Trouble Analysis Facilitation Interface (TAFI). This CLEC TAFI system is accessible via LAN-to-LAN or dial-up basis which allows the CLEC user to mechanically process his/her customer trouble reports in essentially the same manner as BST users process their customer trouble reports. TAFI is a man-machine interface that provides it's users with an interactive dialogue, coupled with automated data retrieval from appropriate legacy systems, in order to correctly process a repair request (implement the repair activity or route the report to the correct entity for manual intervention and subsequent repair).

4-04 The CLEC version of TAFI has the same interface capabilities with BellSouth corporate databases and test systems as does the version of TAFI used by the BellSouth retail customer operating units. The CLEC TAFI system differs from the BellSouth version of TAFI in two ways: (1) a security layer uniquely limits the CLEC user to only accessing records (and processing trouble reports) for his customer base, and (2) the CLEC TAFI system properly handles both residence and business trouble reports in the same application.

MECHANIZED NON-DESIGN MAINTENANCE FLOW
- ORGANIZATIONS / CENTERS -
Exhibit IV - 1



4-05 Any system accessing BellSouth's legacy systems must provide robust security features to ensure the user has access to only to information they are authorized to access. The CLEC TAFI system knows (by the user's profile) which CLEC a given user belongs to and validates that the telephone number entered belongs to that CLEC before any report processing takes place. Since BST TAFI users need to access all customer records (so they can process CLEC reports called in by the CLEC as well as BST customer reports), this security layer in TAFI is bypassed for BST users.

4-06 However, to reiterate, the CLEC TAFI interface will otherwise provide identical functionality with the BellSouth internal TAFI support system. To provide the special security and compartmentalization features and to facilitate system administration, separate TAFI processors are provided for the CLEC TAFI interface.

TAFI Function:

4-07 When a trouble report is entered into TAFI by the CLEC, TAFI will take a number of actions as appropriate based on the nature of the trouble condition reported by the customer. For example, if the problem suggests a trouble with the line, TAFI will automatically initiate a real time request to the Mechanized Loop Test (MLT) system to test the line. The results of this test are then analyzed by TAFI's internal Artificial Intelligence (AI) engine and a recommendation how to handle the situation is presented to the user. On the other hand, if the customer is reporting a feature problem, TAFI will automatically verify that the given feature is on the customer's record by looking at the CRIS CSR. If the customer is paying for the feature, then TAFI issues a request to Predictor to verify that the translations for that feature is correctly implemented in the central office (C.O.). If the translations are not correct in the C.O., TAFI automatically issues a request to MARCH to correct these translations. (Note: MARCH is a product name and not an acronym.) TAFI will also check LMOS data to determine whether a known trouble condition might be affecting the service being reported by the customer (e.g., cable cut, facility outage, switch outage, etc.)

4-08 All of the testing and verification functions possible on the non-designed resale service or UNE being reported are performed mechanically, as described above, usually while the reporting party is still on-line. Depending upon the type of service being reported and the type and mix of features involved, TAFI presents appropriate and necessary questions on the terminal screen for the trouble receipt agent to ask the caller. The answers to these questions are important to clarify the precise nature of the problem and then to isolate the most likely cause(s).

4-09 Once TAFI has collected the answers to the questions and the results of the automated tests and verifications, TAFI subjects this data to its analyzer logic

subsystem. In many cases, TAFI can mechanically correct the problem. For example, if the reported problem is caused by a switch port feature which is missing in the switching system translations, TAFI can issue a transaction to MARCH to input the necessary Recent Change messages and activate the missing feature.

4-10 In many cases, TAFI will determine that there is no technical problem — that the problem may be due to customer confusion or perception. This can induce the carrier agent to train the customer on the use of the service or to advise the customer on appropriate actions. Or the problem may likely be related to customer-owned equipment, and the TAFI results may help the carrier agent discuss such possibilities with the reporting customer.

4-11 In BellSouth's experience, roughly 85% of reported troubles on currently-provided non-designed services can either be corrected mechanically or handled by the trouble receipt center with the reporting customer without the necessity of dispatching the trouble to downstream organizations. In the remaining instances, TAFI will frequently be able to identify the most likely BellSouth work group which should further analyze, investigate, and resolve the trouble report. TAFI will, in such cases, place the appropriate routing code on a trouble ticket and mechanically deliver that ticket to LMOS.

4-12 Where the trouble report must be dispatched for further actions by downstream BellSouth centers or field work groups, TAFI will advise the carrier agent of appropriate commitment information which should be used in making a commitment to the customer.

4-13 In the relatively few instances where TAFI cannot determine an appropriate dispatch action, the report will "fall-out" to a specialized work group. If the report is on a CLEC resale service, the report will fallout to the BellSouth RRC or BRC Maintenance Administration work group as appropriate. If the report is on a CLEC UNE-based or UNE-combination service, the report will fallout to the BellSouth UNEC Electronic Technician work group. Employees in these specialized work groups are experienced and trained in the analysis of more difficult problems. They will take further actions to analyze, investigate, test, etc. — whatever they deem appropriate to resolve the trouble report. They will make appropriate commitments to the CLEC on CLEC-reported troubles.

Manual Interface:

4-14 The CLEC can report troubles on non-designed resale services for residence accounts to the BellSouth Residence Repair Center (RRC) by phone. The CLEC can report troubles on non-designed resale services for business accounts to the BellSouth Business Repair Center (BRC) by phone. The CLEC can report troubles on non-designed

UNEs or UNE combinations to the BellSouth UNEC by phone. In order to ensure getting all pertinent information and questions answered regarding the nature of the trouble being reported, it is important that the appropriate BellSouth representative be able to converse with the CLEC representative who is reporting the trouble. For this reason, reports using facsimile or other non-interactive methods is not applicable.

4-15 CLEC trouble reports will be received and input into the Trouble Analysis Facilitation Interface (TAFI) by the BellSouth trouble receipt center personnel. For those CLECs electing to use a manual interface with BellSouth, this TAFI system will be the same operating system hardware and software that supports the BellSouth retail customer operating units in handling trouble reports from BellSouth retail customers.

4-16 As of August 31, 1997, twelve CLECs are actively using the electronic TAFI interface and five others have established connectivity and received training. Feedback from these CLECs has been good, and no major problems have been noted to date.

4-17 Trouble reports will be accepted by BellSouth via phone in the same way reports are taken from BellSouth retail customers. Considering that UNEs can be combined with CLEC elements to offer services unique to a CLEC, and considering that the operation of service elements and features can produce various results as they interact in different combinations, good dialogue and a thorough understanding of the reported condition by the BellSouth trouble receipt center is essential. The questions and information which must be collected from the reporting party will depend on the nature, complexity, and application of the overall service.

4-18 BellSouth has published a "Reseller Repair Contact Handling Guide" which details pertinent information needed to report troubles on resold and UNE services. This guide also covers trouble isolation procedures to be used by the CLEC with their end user in order to identify on the "front end", i.e. during the initial customer contact, any customer premise equipment (CPE) or customer education problems.

Complex Services:

4-19 Trouble reports for *complex* resale services or *complex* UNEs will require extra handling outside the trouble report pipeline. Complex trouble reports are those which:

- involve the Public Packet Switch Network (i.e. PulseLink®)
- involve broadband offerings (e.g. Asynchronous Transfer Mode data networking)

- involve corrective actions in Advance Intelligent Network (AIN) nodes related to networked services and features (e.g. BellSouth Flexible Call Forwarding®)

4-20 If the trouble report is for complex non-designed resale services, the report will be taken by the BellSouth BRC via manual telephone interface. If the trouble report is for complex non-designed UNEs or UNE combinations, the report will be taken by the BellSouth UNEC in the ACAC. These receipt centers will "hand off" these reports as appropriate to specialized centers which have been established for these particular network architectures. This is the same flow that a BellSouth trouble report would follow when complex functions are involved. The specialized work groups will work with the BRC or UNEC and CLEC to resolve the problem; however, the BRC or UNEC will serve as a single point-of-contact and escalation to the CLEC on any complex trouble reports.

Testing Flow:

4-21 As mentioned in previous paragraphs, TAFI will access the Mechanized Loop Testing (MLT) system for testing non-designed resale and UNE services. MLT is the only actual test system available to TAFI for such services. MLT accesses a line-side switch port through the switching system and runs tests on the associated loop facility. Since MLT test capability is only available via a switching system line port, MLT can be used only on resale services and UNE service configurations which include a switch line-side port. TAFI has a direct electronic interface with MLT and can initiate MLT tests. The results of such tests are returned by MLT to TAFI over the same interface.

4-22 If the trouble report "falls-out" from TAFI for further manual analysis by the RRC, BRC, or UNEC, those centers may decide to retest using MLT or to manually verify certain switching system feature information. In such cases the center personnel will access MLT or a switch recent change I/O (input/output) port via the Predictor system. Predictor has three primary functions. One of these purposes is to provide the BRC and RRC with this manual access to MLT and central office switching systems I/O ports for testing and verification purposes. Using the switch I/O port, the RRC or BRC personnel can diagnose a switch port (i.e. office equipment "OE") or verify the features and attributes assigned to the switch port in the actual switching system translations.

4-23 Secondly, the BRC uses Predictor to obtain information needed regarding loops assigned to ISDN (Integrated Service Digital Network) service. Loops must be capable of supporting ISDN, and the capabilities of the loop can be verified in the Predictor® database by BRC personnel when necessary.

The third primary function of Predictor is not directly related to the trouble report flow, and is mentioned here only for the sake of completeness. Predictor collects information from mechanized testing routines and analysis routines that are automatically run "in the background". Principal of these is the Automated Line Insulation Test (ALIT), which is a set of tests performed by BellSouth switching systems on loops connected to switch ports. This is a proactive routine test program which can detect degradation of copper loop facilities, allowing BellSouth to plan maintenance activities that will prevent actual customer trouble reports. Predictor will correlate ALIT test results with other data, including, for instance, certain trouble report historical records. Using pattern analysis logic, Predictor will identify cable facilities which should be scheduled for cable repair or facility rehabilitation activities.

Report Routing and Distribution Within BellSouth:

4-24 When TAFI determines that a trouble report must be dispatched to a downstream center or field work group, TAFI will place a routing code on the trouble ticket which is passed to the Line Maintenance Operating System (LMOS). Each downstream work group which handles trouble reports has a unique routing code(s). The following are examples of routing codes. These are used to direct customer trouble reports to specific NISC and CO work groups:

- PDI-450 Central Office (CO)
- PDI-451 Recent Change Memory Administration Group (RCMAG)
- PDI-452 Complex Translations Group (CTG)
- PDI-453 Trunk & Carrier Group (TCG)

4-25 If the trouble report is to be dispatched out to the appropriate Installation & Maintenance (I&M) work group, TAFI will apply the correct routing code on the LMOS ticket (e.g., PDI, PDB, PD6, etc.). During the dispatch process, an I&M employee's personal code will be added in LMOS to route the ticket to a particular employee through the employee dispatching process.

4-26 For the CO field work groups, LMOS will pass PDO-450 routed tickets to the Work Force Administration — Dispatch In (WFA-DI) system module via an electronic interface. WFA-DI will load the ticket to the next available central office technician.

4-27 For the center functions (e.g. PDI-451-453 above), LMOS will route the ticket to a work list for that work group. Employees will be presented tickets from that work list in priority order. Tickets are generally prioritized based on:

- Class of Service: Trouble reports from business customers receive higher priority than reports from residence customers.
- Commitment: Open trouble reports rise in priority the closer they approach the commitment time. Should the commitment time be

passed and the report remains open, the report stays at the highest priority level.

4-28 No distinction is made in priority between tickets related to CLEC customers versus tickets related to BellSouth retail customers.

4-29 Thus, LMOS serves to route non-designed trouble reports to the appropriate downstream work group and is used in the employee dispatching process.

Trouble Report Closure:

4-30 Front-end closures of non-complex reports received via the manual process will be handled by the RRC/BRC/UNEC representative with the CLEC representative. In other words, when the trouble can be fixed automatically by TAFI as discussed earlier, when the problem is corrected by RRC/BRC personnel using tools available to them, or when the report is determined by the RRC/BRC/UNEC personnel to be outside BellSouth facilities (e.g. in the CLEC facilities, Customer Premise Equipment, or customer wiring — or is attributable to customer confusion, etc.), the RRC/BRC/UNEC representative will close the ticket with the CLEC agent over the telephone.

4-31 When a CLEC uses the electronic TAFI interface, TAFI front-end closures will be available to the CLEC "on screen". "Fall-out" to the RRC/BRC/UNEC will be closed with the CLEC by personnel in those centers. Should the CLEC be dissatisfied with the TAFI recommendation/closure, the CLEC may elect to refer a trouble to the BellSouth RRC/BRC/UNEC by phone. Closures for such troubles will be handled by BellSouth identically to closures for all reports received via the manual interface.

4-32 Whenever the trouble report is dispatched to a downstream BellSouth organization, the "last" technician — in whatever work group ultimately resolves the problem — is responsible for contacting the party designated on the report and closing the report to that party. In the case of CLEC-initiated trouble reports, that contact number will be the one provided by the CLEC for such purposes. As is the policy for trouble reports from BellSouth retail customers, the downstream field or center technician will make one contact attempt to close the report. If the technician cannot get an answer, or is delayed for lengthy periods in queue, the report will be closed in the appropriate system (LMOS or WFA), and the technician will go on to his/her next dispatched task. In such instances, the CLEC must contact the RRC, BRC, or UNEC as appropriate to determine the status of the report. Or, if the CLEC has elected to use the electronic TAFI interface, the CLEC can determine the status via his TAFI interface.

4-33 When the report is closed in WFA by the CO, the Work Management Center will

periodically receive a report showing all closures which have been entered by the CO. The WMC will manually close the ticket in LMOS and enter all appropriate closure information using the information provided by the CO forces in WFA-DI.

4-34 The RRC and BRC will use LMOS status information when responding to CLEC queries and escalations.

Designed Services

4-35 This section will describe the trouble report flow for local trouble reports on designed resale services and UNEs as depicted on Exhibits IV-2. The reader should refer to that process flow diagram while reading the following:

Trouble Reporting from CLEC to BellSouth:

4-36 As of August 31, 1997, the CLEC community can select from two options to interface with BellSouth in the designed trouble reporting and maintenance process:

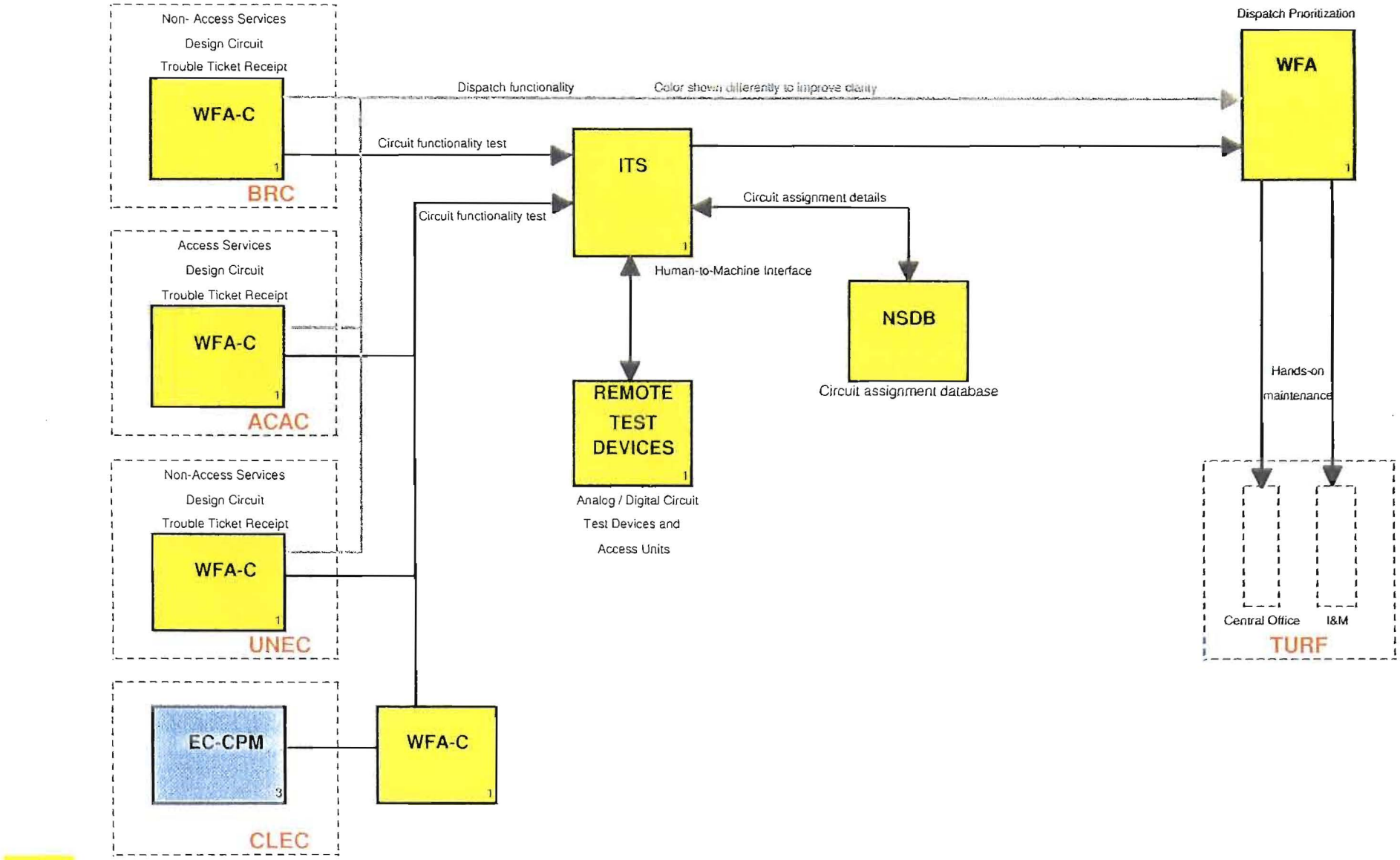
CLEC Electronic Interface with WFA:

4-37 BellSouth has implemented the capability to pass a ticket electronically into the Work Force Administration — Control system module through the Exchange Carrier — Common Presentation Manager (EC-CPM) for those CLECs who elect to implement this alternative. This is basically the same capability that BellSouth has offered to the InterLATA Carriers (ICs) for some time. The electronic interface will allow the CLEC to input trouble report information for designed services using input forms presented to the user by EC-CPM. After successful entry of the trouble report, EC-CPM will pass the report record into WFA-C using a file/records format and file transfer protocol.

4-38 The interface specifications are available to any CLEC who wishes to develop and use the WFA-C electronic interface capability, just as has been true for ICs for quite some time. As of August 31, 1997, no CLECs have opted to use this capability.

4-39 Once the ticket is in WFA-C, it would be handled just as if the trouble had been input by a BRC or ACAC employee.

MECHANIZED DESIGN MAINTENANCE FLOW
- ORGANIZATIONS and CENTERS -
Exhibit IV - 2



Manual Interface:

4-40 The CLEC can report troubles on designed resale services to the BellSouth Business Repair Center (BRC) by phone. The CLEC will report troubles on designed UNEs or UNE combinations to the BellSouth UNE Center (UNEC) by phone. The CLEC will also report designed Local Interconnection troubles (local trunked access to BellSouth switches) to the BellSouth UNEC. The UNEC will act as the single point of contact for local interconnection trouble reports and will coordinate trouble resolution with the ACAC.

4-41 In order to ensure getting all pertinent information and questions answered regarding the nature of the trouble being reported, it is important that the BRC or UNEC representative be able to talk with the CLEC representative who is reporting the trouble. For this reason, reports using facsimile or other non-interactive methods will not be accepted.

4-42 CLEC trouble reports will be received and input into the Work Force Administration — Control (WFA-C) system by the BRC, UNEC, or ACAC personnel. This WFA-C system will be the same operating system hardware and software that supports the BellSouth customer operating units in handling trouble reports from BellSouth retail customers and InterLATA Carrier customers.

4-43 As of August 31, 1997, all CLEC trouble reports for designed resale services, local access services, or UNEs are being handled through manual interface.

4-44 Trouble reports will be accepted by BellSouth via phone in the same way reports are taken from BellSouth retail customers and ICs. Considering that UNEs can be combined with CLEC elements to offer services unique to a CLEC, and considering that the operation of service elements and features can produce various results as they interact in different combinations, good dialogue and a thorough understanding by the BellSouth trouble receipt representative of the nature of the trouble is essential. The questions and information which must be collected from the reporting party will depend on the type, nature, complexity, and application of the overall service.

Future Electronic Communications Trouble Administration (ECTA) Gateway Interface:

4-45 To date, two CLECs have requested the non-parity, 'national standard' interface to BellSouth's OSS to report their customer trouble reports. BellSouth understands the desire of these CLECs to have a common machine-machine interface to all ILECs and has committed to supporting national standards. The ECTA gateway interface is being designed in accordance with the ANSI T1.227-1995 and T1.228-1995 definitions developed by the Electronic Communications Implementation Committee (ECIC). This

gateway interface allows the CLEC user to enter both design and non-design trouble reports in LMOS and WFA from their companion gateway interface.

4-46 Deployment of this ECTA gateway interface is scheduled for late 4Q97. All reports entered via the ECTA gateway will require manual screening by a BellSouth MA or Testing Technician. Once these reports are entered into LMOS or WFA, they will be handled just as if the report was entered by a BRC or ACAC employee.

Testing Flow:

4-47 The primary test interface system for designed services is the Integrated Test System (ITS). ITS interfaces with a large number of test access devices and specialized test systems to perform testing and automated sectionalization on designed circuits. A few examples of test access devices with which ITS interfaces and uses are:

- Switched Access Remote Test System/Switched Maintenance Access System (SARTS/SMAS)
- Digital Cross-Connect Systems (e.g. Lucent Digital Access Cross-Connect Systems, Alcatel Digital Electronic Cross-Connect Systems, etc.)
- Wiltron 9620s

4-48 ITS accesses designed circuits at available test points and automatically runs a series of tests to identify and sectionalize any trouble conditions. ITS uses a variety of test access points, devices, and systems depending upon the type of circuit, the test access available on the circuit, and the type of condition(s) which apply to the circuit and trouble report. ITS conducts demand-type intrusive tests. ITS determines the circuit design and available test access from the data recorded in the Work Order Record Document (WORD) which was issued from the Trunks Integrated Record Keeping System (TIRKS) during the provisioning process. The WORD image is obtained from the Network Services DataBase (NSDB).

4-49 Test results are reported to the control office, BRC, UNEC, or ACAC by ITS. At the same time, if trouble is identified and sectionalized, ITS will automatically prepare dispatch tickets to be passed to WFA-DI (Dispatch In) or WFA-DO (Dispatch Out) for field dispatch. The control office tester can review the ITS results and release the ITS-generated tickets for dispatch, or the tester can take other action(s) in accordance with his/her analysis and experience. If ITS cannot access one or more test access points or devices on the circuit, ITS will report that fact along with other test results to the control office tester.

4-50 If the tester requires additional testing for any reason, he/she will manually initiate tests using the appropriate remote test access capabilities available on the circuit. Or, the tester can issue one or more test-assist tickets through WFA-C into WFA-DI or WFA-DO as appropriate for dispatch to the next available technician.

4-51 Using ITS test results and any field test-assist results as discussed above, the BRC, UNEC, or ACAC testing technician will determine and coordinate all corrective actions. If a circuit redesign or other assignment functions are necessary, the control office tester will contact the appropriate center or field work group. The tester may establish a conference bridge to facilitate cooperative actions among multiple field and center personnel. The tester coordinates all actions until the problem is resolved, at which time the tester closes the trouble report with the CLEC. When the CLEC agrees to close the ticket, the tester closes the report in WFA-C.

Trouble Ticket Flow Within BellSouth:

4-52 All trouble reports and associated tickets for designed services are generated in WFA-C. WFA-C is used by the control office to coordinate and record all activities and findings associated with the trouble report. For this purpose, WFA-C provides a log function which automatically records many of the automated actions and allows the control office testing technician to enter a log of other activities, findings, and important pertinent information. Tickets generated in WFA-C flow to WFA-DI and WFA-DO modules of the Work Force Administration System, where they are dispatched to the next available technician under oversight of the Work Management Center (WMC).

4-53 Field technicians report information concerning their activities and findings into WFA-DI and WFA-DO. Field activities will update the WFA-C log. When field activities on a dispatched ticket are completed, the technicians close their WFA-DO or WFA-DI tickets, and the completed tickets are passed back to WFA-C where the control log is updated by the system.

4-54 The control office — BRC on designed resale services, UNEC on UNEs, and the ACAC on Local Interconnection — will use WFA-C records and status information in all interactions with the CLEC. If the CLEC has elected to implement the EC-CPM electronic interface to WFA-C, then interim status information and completion information is available the CLEC on-screen. EC-CPM provides a three-line text field which the ACAC, UNEC, or BRC will update with current interim status information. Otherwise, all status and completion information is provided to the CLEC designated contact by phone from the control office tester.

Trouble Report Closure:

4-55 On designed services, the Control Office — which is the trouble receipt center for the CLECs, either the BRC, UNEC, or ACAC — coordinates all testing and closure functions with the customer. Therefore, the Control Office will close each report to the designated CLEC contact.

B. Trouble Report Receipt Centers

4-56 The following table (Table 4-1) reflects the resale services and UNEs with the highest projected demand volumes in order to illustrate what types of services will be handled under these processes and interfaces:

Table 4-1: Resale Svc. & UNE Interfaces:

		Resale Service or UNE CLEC Trbl. Reporting Interface Options		
Product Name	*Receipt Ctr.*	*Manual*	*C-TAFI*	*EC-CPM*
Centrex/ESSX	BRC	Y	N	N
Hunting	BRC	Y	Y	N
DID	BRC	Y	N	Y
Megalink	BRC	Y	N	Y
Flat Rate PBX TRUNKS/NARS	BRC	Y	N	N
Synchronet	BRC	Y	N	Y
E-911/SALI	BRC	Y	N	N
Basic Rate ISDN	BRC/RRC	Y	Y	N
Primary Rate ISDN	BRC	Y	N	Y
Off Premises Extension (OPX)	BRC/RRC	Y	Y	Y
Megalink ISDN	BRC	Y	N	Y
FrameRelay and CDS	BRC	Y	N	Y
SmartRing DS1	BRC	Y	N	Y
SmartRing	BRC	Y	N	Y
Flexserv	BRC	Y	N	Y
Msg/Meas Rate PBX TRUNKS/NARS	BRC	Y	N	N
Multiserv/Multiserv Plus	BRC	Y	N	N
Lightgate	BRC	Y	N	Y
Native Mode LAN Interconnection	BRC	Y	N	N
Accupulse	BRC	Y	N	N
Visual Director	BRC/RRC	Y	N	N
Flat Rate Residence	RRC	Y	Y	N
Custom Calling-Speed Calling 8 & 30	BRC/RRC	Y	Y	N
Custom Calling- 3 Way Calling	BRC/RRC	Y	Y	N
Custom Calling-Call Forwarding Variable	BRC/RRC	Y	Y	N
Custom Calling-Remote Access to CF	BRC/RRC	Y	Y	N
RingMaster	BRC/RRC	Y	Y	N

		Resale Service or UNE CLEC Trbl. Reporting Interface Options		
Product Name	*Receipt Ctr.*	*Manual*	*C-TAFI*	*EC-CPM*
Message Telephone Svc (MTS)	BRC/RRC	Y	Y	N
Touchstar-Call Tracing	BRC/RRC	Y	Y	N
Touchstar-Call Block	BRC/RRC	Y	Y	N
Touchstar-Call Selector	BRC/RRC	Y	Y	N
Touchstar-Call Return	BRC/RRC	Y	Y	N
Touchstar-Repeat Dialing	BRC/RRC	Y	Y	N
Touchstar-Preferred Call Forwarding	BRC/RRC	Y	Y	N
Measured Rate Residential	RRC	Y	Y	N
Touchtone	BRC/RRC	Y	Y	N
Optional Calling Plan (OCP)	BRC/RRC	Y	Y	N
MemoryCall	BRC/RRC	Y	Y	N
MemoryCall Answering Service	BRC	Y	Y	N
Caller ID	BRC/RRC	Y	Y	N
Call Waiting	BRC/RRC	Y	Y	N
Call Waiting-Deluxe	BRC/RRC	Y	Y	N
Integrated Pkg-Area Plus, Area Plus w/ Complete Choice & Complete Choice	BRC/RRC	Y	Y	N
Independent Payphone Provider	BRC	Y	N	N
Enhanced Caller ID	BRC/RRC	Y	Y	N
Flat Rate/Basic Local Exchange	BRC/RRC	Y	Y	N
Measured Rate Bus	BRC	Y	Y	N
Georgia Community Calling	BRC	Y	N	N
Remote Call Forwarding (RCF)	BRC/RRC	Y	Y	N
Area Plus	BRC/RRC	Y	Y	N
800 Database Access UNE	UNEC	Y	N	N
Line Information Database Access UNE	UNEC	Y	N	N
2-wire Analog Voice Grade Loop UNE	UNEC	Y	N	Y
4-wire Analog Voice Grade Loop UNE	UNEC	Y	N	Y
4-wire DS-1 & PRI Digital Loop UNE	UNEC	Y	N	Y
2-wire ISDN Digital Loop UNE	UNEC	Y	N	Y
ADSL - 2-wire Asymmetrical Digital Subscriber Line Loop UNE	UNEC	Y	N	Y
HDSL - 2-wire & 4-wire High-Bit-Rate Digital Subscriber Line Loop UNE	UNEC	Y	N	Y
Loop Channelization System UNE	UNEC	Y	N	Y
CO Channel Interfaces 2-wire Voice UNE	UNEC	Y	N	Y
CO Channel Interfaces 4-wire Voice UNE	UNEC	Y	N	Y
Loop Feeder UNE	UNEC	Y	N	N
Loop Concentration UNE	UNEC	Y	N	N
Operator Call Processing - OPCH, FACH, BLV, EI, ECT UNE	UNEC	Y	N	N
Operator Call Processing - Facility-Based OPCH, FACH, ECT UNE	UNEC	Y	N	Y
Operator Call Processing - Facility-Based BLV, EI UNE	UNEC	Y	N	Y
Directory Assistance Access Service (DAAS) UNE	UNEC	Y	N	N

		Resale Service or UNE CLEC Trbl. Reporting Interface Options		
Product Name	*Receipt Ctr.*	*Manual*	*C-TAFI*	*EC-CPM*
Directory Assistance Call Completion (DACC) UNE	UNEC	Y	N	N
Directory Assistance Number Services Intercept (DANSI) UNE	UNEC	Y	N	N
Directory Assistance Transport UNE	UNEC	Y	N	Y
Directory Assistance Database Service (DADS) UNE	UNEC	Y	N	N
Directory Access to DA Svc (DADAS) UNE	UNEC	Y	N	N
NID to NID Cross-Connect 2-wire UNE	UNEC	Y	N	N
NID to NID Cross-Connect 4-wire UNE	UNEC	Y	N	N
NID Spare Capacity UNE	UNEC	Y	N	N
Open AIN (OAIN) Tool Kit UNE	UNEC	Y	N	N
Open AIN (OAIN) Service Management System Access UNE	UNEC	Y	N	N
CCS-7 A-Link Signaling UNE	UNEC	Y	N	Y
CCS-7 D-Link Signaling UNE	UNEC	Y	N	Y
STP UNE	UNEC	Y	N	N
Common/Dedicated Interoffice Transport UNE	UNEC	Y	N	Y
Interoffice Transport Analog Line Grade UNE	UNEC	Y	N	Y
Interoffice Transport DS-0 UNE	UNEC	Y	N	Y
Interoffice Transport DS-1 UNE	UNEC	Y	N	Y
Interoffice Transport DS-3 UNE	UNEC	Y	N	Y
Optical SONET OC-n Interoffice Transport UNE	UNEC	Y	N	Y
Digital Cross-Connect System DCS 1/0 UNE	UNEC	Y	N	Y
Digital Cross-Connect System DCS 3/1 UNE	UNEC	Y	N	Y
Digital Cross-Connect System DCS 3/0 UNE	UNEC	Y	N	Y
Customized Call Routing (Selective Routing - LCC) UNE	UNEC	Y	N	N
Tandem Switching UNE	UNEC	Y	N	N
2-wire Analog Line Switching Port UNE	UNEC	Y	N	N
Hunting UNE	UNEC	Y	N	N
4-wire Analog Line Switching Port (2-wire Port with 4-wire Termination) UNE	UNEC	Y	N	Y
2-wire Analog DID Trunk Switching Port UNE	UNEC	Y	N	Y
2-wire ISDN Digital Line Side Port UNE	UNEC	Y	N	N
4-wire ISDN DS-1 Digital Trunk Port UNE	UNEC	Y	N	Y
Switching Functionality UNE	UNEC	Y	N	N
Unbundled Local Usage (entire local calling area) UNE	UNEC	Y	N	N
Preordering - Unbundled Access to OSS	Note 1	Y	N	N
Ordering/Provisioning - Unbundled Access to OSS (EDI, LEO, LESOG, LENS)	Note 1	Y	N	N
Maintenance/Repair (Service Assurance) Unbundled Access to OSS (TAFI)	Note 1	Y	N	N
1-way Trunking Interconnection	ACAC	Y	N	Y
2-way Trunking Interconnection	ACAC	Y	N	Y
Multiple Tandem Interconnection	ACAC	Y	N	N

Product Name	Receipt Ctr.	Resale Service or UNE CLEC Trbl. Reporting Interface Options		
		Manual	C-TAFI	EC-CPM
Switched Local Channel Interconnection (SLCI) Analog Grade	ACAC	Y	N	Y
SLCI 2-wire	ACAC	Y	N	Y
SLCI 4-wire	ACAC	Y	N	Y
SLCI DS-1	ACAC	Y	N	Y
SLCI DS-3	ACAC	Y	N	Y
Dry Fiber UNE	UNEC	Y	N	Y
Number Portability RCF UNE	UNEC	Y	N	N
Number Portability DID UNE	UNEC	Y	N	N
Loop with Interoffice Transport UNE Combination	UNEC	Y	N	Y
Analog port-loop UNE combination/Digital port-loop UNE combination	UNEC	Y	Y	N
Analog loop with iLNP-RCF UNE Combination	UNEC	Y	Y	N
Loop Cross-Connect with Unbundled Interoffice Transport	UNEC	Y	N	Y

Note 1: Problems with access to Preordering, Ordering/Provisioning, and Maintenance/Repair OSs are reported to the CLEC System Support Center.

4-57 The resale services and UNEs listed in Table 4-1 above are those for which BellSouth has implemented M&Ps and systems support to be operationally ready as of August 31, 1997. The TAFI electronic interface will ultimately be enhanced to support all non-designed offerings. Trouble reports for all offerings can be referred through the manual interface as of August 31, including offerings not listed.

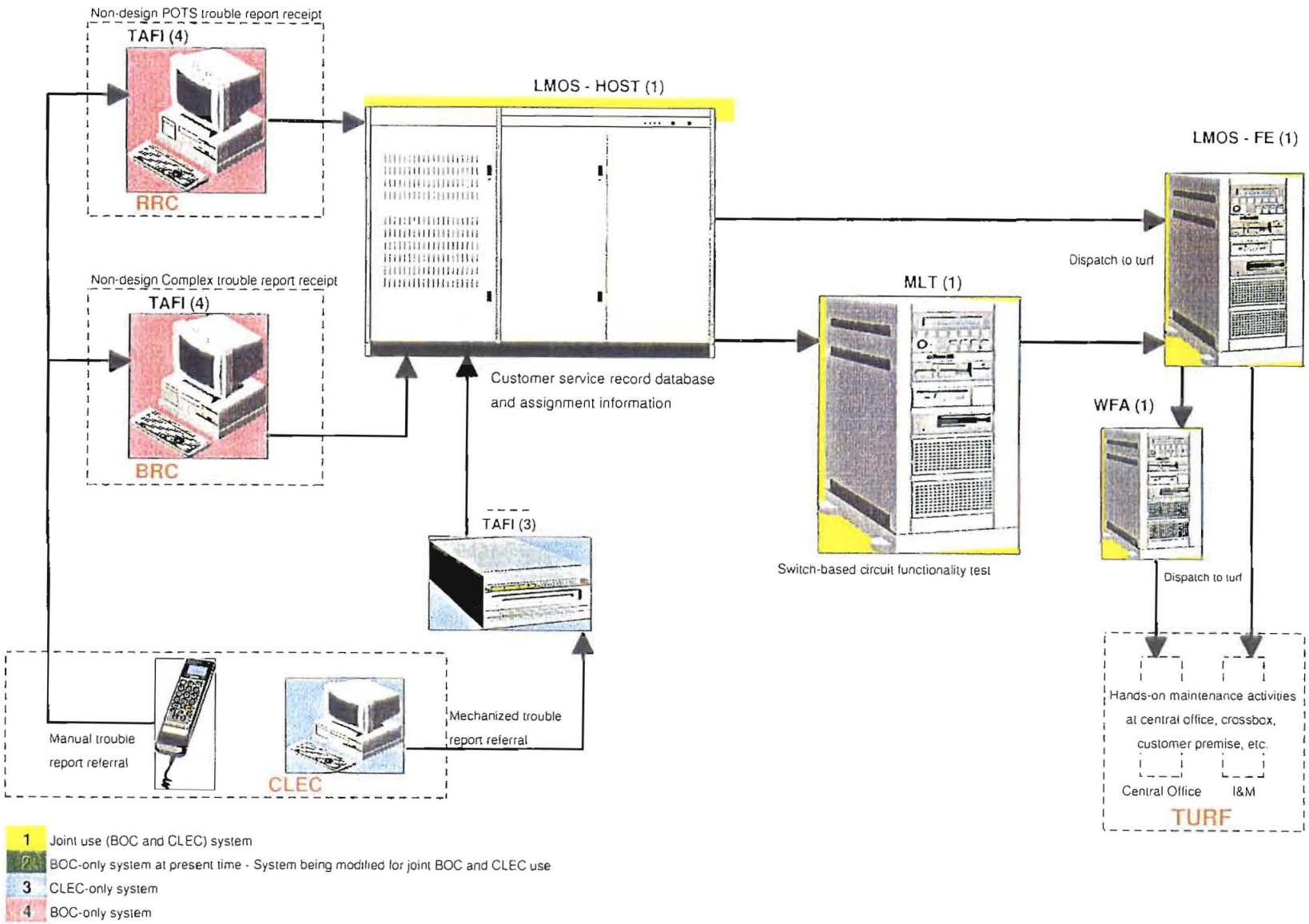
C. CLEC Interfaces

Issuance of Trouble Report:

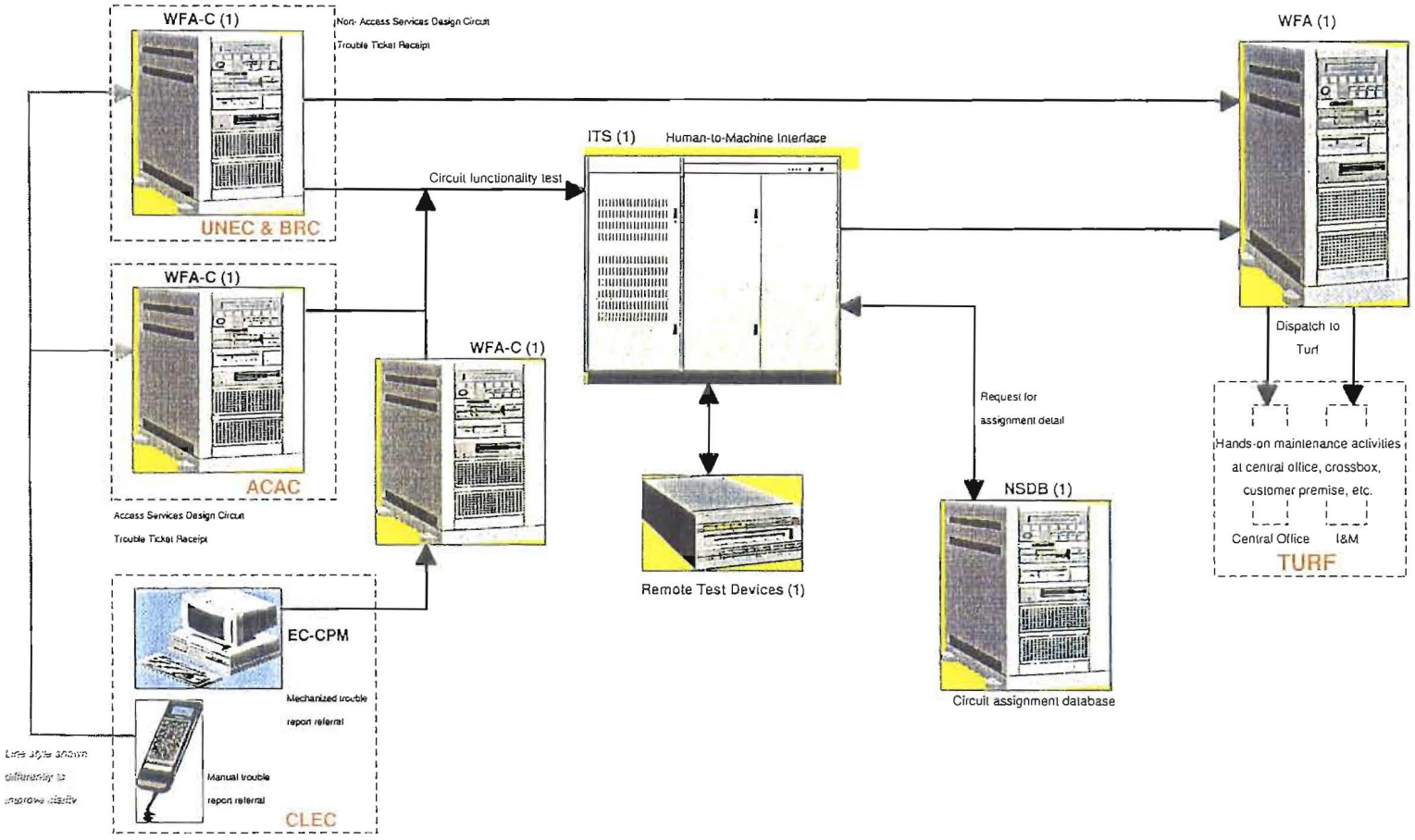
Report Issuance:

4-58 BellSouth will provide three interfaces by which the CLEC can pass Trouble Reports to BellSouth. These interfaces are depicted on Exhibits IV-3 & IV-4.

NON-DESIGN MAINTENANCE FLOW
- MECHANIZED PROCESS -
Exhibit IV - 3



DESIGN MAINTENANCE FLOW
- MECHANIZED PROCESS -
Exhibit IV - 4



CLEC TAFI:

4-59 In accordance with previous regulatory orders, BellSouth has delivered an electronic interface to support the CLEC trouble report process. The CLEC Trouble Analysis Facilitation Interface (TAFI) was available as of March 28, 1997 to any CLEC who elects to use this process for non-designed services. The CLEC has two optional ways of connecting to the BellSouth CLEC TAFI system:

i. The CLEC can establish a LAN-to-LAN connection for reliable, high-speed access.
ii. The CLEC can use dial-up connections into the BellSouth CLEC TAFI.

4-60 The CLEC TAFI system is provisioned using the same TAFI hardware and software configurations which serve the BellSouth RRC and BRC operations. See Paragraphs 4-02 through 4-13 to review the CLEC TAFI system.

4-61 BellSouth tested the CLEC TAFI interface functionality in the lab and then completed interconnection and functional testing with the first CLEC who ordered this interface (CellularSouth). Test results are available upon request. This interface has been in production mode for approximately four and one-half months as of August 31 with this CLEC, and no major problems have occurred. Seven additional CLECs have now actively using CLEC TAFI and fifteen CLECs have established connectivity and completed training. To reiterate, TAFI has been in use for nearly two years in the BellSouth retail customer operating units with excellent results.

4-62 The CLEC TAFI does not conform to ECIC sanctioned standards. This interface supports BellSouth's legacy trouble report coding and OS interfaces. . TAFI is a real time man-machine interface that can 'fix' a problem with the customer on the line while ECIC national standards provide a machine-machine interface to exchange data.

Exchange Carrier — Common Presentation Manager:

4-63 The Exchange Carrier — Common Presentation Manager (EC-CPM) electronic interface is available to the CLEC community as of August 31, 1997. EC-CPM will allow the CLEC to initiate trouble reports for designed resale services and UNEs interactively into BellSouth's WFA-C system. BellSouth offers two alternative ways for a CLEC to access the BellSouth EC-CPM:

i. The CLEC can establish dedicated LAN-to-LAN access into the BellSouth EC-CPM for reliable, high-speed access.

ii. The CLEC can use dial-up connections into the BellSouth EC-CPM.

4-64 BellSouth has offered EC-CPM for quite some time to the InterLATA Carrier community as an optional way of reporting InterLATA access trouble reports. The system can be used by the CLEC community for designed services with no changes. Consequently, no additional testing has been performed on this system. As of August 31, 1997, no CLEC has expressed interest in using EC-CPM.

Manual Interface:

4-65 A manual interface will be available for those CLECs who elect not to implement the electronic interface alternatives — and to handle trouble reports for those services, UNEs, and UNE combinations not yet supported by these interfaces — as well as to provide a contingency process in the event that such a backup becomes necessary. The CLEC can pass Trouble Reports to the appropriate BellSouth trouble receipt center (either the Residence Repair Center, Business Repair Center, or UNEC, depending on the type of service) via telephone. Service representatives in the BellSouth trouble receipt center will input the report information into TAFI or WFA-C as covered earlier in this document.

Electronic Communications Trouble Administration (ECTA) Gateway:

4-66 BellSouth will deploy the ECTA gateway interface by late 4Q97. This interface, built on the ANSI T1.227-1995 and T1.228-1995 national standards as defined by the Electronic Communications Implementation Committee (ECIC), will allow CLECs who desire a machine-machine interface to mechanically enter trouble reports in both LMOS and WFA.

D. Points of Manual Intervention

4-67 The following tables reflect two kinds of manual work which must be handled in the various work groups which comprise the trouble report pipeline. The first kind of manual work is planned and required as an integral part of the process. The second kind of work results when some problem or condition in the mechanized support systems causes an item to "fall-out" into the work group for manual intervention. The first type of work is called "planned" in the following tables, and the second type of work is called "fall-out". Refer also to Exhibits IV-5 and IV-6.

Table 4-2: Control Office (RRC, BRC, UNEC, or ACAC):

Type Manual Work Planned VS. FALL-Out	*Operational System Involved*	*Cause of Manual Intervention*	*How Can the CLEC Control?*
Planned	TAFI	Election of CLEC to use Manual Reporting Interface for non-designed resale services and UNEs. Requires RRC or BRC to manually enter trouble report in TAFI.	The CLEC can implement the electronic TAFI interface.
Planned	WFA-C	Election of CLEC to use Manual Reporting Interface for designed resale services & UNEs or Local Interconnection Trunking. Requires BRC or UNEC to manually enter trouble report in WFA-C.	The CLEC can implement the electronic WFA-C interface.
Fall-out	TAFI	Problems with TAFI's interface with downstream systems (e.g. Predictor, MLT) or between those systems and their interface with network elements (e.g. MARCH interface with end office switch) which prevent TAFI from completing its testing & analysis function. TAFI will route the trouble report to the RRC or BRC MA group for further manual processing if either access to down stream systems fail to provide proper data (as indicated above) or if TAFI has not been 'taught' how to process a give service problem (e.g., hunting on business lines). The trouble receipt center will refer any system problems to Information Technologies department for resolution.	n/a[1]
Fall-out	TAFI/WFA-C	Problems with the electronic TAFI interface prevent CLEC from successfully initiating the trouble report. RRC, BRC, or UNEC as appropriate will take the trouble report via the manual interface and input it through internal OS access. The trouble receipt center will refer any system problems to Information Technologies department for resolution.	n/a[1]
Fall-out	WFA-C	Not enough information on trouble report records received from CLEC via the electronic interface. BRC or UNEC will contact the CLEC for additional information.	Be as complete and clear as possible in the information provided on the initial report.

Type Manual Work Planned VS. FALL-Out	*Operational System Involved*	*Cause of Manual Intervention*	*How Can the CLEC Control?*
Fall-out	WFA	System cannot match work to be dispatched with an available technician. The WMC will review the available resources and the pending work to reassign work, arrange for movement of field resources, arrange for overtime, etc.	CLEC can avoid demanding questionable test-assist dispatches. CLEC can take actions to help level-load where work can be planned or flexibly scheduled. CLEC can make good access arrangements with his end users to prevent wasted dispatches and rework.
Planned	LMOS	Load Control group reviews and adjusts dispatches to minimize travel and other lost time and to maximize overall efficiency & results.	CLEC can avoid demanding questionable test-assist dispatches. CLEC can help level-load where work can be planned or flexibly scheduled. CLEC can make good access arrangements with his end users to prevent wasted dispatches and rework.
Fall-out	WFA	Critical date jeopardy or field work jeopardy must be resolved. The Control Office will escalate to the appropriate organizations in order to expedite corrective actions being taken to resolve jeopardy. If the jeopardy is a field work group problem, the WMC will work with field management to resolve.	n/a[1]
Fall-out	WFA or LMOS	Database error or system problem prevents system from performing its functions. WMC will refer system problems to the Information Technologies department for resolution. Orders will be manually dispatched until system problems are resolved.	n/a[1]

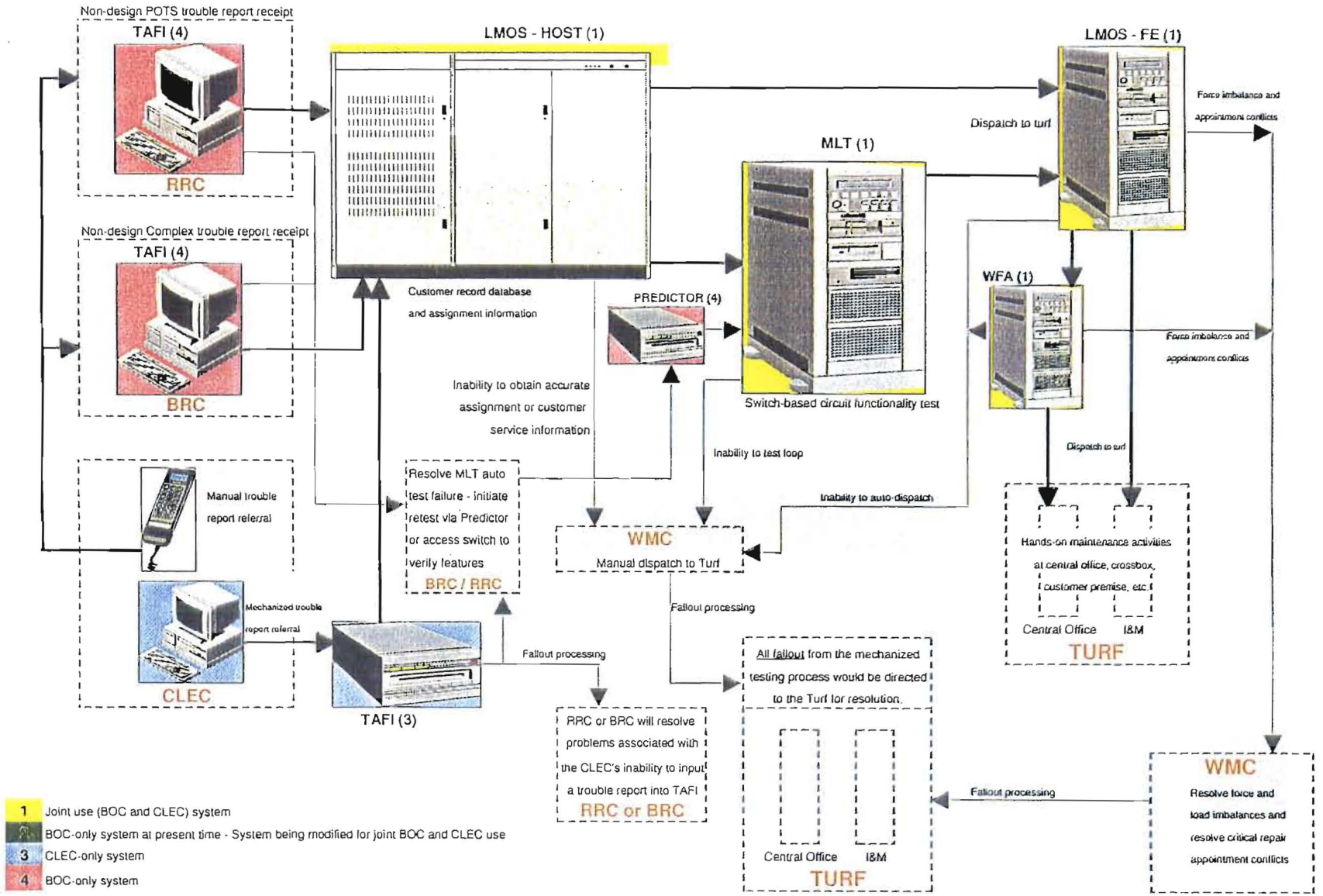
1. Fallout for these causes will impact BellSouth retail COUs in the same way as the CLEC.

Table 4-4: Field or Central Office Work Groups:

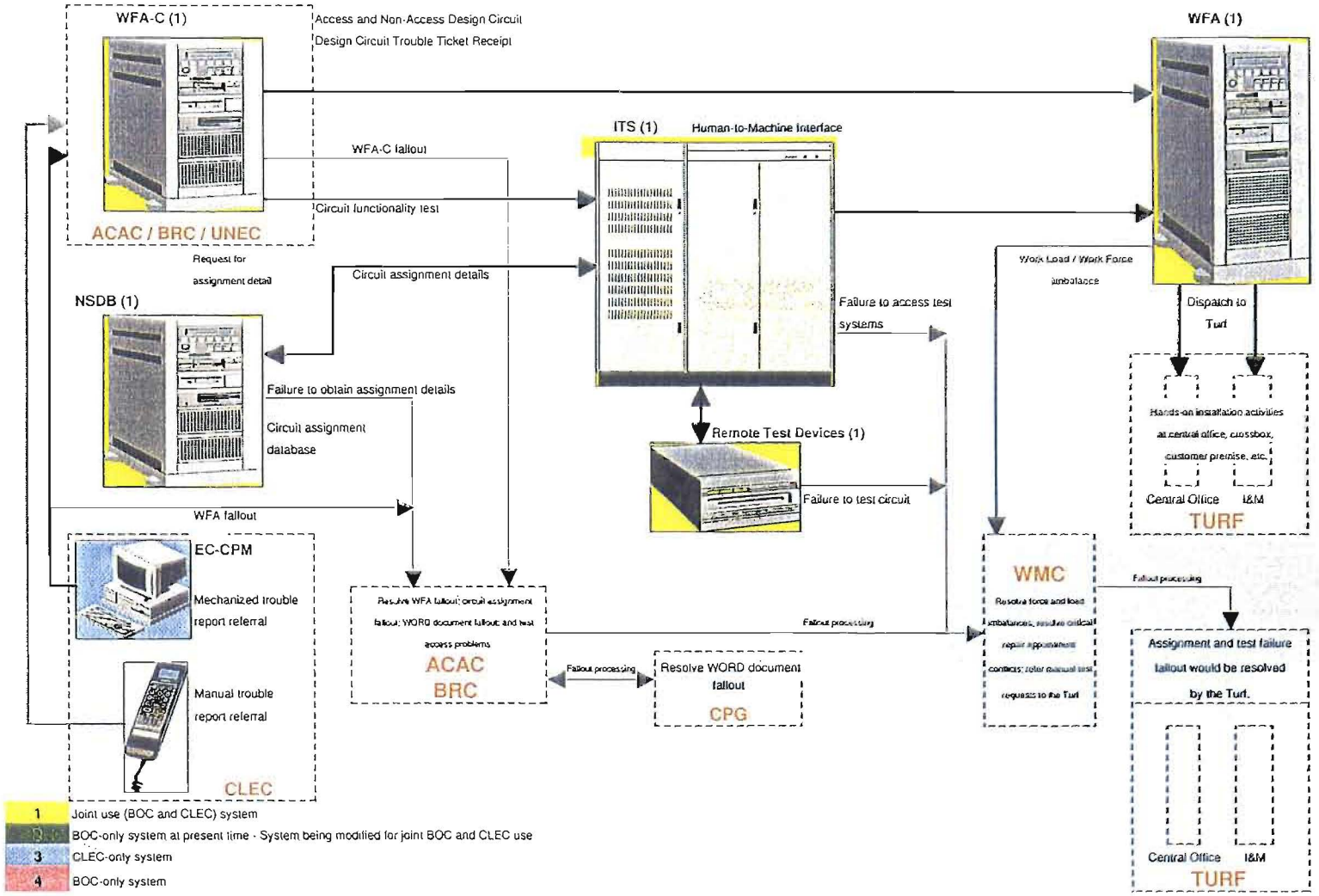
Type Manual Work Planned VS. FALL-Out	*Operational System Involved*	*Cause of Manual Intervention*	*How Can the CLEC Control?*
Planned	WFA	Perform re-wiring, repair, and plug-in replacement activities dispatched by the control office.	n/a[1]
Fall-out	ITS	Perform test-assist activities dispatched by the control office due to mechanized test problems or due to decisions by the control office and CLEC.	Be judicious in the use of expensive manual test-assist requests.

1. Fallout for these causes will impact BellSouth retail COUs in the same way as the CLEC.

NON-DESIGN MAINTENANCE FLOW
- MECHANIZED PROCESS FALLOUT -
Exhibit IV - 5



DESIGN MAINTENANCE FLOW
- MECHANIZED PROCESS FALLOUT -
Exhibit IV - 6



E. CLEC Statusing

Report Statusing:

4-68 With the exception of reports entered via ECTA Gateway, there will be no automatic statusing provided to the CLEC on non-designed trouble reports. If the CLEC elects to use the electronic TAFI interface, the CLEC can check the status in LMOS by entering a subsequent report into TAFI. TAFI will display the current LMOS information regarding the open trouble report to the CLEC user. However, if the CLEC elects to use the manual interface, there is normally no interim reporting of current report status or progress to the CLEC until the report is closed. If a CLEC who uses the manual interface desires to know the status of the trouble — or if a CLEC wants more details than is available through TAFI — the CLEC will contact the RRC, BRC, UNEC, or ACAC as appropriate. The BellSouth trouble receipt center will attempt to answer the CLEC's questions, calling downstream organizations if necessary.

4-69 The Control Office will provide statusing to the CLEC on designed service trouble reports through normal coordination activities. If the CLEC has elected to use EC-CPM, that electronic interface provides status information on-line as discussed earlier. However, the Control Office will normally not provide statusing documentation manually to the CLEC. This is the same way designed service trouble reports are handled with BellSouth retail customers and COUs.

Report Closure:

4-70 No formal trouble closure document or record will be provided to the CLEC for non-designed trouble reports. The BellSouth technician who resolves the problem will call the designated CLEC contact number to close the trouble report. If the trouble can be closed on the front-end as discussed in Paragraphs 4-30 & 4-31, the RRC/BRC/UNEC representative will close the trouble by phone with the CLEC. If the trouble is dispatched to downstream center or field work groups, the technician who resolves the trouble is responsible for calling the designated CLEC contact number to close the report. One attempt will be made to close the report, as is done with BellSouth retail customer trouble reports.

4-71 As covered earlier, if the CLEC has implemented the TAFI interface, trouble status, history, and closure information can be obtained on-line. BellSouth will not customarily furnish *formal* trouble closure documentation *manually* to CLECs.

4-72 As was also discussed earlier in this document: In the case of designed services, the BellSouth control office (either the BRC, UNEC, or ACAC) will coordinate final BellSouth testing and closure of the trouble report with the CLEC. Therefore, for designed services, the CLEC will agree to close the report through the normal control office coordination functions.

4-73 CLECs who elect to implement the EC-CPM electronic interface to WFA-C can capture a final closure record via that interface. BellSouth will not customarily furnish *formal* trouble closure documentation *manually* to CLECs.

Repair Histories:

4-74 If the CLEC uses the manual interface, the RRC, BRC, and UNEC will accept requests for copies of the LMOS trouble history for non-designed resale services, UNEs, or UNE combinations. If the CLEC elects to use the CLEC TAFI electronic interface, the trouble history from LMOS is accessible on line.

4-75 Should a CLEC desire whatever trouble history records are available for a designed resale service, UNE, or Local Interconnection trunk group, the CLEC will request that information from the appropriate trouble receipt center (BRC, UNEC, or ACAC) via the manual interface. This is the same process which applies to BellSouth retail customer operating units.

Conformance to Applicable Industry Standards:

4-76 The Electronic Communications Implementation Committee (ECIC) has sanctioned American National Standards Institute (ANSI) T1M1 standards 227 and 228 for use in electronic data interchange type trouble administration interfaces. BellSouth has conformed to these standards in the development of electronic interfaces for trouble reporting of InterLATA Carrier access troubles which those standards were initially designed to support — including EC-CPM. However, the TAFI electronic interface for non-designed resale services, UNEs, and UNE combinations is not based on these standards.

4-77 With the deployment of the ECTA Gateway discussed earlier, BellSouth will provision a machine-machine interface that conforms to the ECIC sanctioned national standards.

F. Expedites and Escalations:

Expedites:

4-78 The CLEC will be given a commitment on non-designed trouble reports by the RRC, BRC, or UNEC when using the manual interface. When using the CLEC TAFI interface, the TAFI system will help the CLEC set commitments based on the need to dispatch the trouble to downstream organizations. The CLEC will know the commitment intervals on designed trouble reports since those standard intervals are published.

4-79 If the CLEC wishes to expedite handling of a trouble report, they will contact the RRC, BRC, UNEC, or ACAC as appropriate to request the expedite. The BellSouth trouble receipt office will review the report and possibly discuss the situation with downstream organizations, especially the WMC if field dispatching is involved, to negotiate a better commitment. The BellSouth trouble receipt center will provide the best negotiated commitment to the CLEC. This is fundamentally the same way that an expedite request from any customer will be handled by BellSouth.

Escalations:

4-80 If the CLEC is displeased with the commitment given on an expedite request, with the progress on a trouble report, or with a commitment miss, they will escalate to the appropriate trouble receipt center management by phone. The BellSouth trouble receipt center will escalate internally to BellSouth — up the lines of management in the function(s) and organization(s) in which the problem exists until the escalation is resolved. All BellSouth trouble receipt centers are open on a 24x7 basis to receive and handle CLEC escalations. This is fundamentally the same way that any customer escalation would be handled by BellSouth.

G. Performance Monitoring

4-81 BellSouth has no plans to provide performance monitoring data or referrals on resale services or UNEs as an integral part of the element or service. Nor does BellSouth plan to offer electronic interfaces to performance monitoring elements or operating systems. Performance monitoring data may be made available to individual CLECs based on contractual negotiations or upon special request at negotiated prices.

Section V:



Billing

V. Billing:

A. Master Account:

5-01 To conduct business with BellSouth, a CLEC must first establish a Master Account with BellSouth. The CLEC will work with the Local Carrier Service Center (LCSC) and the BellSouth InterConnection Services (ICS) Account Team to do so. The CLEC may choose to negotiate a contract with BellSouth, or the CLEC may elect to do business under the rules and rates stipulated by the state Public Service Commission.

5-02 Once the CLEC has furnished the necessary documentation and information to BellSouth, the LCSC will issue service orders to establish a Master "Q" Account in each BellSouth Revenue Accounting office for each state in which the CLEC will operate. The "Q" is simply a designator in the BellSouth billing systems account identification which designates the account as a CLEC account for ongoing billing functions. After the Master Account is so established, BellSouth can begin taking orders for local interconnection and any end user services which the CLEC may order.

B. Process Flow:

5-03 This section will describe the ongoing billing process flow depicted on Exhibits V-1 and V-2. The billing process actually consists of three separate flows:

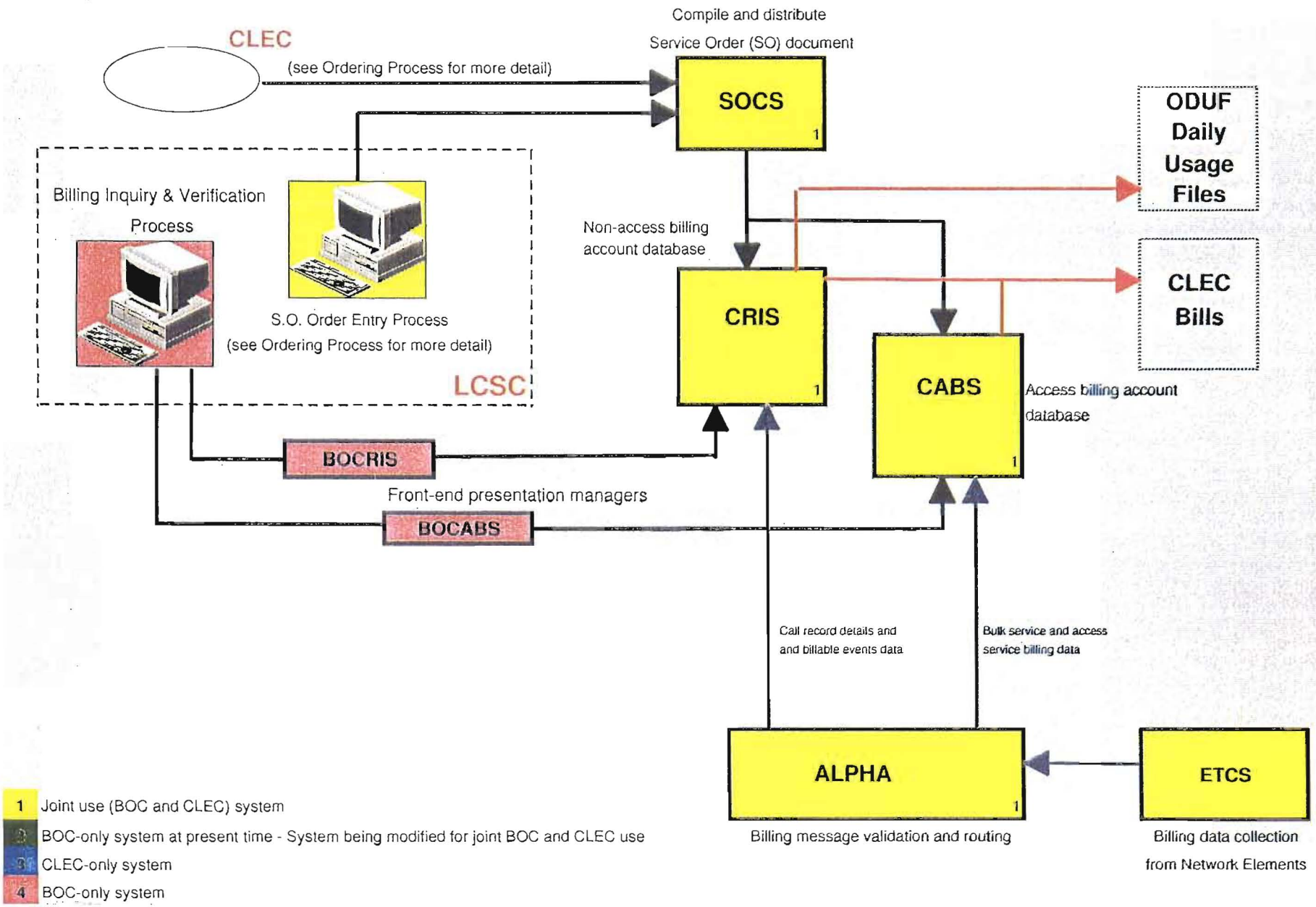
i. Account Updating
ii. Usage, Call, & Event Recording
iii. Bill Rendering

5-04 These three billing processes are described individually. All three processes must occur to provide accurate and timely billing information to the Competitive Local Exchange Carrier (CLEC).

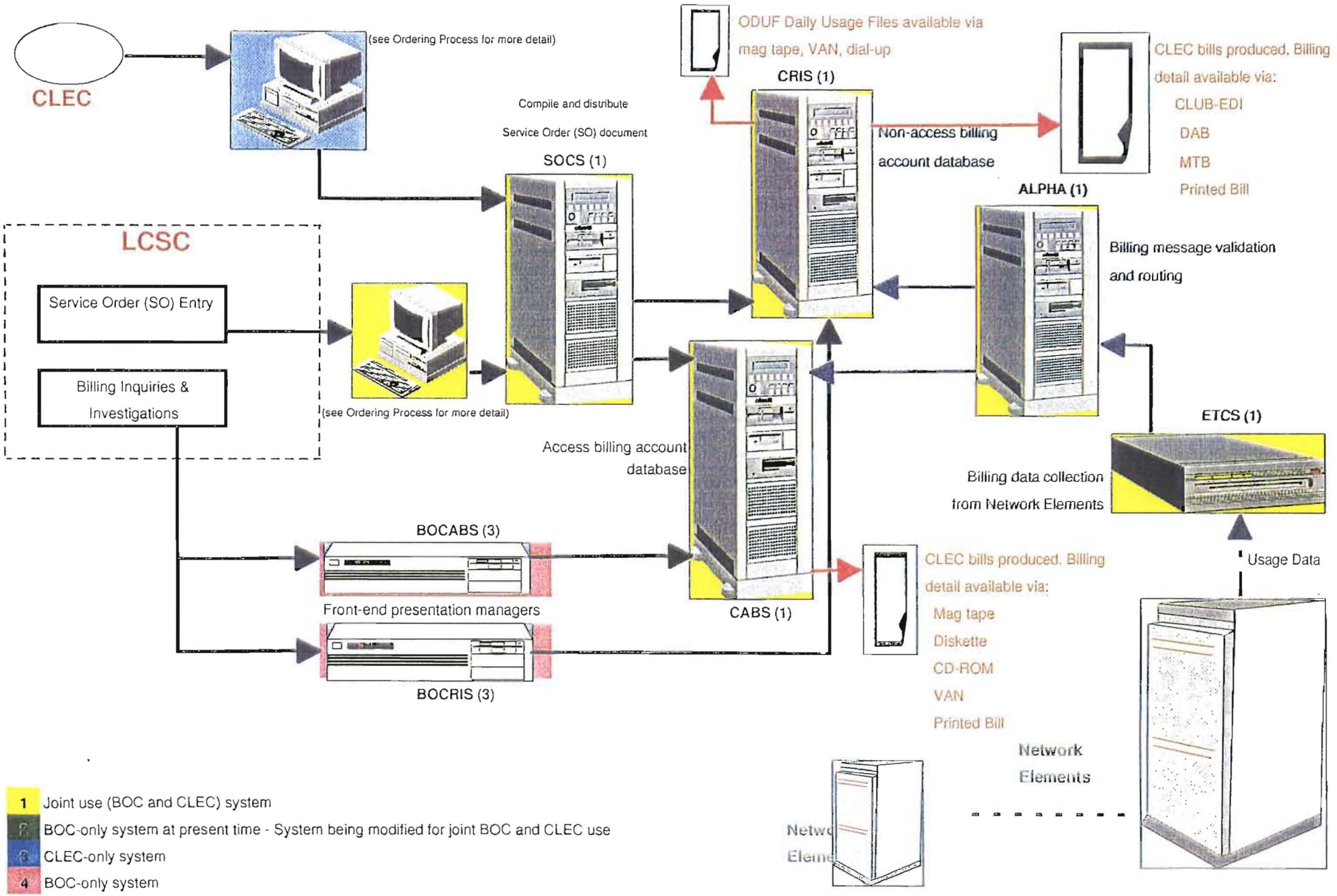
Account Updating:

5-05 As the CLEC makes sales to his end-user customers, the CLEC, in turn, places requests for resale services, unbundled network elements (UNEs), and/or Local Interconnection services on BellSouth. These local service requests (LSRs) and access

MECHANIZED BILLING FLOW
- ORGANIZATIONS / CENTERS -
Exhibit V - 1



BILLING FLOW
- MECHANIZED PROCESS -
Exhibit V - 2



service requests (ASRs) will be received by BellSouth and converted into BellSouth service orders as covered in Section III of this document. When BellSouth provisioning activities are finished, a completed copy of the BellSouth service order (usually called the Completion Notice) flows from the Service Order Control System into the billing systems. (Refer to Paragraphs 3-31 and 3-40.) Service Order completion initiates recurring charges (as applicable) for the new service provided in response to an LSR or ASR as well as any one-time, non-recurring charges related to the installation.

5-06 The BellSouth Carrier Access Billing System (CABS) is designed to accumulate billable access usage and to perform accounting functions associated with services which are billed based on bulked billable usage. The BellSouth Customer Records Information System (CRIS), on the other hand, is designed to accumulate call record details and details on billable events (e.g. activation of a vertical service feature which is billed on a "per-use" basis) which are to be accrued individually against a specific end user service.

5-07 CRIS and CABS are complex mainframe billing systems, each having multiple software applications which perform specific functions. This is directly analogous to the example of the Work Force Administration (WFA) system and the Trunks Integrated Record Keeping System (TIRKS) system which were covered in previous sections. Just as WFA has three major modules (C, DI, and DO), so also CRIS and CABS each have a number of major system applications including, for instance:

- Account Management: These applications establish and maintain account information for BellSouth customers.
- Message Processing: These applications receive Automatic Message Accounting (AMA) records, apply rating rules to derive related charges, and accumulate those charges & detailed billing data pending issuance of a billing invoice.
- Bill Rendering: These applications format the billing invoice in accordance with national standards and BellSouth formatting options selected by the customer.

5-08 Wherever a specific application or function of CRIS or CABS may be mentioned in this document or other BellSouth materials, the reader should understand that these are fully integrated software elements of a single, whole system.

5-09 Two other associated systems must be addressed at this point. The Business Office CRIS (BOCRIS) system is a front-end presentation manager which allows BellSouth operating unit employees to gain access to the official CRIS billing records as necessary during troubleshooting, problem-resolution efforts, or marketing efforts. Such efforts may be required during resolution of provisioning system fall-out RMAs (Requests for Manual Assistance) as covered in previous sections of this document. Or

they may be used to access the official billing records to compare actual circuit configurations, wiring, options, and features during investigation of trouble reports. Update/change capabilities are restricted to specific authorized work groups and internal BellSouth users.

5-10 With the Customer Record Information capability of the Local Exchange Negotiation System (LENS) (see Paragraphs 2-31 through 2-33), the CLEC can perform the same functions. The CLEC is able to review his own end-user customer record information in CRIS to confirm whether features, etc. are properly reflected on BellSouth billing records.

5-11 Likewise, the Business Office CABS (BOCABS) system is a front-end presentation manager to the CABS billing records.

5-12 The Local Carrier Service Center (LCSC) has full access to the CRIS and CABS account and billing records via BOCRIS and BOCABS. The LCSC will use these systems to modify a CLEC's master account in response to subsequent contract renegotiations or changes requested by the CLEC. Also, the LCSC will use BOCRIS and BOCABS access to handle CLEC billing inquiries and related adjustments as discussed later in this section.

5-13 In summary, as a CLEC places LSRs and ASRs on BellSouth for specific services and UNEs, the related service orders will be provisioned as discussed in Section III of this document. The Completion Notice for a service order will be passed to CRIS or CABS as appropriate by SOCS, which will update the CLEC account with the new or changed service(s). This initiates recurring (non-usage) charges for the new service(s) and accrues any non-recurring charges to the account applicable to the installation activity. If, thereafter, the CLEC refers a billing complaint or inquiry to the LCSC, the LCSC will manually review, adjust, or correct account database information in CRIS via the BOCRIS system and in CABS via the BOCABS system.

Usage, Call, & Event Recording:

5-14 Once a service has been provisioned and updated to the CLEC's account, the next billing process is the ongoing recording and processing of usage, call details, and/or billable events. Such data is recorded in the form of Automatic Message Accounting (AMA) messages by network elements which are involved in providing the service. In the case of Local Interconnection trunk groups, for example, usage is collected through the AMA messages recorded for each call attempt handled by the trunk group. In the case of switched line port services, AMA messages are typically recorded to capture details about call attempts or certain feature uses/activations. Such call records can be used either to generate measured-service billing or call-detail billing for billable

(e.g. "toll") calls. In the case of Advanced Intelligent Network (AIN) services, database queries to the Service Control Point (SCP) might, for instance, be recorded with AMA messages at the Service Switching Point (SSP).

5-15 Each type of network element uses its own unique software and hardware elements to record, store, and forward AMA messages. There are many types of network elements in use across BellSouth. The processes and architectural details associated with programming network element AMA recording is extremely complex and beyond the scope of this document. For completeness, however, a high-level, generic description of the network element AMA teleprocessing process will be given here.

5-16 Typically, the instructions for generating AMA messages are programmed into the network element database via system software options or translations. Certain software programming options may be instituted during the work to implement feature or service capabilities in the network — in advance of any sales and service provisioning activities. Other such programming options may be instituted in connection with the service provisioning activities associated with a particular service request.

5-17 BellSouth uses AMA teleprocessing capabilities to collect AMA messages from the various network elements into the billing systems. In general, a network element will record AMA messages in real time and store that data using a short term temporary storage media. This is typically a hard disk storage device within an AMA teleprocessing module of the network element. The AMA messages are polled by AMA collector systems located in BellSouth Corporate Data Centers called Electronic Toll Collections Systems (ETCS). The ETCS collector will access its assigned remote network elements one of two ways:

- In some instances, the collector has a dedicated data link to the remote network element. Only the largest, highest-volume network elements warrant this type of data linkage.
- In most instances, the collector will access the remote network element via a dial-up data link using secure automated call-back modems.

5-18 When the collector polls a network element, the network element transmits the stored AMA messages using file transfer protocols. Once a file of AMA messages covering a time period has been transferred to ETCS, that file is marked as "polled" in the network element storage. The file is retained there a short time longer as backup in case a second poll is required due to problems in downstream billing systems.

5-19 The ETCS collector checks the AMA messages collected during the polling session for integrity. ETCS also performs date and time checks against the data collected from the network element from the previous polling session to ensure continuity. If gaps or discrepancies are detected, the system requests manual intervention

to take appropriate actions. If no problems are detected, the newly received AMA data is accepted. ETCS passes AMA data collected from all network elements to the ALPHA Message Processor system (ALPHA). ETCS will then archive the AMA data to magnetic tape which is stored for specified retention periods in the Corporate Data Center.

5-20 ALPHA will perform additional, more detailed validity checks on the AMA data received from ETCS. ALPHA will then "sort" the AMA messages by type and route them appropriately for downstream processing. If the AMA messages are types which contain call details or billable events associated with CRIS billing, ALPHA routes such AMA messages to the CRIS—Message Processing (CRIS-MP) application. If the AMA messages are types which contain access data used to accumulate CABS billable usage, ALPHA passes such AMA messages to the CABS—Message Processing (CABS-MP) application.

5-21 CRIS-MP will then apply rating rules and charges in order to calculate the total charges for each call or billable event. In a traditional billable "toll" call, for example, the rating process would consider the distance (determined by longitude and latitude coordinates of the originator's NPA-NXX and the coordinates of the called party's NPA-NXX). The rating process would also consider the time-of-day and day-of-the-week when the call was made. Other factors might also apply, such as whether the customer has subscribed to a special calling plan. As CRIS-MP rates each call or billable event, it accrues those charge details against the associated CRIS account. In the case of CLECs, charges will be calculated and accrued in accordance with any contractual requirements negotiated between that CLEC and BellSouth and in accordance with regulatory requirements.

5-22 Likewise, CABS will accrue billable usage against CABS accounts by processing Local Interconnection trunk usage AMA messages. In certain instances CABS will reference Customer Guide information which is contained in CRIS via a link between the two systems, primarily:

- If the CLEC negotiates different Local Interconnection usage rates for different sets/classes of end users or for specific call types, CABS can obtain information from CRIS about the originating or terminating telephone number contained in AMA messages.
- Interim Local Number Portability (iLNP) usage is billed via CABS. CABS identifies those AMA messages based on analysis of the telephone number, and uses information from the CRIS Customer Guide to do so.

5-23 Otherwise, CABS functions independently from CRIS. In the case of CLECs, CABS charges will be calculated and accrued in accordance with any contractual

requirements negotiated between that CLEC and BellSouth and in accordance with regulatory requirements.

5-24 CRIS and CABS will each store accrued charges and billing data until time to render customer billing via whichever invoicing option(s) the CLEC has selected.

5-25 In summary, AMA messages are recorded in real time by network elements and collected by ETCS in the Corporate Data Center via polling/teleprocessing arrangements. ETCS and ALPHA check to ensure that messages are correctly recorded and formatted, that no gaps or duplications exist in the collected data, and then pass the messages to the appropriate billing system — either CRIS or CABS. The billing systems read the AMA messages, apply appropriate rating, and accrue billing data and charges to the associated account. The billing systems store the accumulated billing data until time to render a bill.

Bill Rendering:

5-26 BellSouth offers a number of options and alternatives among which each CLEC can select to receive billing invoices and billable usage data. Those options themselves are described in Section V.D. The following is a description of the overall process flow, primarily from a systems perspective.

5-27 Generally speaking, bills are rendered in accordance with billing cycles. CRIS processes 20 billing cycles each month, and CABS processes 10 billing cycles each month. Customers are spread across all billing cycles in order to "level load" the billing systems as much as possible. This technique uses systems capacity in the most efficient manner, conserving capital and expense costs. However, a customer can request that his bills be rendered on a specified billing cycle, and BellSouth will make every attempt to accommodate the customer's needs.

5-28 On the scheduled billing cycle, CRIS and CABS process the billing invoice(s) for each customer on that cycle. The billing data and charges which have been accruing during the billing cycle for each account in the Accounts module is passed to the Bill Presentation module. This includes any recurring and non-recurring charges having to do with the services under each account. In this way, the Billing Presentation module of CRIS and CABS collect all of the pending charges, both recurring and accrued, as well as the appropriate customer account and formatting information.

5-29 If the CLEC has questions or complaints about their billing, the CLEC will contact the LCSC. All CLEC billing inquiries, complaints, and escalations will be handled through the LCSC. The LCSC personnel can access the CLEC's accounts via the BOCRIS and BOCABS systems interfaces to review and provide information in response

to questions, to make changes and adjustments in billable charges on a bill as negotiated with the CLEC, or make corrections to the account database.

C. Points of Manual Intervention:

5-30 The following tables reflect two kinds of manual work which must be handled in the various work groups that comprise the billing pipeline. The first kind of manual work is planned and required as an integral part of the process. The second kind of work results when some problem or condition in the mechanized support systems causes an item to "fall-out" into the work group for manual intervention. The first type of work is called "planned" in the following tables, and the second type of work is called "fall-out". Refer also to Exhibit V-3.

Table 5-1: Corporate Data Center (CDC):

Type Manual Work Planned VS. FALL-Out	*Operational System Involved*	*Cause of Manual Intervention*	*How Can the CLEC Control?*
Fall-out	ETCS	Problems in accessing one or more network elements to collect AMA data. CDC personnel will refer problems to Information Technologies who will investigate problems and work with Network as necessary to restore access.	n/a[1]
Fall-out	ETCS/ALPHA	Gaps in collection files, corrupted files or AMA entries, missing files, missing AMA entries. CDC personnel will coordinate with appropriate Network organizations to resolve the problem. For example, to resolve a hardware or generic software problem in a network element, the CDC would contact the Network Reliability Center (NRC). For a network element translations error, the CDC would refer the problem to the NISC-CTG for investigation.	n/a[1]
Fall-out	CRIS/CABS	System problems or conditions which prevent the system from completing its function. The CDC will refer systemic problems to the Information Technologies department for resolution.	n/a[1]

1. Fallout for these causes will impact BellSouth retail COUs in the same way as the CLEC.

BILLING FLOW
- MECHANIZED PROCESS FALLOUT -
Exhibit V - 3

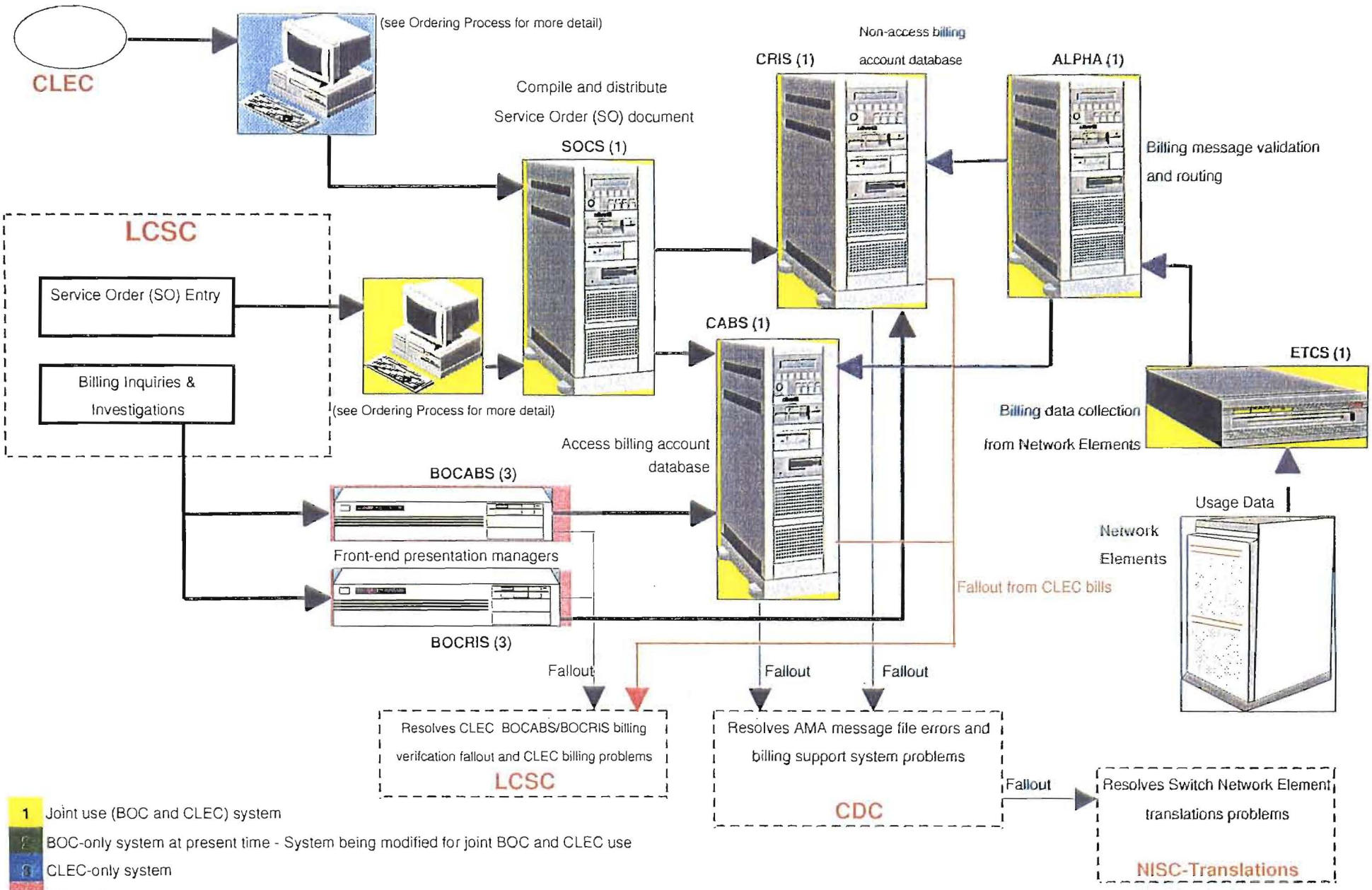


Table 5-2: Local Carrier Service Center (LCSC):

Type Manual Work Planned VS. FALL-Out	*Operational System Involved*	*Cause of Manual Intervention*	*How Can the CLEC Control?*
Planned	BOCRIS/BOCABS	Billing inquiries or complaints received from the CLEC. LCSC personnel will review the CLEC's account information, billing data and charges, etc. in response to the customer's questions or complaint. LCSC personnel will make the appropriate changes, corrections, or adjustments in the billing systems database in accordance with their investigations and negotiations with the CLEC.	n/a

D. CLEC Interfaces:

5-31 Several options are available to the CLEC for interfacing with BellSouth billing systems. First there are several options for receiving invoiced billing either through the mail or electronically. Secondly, there is an option for obtaining billable usage data on a daily basis via a file transfer process. These options will be described in the following paragraphs.

Invoiced Billing:

5-32 All of the following invoicing alternatives have been in production for quite some time with BellSouth retail customers and/or with InterLATA Carrier customers of BellSouth. Consequently, BellSouth has no need to subject these interfaces to additional or special internal testing during preparations for conducting business with CLECs.

Invoicing Options:

CRIS:

5-33 There are four basic options available to the CLEC for receiving CRIS billing. Three of these are electronic interfaces:

- Magnetic Tape Billing (MTB_{sm})

- Diskette Analyzer Billing (DAB_{sm})
- Customized Large User Billing — Electronic Data Interchange ($CLUB\text{-}EDI_{sm}$)
- Traditional printed and mailed invoicing

Magnetic Tape Billing (MTB_{sm}):

5-34 The CLEC can elect to receive his CRIS bills on magnetic tape media in a format that is based on the Bellcore Magnetic Tape Billing Plan. Following are the CLEC's requirements for implementing magnetic tape billing: software application, programming support, compatible tape reader. Delivery options include: reel tape (6250 BPI or 1600 BPI), cartridge tape, Connect:Direct, or server. The magnetic tape will be delivered via mail delivery service.

Disk Analyzer Billing (DAB_{sm}):

5-35 DAB provides billing data and analysis software on a 3.5" floppy diskette or CD-ROM. Following are the minimum requirements for receiving DAB: IBM or IBM compatible PC, DOS based 3.0 version or higher, minimum of 10 MB hard disk drive. The bill format will be the image of a Customized Large User Bill ($CLUB^{SM)}$ bill. With DAB, CLECs can generate standardized or customized reports using any data that appears on the bill. DAB will be sent via US mail or mail delivery service to the CLEC billing address specified in the master account.

5-36 Under this option, the billing information will be recorded using the "Magnetic Tape Bill Plan" transaction set. This service includes $Disk\ Analyzer_{sm}$ software which can be used to work with the data. Or the data can be loaded into the CLEC's own proprietary billing systems. The selected media will be sent via a delivery service

Electronic Data Interchange ($CLUB\text{-}EDI_{sm}$):

5-37 This EDI interface is ***not*** the same EDI interface used in the Ordering and Provisioning process as described in Section III of this document. The Ordering and Provisioning EDI supports only the ordering process using OBF standards applicable to service requests. The $CLUB\text{-}EDI_{sm}$ is a separate and distinct electronic interface used only to deliver formatted CRIS billing information to customers who elect this option.

5-38 To use EDI, the CLEC must be a CLUB account customer — that is, the CLEC receives his CRIS billing invoices in Customized Large User Bill (CLUB) format. BellSouth®'s $CLUB*EDI^{SM}$ is an automated exchange of business transactions in a standard format between computer applications. CLUB*EDI contains all of the information displayed on the CLEC's Customized Large User Bill (CLUB) bill, but the

format is a standard, hierarchical format that will be transmitted to the CLEC via a value added network (VAN), Connect:Direct, or gateway dialup.

5-39 CONNECT:Direct® is a host communications system used by BellSouth which supports the transmission of data over networked telecommunications lines. CONNECT:Direct® is a product of Sterling Commerce, Inc. A CLEC who chooses to obtain his billing via EDI from BellSouth can subscribe to a Value Added Network to which the EDI files can be delivered. The CLEC has many commercial offerings from which to choose. For example, three unaffiliated Value Added Network providers who are commonly used by BellSouth CLUB-EDI customers are:

- Sterling Commerce, Inc.
- Harbinger Corporation
- G.E. Information Services Corporation (GEISCO)

5-40 CRIS will transfer the EDI files to the CLEC's VAN address via CONNECT:Direct® when scheduled to do so. Sterling's interface does support either TCP/IP (Transmission Control Protocol/ Internet Protocol) standards or a Virtual Telecommunications Access Method (VTAM) IBM protocol.

Paper Invoices:

5-41 CLEC's who elect to receive printed billing invoices will receive a Customized Large User Bill (CLUB). The CLUB provides various sorting options and features that should accommodate the billing needs of the CLEC. The CLUB will be delivered via US mail to the address provided for the CLEC's master billing account.

CABS:

5-42 There are four basic electronic interface options available to the CLEC for receiving CABS billing in addition to paper invoices. The CABS electronic interfaces are various forms of CABS — Billing Data Transfer utilizing different mediums to transport the billing information as follows:

- CD-ROM
- Magnetic Tape
- Diskette
- EDI via CONNECT:Direct®

CD-ROM Billing:

5-43 The CLEC can elect to have his bills written to CD-ROM (Compact Disc Read Only Memory) media. Formatting conforms to OBF standards. This service does *not* include Disk Analyzer$_{sm}$ software. The billing data can be loaded into the CLEC's

own proprietary billing systems. The CD-ROM media will be sent via a delivery service to the CLEC billing address specified in the master account.

CABS — Magnetic Tape:

5-44 The CLEC can elect to have his CABS bills written to magnetic tape. Formatting conforms to OBF standards. Under this option, either a magnetic tape cartridge or 9-track reel tape will be used to record the data. The tape will be delivered to the CLEC via mail a delivery service to the CLEC billing address specified in the master account.

CABS — Diskette:

5-45 The CLEC can elect to have his bills written on a 3.5" floppy diskette. Formatting conforms to OBF standards. This service does *not* include Disk Analyzer$_{sm}$ software. The billing data can be loaded into the CLEC's own proprietary billing systems. The diskette will be sent via a delivery service to the CLEC billing address specified in the master account.

CABS —CONNECT:Direct®

5-46 With this option, CABS billing data is delivered to the CLEC using Connect:direct. CONNECT:Direct® is a host communications system used by BellSouth which supports the transmission of data over networked telecommunications lines. CONNECT:Direct® is a product of Sterling Commerce, Inc. A CLEC who chooses to obtain his billing via CONNECT:Direct® from BellSouth can subscribe to a Value Added Network to which the billing data files can be delivered.

Paper Invoices:

5-47 The CLEC can elect to receive printed CABS billing invoices delivered through a traditional mail service. Under this option, paper invoices will be printed by CABS in accordance with the established billing cycle. Bill presentation software will generate the paper invoices and control automated equipment which will package the material for mailing. The invoices will be sent to the billing address contained in the master account.

Future CRIS-to-CABS Bill Reformatting Option:

5-48 Some CLECs have requested the option to receive their CRIS billing in CABS format. BellSouth is currently developing the capability to provide this reformatting option for CLECs. The option is generally available beginning July, 1997. Since the billing data will still actually flow through CRIS, CRIS will send this billing to

CABS which will render the bill. Therefore, the billing will fully comply with OBF CABS BOS standards. Certain output fields which do not apply to CRIS billing will default to predetermined values. If a CLEC desires this format and agrees to accept the defaulted fields, BellSouth will provide this option.

Daily Usage Files:

5-49 The CLEC can elect to receive Daily Usage Files from BellSouth. Daily Usage Files are *not* billing invoices. These files contain data about billable events and usage which originate from CLEC resale lines or unbundled switch ports (or has been ordered to "bill to" a resale line or switch port). Daily Usage Files can be used by the CLEC in any way deemed appropriate. For example, the CLEC may:

- Conduct fraud detection.
- Perform marketing studies.
- Render bills to end users.
- Perform credit limit processes.

5-50 The Daily Usage Files are created and data linked to the CLEC through a CRIS software application called ODUF (OLEC Daily Usage File — OLEC is an acronym for Other Local Exchange Carrier). The CLEC has three options for obtaining Daily Usage Files:

- ODUF can interface with CONNECT:Direct® to transfer the Daily Usage Files to the CLEC electronically through Value Added Network services.
- ODUF can interface with the CLEC via NCR COMTEN data ports.
- ODUF can generate a magnetic tape which will be mailed to the CLEC.

5-51 ODUF is the only new billing interface capability developed expressly for the CLEC community. As stated in Paragraph 5-32, all of the other billing interfaces have been in production for quite some time with BellSouth retail and IC customers. ODUF was implemented in July, 1996 for CLEC use, and interconnection testing was conducted with a large CLEC at that time. Since then a number of CLECs have implemented the ODUF interface, and over 1M CLEC billable usage records have been processed via ODUF.

Applicable Standards:

5-52 Several standards documents apply to the billing interfaces as mentioned above. Applicable standards continue to evolve, and a number of issues remain open in

the OBF and other standards bodies. BellSouth intends to transition to applicable national or industry standards when finalized.

5-53 At this time, the following are the primary applicable standards which apply to CLEC billing:

Table 5-3: BellSouth Billing System Standards:

Billing System	*Standard/Specification*	*Description*
CRIS	BR010-200-010	EMR (Exchange Message Record) as published by Bell Communications Research.
CRIS	SR-OPT-00153	Magnetic Tape Bill Plan, a billing specification originally published by Bell Communications Research.
CABS	ASC X12 811	ANSI An ANSI standard transaction set sanctioned by the TeleCommunications Industry Forum (TCIF) under the Carrier Liaison Committee of the Alliance for Telecommunications Industry Solutions.
CABS	CABS BOS	CABS Billing Output Specification of the Billing Committee of the Ordering & Billing Forum (OBF)
CABS	MECAB	Multiple Exchange Carrier Access Billing document of the Billing Committee of the OBF
CABS	MECOD	Multiple Exchange Carrier Ordering and Design Guidelines of the Ordering and Provisioning Committee of the OBF

E. Billing Inquiries & Escalations:

5-54 All billing inquiries and escalations will be handled by the LCSC. The LCSC will receive these primarily by phone or facsimile, although regular or electronic mail correspondence will also be accepted. The LCSC will have access to the CRIS and CABS accounts database and associated billing data via BOCRIS and BOCABS respectively. The LCSC will coordinate with appropriate groups in BellSouth Information Technologies, Network, Comptrollers, InterConnection Services, BellSouth Business Systems, Consumer, etc. to investigate in response to a CLEC billing inquiry or complaint.

5-55 If corrections to the accounts database or adjustments to billing rendered must be made, the LCSC will handle such transactions via BOCRIS and BOCABS, documenting the corrections or adjustments to the CLEC. Negotiations, when appropriate, with the CLEC will be handled under the oversight of the LCSC and InterConnection Services (ICS) management.

5-56 If the CLEC is dissatisfied with the response of the LCSC to a billing inquiry or complaint, the CLEC may escalate to LCSC management, and from there to higher management levels within the ICS organization. Escalation procedures and contacts will be furnished to the CLECs by the LCSC.

Section VI



Forecasts and Capacities

VI. Forecasts and Capacities:

A. CLEC Forecast:

6-01 The BellSouth InterConnection Services forecasting group has produced business sales forecasts for various CLEC volumes. These forecasts were produced using information which was shared with BellSouth by the CLECs and from information and indicators available through public sources. Furthermore, in the forecast iterations to date, the BellSouth retail COUs (Customer Operating Units) have commissioned customer surveys to get some indication of expected business losses to the CLEC community. Finally, the forecast group analyzes the trends of actual volumes to compare against the projections derived from these other sources.

6-02 From these projections, the ICS forecast group produced their local competition sales forecast. The latest such official forecast is summarized in Table 6-1 below.

Table 6-1: CLEC Forecast Vs. Current Actuals

BellSouth Regional Data	*End-of-Year*		*YTD July*	*End-of-Year*
Forecast Item	*1996 Fore.*	*1997 Fore.*	*1997 Act.*	*1998 Fore.*
Total Residence Lines	57680	140268	33187	370833
Total Business Lines	5303	131043	41458	332805
Total ESSX Lines	1890	33297	1258①	84562
Total PBX Trunks	1116	4952	1927	12578
Voice Mail Mailboxes	7604	30506	2633	78909
ISDN Individual Lines	19	1070	151	2718
RingMaster	1704	12645	431	42748
Unbundled Loops	2492	22603	7864	134008
Unbundled Ports	1704	100	0	8175
Unbundled Loops & Ports	2492	0	0	392851

Note 1: "Total ESSX Lines" actuals are end of month, June, 1997. All other actuals are end of month, July, 1997.

6-03 The CLEC forecast data is next furnished to a corporate forecasting group which collects forecast information from all customer operating units of BellSouth. The individual market forecasts are combined into a single consolidated sales forecast for BellSouth. Some information is forecasted at state level, some at a "geo level", and a subset of forecast data is carried to wire center level. To date, the forecasts have assumed no significant market growth due to increased stimulation. Most of the forecasted CLEC sales have been reflected as retail COU reductions in market share. The consolidated

market forecast is then distributed to all departments of BellSouth as the corporate official view to use in:

- establishing revenue commitments
- provisioning network capacities
- provisioning operational systems capacities
- planning force sizing for the various organizational entities
- negotiating capital and expense budget levels.

6-04 The above forecast summary shows that CLEC sales volumes are currently running below BellSouth's forecast by a considerable margin.

B. System Capacity:

6-05 The DOJ has defined the "system" to be:

> *"...the specific electronic interfaces, back-office systems, and BOC personnel (hereinafter referred to in combination as "the system") involved in providing the listed functions."*

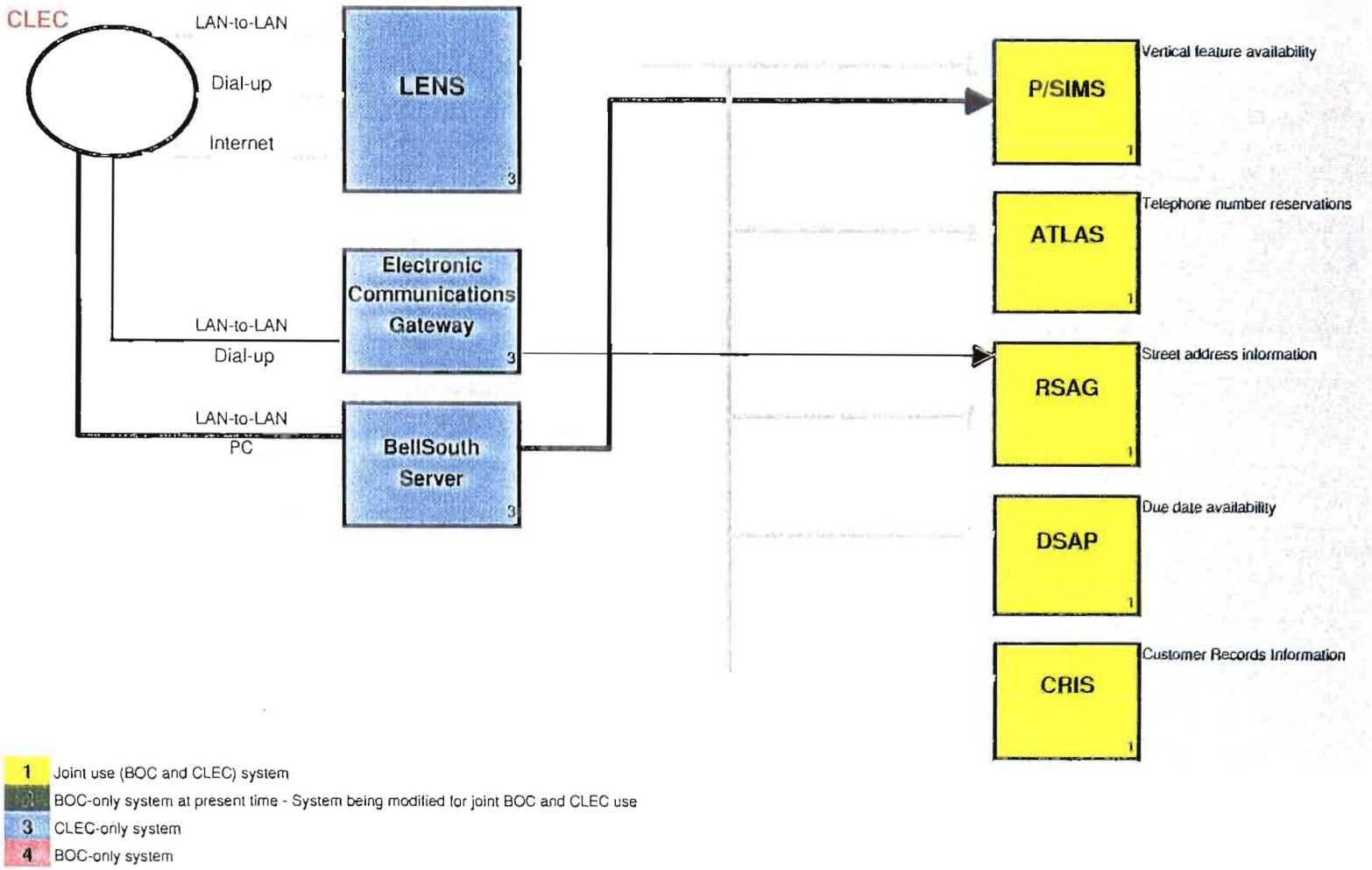
6-06 The DOJ then asks:

> *"...what is the capacity of the system in terms of the number of transactions meeting the above criteria that can be processed per day per wire center (or other meaningful measure) for the described functions and what limits the BOC to this capacity? What is the geographical reach of this capacity?"*

6-07 To state the capacity of an end-to-end system as complex and interrelated as each of the four processes described in this document, one must first look at the capacities of each element of the system. The capacity of the end-to-end system — i.e. the "throughput" of the "pipeline" — will be equal at any point in time to the capacity of the most limiting element. To make such an analysis possible, capacities must be measured or calculated in very consistent terms for every element of the pipeline. Furthermore, the systems involved in processing CLEC transactions are, for the most part, the same systems processing BOC transactions. In fact, once a CLEC transaction has passed through the pipeline elements dedicated to the CLEC interface, there is no distinction between a CLEC transaction and a BOC transaction and any bottleneck occurring in these downstream pipeline elements will affect CLEC and BOC transactions equally.

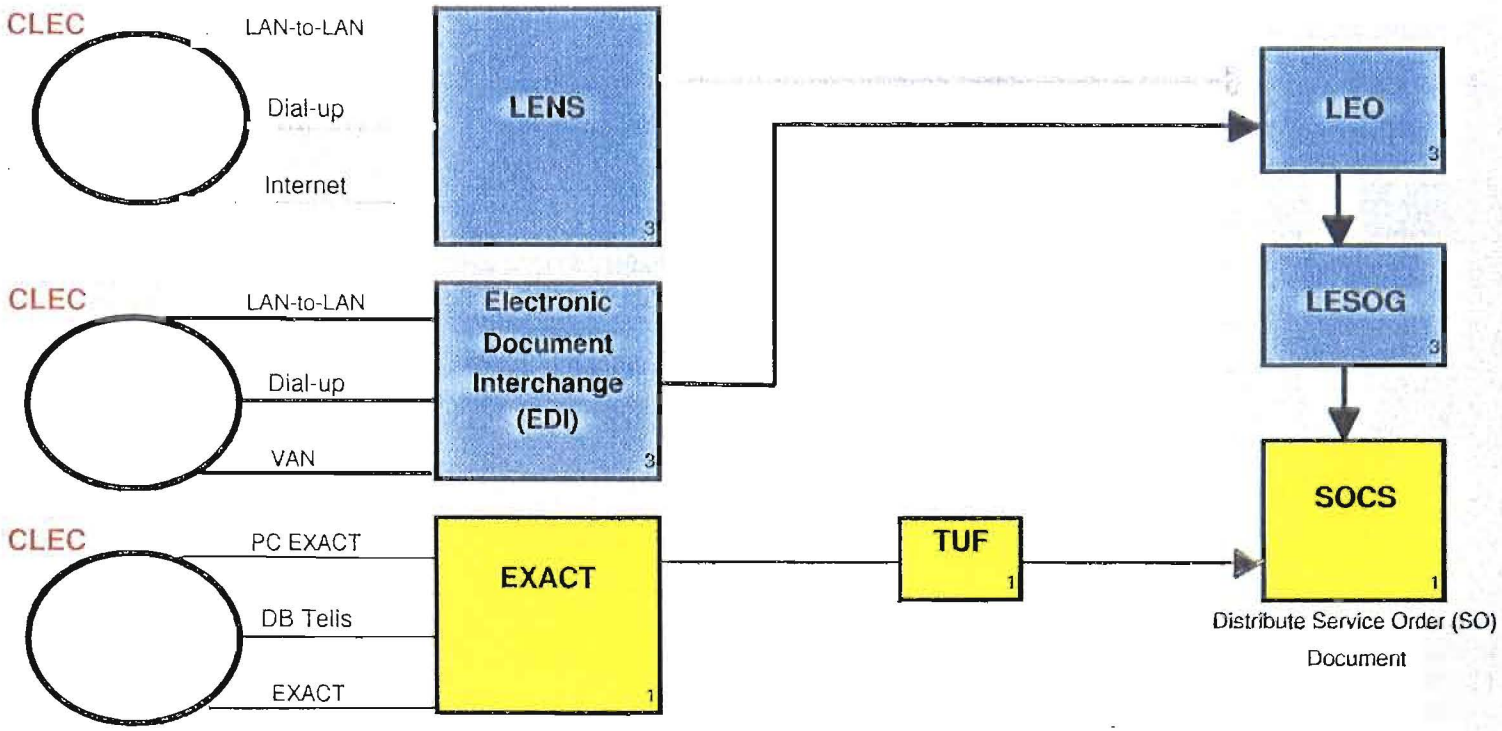
MECHANIZED PREORDERING FLOW

Exhibit VI - 1



MECHANIZED ORDERING FLOW

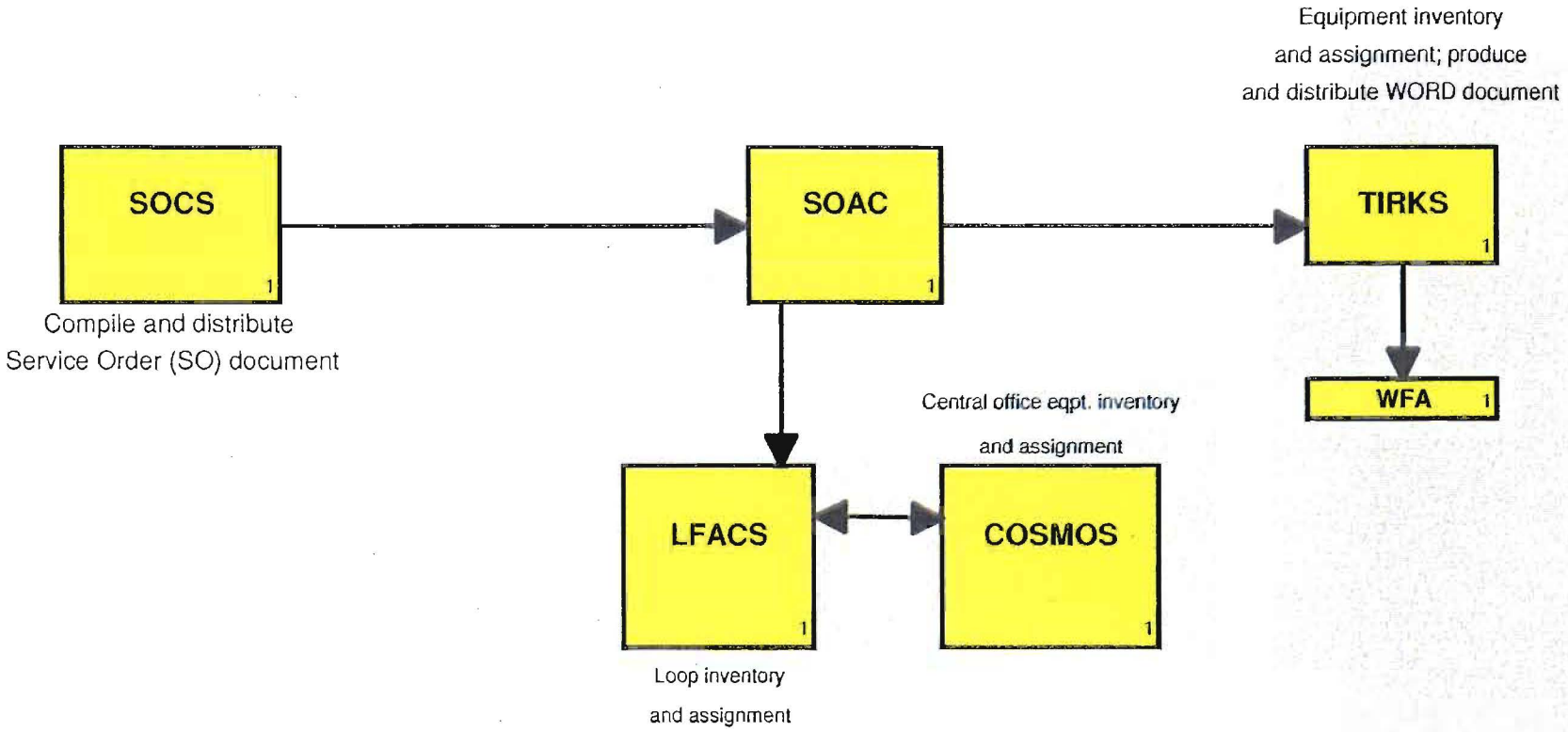
Exhibit VI - 2



1 Joint use (BOC and CLEC) system
2 BOC-only system at present time - System being modified for joint BOC and CLEC use
3 CLEC-only system
4 BOC-only system

MECHANIZED DESIGN PROVISIONING FLOW

Exhibit VI - 3



1 Joint use (BOC and CLEC) system

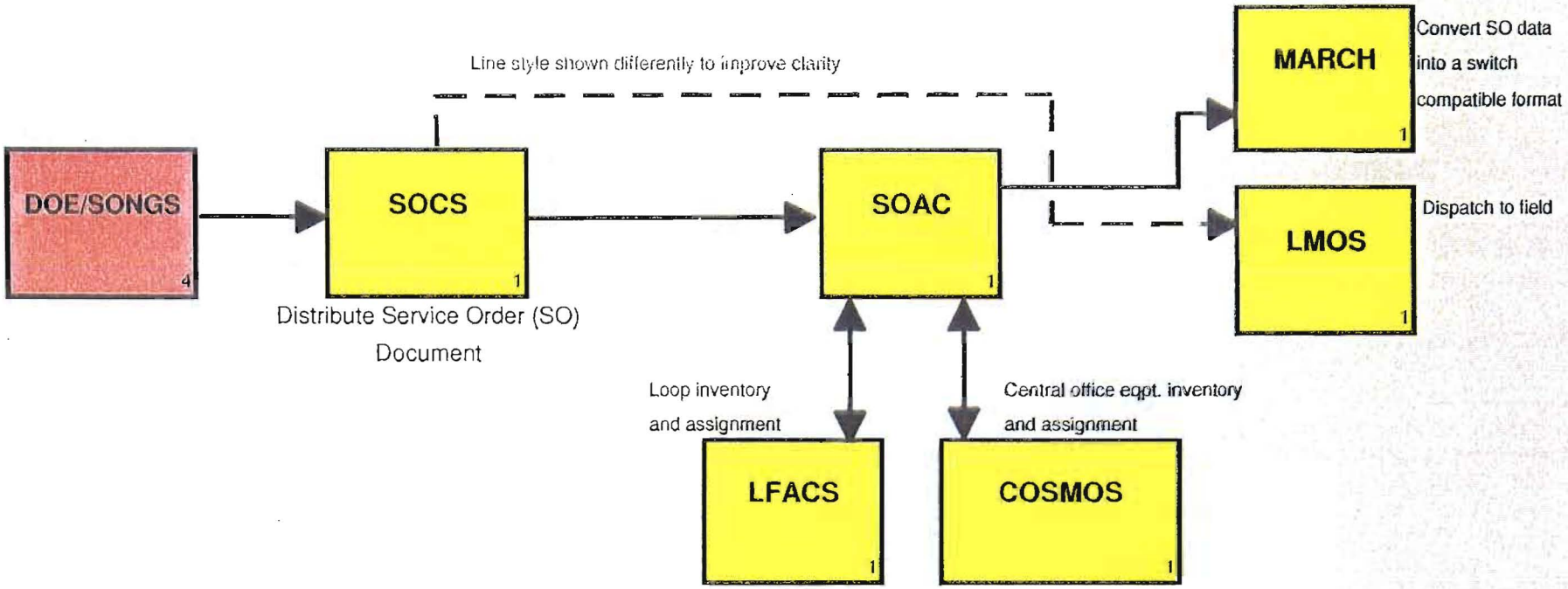
2 BOC-only system at present time - System being modified for joint BOC and CLEC use

3 CLEC-only system

4 BOC-only system

MECHANIZED NON-DESIGN PROVISIONING FLOW

Exhibit VI-4



1 Joint use (BOC and CLEC) system

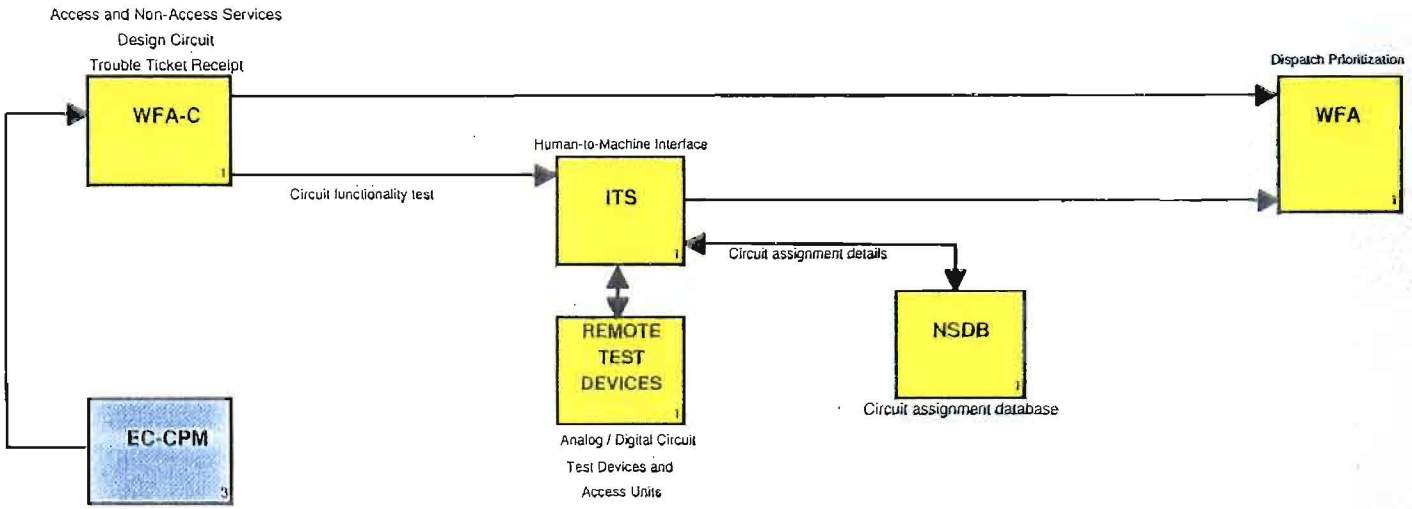
2 BOC-only system at present time - System being modified for joint BOC and CLEC use

3 CLEC-only system

4 BOC-only system

MECHANIZED DESIGN MAINTENANCE FLOW

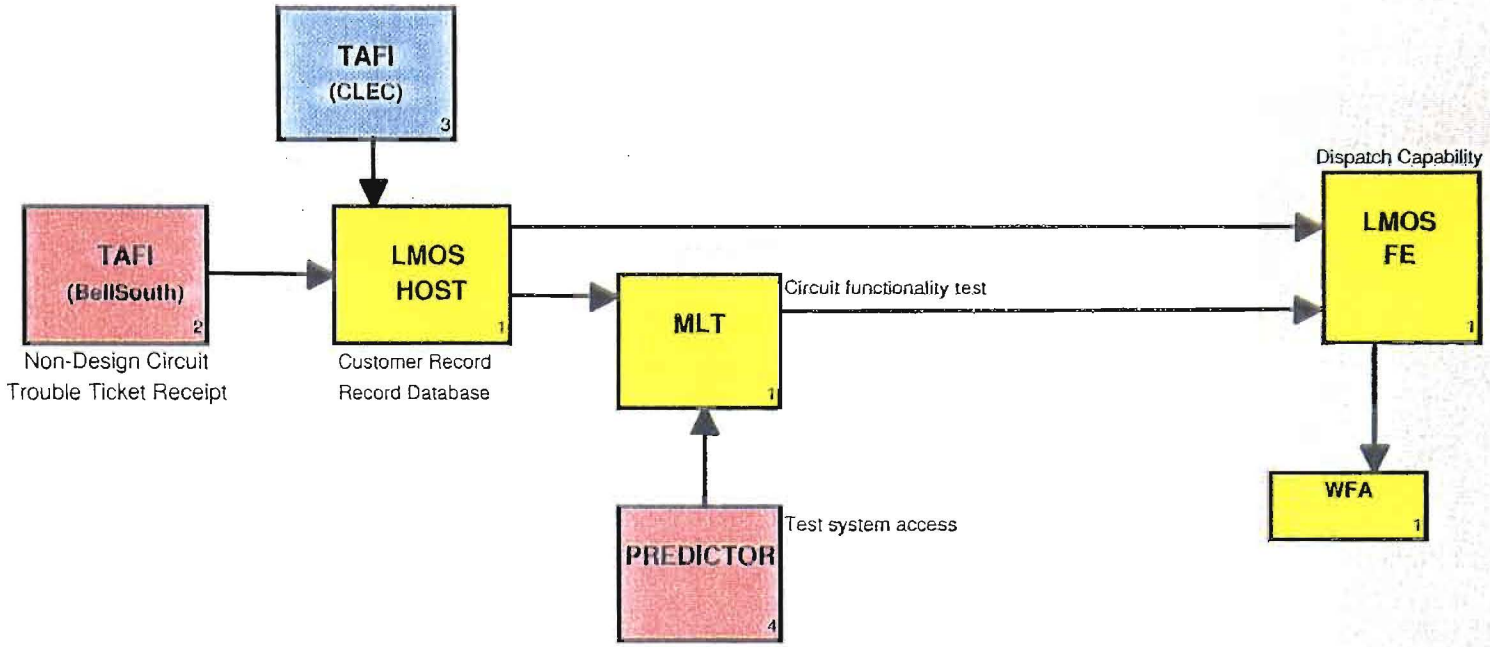
Exhibit VI - 5



1	Joint use (BOC and CLEC) system
2	BOC-only system at present time - System being modified for joint BOC and CLEC use
3	CLEC-only system
4	BOC-only system

MECHANIZED NON-DESIGN MAINTENANCE FLOW

Exhibit VI - 6



1 Joint use (BOC and CLEC) system

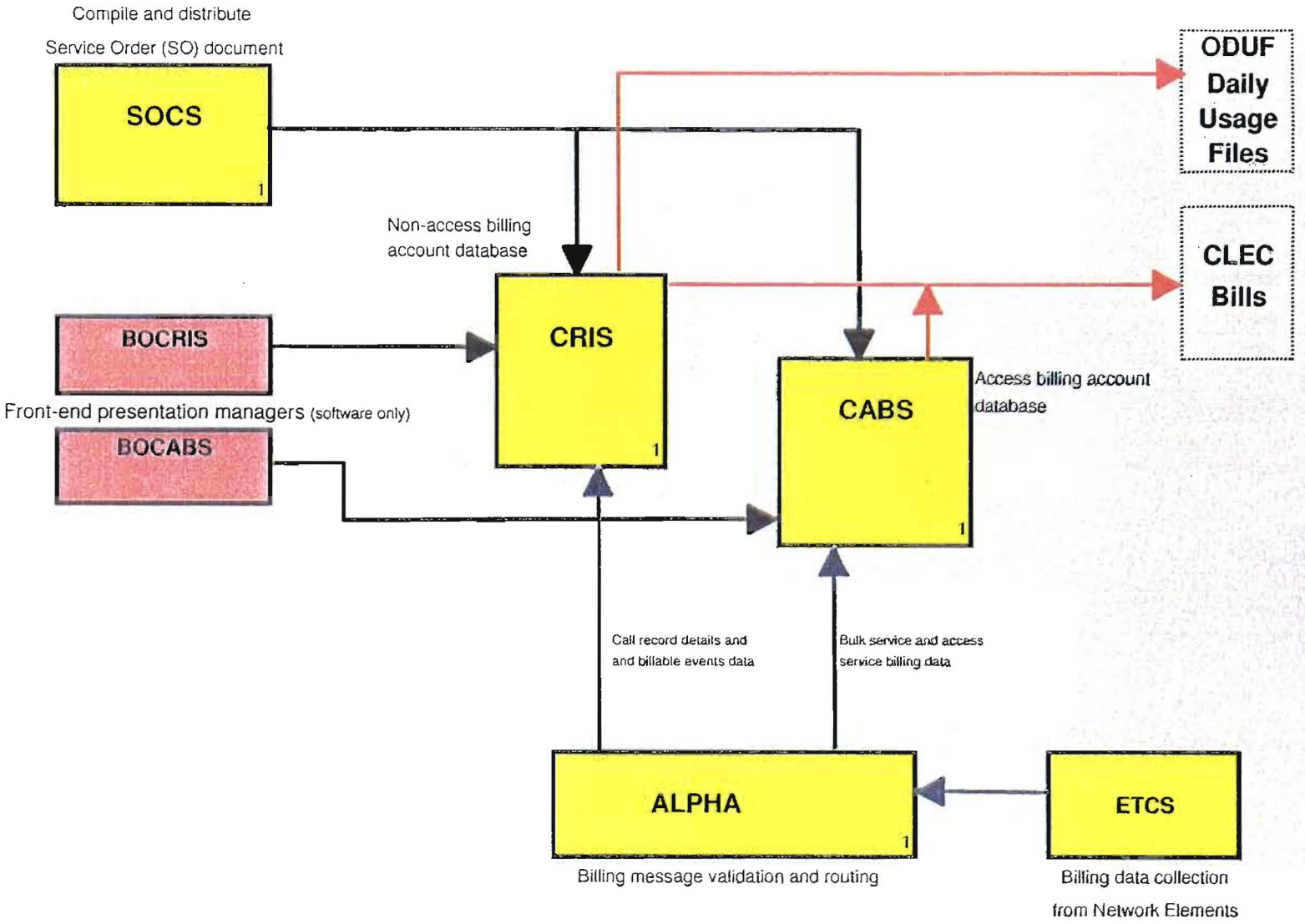
2 BOC-only system at present time - System being modified for joint BOC and CLEC use

3 CLEC-only system

4 BOC-only system

MECHANIZED BILLING FLOW

Exhibit VI - 7



1 Joint use (BOC and CLEC) system

2 BOC-only system at present time - System being modified for joint BOC and CLEC use

3 CLEC-only system

4 BOC-only system

Operations System Capacities

6-08 All OS elements involved in the four process flows except EDI, LENS, LEO, LESOG, and the dedicated TAFI will process both BellSouth and CLEC items. See Exhibits VI-1 through VI-6 for an overview of the process flow and systems. To these infrastructure systems, transactions related to BellSouth retail service and CLEC wholesale service are handled the same. Some data fields will be different for each; however, the OS will process the transactions in the same way.

6-09 To COSMOS, for instance, one cross-connect assignment is processed much like another. The impact on the machine of a cross-connect assignment transaction which is driven by a BellSouth order is no more or less than a cross-connect assignment driven by a CLEC order. The same is true for all other infrastructure OSs.

6-10 It might be possible in theory to develop a concept like "transactions" to provide capacity figures in consistent terms for all mechanized and manual elements of the process pipeline. But we cannot use "orders", "requests", "lines", etc. to do so. Consider the OSs employed in the Ordering & Provisioning flow, for instance. Not all service orders which are processed through these systems involve "lines" or "loops". These OSs process the full range of service types and network elements, so a statement of capacities stated in terms of "lines per x" would be purely arbitrary and contrived based on some historical mix of orders which would constantly vary day-to-day.

6-11 We cannot use the concept of "orders, or requests, per hour, day or wire center" for similar reasons. One local service request, or one service order, is not at all equivalent to another. In an extreme example, one service request or order involving 40 new ESSX (MultiServe®) lines would ***not*** be equivalent in impact to one service request or order involving a single residence flat-rate line. None of our operating systems can be sized or capacity-monitored on a "wire center" basis.

6-12 Today it is not possible to state capacities in consistent terms throughout the process pipeline. Some of these BellSouth OSs are mainframe systems and some are "minicomputer" based. Some use distributed processing functionality, and some do not. Some have "front-end" systems which typically serve limited geographic areas or specific organizational entities. The varied architectural designs of these systems have led the vendors of those systems to provide specific system monitoring and measurement tools optimized for their product.

6-13 Finally, many of the infrastructure OSs process transactions related to multiple flows. LMOS, for example is heavily involved both in provisioning transactions and in service assurance transactions. It is involved in testing functions with TAFI as well as field dispatch functions. The system monitoring and sizing tools for LMOS, as an

example, do not consider specific process flow transactions. These tools measure and monitor the combined demand on the system elements such as Central Processor Unit (CPU) real time usage.

6-14 To provide the details of the capacity determination for every individual OS is beyond the scope of this response document. Specific information on the capacity management process for any individual OS is available upon request. These capacity management tools do not permit BellSouth to state capacity of each infrastructure OS in consistent terms. However, to demonstrate the capacities of the OSs that could present a bottleneck or limitation to CLEC transactions, system capacity and load data has been compiled for the OSs that are dedicated to CLEC transactions..

6-15 The current capacities of each of the CLEC dedicated OSs are shown in Table 6-2 below. This table also reflects an estimated cost and interval to increase the capacity of each OS by 100% and 500%. Exhibits VI-1 through VI-6 demonstrate how these CLEC systems interface with downstream OSs to form a pipeline in which CLEC transactions are integrated with BellSouth retail transactions.

Table 6-2: Operating System Capacities:

	Current		*Cost & Interval To Increase Cap. by 100%*			*Cost & Interval To Increase Cap. by 500%*		
System	*Current Demand*	*Design Capacity ①*	*Capital*	*Expense*	*Interval*	*Capital*	*Expense*	*Interval*
EDI	~190 LSRs per day	4,000 LSRs per day②	$200K②	$300K②	90 days②	$400K②	$600K②	180 days②
LEO	~400 LSRs per day	5,000 LSRs per day	$200K②	$300K②	90 days②	$400K②	$600K②	180 days②
LESOG	~400 LSRs per day	5,000 LSRs per day	$200K②	$800K②	90 days②	$400K②	$1.7M②	180 days②
LENS	~210 LSRs per day	1,000 LSRs plus pre-order for 5000 LSRs per day	$500K②	$1.0M②	90 days②	$1.0M②	$1.9M②	180 days②
TAFI	< 5 concurrent users	130 concurrent users 2600 reports per hour	$500K②	$200K②	60 days②	$2.5M②	$1.0M②	120 days②

NOTES:

1. The design capacity for the CLEC ordering pipeline is based on a total of 5000 LSRs per day. LSRs will flow from either EDI or LENS into LEO and then LESOG.
2. The actual systems capacity increases will be driven by forecasts and actual historical data from CLECs' volume collected over time. We are prepared to add capacity to our systems as the CLEC forecasts and volumes require. We will continue to tightly monitor systems capacities to ensure adequate capacities and adequate time leads to increase capacities where needed.

6-16 BellSouth Information Technologies assigns a System Administrator (SADM) to each Operations System. The IT SADM is responsible for collecting operating and system performance measurements on the OS using the reports and tools designed into the OS. Typical measures and data collected include component usages, processor real time usage, port usages, system response times, file system capacity measures, system errors and diagnostics, etc. Using the engineering methods which have been established for each OS, Information Technologies applies the data collected to address system capacity and performance needs. A number of approaches are used to manage capacity and ensure good system performance, including:

- Adding components (e.g. ports, front-ends, additional distributed processors) to increase the capacity of the system.
- Rebalancing the load on the existing system components.
- Moving geographical areas from one OS system complex to another. For example, two other states share one of the mainframe-based OSs with Georgia. To increase Georgia's capacity, BellSouth might at some point swap one of the states on this processor with a more lightly-loaded state served by another mainframe. Or one of the other states might be moved off the mainframe which supports Georgia.
- Upgrading the system or selected system components with higher capacity components.
- Purchasing system or software design enhancements or features which relieve the load by, for instance, changing the way the system performs.
- Replacing the OS.
- Batching reports or moving reports functions off-line to decrease load on the system during "busy hours".

6-17 Information Technologies collects historical data used in the capacity management process for each OS. The historical data is trended and projected into the future in order to decide when to schedule capacity management actions. The consolidated official forecasts described in Section 6.A above are used to make engineering judgments regarding these projections. For example, if the sales forecast reflects a markedly different trend or exhibits an unusual aberration, the trended OS projections will be questioned and adjusted as deemed appropriate. If, on the other hand, the sales forecasts support the same trend, the trended projections will be used to time OS sizing actions.

6-18 Thus, for the infrastructure OSs such capacity management processes consider the total system load, of which CLEC-related system demands are but one single factor.

6-19 Certain OSs are dedicated to supporting CLEC business: EDI, LENS, LEO, LESOG, and CLEC-TAFI systems. EDI, LENS, LEO, and LESOG function in a closely interrelated manner. EDI and LENS share downstream LEO and LESOG

processors — that is, both EDI and LENS will send LSRs into the same LEO-LESOG downstream pipeline. The capacity management of these systems is still relatively new. Until more experience has been gained, BellSouth has focused early engineering and testing of these new interfaces on ensuring committed minimum throughput capacities. Based on forecasts and all available information, BellSouth decided to certify an initial capacity of at least 5,000 LSRs per day through EDI and LENS with a corresponding load of preordering transactions being processed via LENS. System capacity was installed based on engineering algorithms, and that capacity has been confirmed through load and volume testing.

6-20 The above describes the process used for managing BellSouth OS capacities. Details regarding the specific measurements, engineering methodology, planning process, etc. for each OS are available if such detail is needed. However, as stated earlier, that volume of information is beyond the scope of this document.

Work Group Capacities

6-21 Just as with BellSouth's OSs, none of BellSouth's work groups are limited to a wire center in scope. BellSouth Installation & Maintenance groups cover multiple wire centers. Center work groups are statewide or regional in scope. The only work force which comes even close to this limited a geographical scope is, perhaps, our central office technician work groups. However, generally BellSouth central offices are grouped, or "clustered", with a work force which is routinely moved and dispatched among the offices in the cluster as workload demands. Only the very largest and highest volume central offices are manned daily, and even those offices loan forces to other locations or borrow forces from other locations as workload dictates. It is not meaningful to attempt to state system capacity based on wire center boundaries.

6-22 Only two of the work groups involved in the four processes are dedicated to handling CLEC business demands: the LCSC and the UNEC. All other BellSouth work groups handle any-and-all work which must involve their function. Only certain work groups handle work as a planned part of process flows. Most work groups basically handle "fall-out" where manual intervention must occur due to some problem or set of circumstances as discussed in earlier sections of this response.

Activity-Based Force Sizing Models:

6-23 BellSouth relies on activity-based force sizing models to support staffing and budgeting processes. All such force sizing models are developed and maintained in essentially the same way.

6-24 The actual drivers of manual work are identified for the specific work group. A work driver is an item of manual work which consists of a tangible and measurable input resulting in either an identifiable output from the group or a defined set of results. Then the work process involved with manual handling each input is documented in a work process flow. Steps or segments of each such work process are then grouped into "tasks" which have identifiable starting and ending points — and thus can be accurately timed.

6-25 Periodically, time-and-motion study techniques are used to determine the time-per-task over a statistical sample of observed actual work. The average time-per-task is aggregated to yield the overall work time required to accomplish an item of work for each identified driver. Care is taken so that the time required to accomplish each type of activity, or "work driver", considers an overall mix of personnel with typical employee profiles of performance, training, and experience. The OSs which support these groups keep historical records of volumes handled for each driver. Based on historical trends, an expected volume is projected forward for a study period. These projections are then compared to the official sales forecasts in the same manner used for OS projections as discussed in Paragraph 6-17 and adjusted if warranted.

6-26 The study period is typically the next calendar year, which corresponds with the BellSouth corporate budget cycle. However, changing conditions or service results issues can trigger force adjustments at any time.

6-27 The projected workload volumes are then multiplied by the time factors, adjusted for productivity commitments which are based on scheduled OS enhancements, process improvements, etc. during the study period. This yields the number of "raw" man-hours necessary to accomplish the projected work volume. This raw man-hour requirement is next adjusted by the force sizing models to account for vacation time, typical time lost to illness, work group training plans, overtime objectives, etc. The total man-hours calculated in this manner is finally converted to "head count" required for the study period. This force sizing is used in the corporate budgeting process.

Local Carrier Service Center (LCSC):

6-28 The LCSC is dedicated to handling CLEC business requests. The LCSC is multi-state in scope. There are actually two BellSouth LCSCs at the current time. These two LCSCs are currently organized around CLEC customers — i.e. each LCSC is assigned to support a specific set of CLECs with the load matched to the force in each center. The LCSC's workload is currently based primarily on the total number of preordering and ordering transactions processed through the manual interface.

6-29 This group has been in existence for a relatively brief time, and the LCSC processes and CLEC interfaces are rapidly evolving. As more CLECs begin to use the electronic interfaces, the overall manual workload of the LCSC will decrease and the portion of that workload driven by OS fallout will increase in significance. Implementation of electronic mechanized interfaces is currently a foundation of BellSouth's plans to handle increases in volume of CLEC ordering transactions.

6-30 The initial iteration of the LCSC force sizing plan is currently being updated because of evolving methods and expectations. Human resources will be sized accordingly, added if necessary. Based on BellSouth forecasts, the growth in CLEC volumes is offset by a decline in volumes in traditional BellSouth "business office" contact groups. Plans are underway to move human resources from other business units into the LCSC as appropriate in order to preserve the experience and training of those employees.

6-31 As described in earlier sections, the LCSC handles preordering requests, ordering requests, billing inquiries and complaints, escalations and expedite requests, and OS fallout. That organization has stated their current organizational capacity in terms of manual LSRs/day while handling the expected volumes of their other auxiliary functions.

Unbundled Network Element Center (UNEC):

6-32 The UNEC is dedicated to CLEC business. As discussed earlier in this document, the UNEC is a special work group within the BellSouth Access Customer Advocacy Center (ACAC) organization. The UNEC is responsible for:

- Control Office functions during installation and service assurance activities on designed UNEs and UNE-combinations.
- Trouble receipt center providing testing and analysis on non-designed UNEs and UNE combinations.

6-33 The UNEC is multi-state in scope. There are actually two BellSouth UNECs at the current time. These two UNECs are currently organized around CLEC customers — i.e. each UNEC is assigned to support a specific set of CLECs with the load matched to the force in each center. The UNEC's workload is currently driven primarily by repair workload for non-designed UNE services.

6-34 This group has been in existence for a very brief time — the UNECs were formed and staffed during March-April of 1997. As with the LCSC, processes and CLEC interfaces are rapidly evolving. As more CLECs begin to use the electronic repair interfaces, the overall workload of the UNEC will decrease and the portion of that workload driven by OS fallout will increase in significance. On the other hand, as

facility-based CLEC volumes grow, the designed UNE Control Office functions will increase.

6-35 Initially, the UNECs were intentionally overstaffed (20 top level electronic technicians per center). This approach was taken to gain experience, train the selected technicians in the broad scope of the job requirements, and to care for contingencies should workload ramp much more rapidly than anticipated.

Center Work Groups:

6-36 As stated before, the operations center work groups handle both CLEC and BellSouth provisioning requests. No individuals in these work groups are dedicated to handling CLEC transactions. These groups handle any-and-all items in the system which involves their work functions. Work is assigned to the employees in these work groups in various ways to optimize productivity and equalize work load. These centers are statewide or larger in reach.

6-37 In the groups which handle only system fall-out (e.g. AFIG, RCMAG, CPG), work is normally presented to the employees by the OS, and the employee handles the next item which is presented. The systems involved apply priorities based on order due date and/or appointments. No distinction is made whether the fall-out item is associated with a CLEC LSR or with a BellSouth retail order.

6-38 As described in Paragraphs 6-23 through 6-27, center force sizing plans have been based on tracked and trended work-driver volumes specific to each group. The current capacity for each center has been calculated by the BellSouth staff and stated in terms most meaningful to that center work group. These capacities are the best calculation of CLEC capacities which the related staffs can make. It is very important to understand that these work groups are sized based on their total workload of which CLEC items would be only a single embedded component.

Field Work Groups:

6-39 Sizing of the field work groups and WMC takes a somewhat different approach than sizing of the center work groups. BellSouth's focus in dispatching geographically dispersed field forces is to maximize efficiency in order to balance overall service objectives. Priority is given to different types of work when scheduling dispatches. Generally, customer trouble reports receive higher priority than service orders. Business type classes of service receive higher priority than residential classes of service. Designed services receive higher priority than non-designed services. Carrier interconnection designed services receive higher priority than non-access/interconnection

designed services. Regardless of the type of service, the due date or customer commitment date is taken into account in setting dispatch priorities. In the support OSs, there are no provisions for priority distinctions specifically between BellSouth orders, CLEC orders, and IC orders.

6-40 The WMC and field management attempt to work items in accordance with these overall priorities so as to optimize overall service quality measurements. At times, dispatching plans must be adjusted due to escalations or in order to avoid wasteful travel time. For example, a technician may be dispatched on a lower priority item which can be picked up "on his way" to work a higher priority item and where the higher priority item will not be jeopardized in the process. In other words the WMC and field management team work together to maximize productivity of the field forces — maximize system throughput — while balancing other service objectives in the process. This involves a complex set of interactions between the WMC, the field management team, and the Operations Systems.

6-41 Furthermore, as mentioned earlier, the WMC and field management team regularly and routinely borrow and loan forces between geographical areas and organizational entities to best balance force and load. Technicians can be dispatched from one working area or grouping of offices to another in accordance under the "all in a day's work" provisions of the Working Agreement between BellSouth and the Communications Workers of America. Thus, there is no static force level in any given wire center or local geographical area.

6-42 Finally, the field work groups handle both service provisioning work as well as work driven by customer trouble reports, requests from other carriers for assistance with testing, etc. The capacity of the field work groups to handle service provisioning transactions will heavily depend on the trouble load at the time, the weather conditions, and the volume of requests from other carriers for assistance with manual testing for trouble sectionalization.

6-43 These field work groups are also sized using activity-based models and productivity commitments. Historical and forecasted volumes for each type of work driver which impacts the force group (e.g. I&M, SSI&M, CO) are multiplied by average time-per-task factors adjusted by the latest productivity commitments to derive total projected required man-hours for the planning period (typically the next calendar year which aligns with the corporate budget cycle). Added to this figure are other factors such as time lost to illness, factors to account for vacation time, factors to account for training time, overtime objectives, etc. The end result is the total required man-hours necessary to accomplish the projected volumes, which is finally converted to "head count".

6-44 The force levels calculated in this fashion are then assigned where local

management determines the forces are most needed to accomplish the best day-to-day match of force to load. Then, as stated earlier, forces are moved, loaned, borrowed, or dispatched to adjust the match of force to load as changing conditions require.

6-45 The following table shows the estimated CLEC capacity information for the work groups dedicated to the CLEC business processes described in this document: For the other work groups described above, CLEC transactions represent only a portion of their assigned work and it is not meaningful to attempt to state their capacity to handle a specific segment of their overall work load.

Table 6-3: Work Group Capacity Information:

	Current		*Cost & Interval To Increase Cap. by 100%*			*Cost & Interval To Increase Cap. by 500%*		
Work Grp.	*Load*	*Capacity*	*Capital*	*Expense*	*Interval*	*Capital*	*Expense*	*Interval*
LCSC	215 Requests/day	2731 Requests/day	$0	$0	0	$850K	$180K	15 Weeks
UNEC	186 Requests/day	245① Requests/day	$305K	$777K	15 Weeks	$1.8M	$4.5M	15 Weeks

Note 1: The UNE Center is a new work group. Work functions are still evolving, therefore, the capacity of the center is not fully defined.

Section VII



Measurements

VII. Measurements:

Performance Measurement:

7-01 This section describes certain performance measures BellSouth provides to CLECs. This section includes performance measurements for five (5) categories of Performance: (1) Provisioning; (2) Maintenance; (3) Billing; (4) Databases, e.g., LIDB and (5) Account Maintenance. Each category includes measurements which focus on timeliness, accuracy and quality.

7-02 BellSouth will provide data on a monthly basis in a mutually agreed upon format. This data allows CLECs to compare BellSouth's performance for itself with respect to a specific measure to BellSouth's performance for CLECs. BellSouth can also provide the raw data used to calculate each measurement as reasonably requested. For provisioning and maintenance, separate measurements can be provided as follows:

POTS/Non-Design
- Residence - Dispatch Out/Non-Dispatch Out
- Business - Dispatch Out/Non-Dispatch Out

UNE - Dispatch Out/Non-Dispatch Out
Local Interconnection/Trunking
Specials - Design Only

7-03 BellSouth is continuing to work with CLECs to refine the measurements defined in the following tables and to develop additional meaningful measurements.

PROVISIONING PERFORMANCE MEASUREMENTS

7-04 The following table shows the measurements on Provisioning:

Table 7-1: Provisioning Measurements:

Measure	*Components*	*Basic Formula*	*Annotation*
Commitment Due Date Met	POTS (Non-Design) Res. Dispatch Out Res. Non-Disp. Out Bus. Dispatch Out Bus. Non-Disp. Out UNE Dispatch Out Non.-Disp. Out Loc. Interconnect Trkg. Specials (Designed)	Total Appointments Met / Total Appointments Set	Based on standard and negotiated intervals
Provisioning Quality	POTS (Non-Design) Res. Dispatch Out Res. Non-Disp. Out Bus. Dispatch Out Bus. Non-Disp. Out UNE Non-Designed Dispatch Out Non.-Disp. Out	All troubles on service installed <30 days in a calendar month / No. installations in same calendar month	Numerator and denominator are not the same order base.
	UNE Designed Dispatch Out Non.-Disp. Out Loc. Interconnect Trkg. Specials — Designed	All troubles on service installed <30 days in a calendar month / No. installations in same calendar month	Numerator and denominator are the same order base.
Firm Order Confirmation	POTS Non-Design UNE Loc. Interconnect Trkg. Specials — Designed	Total No. of FOCs sent <24 Hrs. / Total No. of FOCs sent	BellSouth can only provide measurement of orders that flow through without human intervention.
Reject or Error Status Notification	n/a	No. of Rejects or Error Status Sent in ≤1 hour / Total Number of Rejects or Error Status Sent	BellSouth can measure rejects that occur up-front — before system processing begins — due to "fatal" errors caused by incomplete or missing data or other serious and obvious problems. BellSouth is working with CLECs to negotiate error-handling standards.

MAINTENANCE MEASUREMENTS

7-05 The following table shows the measurements on Maintenance (Repair).

Table 7-2: Maintenance Measurements

Measure	*Components*	*Basic Formula*	*Annotation*
Time to Restore	POTS (Non-Design) UNE	Total Duration Time / Total Reported Troubles	Reported troubles that are service affecting or cause service outages are included in this measurement. See Note 1
	Loc. Interconnect Trkg. Specials (Designed)	Responsible Duration Time / Total Reported Troubles	Reported troubles that are service affecting or cause service outages are included in this measurement. See Note 1
Repeat Troubles Within 30 Days	POTS (Non-Design) UNE Loc. Interconnect Trkg. Specials (Designed	Total Repeats < 30 Days / Total Troubles	Measures trouble reports from the same customer in a 30 day period, excluding reports that do not involve BellSouth such as CPE.
Appointments Met	POTS (Non-Design) UNE Loc. Interconnect Trkg. Specials (Designed)	Total Appointments Met / Total Appointments Set	Appointments not met reflect misses for company reasons.
Report Rate	POTS (Non-Design) Specials (Designed)	Total Reported Troubles X 100 / Total Number of Access Lines	

Note 1: CLECs may request that BellSouth measure the time to restore Local Services, Network Elements or Combinations, separated between time to restore where no dispatch is required, time to restore where dispatch is required and time to restore a service impairment. In addition, CLECs may request BellSouth to provide these measurements delineated in certain hourly intervals. BellSouth is agreeable to meeting requests for hourly intervals as delineated by CLECs, subject to the CLECs giving BellSouth thirty (30) days written notice of its desire and subject to agreement by the CLEC to cover the additional costs (one-time and monthly).

BILLING, DATA BASE, AND ACCOUNT MAINTENANCE MEASUREMENTS

7-06 The following table shows the measurements on Billing Data, Data Base, and Account Maintenance.

Table 7-3: Billing, Data Base, and Account Maintenance Measurements

Measure	*Components*	*Basic Formula*	*Annotation*
Timeliness	CRIS-ODUF	Total Messages Xmitted Within 6 Days of Initial Recording X 100 / Total No. of Messages Sent	BellSouth will mechanically transmit, via CONNECT:Direct, all usage records to CLEC Message Processing Centers once daily. Target: ≥ 95%
Completeness	CRIS-ODUF	Total Recorded Usage Records Prov. ≤30 Days from Message Date X 100 / Total Recorded Usage	BellSouth will provide all required Recorded Usage Data and ensure that it is processed and transmitted within thirty (30) days of the message create date. Target: ≥ 98%

Measure	*Components*	*Basic Formula*	*Annotation*
Data Bases	Line Information Data Base (LIDB)	Processing time at the Line Information Data Base ("LIDB") ≤ 1 second for 99% of all messages under normal conditions. 99.9 % of all LIDB queries in a round trip within 2 seconds. There shall be at least a 99.9.% reply rate to all query attempts. Queries shall time out at LIDB no more than 0.1% of the time. Group troubles shall occur for no more than 1% of all LIDB queries.	Development is necessary before the last three measusrements are reported.
Account Maintenance	Customer Switch	Number of Local Service Changes From a CLEC to Another CLEC Provisioned with Notification to a CLEC in One Business Day / Total Number of Local Service Cahanges From a CLEC to Another CLEC Provisioned with Notification to the CLEC	When notified by a CLEC that a Customer has switched to CLEC service, BellSouth shall provision the change, and notify the CLEC via CONNECT:Direct that the customer has changed to another service provider ("OUTPLOC") within one (1) business day:
	PIC Change Confirmation	Number of PIC only Changes From one IEC to Another Initiated by CLEC Provisioned with Notification via Work Order Complete Feed in One Business Day / Total Number ofPIC only Cahanges From one IEC to Another Initiated by CLEC Provisioned with Notification via Work Order Complete Feed	When notified by a CLEC that a customer has changed his/her PIC only from one interexchange carrier to another carrier, BellSouth shall provision the PIC only change and convey the confirmation of the PIC change via the work order completion feed within one (1) business day. See Note 1

Note 1: If notified by an interexchange carrier using an '01' PIC order record that a CLEC Customer has changed his/her PIC only, BellSouth will reject the order and notify that interexchange carrier a CARE PIC record should be sent to the serving the CLEC for processing within one (1) business day of BellSouth's receipt of the PIC order from the IXC.

Comparative Measurements:

7-07 Reports are being prepared and distributed in accordance with specific agreements with CLECs and regulatory agencies. The reports and supporting data allow CLECs to compare BellSouth's performance for itself with respect to a specific measure to BellSouth's performance for CLECs. Reports distributed to state Public Service Commissions include graphs which facilitate comparisons of the service BellSouth provides to CLECs to the service BellSouth provides to itself.

Section VIII



Interface Usage

VIII. Interface Usage:

CLEC Users:

8-01 The following table reflects which CLECs are currently using each interface option and provides additional related information.

Table 8-1: CLEC Electronic Interface Users as of August 31, 1997

Interface	*Option*	*CLEC*	*How Long?*	*Approx. Vol.* [1]
LENS	LAN-to-LAN	AT&T	Since June, 1997	Pre-order Only
LENS	LAN-to-LAN	Delta Comm.	Since July, 1997	19 LSRs
LENS	LAN-to-LAN	LCI	Since May, 1997	10 LSRs
LENS	LAN-to-LAN	Unique Comm.	Since May, 1997	5 LSRs
LENS	Dial-up	CellularSouth[2]	Since April, 1997	70 LSRs
LENS	Dial-up	Intetech	Since June, 1997	2 LSRs
LENS	Dial-up	Intermedia Comm. (ICI)	Since June, 1997	275 LSRs
LENS	Dial-up	Jetcom	Since June, 1997	1 LSR
LENS	Dial-up	KMC Telecom	Since August, 1997	1 LSR
LENS	Dial-up	Mississippi Cellular	Since April, 1997	14 LSRs
LENS	Dial-up	Reconex	Since May, 1997	2 LSRs
LENS	Dial-up	Tel Link	Since June, 1997	134 LSRs
LENS	Dial-up	TTE of Charleston	Since June, 1997	10 LSRs
LENS	Dial-up	WinStar	Since May, 1997	18 LSRs
LENS	Dial-up	World Link	Since June, 1997	27 LSRs
LENS	Internet	Access America	Since May, 1997	4 LSRs
LENS	Internet	Dial Tone & More	Since August, 1997	3 LSRs
LENS	Internet	East Florida Comm.	Since July, 1997	10 LSRs
LENS	Internet	Interlink	Since July, 1997	50 LSRs
LENS	Internet	MCI	Since June, 1997	678 LSRs
LENS	Internet	National Tel.	Since June, 1997	58 LSRs
LENS	Internet	Supra Telecom	Since July, 1997	599 LSRs
LENS	Internet	Talk Solutions	Since July, 1997	26 LSRs
LENS	Internet	U. S. Long Distance	Since July, 1997	2 LSRs
EC-LITE	Direct	AT&T Comm.	In Development	
EDI	Direct	AT&T Comm.	Since June, 1997	6044 LSRs
EDI	Dial-up	Citizens Telecom	Under Test	Under Test
EDI	Dial-up	East Florida Comm.	Under Test	Under Test
EDI	Dial-up	National Tel.	Under Test	Under Test
EDI	Dial-up	Tel. Co. Central Fla.	Under Test	Under Test
EDI	VAN	None		
EXACT	NDM	ICG Access	Since Nov., 1995	330 ASRs[3]
EXACT	NDM	MCI Local Svc.	Since Jan., 1990[4]	10 ASRs
EXACT	NDM	Sprint Metro	Since Jan., 1990[4]	66 ASRs

Interface	*Option*	*CLEC*	*How Long?*	*Approx. Vol.* [1]
EXACT	TELIS-PC	MFS IntelNet	Since Aug., 1994	67 ASRs
EXACT	TELIS-PC	Nextlink Tennessee	Since Nov., 1996	124 ASRs[2]
EXACT	TELIS-PC	ICG Access	Since Feb., 1996	330 ASRs[2]
EXACT	TELIS-PC	Brooks Fiber Comm.	Since Nov, 1996	4 ASRs
EXACT	TELIS-UNIX	Nextlink Tennessee	Since Nov. 1996	124 ASRs[2]
EXACT	TELIS-UNIX	ACSI	Since Jan., 1995	546 ASRs
EXACT	TELIS-UNIX	Time Warner	Since Oct., 1996	96 ASRs
TAFI	LAN-to-LAN	AT&T	Since June, 1997	6 Reports
TAFI	LAN-to-LAN	CellularSouth[2]	Since Apr., 1997	792 Reports
TAFI	LAN-to-LAN	Miss. Cellular[2]	Since Apr., 1997	354 Reports
TAFI	LAN-to-LAN	Delta Comm.	Since July, 1997	4 Reports
TAFI	LAN-to-LAN	Unique Comm.	Since July, 1997	16 Reports
TAFI	Dial-up	Citizens Comm.	Since July, 1997	5 Reports
TAFI	Dial-up	East Florida Comm.	Since August, 1997	5 Reports
TAFI	Dial-up	Intermedia Comm. (ICI)	Since July, 1997	No Reports
TAFI	Dial-up	Intetech	Since June, 1997	395 Reports
TAFI	Dial-up	National Tel.	Since July, 1997	No Reports
TAFI	Dial-up	Now Comms.	Since July, 1997	3 Reports
TAFI	Dial-up	Southern Phone Reconnek	Since August, 1997	8 Reports
TAFI	Dial-up	Tel Co of Central Fl	Since July, 1997	28 Reports
TAFI	Dial-up	The Other Phone Co.	Since July, 1997	73 Reports
TAFI	Dial-up	TTE of Charleston	Since June, 1997	1 Report
TAFI	Dial-up	Winstar	Since July, 1997	No Reports
TAFI	Dial-up	Tel Link	Since July, 1997	No Reports
EC-CPM		None		
CRIS DAB	Diskette	CellularSouth[2]	Since Mar., 1997	$100K
CRIS DAB	Diskette	Miss. Cellular[2]	Since Mar., 1997	$24K
CRIS DAB	Diskette	ICI	Since Dec., 1996	$619K
CRIS DAB	Diskette	Intetech	Since Dec., 1996	$51K
CRIS DAB	Diskette	Sprint Metro	Since Feb., 1997	$300
CRIS DAB	Diskette	East Florida Comm.	Since May, 1997	$1.7K
CRIS DAB	Diskette	KMC Telecom, Inc.	Since April, 1997	$259K
CRIS DAB	Diskette	Southeast Telephone	Since May, 1997	$1.3K
CRIS MTB	Magnetic Tape	Tel. Co. of Cent. Fla.	Since Oct., 1996	$666K
CRIS MTB	Magnetic Tape	Tricomm Inc.	Since May, 1997	$8.3K
CRIS MTB	Magnetic Tape	Unicom Comm. Inc.	Since May, 1997	$1.1K
CRIS DAB/MTB	Diskette & Magnetic Tape	Advanced Tel. Inc.	Since May, 1997	$900[3]
CRIS DAB/MTB	Diskette & Magnetic Tape	Citizens Comm.	Since June, 1997	$200[3]
CRIS DAB/MTB	Diskette & Magnetic Tape	National Tel.	Since Sep., 1996	$620K[3]
CRIS DAB/MTB	Diskette & Magnetic Tape	Payphone Cons.	Since Nov., 1996	$186K[3]
CLUB-EDI	Connect:Direct	None		
ODUF	Connect/Direct	AT&T	Since May, 1997	68 Days Usage

Interface	*Option*	*CLEC*	*How Long?*	*Approx. Vol.* [1]
ODUF	Connect/Direct	Sprint Comm	Since June, 1997	35 Days Usage
ODUF	Connect/Direct	ACSI	Since Mar., 1997	124 Days Usage
ODUF	Connect/Direct	LCI	Since Apr., 1997	84 Days Usage
ODUF	Connect/Direct	MediaOne	Since Feb., 1997	146 Days Usage
ODUF	Connect/Direct	MCI Metro	Since July, 1997	25 Days Usage
ODUF	Magnetic Tape	Advanced Tel. Inc.	Since May, 1997	57 Days Usage
ODUF	Magnetic Tape	Brooks Fiber Comm.	Since Feb., 1997	141 Days Usage
ODUF	Magnetic Tape	CellularSouth[2]	Since Feb., 1997	154 Days Usage
ODUF	Magnetic Tape	Miss. Cellular[2]	Since Mar., 1997	125 Days Usage
ODUF	Magnetic Tape	National Tel.	Since Oct., 1996	286 Days Usage
ODUF	Magnetic Tape	NextLink Tennessee	Since Nov., 1996	241 Days Usage
ODUF	Magnetic Tape	Unique (Unicom)	Since May, 1997	67 Days Usage
ODUF	Magnetic Tape	WinStar	Since Feb., 1997	125 Days Usage
ODUF	Magnetic Tape	Delta Com	Since July, 1997	12 Days Usage

Notes:

1. *The volume is stated terms appropriate to the particular function and reflects the approximate volume over the interface within the past 12 months. If the CLEC has been using the interface for less than 12 months, the volume stated is the approximate volume since the interface was turned up.*
2. *CellularSouth and Mississippi Cellular are both affiliated with Cellular Holding.*
3. *ICG Access uses both EXACT-NDM and EXACT Telis-PC. NextLink Tennessee uses both EXACT Telis-PC and Telis-UNIX. The volumes were obtained from EXACT, which does not track which link was used to input the ASRs. Consequently, the volume shown is a combined volume of EXACT ASRs.*
4. *Sprint & MCI have been using EXACT for InterLATA business. They are using the same links now for local interconnect ASRs, etc.*
5. *These customers use both Magnetic Tape Billing and DAB. Detailed records have not been kept regarding precisely how much billing was handled for each via each method.*



Glossary

Glossary

800-DB

800 Database Service is provided under two scenarios. One, where the CLEC is equipped with Service Switching Point (SSP) functionality requires access to the BST Service Control Point (SCP). Another, where the customer is not SSP-equipped, requires routing of the call to a BST SSP. In either case, identification and routing of 8XX dialed calls is based on the full ten digits dialed (8XX-NXX-XXXX)

811 Transaction Set

The Consolidated Service Invoice/Statement Transaction Set (811) is a hierarchically structured transaction which is designed for complex billing structures such as telecommunications invoices. The 811 may contain up to nine hierarchical levels to provide sufficient data organizational flexibility to handle billing for multiple service providers and a variety of sub-billing arrangements. The standards for this set are published by the American National Standards Institute (ANSI) Accredited Standards Committee (ASC) and are sanctioned by the TCIF.

ACD

Automatic Call Distribution — A service that provides status monitoring of agents in a call center and routes high volume incoming telephone calls to available agents while collecting management information on both callers and attendants. May distribute calls among agents within a single call center, or be a function that distributes telephone calls over a wide area in an intelligent fashion known as Network ACD (N-ACD).

ACAC

Access Carrier Advocacy Center — The BellSouth InterConnection Services centers who serve as Control Office on Access Services, including Local Interconnection as well as InterLATA Carrier Access. The ACACs are regional centers.

AFIG

Address and Facilities Inventory Group — The BellSouth NISC work group which administers the validation of address information, administers the inventory of loop facilities database in LFACS, administers the correction of database errors in LMOS, administers switching load balance and related activities, and administers the availability of spare telephone numbers in ATLAS (e.g. "line and number administration).

AIN Toolkit & AIN SMS Access 1.0

AIN Toolkit 1.0 is a product designed to provide the CLEC with the ability to create and offer AIN service applications to their end users. Service applications are created in a BellSouth-provided Service Creation Environment (SCE) using a BellSouth-provided Graphical User Interface (GUI). AIN SMS Access 1.0 provides access to the SCE and supports administrative activities (e.g. inputting end user specific data or access usage reports) associated with the service applications which the CLEC creates using AIN Toolkit 1.0. AIN SMS Access 1.0 is required in conjunction with AIN Toolkit 1.0.

ALPHA

Not an acronym — The ALPHA message processor receives AMA messages collected by ETCS. ALPHA validates and "sorts" these messages by type, delivering access usage type records to CABS and call/event local service type messages to CRIS.

AMA

Automatic Message Accounting — The process of recording standard formatted records of usage or events in switching systems or other network elements. AMA messages are sent via teleprocessing links into Regional AMA Collectors where they are passed to the rating and billing systems in order to generate CRIS and CABS customer bills.

ASR

Access Service Request — A request for access service — terminating delivery of carrier traffic into a Local Exchange Carrier's (LEC's) network. InterLATA Carriers purchase access, both switched access and special access, from LECs. A CLEC purchases access from the ILEC, and the ILEC purchases access from the CLEC so that traffic can be completed across networks. ASRs are to be transmitted in compliance with OBF standards where such standards have been finalized.

ATIS

Alliance for Telecommunications Industry Solutions — A nationally sanctioned organization which manages development of operations guidelines and American National Standards to help the industry provide high quality, reliable telecommunications service. Many issues involving critical internal industry operations are referred to ATIS by the Federal Communications Commission. Several ATIS committees were created specifically to work on issues cited by the FCC, including the Carrier Liaison Committee, the Network Reliability Steering Committee and the Information Industry Liaison Committee.

ATLAS

Application for Telephone number Load Administration and Selection — The BellSouth OS used to administer the pool of available telephone numbers (also referred to as "directory numbers") and to reserve selected numbers from the pool for use on pending service requests/service orders.

BBS

BellSouth Business Systems — The retail customer operating unit of BellSouth Telecommunications which serves the "major business", i.e. large-business, customer base.

Billing

The process and functions by which billing data is collected and by which account information is processed in order to render accurate and timely billing.

Billing Committee A subcommittee of the OBF which addresses billing issues and maintains the Multiple Exchange Carrier Access Billing (MECAB) document, the Small Exchange Carrier Access Billing (SECAB) document, and the CABS Auxiliary Report Specification (CARS) document.

BOCABS Business Office Carrier Access Billing System — A front-end presentation manager used by BellSouth organizations to access the CABS database. The Business Office functions — in the case of this document, the LCSC — have input and update capabilities in order to support their billing inquiry and complaint functions. Other BellSouth organizations typically have read-only access to allow verification of information and comparison of CABS data with other databases and actual wiring, translations, etc. during troubleshooting activities.

BOCRIS Business Office Customer Records Information System — A front-end presentation manager used by BellSouth organizations to access the CRIS database. The Business Office functions — in the case of this document, the LCSC — have input and update capabilities in order to support their billing inquiry and complaint functions. Other BellSouth organizations typically have read-only access to allow verification of information and comparison of CRIS data with other databases and actual wiring, translations, etc. during troubleshooting activities.

BRC Business Repair Center — The BellSouth Business Systems trouble receipt center which serves large business and CLEC customers and non-access services. The BRC also functions as the BellSouth Control Office on business retail customer special services and CLEC designed non-access services or UNEs. The BRCs are "large teamed" using telephony and OS capabilities to share resources across multiple states.

CABS Carrier Access Billing System — The BellSouth proprietary corporate database and billing system for access customers and services. CABS is a complex mainframe system consisting of multiple functional software applications. CABS contains the "corporate official" records of the account information which is used to generate the appropriate customer billing. CABS accrues charges to customer accounts and generates billing invoices according to the formatting options selected by the customer.

CLC Carrier Liaison Committee — A Committee which functions under ATIS to provide executive oversight for:

- the Network Interconnection/Interoperability Forum,
- the Ordering and Billing Forum (OBF),
- the Industry Numbering Committee, and
- the Toll Fraud Prevention Committee.

CLEC Competitive Local Exchange Carrier

CLUB Customized Large User Bill — A BellSouth invoicing format designed to meet the needs of most large customers, resellers, and CLECs.

CNAM-db

Calling Name Database query service provides a method for CLECs who sell calling name delivery and own a CNAM database to query the BST CNAM database, in response to an incoming call to a CLEC CNAM customer, for the name of the calling BST customer. Also included is the ability to query, in response to an incoming call to a CLEC CNAM customer, the name of any other carrier's calling customer which is stored in the BST CNAM database. This service requires the subscribing CLEC to allow access to their customers' names by BST and all other companies who contract with BST to store names in the BST CNAM database. Queries and responses to and from both parties will be formatted using Bellcore TR-1188 standards.

CO

Central Office — Used frequently to refer to the central office — or "inside" — technician work force.

Complex Service Requests

Complex service requests are for resale services or UNEs which require extra handling outside the service provisioning pipeline, handled by a BellSouth Account Team. Complex requests are those which:

- require complex translations work involving customer groups (e.g. ESSX (MultiServ®, Automatic Call Distribution groups, etc.) or changes to switch configurations (e.g. turning on new switch software features)
- involve any customized switch or network routing changes
- involve the Public Packet Switch Network (i.e. PulseLink®)
- involve broadband offerings (e.g. Asynchronous Transfer Mode data networking)

CONNECT:Direct®

A value-added network (VAN) service of Sterling Commerce, Inc. which supports VTAM and TCP/IP protocols. This VAN is used by BellSouth to support customer access into BellSouth systems. An example is the CLEC option to receive Daily Usage Files.

Consumer Services

BellSouth Consumer Services — The retail customer operating unit of BellSouth Telecommunications which serves the "consumer", i.e. residential, customer base.

COSMOS

COmputer System for Mainframe OperationS — A BellSouth OS of Lucent Technologies design which is used for distributing frame administration, switch concentrator load balance operations, tie pair administration, provisioning selection of line-side switching system terminations ("OEs", or Office Equipments), and issuance of frame wiring orders.

CRIS

Customer Records Information System — The BellSouth proprietary corporate database and billing system for non-access customers and services. CRIS contains the "corporate official" records of the account information which is used to generate the appropriate customer billing. CRIS is a complex mainframe system consisting of multiple functional software applications. CRIS accrues charges to customer accounts and generates billing invoices according to the formatting options selected by the customer.

CRO CROss-referenced — A term and service order code used to denote that two or more service orders have been cross-referenced for simultaneous handling by the OSs or work groups involved in the provisioning process.

CTG Complex Translations Group — The BellSouth NISC work group which manages the complex switching system translations associated with complex customer group features/capabilities, customized routing, network routing, AMA recording, installation of new switching system features/capabilities, etc.

DA Directory Assistance access (411 and HNPA-555-1212) will provide telephone listing information to a subscribing CLEC's end users on behalf of the CLEC. BellSouth DA is available as a UNE to facility-based CLECs today. For non-facility-based CLECs, DA can be accessed via a Selective Routing option as defined in the Technical Service Description for ULS. While the CLEC will have certain options involving transport connectivity to the BST Operator Services System, there are no optional network features directly associated with this service.

DACC Directory Assistance Call Completion is available to CLECs who also subscribe to Directory Assistance (DA) access service. DACC will allow the CLEC end user's calls to BellSouth Directory Assistance to be automatically (i.e. without having to dial the number) completed after obtaining the directory listing number. Following provision of the DA listing, a standard announcement will advise the customer of an option to have the call completed automatically. While the CLEC will have certain options involving transport connectivity to the BST Operator Services System, there are no optional network features directly associated with this service.

DADAS Directory Assistance listing Database and Directory Assistance Search application provides a CLEC with direct access to BellSouth's Directory Assistance Search Application and Database Administration Call Control for the sole purpose of providing a traditional voice directory assistance service by the CLEC. Non-published listings and listings that are requested to be omitted by BST customers are not provided.

DADS Directory Assistance Database Service provides a CLEC with access to BellSouth subscriber listing information (listed names, addresses, telephone numbers) solely for providing CLEC Directory Assistance services. Non-published listings and listings that are requested to be omitted by BST customers are not provided. Other CLEC listings are not provided unless a contract is in effect between BST and the other CLEC to do so.

DCSC Data Customer Service Center — A BellSouth center specializing in the ordering and trouble report handling of broadband and public packet data network services.

Designed Service A local service which requires special equipment and design parameters in circuit electronics, loop make-up/configuration, special interconnections, transmission conditioning, etc. Such circuits flow in BellSouth through the Trunks Integrated Record Keeping System (TIRKS) for design in the Network Infrastructure Support Center (NISC) Circuit Provisioning Group (CPG). The CPG issues a Work Order Record Document (WORD) for such services which contains all of the necessary design information.

DLC Digital Loop Carrier — Digital multiplexed carrier systems used in the outside plant loop facilities to replace copper cable. Refers to the vintage of products designed around TR-008 specifications.

DOE Direct Order Entry System — An internal BellSouth service order entry system used to input service orders in BellSouth format with the proprietary coding and formatting necessary for downstream processing by provisioning and billing systems. This system was developed and deployed within the former Southern Bell states of BellSouth.

DSAP DOE Support APplication — The BellSouth OS which assists a Service Representative or similar carrier agent in negotiating service provisioning commitments for non-designed services and UNEs. DSAP has access to information from LMOS regarding closed dates, from LFACS regarding CTs and restricted areas, and other information/guidance to help establish a realistic and meaningful commitment/appointment date.

EC-CPM Exchange Carrier - Common Presentation Manager — A new BellSouth OS, based on the ICREF presentation manager originally developed to support InterLATA Carrier electronic trouble report interface with BellSouth. EC-CPM will allow a CLEC to enter trouble reports for designed resale services and UNEs as well as Local Interconnection into WFA-C. EC-CPM facilitates this entry on an interactive basis using prompts and input screen displays.

ECIC Electronic Communications Implementation Committee — A subcommittee of the TCIF which was established to foster the implementation of electronic communications, particularly with regard to trouble administration. Its mission is to identify and resolve common technical and operational issues for the successful implementation of electronic bonding. ECIC focuses on the implementation of application-to-application communications for operations, administration, maintenance, and provisioning (OAM&P) functions. ECIC identifies additional functionalities for standardization and champions the development with appropriate standards groups.

EDI

Electronic Data Interchange — The computer-to-computer exchange of inter and/or intra company business documents in a public standard format. The ordering interface sanctioned by the Ordering & Billing Forum (OBF) for implementation based on OBF standards and proposals. BellSouth offers two EDI interface options to CLECs:

- Ordering EDI used to transmit OBF LSRs and ASRs into BellSouth service provisioning OSs.
- Billing EDI used to receive billing invoices in standard transaction sets from BellSouth billing systems.

ESSX

Electronic Switched Services eXchange — A central office based customer-group service configuration analogous to PBX (Private Branch eXchange) service. Allows shared features, customized routing for members of the customer group, etc. Formerly called "Centrex" (Central Exchange) service. BellSouth's registered service name is MultiServ.

ETCS

Electronic Toll Collection System — The BellSouth billing system which collects AMA messages through teleprocessing and polling of remote network elements. The AMA messages are collected in polling files which are automatically verified for integrity, formatting, date/time gaps, and obvious recording problems. Once accepted, ETCS passes the AMA messages to the ALPHA message processor and archives the data to magnetic tape for backup purposes.

EXACT

EXchange Access Control & Tracking — The BellSouth OS which was initially developed for InterLATA Carriers to use in placing Access Service Requests. The system is also offered to CLECs to use in placing Local Interconnection ASRs.

FID

Field IDentifier — FIDs are service order codes which identify specific data/information fields in the service order image to BST provisioning OSs. These codes allow the mechanized systems to search the service order image and extract the specific information which they require or to determine what action to take. For instance, the address FID identifies the customer premise address information in the service order; whereas, a reuse FID simply tells LFACS to reuse currently assigned facilities.

FOC

Firm Order Confirmation — A notification returned to the CLEC confirming that the LSR/ASR has been received and accepted, including the specified requested due date — i.e. commitment date.

I&M

Installation and Maintenance — The BellSouth field work group which installs and repairs "POTS-like" non-designed services/circuits. This is an "outside" technician work group which normally performs work at the customer premise or at remote facility locations.

IAS Intercept Access Service refers calls from a disconnected or non-working telephone number to the proper number. BellSouth Telecommunications (BST) will provide this service to facilities-based CLEC end users on behalf of the subscribing facilities-based CLEC. A database look-up is performed to retrieve the referral number. The referral number is announced to the calling party by a mechanized audio announcement.

ICS BellSouth InterConnection Services — The customer operating unit of BellSouth Telecommunications which serves Access Customers, both InterLATA Carriers (ICs) and Competitive Local Exchange Carriers (CLECs).

IDLC Integrated Digital Loop Carrier — The multiplexing functions are integrated into the end office switching system line equipment modules. There is no D/A (digital-to-analog conversion) in the local switch — i.e. no Central Office carrier terminal is used.

ILEC Incumbent Local Exchange Carrier

iLNP-DID Interim Local Number Portability - Direct Inward Dialing provides an interim procedure to enable Service Provider Local Number Portability until Long Term Service Provider Local Number Portability is deployed. This service will be deployed only until the long term architecture is made available pursuant to the FCC schedule for deployment. This iLNP-DID interim version will use BST end office switch Remote Call Forwarding (RCF) capabilities to reroute incoming calls to a ported number to the new network address of the called party in the CLEC network.

INSAC Intelligent Network Service Activation Center — A special regional BellSouth center which handles inputs to Advanced Intelligent Network elements such as Service Control Points (SCPs) and Service Nodes (SNs) to configure and activate AIN services.

IT Information Technologies — The BellSouth department responsible for managing and maintaining BellSouth corporate computing, database, data-networking, and office mechanization resources.

ITS Integrated Testing System — A BellSouth OS of Bellcore design which automates the testing of designed circuits and facilities both during provisioning and repair activities. ITS interprets the design information on the WORD record contained in NSDB, links with various specialized and dispersed test access devices & systems to conduct selected tests, collects the test results and makes an automated analysis, prepares repair tickets which can be transferred to WFA for dispatching field forces, presents all such information to the Control Office tester, and allows manual initiation of additional testing/retesting.

LAN Local Area Network — Data interconnection of computing resources via high-speed links and protocols conforming to any of several industry specifications.

LCSC Local Carrier Service Center — The ICS center which is dedicated to handling CLEC LSRs, ASRs, and Preordering transactions along with associated expedite requests and escalations.

LENS Local Exchange Negotiation System — The new BellSouth LAN/web server/OS application developed to provide both preordering and ordering electronic interface functions for Competitive Local Exchange Carriers.

LEO Local Exchange Ordering System — A new system which accepts the output of EDI, applies edit and formatting checks, and reformats the Local Service Request into BellSouth Service Order format.

LESOG Local Exchange Service Order Generator — A new system which accepts the service order output of LEO and enters the Service Order into the Service Order Control System using terminal emulation technology.

LFACS Loop Facility Assignment Control System — A BellSouth OS of Bellcore design which selects loop facilities which serve the address(es) on the service order.

LIDB Line Information DataBase access provides the subscribing CLEC the capability to query BellSouth Telecommuncations' LIDB for validation of credit card, Billed-to-Third, and Collect calls. Subscribing CLECs are required to interface with BST's LIDB locations as described and listed in the applicable tariffs. BST LIDBs are currently located in Birmingham, AL and Atlanta, GA. No optional network features are associated with this service.

LMOS Line Maintenance Operations System — A BellSouth OS of Lucent Technologies design. LMOS stores the assignment and selected account information for use by downstream OSs and BellSouth personnel during provisioning and maintenance activities. MLT, for example, uses the LMOS records to conduct its automated testing functions. LMOS is used by the Work Management Center in the dispatching of service orders to outside forces. LMOS administers non-designed customer trouble reports and is used by the Work Management Center in the dispatching of trouble reports to outside forces.

LNP

Local Number Portability — In the context of this document, the capability for a subscriber to retain his current telephone number as he transfers to a different local service provider. The name for this specific version of LNP, which is the only version which BellSouth can currently offer due to technological limitations, is Service Provider Local Number Portability. Two versions of Service Provider LNP will be used in BellSouth during 1997:

- iLNP-DID: Interim LNP-Direct Inward Dialing uses Remote Call Forwarding (RCF) capabilities of end office switches to forward calls to the subscriber's new telephone number in the new local service provider's switch. (See iLNP-DID.)
- spLNP-DID: Service Provider LNP uses Advanced Intelligent Network capabilities to reswitch calls which were dialed to the subscriber's old telephone number to his new telephone number in the new local carrier's switch.

LSR

Local Service Request — A request for local resale service or unbundled network elements (UNEs) from a Competitive Local Exchange Carrier (CLEC). LSRs are to be transmitted in compliance with OBF standards where such standards have been finalized.

MARCH

MARCH® is a product name, not an acronym — A BellSouth OS of Bellcore design which accepts service orders, interprets the coding contained in the service order image, and constructs the specific switching system Recent Change command messages for input into end office switches. Recent Change messages instruct the switching system to make the necessary assignments and associations in its translations database to activate service and any assigned features or capabilities.

MIPS

Million Instructions Per Second — A unit of measure for Central Processor capacity in some computer systems.

MLT

Mechanized Loop Testing — A BellSouth test OS of Lucent Technologies design which conducts testing of loop facilities and inside wiring (CO distributing frame continuity) by accessing the loop via the line-side switching system port. MLT supports only non-designed loop testing through an assigned and interconnected switch line port (i.e. "OE", or Office Equipment termination).

MultiServ®

BellSouth's registered service name for ESSX service.

Network

BellSouth Network Operations — The BellSouth department responsible for managing and maintaining public network elements and resources used to provide telecommunications services for BellSouth Telecommunications.

NGDLC

Next Generation Digital Loop Carrier — Digital multiplexed carrier systems used in the outside plant loop facilities to replace copper cable or older versions of DLC when appropriate. Refers to the vintage of products designed around TR-303 specifications.

NID Network Interface Device is used to connect the loop facility to the customer premise inside wiring. The NID serves as a point of interconnection and includes electrical protection primarily for personnel safety. The NID may or may not provide remote testing and trouble sectionalization capabilities. The NID UNE allows a CLEC to connect its loop to the inside wiring portion of BST's NID. A facility-based CLEC is expected to provision a CLEC loop *and* a NID to the customer premise. If the CLEC purchases the NIC UNE, the CLEC may perform a physical cross-connect of the inside wire to its loop using a BST NID.

NISC Network Infrastructure Support Center — A family of center specialized work groups which perform Network Operations functions related both to service provisioning and service assurance. The functional groups of the NISC are: RCMAG, CTG, TCG, CPG, and AFIG.

NOF Network Operations Forum — The Network Operations Forum (NOF) operated under the Carrier Liaison Committee (CLC). The NOF provided a forum for all telecommunications industry participants to identify operations issues which are industry-wide in scope involving the installation, testing and maintenance of exchange access and telecommunications network interconnection. The committee has been reorganized.

Non-Designed Service A local service which does not require special conditioning or design. Such services are usually called "POTS" ("Plain Old Telephone Service") type service. These orders do not involve TIRKS (Trunks Integrated Record Keeping System) and CPG (Circuit Provisioning Group) processing.

NSDB Network Services DataBase — A BellSouth OS of Bellcore design which contains a "mirror" image of the TIRKS design for active designed circuits. The NSDB image is created from the WORD issued from TIRKS during the design process. The NSDB image is used in the dispatching and conduct of field work group activities. ITS uses the NSDB to perform its test integration functions. The Control Office uses NSDB to perform its coordination, testing, etc. functions. NSDB is a concurrent application on the WFA Operations System.

OBF Ordering & Billing Forum — The Ordering and Billing Forum (OBF) operates under oversight of the Carrier Liaison Committee (CLC). The OBF provides a forum for customers and providers in the telecommunications industry to identify, discuss and resolve national issues which affect ordering, billing, provisioning and exchange of information about access services, other connectivity and related matters. The OBF has six subcommittees:

- Billing Committee
- Message Processing Committee
- Ordering & Provisioning Committee
- Subscription Committee
- SMS/800 Number Administration Committee
- Telecommunications Service Ordering Request Committee

OCP

Operator Call Processing is available to CLECs via a trunk group connecting the CLEC Point-of-Interface (POI) and the BST Operator Services System. Certain transport options are involved in the method of connectivity to the BST Operator Services System; however, there are no optional network features directly associated with this service.

ODUF

OLEC (Other Local Exchange Carrier) Daily Usage File — A daily file containing billable usage and event data — not billing/charges. The CLEC can use this file for a number of possible applications internal to his business. There are two options for receiving the DUF:

- Electronically via CONNECT:Direct®.
- On magnetic tape via mail service.

OE

Office Equipment — Commonly used term and BellSouth service order coding which refers to a switching system line-side termination, or port — the source of "dial tone".

Ordering

The process and functions by which resale services or unbundled network elements are ordered from the ILEC — the process by which an LSR or ASR is placed with the ILEC.

OS

Operations System — A support system or database which is used to mechanize the flow or performance of work. The term is used to refer to the overall system consisting of hardware complex, computer operating system(s), and application which is used to provide the support functions.

OSS

Unbundled Operational Support Services provide the CLEC with access to BellSouth Telecommunications OS functionalities. These services give the CLEC the ability to service their end user customers with unbundled network services or resold BST services. The electronic interfaces being built will interface with various BST legacy OSs. Four OSSs will be provided: (1) Preordering, (2) Ordering, (3) Repair, and (4) Billing.

P/SIMS

Product/Services Inventory Management System — The BellSouth database OS which contains availability information on switching system features and capabilities and on BellSouth service availability. This database is used to verify the availability of a feature or service in an NXX prior to making a commitment to the customer.

PPSN

Public Packet Switched Network — A packet-switching data network providing various related services based around X.25 specifications. BellSouth's registered service name for its PPSN is PulseLink.

Predictor

Not an acronym — The BellSouth OS of Lucent Technologies design which is used to administer proactive maintenance and rehabilitation activities on outside plant facilities, provide access to selected work groups (e.g. RRC & BRC) to MLT and switching system I/O ports, and provide certain information regarding the attributes and capabilities of outside plant facilities.

Preordering The process and functions by which vital information is obtained, verified, or validated prior to placing a service request. Access to preordering information is necessary to ensure the smooth provisioning and delivery of requested service, avoiding fall-out and the need for manual intervention due to downstream problems.

Provisioning The process and functions by which necessary work is performed to activate a service requested via an LSR or ASR and to initiate the proper billing and accounting functions.

PulseLink® BellSouth's registered service name for PPSN services.

RCMAG Recent Change Memory Administration Group — The BellSouth NISC work group which manages the administration of service provisioning and service assurance activities involved with switching system Recent Changes. RCMAG primarily handles fall-out from MARCH and non-designed trouble reports routed to this work group via LMOS.

Repair The process and functions by which trouble reports are passed to the ILEC and by which the related service problems are resolved.

RRC Residence Repair Center — The BellSouth Consumer Services trouble receipt center which serves residential customers and services. The RRCs are "large teamed" using telephony and OS capabilities to share resources across multiple states.

RSAG Regional Street Address Guide — The BellSouth database which contains street addresses validated to be accurate with state and local governments. This information is used to ensure a consistent and accurate address for the purposes of matching loop facilities available to a customer address and for dispatching outside field technicians. The database recognizes standard and common abbreviating and formatting conventions to help ensure a good "hit" on the proper validated address.

SADM System Administrator — The BellSouth Operations System manager and administrator who is responsible for administering OS resources, tracking OS performance, monitoring OS capacity, planning OS enhancements, overseeing OS maintenance activities, etc.

Service Assurance A term often used to refer to repair and routine maintenance or surveillance functions. In the context of this document, the term is synonymous with "repair".

Service Provisioning A term frequently used to refer to combined ordering and provisioning functions.

Simple Service Requests Simple service requests are for resale services or UNEs for which all work and records/assignment functions are handled through the provisioning flow beginning with the Service Order Control System and flowing through the provisioning operations support systems downstream. No Account Team effort is necessarily required for simple services.

Small Business Services — BellSouth Small Business Services — The retail customer operating unit of BellSouth Telecommunications which serves the "small business" customer base.

SOAC — Service Order Analysis & Control — A BellSouth OS of Bellcore design which controls the flow of service orders to appropriate downstream assignment OSs, primarily LFACS and TIRKS. SOAC controls the flow based on the type of order and the required facilities using BellSouth codes contained in the Service Order image.

SOCS — Service Order Control System — A BellSouth OS which routes service order images among BellSouth drop points and BellSouth Operations Systems during the service provisioning process. SOCS uses coding placed on the Service Order by the Service Representative or by front-end logic in systems such as DOE, SONGS, RNS, and LESOG.

SONGS — Service Order NeGotiation System — An internal BellSouth service order entry system used to input service orders in BellSouth format with the proprietary coding and formatting necessary for downstream processing by provisioning and billing systems. This system was developed and deployed within the former South Central Bell states of BellSouth.

SSI&M — Special Services Installation and Maintenance — The BellSouth field work group which installs and repairs special service — or more accurately — designed non-access services/circuits. This is an "outside" technician work group which normally performs work at the customer premise or at remote facility locations.

spLNP — Service Provider LNP uses Advanced Intelligent Network capabilities to reswitch calls which were dialed to the subscriber's old telephone number to his new telephone number in the new local carrier's switch.

TAFI — Trouble Analysis Facilitation Interface — A BellSouth OS which supports trouble receipt center personnel in taking and handling customer trouble reports. TAFI prompts the trouble receipt center agent with appropriate questions through prompts and screen displays. Concurrently, TAFI obtains the assignment and billing information by interfacing with systems such as LMOS and CRIS. TAFI automatically initiates MLT testing on the loop if that is possible for the resale service or UNE combination. TAFI automatically verifies the line translations via MARCH if a switch port is involved in the service being reported. TAFI subjects all findings to its analyzer logic and attempts to correct the problem, or presents information in "real time" to the trouble receipt center agent which will enable the front-end correction and/or closure, or identifies and routes the ticket to a downstream BellSouth work group for further action. If TAFI cannot determine what appropriate action to take based on the information at hand, TAFI will send the report to a specialized work group in the RRC or BRC with a request for manual intervention.

TCG Trunk & Carrier Group — The BellSouth NISC work group who perform Control Office functions on BellSouth local interoffice trunk groups and interoffice carrier facilities.

TCIF Telecommunications Industry Forum — An industry committee/forum which functions under the oversight of ATIS to promote electronic commerce, electronic data interchange, improvements in bar coding of telecommunications products for inventory control, and electronic bonding. TCIF is a guideline-setting organization for members of the telecommunications industry to coordinate the use of existing standards such as, for example, the American National Standards Institute (ANSI) Accredited Standards Committee (ASC) X12 standards for EDI.

TCP/IP Transmission Control Protocol/Internet Protocol — A suite of communications protocols used by host computers to exchange information between application processes over local or wide area networks. This is the protocol suite also used by the Internet.

TELIS Telecommunications Information System — A software front-end application to the Exchange Access Control & Tracking (EXACT) electronic interface. There are two versions of TELIS: a PC version for smaller CLECs who wish to interface with EXACT on a dial-up basis from their personal computer platforms and a UNIX© version for CLECs who wish to use a UNIX-based dial-up interconnection.

TIRKS Trunks Integrated Record Keeping System — A BellSouth OS of Bellcore design. TIRKS is a family of software modules used to:

- manage the inventory, administration, and assignment of facility network elements & terminations
- design and maintain a database of "special services" circuits, trunking facilities, and designed services
- mechanically requisition the plug-in units required to provision designed circuits & services.
- Issue Work Order Record Document (WORD) to provide the assignments and design for downstream provisioning, testing, and dispatch OSs and for use by work groups in performing manual functions.

TUF Translation of USOCs and FIDs system takes an ASR from EXACT and translates it into BellSouth service order format which can be processed by downstream provisioning systems. TUF inputs the service order into SOCS.

UC Unbundled Channelization provides the electronics allowing a high-capacity circuit (i.e. 1.544 Mbps or higher) to be channelized. This can be accomplished through use of a multiplexer or a digital cross-connect system. Channels can be activated all at once or on an as-needed basis once the system has been installed.

UDF	Unbundled Dry Fiber is offered as a point-to-point arrangement between a customer designated premise and a BellSouth Telecommunications (BST) wire center or between BST wire centers. This arrangement consists of four optical fibers and is offered without optical signal regeneration.
UDL	Unbundled Digital Loop will provide a dedicated transmission facility from the BellSouth Telecommunications (BST) MDF to a customer premise. This facility will allow the end user to send and receive traffic using such technologies as ISDN, Enhanced Electronics capabilities such as HDSL/ADSL, and high-capacity services such as DS1 when the loop is connected to the proper packet/circuit switch. This facility will include an NID at the end user customer location for the purpose of connecting the loop to the customer's inside wire. UDLs can be configured as 2W ISDN (2W/I), 2W Enhanced Electronics (2W/EE), 4W DS1 & ISDN (4W/DI), or 4W Enhanced Electronics (4W/EE). On 2W and 4W facilities, BST does not provide the Enhanced Electronics.
UIT-S	Unbundled Interoffice Transport - Shared provides a transmission path between switching locations that allows a call to be transported from one location to another. These facilities/trunks groups may be configured in various transmission configurations (e.g. DS1, OC3, etc.) based on total shared network requirements between each BellSouth Telecommunications (BST) end office and the BST tandem.
ULC	Unbundled Loop Connection will allow a CLEC to concentrate up to 96 loops (UVL/UDL) onto 2 DS1s for the purpose of transporting the loops at a concentrated level back to the CLEC switch. The loops will terminate at the BST end office main distributing frame (MDF) and cross-connected to the concentrator. The ULC concentrate the loops onto one or two DS1 prime interfaces (depending on the number of loops and the desired concentration level). The DS1 prime interface(s) terminate on a digital signal cross-connect device (DSX) at which they would cross-connect either to CLEC collocation or to DS1 interoffice transport offerings.
ULS	Unbundled Local Switching provides the CLEC with the ability to offer end office switching capabilities to end users. The ULS product is segmented into three parts: Line Port (ULS-LP) with access to Switching Functionality (ULS-SF) and a Trunk Port (ULS-TP) with access to USF. Trunk Ports may be dedicated or shared.
UNE	Unbundled Network Element
UNEC	UNEC — A new specialty center with the BST ACAC which will receive CLEC trouble reports related to UNEs and UNE combinations. This will be a 7x24 trouble receipt center staffed by skilled technicians specializing in the analysis and handling of these CLEC trouble reports.

USF Unbundled Signaling Functionality refers to service provided by the BellSouth Signaling System 7 (SS7) signaling network. The SS7 network is a separate network from the BST network which carries voice messages. The SS7 network complements the voice network by providing call setup, TCAP query messaging, and access to Advanced Intelligent Network (AIN) services.

USOC Universal Service Order Code — USOC codes are assigned to all tariffed services and features. These codes are used by BellSouth OSs and work groups in provisioning, repair, and billing activities.

UTS Unbundled Tandem Switching functionality allows CLECs who are purchasing UNEs from BellSouth Telecommunications (BST) to route calls between BST end offices or between a CLEC switch and BST's end offices.

UVL The voice grade Unbundled Voice Loop (UVL) is a dedicated transmission facility from BellSouth's main distributing frame (MDF) to a customer premise. This facility will allow an end user to send and receive normal voice communications traffic when connected to a dial-tone providing switch or via a designed point-to-point facility to CPE at another customer premise. This facility will include a Network Interface Device (NID) at the customer's location for the purpose of connecting the loop to the customer's inside wire. UVLs can be configured as 2-Wire (2W) or 4-Wire (4W) facilities.

VAN Value Added Network — A data transmission network that provides features beyond basic transmission of information. For example, a data network that provides protocol translation or store-and-forward capabilities. BellSouth uses CONNECT:Direct®, for instance, in the billing electronic interfaces offered to CLEC customers.

VMC Vendor Marketing Center — A BellSouth center which serves as the point of interface with third-party vendors who market BellSouth telecommunications services on behalf of BellSouth or who resell BellSouth local services to their own customer base.

WFA Work Force Administration — A BellSouth OS of Bellcore design. Consists of three modules:

1. WFA-Control: Used by the Control Office in the coordination, testing, turn-up, and repair functions associated with designed services.
2. WFA-DI (Dispatch In): Used by the Work Management Center and Central Office forces in the dispatching of technicians and in the administration of loaded/dispatched work.
3. WFA-DO (Dispatch Out): Used by the Work Management Center and Outside Field Work Groups in the dispatching of technicians and in the administration of loaded/dispatched work.

Wire Center The geographic area served by all local outside plant loop facilities which home on a particular central office. The central office may or may not contain multiple switching systems and other network elements. Each switching system can contain multiple NXXs and, possibly, NPAs.

WMC Work Management Center — The BellSouth Operations center which is responsible for dispatching of work to field work groups — both outside forces and central office work groups. The WMC attempts to maximize service results performance by managing dispatch efficiency and matching workload to available forces. The WMC is typically (but not always) a statewide center.

WORD Work Order Record Document — The design document issued from TIRKS by the NISC-CPG which reflects all network elements, terminations, assignments, options/settings, interfaces, test access points, test priming information, etc. involved in the design of the circuit(s) provided under the overall Circuit Identification Number.

PART A
GENERAL TERMS AND CONDITIONS

Section 13. Continuing Obligations

13.3 BellSouth agrees that it will provide to MCIm on a nondiscriminatory basis unbundled Network Elements and ancillary services as set forth in this Agreement and the operations support systems as set forth in this Agreement. BellSouth further agrees that these services, or their functional components, will contain all the same features, functions and capabilities and be provided at a level of quality at least equal to the level which it provides to itself or its Affiliates.

13.8 BellSouth agrees that order entry, provisioning, installation, trouble resolution, maintenance, billing, and service quality with respect to Local Resale will be provided at least as expeditiously as BellSouth provides for itself or for its own retail local service or to others, or to its Affiliates, and that it will provide such services to MCIm in a competitively neutral fashion.

FLORIDA PUBLIC SERVICE COMMISSION
DOCKET NO. 980281-TP EXHIBIT NO. 16
COMPANY/ WITNESS: Hendrix
DATE: 8-5-98

DOCUMENT NUMBER-DATE
05894 JUN-1 98
FPSC-RECORDS/REPORTING

ATTACHMENT VIII

BUSINESS PROCESS REQUIREMENTS

SECTION 2. ORDERING AND PROVISIONING

2.3 Systems Interfaces and Information Exchanges

2.3.1 General Requirements

2.3.1.3 BellSouth and MCIm shall agree on and implement interim solutions for each interface within thirty (30) days after the Effective Date of this Agreement, unless otherwise specified in Exhibit A of this Attachment. The interim interface(s) shall, at a minimum, provide MCIm the same functionality and level of service as is currently provided by the electronic interfaces used by BellSouth for its own systems, users, or subscribers.

ATTACHMENT VIII

BUSINESS PROCESS REQUIREMENTS

SECTION 5. MAINTENANCE

5.1 GENERAL REQUIREMENTS

5.1.1.1 During the term of this Agreement, BellSouth shall provide necessary maintenance business process support as well as those technical and systems interfaces required to enable MCIm to provide at least the same level and quality of service for all services for resale, functions, features, capabilities and unbundled elements or combinations of elements as BellSouth provides itself, its subscribers any of its Affiliated or subsidiaries or any other entity. BellSouth shall provide MCIm with the same level of maintenance support as BellSouth provides itself in accordance with standards and performance measurements that are at least equal to the highest level of standards and/or performance measurements that BellSouth uses and/or which are required by law, regulatory agency, or by BellSouth's own internal procedures, whichever are the most rigorous. These standards shall apply to the quality of the technology, equipment, facilities, processes, and techniques (including, but not limited to, such new architecture, equipment, facilities, and interfaces as BellSouth may deploy) that BellSouth provides to MCIm under this Agreement.

5.1.1.2 Until an Electronic Interface is available, BellSouth shall provide access numbers to the state specific TRC (Trouble Reporting Center) based on class of service for MCIm to report via telephone maintenance issues and trouble reports twenty-four (24) hours a day and seven (7) days a week.

ATTACHMENT VIII

BUSINESS PROCESS REQUIREMENTS

SECTION 2. ORDERING AND PROVISIONING

2.1 GENERAL BUSINESS REQUIREMENTS

2.1.3 Street Address Guide (SAG)

2.1.3.1 Within thirty (30) days after the Effective Date of this Agreement, BellSouth shall provide to MCIm the SAG data, or its equivalent, in electronic form. All changes to the SAG shall be made available to MCIm on the same day as the change to the data is made.

ATTACHMENT VIII

BUSINESS PROCESS REQUIREMENTS

SECTION 2. ORDERING AND PROVISIONING

2.3 Systems Interfaces and Information Exchanges

2.3.2 Ordering and Provisioning for Resale Services

2.3.2.5 At MCIm's option, BellSouth will provide MCIm the capability to validate addresses by access to BellSouth's Regional Street Address Guide (RSAG) via dial-up or LAN to WAN access. Implementation time frames will be negotiated between the parties.

ATTACHMENT VIII

BUSINESS PROCESS REQUIREMENTS

SECTION 2. ORDERING AND PROVISIONING

2.2 Service Order Process Requirements

2.2.4 Desired Due Date (DDD)

2.2.4.3 BellSouth shall supply MCIm with due date intervals to be used by MCIm personnel to determine service installation dates.

PART A
GENERAL TERMS AND CONDITIONS

Section 13. Continuing Obligations

13.5 BellSouth Agrees that it will provide nondiscriminatory access to telephone numbers for as long as BellSouth remains the code administrator for the North American Numbering Plan.

ATTACHMENT VIII

BUSINESS PROCESS REQUIREMENTS

Section 2. Ordering and Provisioning

2.1.8 Number Administration/Number Reservations

2.1.8.1 Until Number Administration functions are assumed by a neutral third party in accordance with FCC Rules and Regulations, BellSouth shall assign NXXs to MCIm on a non-discriminatory basis in accordance with national guidelines. BellSouth shall provide the same range of number choices allowing the assignment of numbers while the subscriber is on the phone to MCIm, including choice of exchange number, as BellSouth provides its own subscribers. Reservation and aging of numbers shall remain BellSouth's responsibility.

2.1.8.2 Where MCIm has not obtained its own NXX, BellSouth shall reserve up to 100 telephone numbers, per MCIm request, per NPA-NXX (where available), for large business subscribers in the same manner as for BellSouth's own large business subscribers. BellSouth shall provide additional numbers at MCIm's request as subscriber demand requires. Telephone numbers reserved in this manner may be released for other than MCIm use only in the same manner that BellSouth would release numbers reserved for its own subscribers. .

2.1.8.3 Where MCIm has obtained its own NXX, but has purchased BellSouth services for resale or Network Elements, BellSouth agrees to install the MCIm NXX in BellSouth's switch according to the local calling area defined by BellSouth and perform appropriate number administration functions. Where MCIm provides its own switching and obtains its own NXX code, BellSouth agrees to install the routing in its switches according to the local calling area defined by MCI.

2.1.8.4 BellSouth shall accept MCIm orders with assigned vanity numbers and blocks of numbers assigned for use with complex services including, but not limited to, DID, MULTISERV, and Hunting arrangements. Vanity numbers and numbers for use with complex services, DID and Hunting arrangements will be assigned by the LCSC on a case-by-case basis to meet the needs for specific service order activity.

2.1.8.5 Until the Electronic Interface exists for simple services number reservations, BellSouth shall use its best efforts to provide confirmation of a number reservation within twenty-four (24) hours of receiving a completed MCIm's request. For reservations associated with complex services see 2.1.8.4.

ATTACHMENT VIII

BUSINESS PROCESS REQUIREMENTS

SECTION 2. ORDERING AND PROVISIONING

2.3 Systems Interfaces and Information Exchanges

2.3.2 Ordering and Provisioning for Resale Services

2.3.2.3.1.2 BellSouth shall provide MCIm with CSR information, which may include CPNI, for preordering and ordering purposes, to the extent that BellSouth provides such information to other carriers, and upon the same terms and conditions that BellSouth uses for providing the same information to other carriers.

ATTACHMENT VIII

BUSINESS PROCESS REQUIREMENTS

SECTION 2. ORDERING AND PROVISIONING

2.2 Service Order Process Requirements

2.2.9 Jeopardy Situations

2.2.9.1 BellSouth shall provide to MCIm notification of any jeopardy situations prior to the Committed Due Date, missed appointments and any other delay or problem in completing work specified on MCIm's service order as detailed on the FOC.

ATTACHMENT VIII

BUSINESS PROCESS REQUIREMENTS

SECTION 2. ORDERING AND PROVISIONING

2.2 Service Order Process Requirements

2.2.6 Firm Order Confirmation (FOC)

2.2.6.1 BellSouth shall provide to MCIm, via an electronic interface, a Firm Order Confirmation (FOC) for each MCIm order provided electronically.

ATTACHMENT VIII

BUSINESS PROCESS REQUIREMENTS

SECTION 2. ORDERING AND PROVISIONING

2.5 Performance Measurements and Reporting

2.5.3 Provisioning Performance Standards

2.5.3.1 Installation functions performed by BellSouth will meet the following performance standards:

Firm Order Confirmation within:
Manual - within 24 hours 99% of the time
Electronic - within 4 hours 99% of the time

Attachment IV

INTERCONNECTION

Section 4. Network Servicing

4.2 Grade Of Service:

4.2.1 A blocking standard of one percent (.01) during the average busy hour, as defined by each party's standards, for final trunk groups between a MCIm end office and a BellSouth access tandem carrying meet point traffic shall be maintained. All other final trunk groups are to be engineered with a blocking standard of one percent (.01). Direct end office trunk groups are to be engineered with a blocking standard of one percent (.01). The blocking standard of one half of one percent (.005) will be used on trunk groups carrying interlata traffic.

4.2.2 For trunks carrying MCIm interlata traffic, MCIm may request BellSouth to report trunk group service performance and blocking standards to the industry.

ATTACHMENT VIII

BUSINESS PROCESS REQUIREMENTS

Section 4. Provision Of Subscriber Usage Data

4.1 Procedures

4.1.1 General

4.1.1.1 BellSouth shall comply with BellSouth EMR industry standards in delivering customer usage data to MCIm.

4.2 Information Exchange and Interfaces

4.2.1 Core Billing Information

4.2.1.1 Recorded Usage Data all intraLATA toll and local usage. BellSouth shall provide MCIm with unrated EMR records associated with all billable intraLATA toll and local usage which they record on lines purchased by MCIm for resale.

ATTACHMENT VIII

BUSINESS PROCESS REQUIREMENTS

Section 6. Miscellaneous Services & Functions

6.1 General Requirements

6.1.6 Directory Assistance Data

6.1.6.1 BellSouth shall provide to MCIm, to the extent authorized, the residential, business, and government subscriber records used by BellSouth to create and maintain its Directory Assistance Data Base, in a non-discriminatory manner. MCIm may combine this element with any other Network Element for the provision of any Telecommunications Service.

6.1.6.2 Upon request, BellSouth shall provide an initial load of subscriber records via electronic data transfer for ILECS, CLECs and independent Telcos included in their Directory Assistance Database, to the extent authorized.

6.2 Systems Interfaces and Exchanges

6.2.2 Directory Assistance Data Information Exchanges and Interfaces

6.2.2.2 This section addresses data format requirements and data inclusion requirements for directory assistance data information exchange between BellSouth and MCIm. BellSouth shall provide MCIm the following:

6.2.2.2.5 List of Independent Company names and their associated NPA-NXXs for which their listing data is a part of BellSouth's directory database, but BellSouth is not to provide the listing data to MCIm under this request.

Attachment III

NETWORK ELEMENTS

Section 7. Local Switching

7.2. Technical Requirements

7.2.1.11 Where BellSouth provides the following special services, it shall provide to MCIm:

7.2.1.11.4 Soft dial tone where required by law. Where BellSouth provides soft dial tone, it shall do so on a competitively-neutral basis.

OrderTracking Business Function	Long-Term Solution*	Real-Time Access To Data**	Real Time Transaction Processing	Frequency/ Time Interval	Interim Solution
BellSouth provides acknowledgment or rejection of Service Orders to MCIm	Electronic Interface	Y	Y	within 1 hour	To be negotiated
BellSouth provides errors in Service Orders to MCIm	Electronic Interface	Y	Y	N/A	To be negotiated
BellSouth provides FOC to MCIm	Electronic Interface	N	Y	within 4 hours	To be negotiated
Provisioning					
BellSouth provides delay notification to MCIm	Electronic Interface	Y	Y	N/A	To be negotiated
BellSouth provides completion notification to MCIm	Electronic Interface	Y	Y	within 1 hour	To be negotiated
MCIm schedules service installations	Electronic Interface	Y	Y	N/A	To be negotiated
BellSouth provides charges on special construction to MCIm	Electronic Interface	Y	Y	N/A	BellSouth's LCSC will immediately notify MCIm by phone
BellSouth supplies MCIm with Due Date Interval Guides/Job Aids	Electronic Interface	Y	N	N/A	To be negotiated

FLORIDA PUBLIC SERVICE COMMISSION
DOCKET NO. 980281-TP EXHIBIT NO. 17
COMPANY/ WITNESS: Hendrix
DATE: 8-5-98

BELLSOUTH

BellSouth Interconnection Services
Suite 420
1960 West Exchange Place
Tucker, Georgia 30084

770 492-7510
Fax 770 621-0632
MCI ID 361-2846

Pam Lee
Sales Assistant Vice President
MCI Account Team

February 27, 1998

Ms. Charlene Keys
Director of Carrier Markets
MCI Telecommunications Corporation
Two Northwinds Pkwy., Suite 500
2520 Northwinds Pkwy.
Alpharetta, GA 30004

Dear Charlene:

This is in response to your letter dated January 28, 1998, regarding receipt of Firm Order Confirmations (FOC) following MCI's submission of an Access Service Request (ASR) to BellSouth for local service. In your letter, you requested a response by February 9, 1998. However, as you are already aware from our conversation, I did not receive the January 28th letter until it was faxed to my office on February 12, at 5:30 PM. With the understanding that you required a quick response, Steve Harris left you a voice mail on Friday, February 13. This issue was also discussed in our executive meeting on February 17. This letter confirms the discussions that have taken place as a result of your letter.

MCI refers to ASRs submitted for local service to BellSouth. The ASR process is used to order access service, not local service. The Off-Net T1s that MCI is ordering via the ASR process are being handled as access orders and are processed through the Interexchange Carrier Service Center (ICSC) as opposed to the Local Carrier Service Center (LCSC), which handles local service orders. Since the T1s were ordered as access service, the T1s are not governed by the FOC requirements in the Florida and Tennessee Interconnection Agreements as referenced by MCI. The T1 orders are provided in accordance with the access services tariff(s) provisions.

I trust that the above information satisfies your concerns. If you have additional questions, please call me.

Sincerely,

Pamela K. Lee
Sales Assistant Vice President

cc: Larry Cost

FLORIDA PUBLIC SERVICE COMMISSION
DOCKET NO. 980281-TP EXHIBIT NO. 18
COMPANY/ WITNESS: Milner
DATE: 3-5-98

DOCUMENT NUMBER-DATE
05895 JUN-1 98
FPSC-RECORDS/REPORTING

200 9E0'ON ND.036 22:60 99/81/10

Stephen R. Harris /AL,BRB807 12/11/97 0:35 Page 1

MESSAGE Dated: 12/3/97 at 12:35
Subject: FW: BellSouth tandems Contents: 3
Sender: Mark!E!Turner /internet (Mark.E.Turner@mci.com)

Item 1

FROM: Mark!E!Turner /internet (Mark.E.Turner@mci.com)
TO: Stephen R. Harris /AL,BRB807
CC: mark!e!turner /internet (mark.e.turner@mci.com)

Item 2

ARPA MESSAGE HEADER

Item 3

Would you help me shorten the process for this one order. Attached is end offices subtending the tandem, but there are issues with LERG accuracy until mid-December.

How about providing me the list of end offices subtending East Point and we can move on. I have included what we were able to pull so can you have someone say verify the list and make any needed changes.

Mark Turner
404-267-6599

-----Original Message-----
From: Rama Thiagarajan [SMTP:Rama.Thiagarajan@MCI.com]
Sent: Wednesday, December 03, 1997 11:57 AM
To: Mark Turner
Cc: Wally Schmidt (E-mail) (E-mail)
Subject: RE: BellSouth tandems

I do not think so. According to Jeanie Ash, they have changed the BellSouth tandem clli code from ATLNGAEP01T to ATLNGAEP11T and the clli to be used is the new ATLNGAEP11T (This does not have data yet). I am assuming that this change has not become effective in LERG yet. Jeanie also mentioned in her message to me that the person who would be able to tell me how to pull the info from LERG is on vacation.
ATLNGAEP11T, which is the code you had asked for originally, does not return any data from LERG, whereas the older clli code ATLNGAEP01T does. I would suggest we wait for the December LERG (This data is expected in mid December) to see if the changed code ATLNGAEP11T would return any data in LERG. I provided information on the older clli code ATLNGAEP01T, just for your information.
Please call me if you have any questions.
Thanks
Rama Thiagarajan

Message-ID: <01BCFFC9.000500C0@Mark.E.Turner@mci.com>
From: Mark Turner <Mark.E.Turner@mci.com>
Reply-To: "Mark.E.Turner@mci.com" <Mark.E.Turner@mci.com>
To: "'Rama.Thiagarajan@mci.com'" <Rama.Thiagarajan@mci.com>
Cc: "Wally Schmidt (E-mail) (E-mail)" <Wally.Schmidt@MCI.Com>
Subject: RE: BellSouth tandems
Date: Wed, 3 Dec 1997 08:54:00 -0800
Organization: SPO
Encoding: 50 TEXT

Is this the data we should use based on your contacts with BellSouth? I just want to be sure.
Thanks again,
Mark Turner
-----Original Message-----
From: Rama Thiagarajan [SMTP:rthiagar@rthiagarajan]
Sent: Tuesday, December 02, 1997 8:29 AM
To: Mark.E.Turner@mci.com
Subject: BellSouth tandems

MESSAGE Dated: 12/10/97 at 16:13
Subject: Atlanta Local Tandem Homing Arrangements Contents: 3
Creator: Jeanie Ash /AL,BRHM03

Item 1

FROM: Jeanie Ash /AL,BRHM03 (Undisplayable address parts)
TO: Jamie Smith /smtp (@bstfirewall:jamie.g.smith@mci.com)
Mark Turner /smtp (@bstfirewall:mark.e.turner@mci.com)

Item 2

As requested, the attached EXCEL spreadsheet includes a list of offices that subtend the Atlanta Local Tandems. For your information, I have also included the Atlanta Toll Tandems.

Normally, the best source for this information is the LERG. However, since our LERG representative has been out of the office and since there have been many recent changes, the attached list was compiled by our Circuit Capacity Managers. You will probably want to use the LERG as a resource for ongoing updates.

If you have difficulty opening the attached file or have additional questions, I can be reached at 770 492-7541.

Jeanie Ash
BellSouth Interconnection Services
MCI Account Team

Item 3

This item is of type MS EXCEL SPREADSHEET and cannot be displayed as TEXT

TOLL TANDEM HOMING ARRANGEMENT

ATLNGABU01T	NRCRGAMA01T	GSVLGAMA02T
ACWOGAMA97E	ALPRGAMA47C	CMNGGAMA88C
ASTLGAMA94F	ATLNGATH78A	FLBRGAMADS1
ATLNGABU84C	BUFRGABH94A	GSVLGAMA53C
ATLNGABUDS2	CHMBGAMADS0	
ATLNGACD28F	CNYRGAMA48F	
ATLNGACS33A	CRVLGAMA38C	
ATLNGACS65C	CVTNGAMT78C	
ATLNGACSDS3	DLTHGAHS47C	ATHNGAMA02T
ATLNGAEL37C	DNWDGAMA67A	
ATLNGAEP64A	GRFNGAMA22C	CMRCGAXADS1
ATLNGAHR79E	LRVLGAOSDS1	HRWLGAAEDS0
ATLNGAIC29A	LTHNGAJS48C	HRWLGAXA37A
ATLNGAPP34A	NRCRGAMA84A	MDSNGAMA34E
ATLNGAPPDS2	PANLGAMA98F	
ATLNGASSDS1	SMYRGAPF95C	
ATLNGAWD35F	SNLVGAMA97F	
BRMNGAES53A		
CDTWGAMA74C		
CNTNGAXADS0		
CNTNGAXADS1		
DLLSGAES44A		
FAMTGAXA33A		
FRBNGAMADS1		
FYVLGASG46A		
JNBOGAMA47F		
LLBNGAMADS1		
MCDNGAGS94A		
MRTTGAEA97F		
MRTTGAMA42G		
NLSNGAXADS1		
PWSPGAAS94A		
RCKMGAES68A		
ROMEGATL29A		
RSWLGAMADS1		
RVDLGAMA99A		
SMYRGAMADS1		
SNMTGALRDS1		
STBRGANH47C		
TUKRGAMADS2		
VLRCGAES45A		
WDSTGACR92E		

ATLANTA LOCAL TANDEM HOMING ARRANGEMENT

ATLNGABU01T	ATLNGAEP01T	NRCRGAMA01T
ACWOGAMA97E	ASTLGAMA94F	ALPRGAMA47C
ATLNGABU84C	ATLNGAAD69F	ATLNGATH78A
ATLNGABUDS2	ATLNGABH34F	BUFRGABH94A
ATLNGACD28F	ATLNGAEP64A	CHMBGAMADS0
ATLNGACS33A	ATLNGAFP36F	CNYRGAMA48F
ATLNGACS65C	ATLNGAGR24F	CRVLGAMA38C
ATLNGACSDS3	ATLNGALADS1	CVTNGAMT78C
ATLNGAEL37C	ATLNGAWE75F	DLTHGAHS47C
ATLNGAHR79E	CLMBGABV68C	DNWDGAMA67A
ATLNGAIC29A	CLMBGAMW56C	GRFNGAMA22C
ATLNGAPP34A	CRTNGAMA83C	LRVLGADSDS1
ATLNGAPPDS2	DGVLGAMA94F	LTHNGAJS48C
ATLNGASSDS1	FRBNGAEB96A	MDSNGAMA34E
ATLNGAWD35F	FYVLGASG46A	NRCRGAMA84A
BRMNGAES53A	JNBOGAMA47F	PANLGAMA98F
CDTWGAMA74C	MCDNGAGS95A	SMYRGAPF95C
CLMTGAMA38C	MRRWGAMA96F	SNLVGAMA97F
CMNGGAMA88C	NWNNGAMA25C	
DLLSGAES44A	PLMTGAMA46C	
FLBRGAMADS1	PTCYGAMA48C	
GSVLGAMA53C	RVDLGAMA99A	
LLBNGAMADS1	STBRGANH47C	
MRTTGAEA97F		
MRTTGAMA42G		
PWSPGAAS94A		
ROMEGATL29A		
RSWLGAMADS1		
SMYRGAMADS1		
SNMTGALRDS1		
TLLPGAES57F		
TUKRGAMADS2		
VLRCGAES45A		
WDSTGACR92E		

SAMPLE LETTER TO ICOs and CLECs

Date:

Ms. Jane Doe
XYZ Telephone Company
12345 6th Street
Anytown, USA 55555

Dear Ms. Doe:

On numberous occasions we have received requests from CLECs and others to provide your directory assistance listings in our Directory Assistance Database Service (DADS) offering. However, we are unable to fulfill these requests because the language in our Agreement does not allow us to respond to the request or release your directory assistance listings to third parties.

We, at BellSouth, are not comfortable in representing your interest and the interest of CLECs and others unless we have the ability to pass your directory assistance listings along with our own. Therefore, we would like to have your written permission allowing us to include your listings in all our directory assistance services and provide them to CLECs and others who request them. We will start passing this information once we have your authorization.

Please let us know by (15 days from date of letter) how you wish for us to proceed regarding passing your listings to third parties.

Thank you in advance for your cooperation in helping to resolve this issue.

Sincerely,

Ida Bourne /AL,BRHM08 5/5/98 15:03 Page 1

MESSAGE Dated: 5/4/98 at 16:12
Subject: DADS proposal Contents: 3
Sender: Ida Bourne /AL,BRHM08

Item 1

FROM: Ida Bourne /AL,BRHM08 (Undisplayable address parts)
TO: Linda L. Myler /AL,BRHM09 (Undisplayable address parts)

Item 2

Linda,

As discussed, ALLTEL does not wish to amend their NC or FL agreements.

Ida

Item 3

MESSAGE Dated: 4/30/98 at 11:04
Subject: DADS proposal Contents: 3
Creator: Jayne.T.Eve@alltel.com

Item 3.1

FROM: Jayne.T.Eve@alltel.com
TO: Ida Bourne /AL,BRHM08

Item 3.2

ARPA MESSAGE HEADER

Item 3.3

Ida, ACI prefers to keep the existing Agreement language related to directory assistance listings and would hope that BST would be able to distinguish the two company's listings.

Please call me if you would like to discuss.

Thanks, JE 704-660-6680

[redacted]

CLEC NAME: !nterprise America

Check one:

_____ Interconnection Agreement	___ X __ Interconnection Amendment
_____ Resale Agreement	_____ Resale Amendment
_____ Collocation Agreement	_____ Collocation Amendment
_____ CMRS Agreement	_____ CMRS Amendment

Check one: ___X__ New _____ Renegotiated

Please enter effective date of agreement/amendment: May 27, 1998
If an amendment, please enter effective date of original agreement: October 8, 1997

Check appropriate states:

____ AL _ X_ FL ____ GA ____ KY ____ LA ____ MS

____ NC ____ SC ____ TN ____ ALL BST STATES

Provide Brief Synopsis of Agreement (to include significant provisions/changes):

Pursuant to Sections 251 and 252 of the Telecommunications Act of 1996, BellSouth is filing an executed Interconnection amendment by and between BellSouth Telecommunications, Inc. and !nterprise America.

Check One:

__X___ BST to File with Commission _____ CLEC to File with Commission

Provide Any Additional Special Filing Instructions:

Negotiator Name:	Lynn Juneau
Telephone No:	*205 977-1380*
Date:	*May 26, 1998*

Amendment One to Interconnection Agreement by and between BellSouth Telecommunications, Inc. and !nterprise America

This Agreement refers to the Interconnection Agreement ("the Agreement") entered into by U S WEST Interprise America, Inc. ("!nterprise America") and BellSouth Telecommunications, Inc. ("BellSouth") on October 8, 1997 in the state of Florida. This Amendment ("Amendment") is made by and between !nterprise America and BellSouth and shall be deemed effective on the date executed by !nterprise America and BellSouth.

NOW THEREFORE, in consideration of the mutual provisions contained herein and other good and valuable consideration, the receipt and sufficiency of which are hereby acknowledged, !nterprise America and BellSouth (individually, a "Party" and collectively, the "Parties") hereby covenant and agree as follows:

1. BellSouth and !nterprise America are entering into this Agreement for the purpose of amending section 20.1 of the Terms and Conditions contained in their existing Agreement to allow BellSouth to provide !nterprise America subscriber listings contained in BellSouth's Directory Assistance Database to third parties such as other CLEC's, Independent Companies and Interexchange Carriers or other telecommunications service providers who may request such information.

2. The Parties agree that all other provisions of the Interconnection Agreement, dated October 8, 1997, shall remain in full force and effect.

3. The Parties further agree that either or both of the Parties is authorized to submit this Amendment to the Florida Public Service Commission or other regulatory body having jurisdiction over the subject matter of this Amendment, for approval subject to Section 252(e) of the federal Telecommunications Act of 1996.

IN WITNESS WHEREOF, the parties hereto have caused this Amendment to be executed by their respective duly authorized representatives on the date indicated below.

U S WEST Interprise America, Inc.	**BellSouth Telecommunications, Inc.**
Signature	Signature
Mary F. LaFaye	Jerry D. Hendrix
Name	Name
Director Regulatory Affairs	Director - Interconnection Services
Title	Title
May 21, 1998	5/27/98
Date	Date

MCI Telecommunications Corporation
Two Northwinds Center
2520 Northwinds Parkway
Alpharetta, GA 30004

FLORIDA PUBLIC SERVICE COMMISSION
DOCKET NO. 980281-TP EXHIBIT NO. 19
COMPANY/ WITNESS: Milner
DATE: 8-5-98

June 1, 1998

Ms. Pam Lee
Sales Assistant Vice President, MCI Account Team
BellSouth Interconnection Services
1960 W. Exchange Place
Suite 420
Tucker, Georgia 30084

Re: Notice that MCIm will be ordering Interconnection T-1s pursuant to the MCIm/BellSouth Interconnection Agreement and demand for credit.

Dear Ms. Lee:

As you know, on November 10, 1997, MCIm requested that BellSouth provide to MCIm combinations of unbundled network elements (UNEs) generally consisting of the following elements: 4-wire DS-1 local loop and DS-1 dedicated transport per mile and per termination. For convenience purposes, I will refer to such combinations as Interconnection T-1s. MCIm made this request pursuant to the provisions of the MCIm/BellSouth Interconnection Agreement which require BellSouth to provide to MCIm UNE combinations at UNE rates. Despite the plain language contained in the Agreement, BellSouth refused to provide these UNE combinations to MCIm. Because MCIm had no other way to order these loops, and thus serve our customers, MCIm had to resort to ordering T-1s from BellSouth's Interstate Access Tariff.

As you may be aware, the Florida Public Service Commission has recently affirmed MCIm's interpretation of the Agreement on this point, i.e., BellSouth is under an obligation to provide UNE combinations to MCIm at the sum of the stand alone UNE rates contained in the Agreement. See FPSC Docket No. 971140-TP. Indeed, the Commission ruled that the rates for combinations could be less than the sum of the rates of the component elements since duplicate charges and charges for services not needed should be removed from the combination rates.

Based on the above, this is to officially notify BellSouth that MCIm will be migrating our local T-1s currently ordered from the Interstate Access Tariff to UNE combinations from the Florida Interconnection Agreement. Further, BellSouth should treat all T-1 orders currently being processed as requests for Interconnection T-1s at the interconnection rates. BellSouth should also convert the billing of the existing T-

DOCUMENT NUMBER-DATE
06836 JUN 29 98
FPSC-RECORDS/REPORTING

June 1, 1998

1s from the access rate to the Florida interconnection rates. Finally, MCIm is requesting credits for all T-1s ordered from November 10, 1997 to the present. This credit will be the difference between the pricing of the T-1 access rate and the price of the component UNEs at the interconnection prices. (e.g. During this time period, the recurring rates for DS-1 local loops was $80.00 per month. For DS-1 Dedicated Transport it was $1.60 per mile and $59.75 per termination.)

MCIm would like to schedule a meeting to discuss in more detail the processes involved in migrating the existing T-1s to UNEs and ordering Interconnection T-1s in the future. MCIm requests this meeting no later than June 10, 1998.

If you have any questions regarding MCIm's position on this matter please give me a call to discuss. I can be reached at (770) 625-6849.

Sincerely,

Walter J. Schmidt
Senior Manager
Southern Financial Operations – Carrier Agreements

cc: Ilene Barnett
Charlene Keys
Daren Moore
Daniel Fry
Andri Weathersby
Vernon Starr

BellSouth Local Tandems and Subtending Offices
In
Florida

Fort Lauderdale/ Plantation

FTLDFLPL13T
DRBHFLMADS0
FTLDFLAMCM1
FTLDFLCR56E
FTLDFLCYDS0
FTLDFLFTCM1
FTLDFLJADS0
FTLDFLMRDS0
FTLDFLNPRSO
FTLDFLOADS0
FTLDFLPLDSO
FTLDFLSGDS0
FTLDFLSU74E
FTLDFLTBCM1
FTLDFLWNDS0
HLWDFLHA45E
HLWDFLMADS0
HLWDFLPEDS0
HLWDFLWHDS0
PMBHFLCSDS0
PMBHFLFECG0
(To be deleted 9/99)
PMBHFLFEDS0
(To be added 9/99)
PMBHFLMADS0
PMBHFLTADS0

Orlando

ORLDFLMA34T
ALSPFLXA32T
ALSPFLXADS0
EORNFLMARS0
(Effective 7/18/98)
CSLBFLXADS1
GLRDFLXADS0
KSSMFLXA32T
KSSMFLXADS0
KSSMFLXADS1
LKBNFLXADS0
LKBRFLXADS1
LKMRFLMADS0
MTLDFLXADS1
ORLDFLAPDS0
ORLDFLCLDS0
ORLDFLMA42E
ORLDFLMADS1
ORLDFLPCDS0
ORLDFLPHDSO
ORLDFLSADS0
OVIDFLCADS0
STCDFLXADS0
STCDFLXARS0

SNFRFLMA32T
DBRYFLDLDS0
DBRYFLMARS1
GENVFLMARS0
LKMRFLABRS0
LKMRFLMADS0
ORCYFLXADS0
ORLDFLAPDS0
ORLDFLCLDS0
ORLDFLMA42E
ORLDFLMADS1
ORLDFLPCDS0
ORLDFLPHDS0
ORLDFLSADS0
OVIDFLCADS0
SNFRFLMADS0
SNFRFLMADS1

Miami/Dade

MIAMFLRR1GT
HMSTFLHMDS0
MIAMFLAEDS0
MIAMFLAL63E
MIAMFLAPDS0
MIAMFLBA85E
MIAMFLBCDS0
MIAMFLBRDS0
MIAMFLCADS0
MIAMFLFLDS0
MIAMFLGRDS0
MIAMFLGRDS1
MIAMFLHLDS0
MIAMFLIC86E
MIAMFLKEDS0
MIAMFLME32E
MIAMFLNMDS0
MIAMFLNSDS0
MIAMFLOL68E
MIAMFLPB88E
MIAMFLPLDS0
MIAMFLRRDS0
MIAMFLSH75E
MIAMFLSO59E
MIAMFLWDDS0
MIAMFLWM26E
NDADFLAC94E
NDADFLBR62E
(CUTS 7/98)
NDADFLBRDS0
(NEW SWITCH 7/98)
NDADFLGGDS0
NDADFLOL93E
(CUTS 11/98)
NDADFLOLDS0
(NEW SWITCH 11/98)
PRRNFLMADS0

BellSouth Local Tandems and Subtending Offices
In
Florida

Gainesville

GSVLFLMA35T
ARCHFLMARS0
BRKRFLXADS0
BRSNFLMARS0
CDKYFLMARS0
CFLDFLMARS0
CSCYFLBARS0
GSVLFLMADS0
GSVLFLMADS1
GSVLFLNW33E
HGSPFLXADS0
HWTHFLMARS0
KYHGFLMARS0
LKBTFLXADS0
LVOKFLXADS0
MCNPFLMARS0
MLRSFLXADS0
NWBYFLMARS0
OLTWFLLNRS0
TRENFLMARS0
WALDFLXADS0

Jacksonville

JCVLFLCL55T
BLDWFLMARS0
CLHNFLXADS0
FRBHFLFPDS0
FTGRFLMARS0
GCSPFLCNDS0
JCBHFLABRS0
JCBHFLMA24E
JCBHFLMADS0
JCBHFLSPRS0
JCVLFLARDS0
JCVLFLBWDS0
JCVLFLCLDS0
JCVLFLCLDS1
JCVLFLFCDS0
JCVLFLIARS0
JCVLFLJTRS0
JCVLFLLF76E
JCVLFLNODS0
JCVLFLOWDS0
JCVLFLRV38E
JCVLFLSJ73E
JCVLFLSMDS0
JCVLFLWCDS0
MCLNFLXADS1
MDBGFLPMDS0
MNDRFLAVDS0
MNDRFLLODS0
MNDRFLLWRS0
MXVLFLMARS0
ORPKFLMA26E
ORPKFLRWDS0
PNVDFLMADS0
STAGFLWGRS0
YULEFLMARS0

Pensacola

PNCYFLMA32T
PNCYFLCARS0
PNCYFLMADS0
TAFBFLXADS0

PNSCFLBL32T
BRTOALMADS0
CNTMFLLEDS1
GLBRFLMCDS0
JAYFLMARS0
MLTNFLRADS0
MNSNFLMARS0
PACEFLPVRS0
PNSCFLBL43E
PNSCFLFPDS0
PNSCFLHCRS0
PNSCFLPBDS0
PNSCFLWADS0

Data as of 6/25/98



Pamela A. Nelson

Room 12N54
1200 Peachtree St. NE
Atlanta, GA 30309
404 810-3100

June 2, 1998

Ms. Susan Arrington
Manager – Interconnection Services/Pricing
BellSouth Telecommunications, Inc.
Room 34S91 BellSouth Center
675 West Peachtree Street, N.E.
Atlanta, Georgia 30375

Re: AT&T's Directory Listing Information

Dear Susan:

I am responding to your letter dated April 21, 1998, regarding an amendment to the BellSouth/AT&T Interconnection Agreement to allow BellSouth to provide AT&T's Directory Listing Information to third parties.

Before AT&T can determine whether or not to amend Section 21.2 of the General Terms and Conditions of the BellSouth/AT&T Interconnection Agreement, further information is required from BellSouth. According to your letter, BellSouth has received requests from CLECs and other third parties to provide AT&T directory assistance listings in the BellSouth Directory Assistance Database Service (DADS) offering. Specifically, please identify the companies making these requests. Secondly, how will BellSouth plan to compensate AT&T for its portion of the revenue received by BellSouth on each DADS offering.

Your written response to my questions by June 10, 1998 would be appreciated. If you prefer to establish a meeting to discuss my questions, please let me know.

Sincerely,

Pamela A Nelson

Susan M. Arrington /AL,BRHM03 6/10/98 7:08 Page 1

MESSAGE Dated: 6/9/98 at 10:21
Subject: BST/Sprint Louisiana Agreement Contents: 3
Sender: MClosz@igate.sprint.com

Item 1

FROM: MClosz@igate.sprint.com
TO: Susan M. Arrington /AL,BRHM03

Item 2

ARPA MESSAGE HEADER

Item 3

Susan,
A few more areas to "close" for our Louisiana agreement:

General Terms, 1A- Prices for UNE Combinations
Sprint agrees to the BellSouth proposed language given that it is consistent with the arbitration decisions in Louisiana.

General Terms, Section 15- Dispute Resolution
I believe we discussed this, but to confirm, Sprint agrees to the Section 15 language with the following added to the end of the last sentence of the paragraph, "...as set forth in Attachment 1." This makes this section consistent with the language/approach for dispute resolutions and the language of Attachment 1.

General Terms, Section 20.1- Provision of Directory Listings to Third Parties
Sprint does not wish to re-open negotiations on this section at this time and agrees to implement the language in our Georgia agreement for this section.

General Terms, Section 27.1- Routing to Directory Assistance/Operator Services
Sprint agrees to the BellSouth proposed language given that it is consistent with the arbitration decisions in Louisiana.

Please let me know if you need any additional clarification. I will be in touch later this week to discuss status of the remaining issues.
Thanks,
Melissa

Exhibit _____

Docket No. 980281-TP

DEPOSITION OF KEITH MILNER

FLORIDA PUBLIC SERVICE COMMISSION
DOCKET NO. 980281-TP EXHIBIT NO. 20
COMPANY/ WITNESS: Milner
DATE: 8-5-98

PAGE 1 SHEET 1

1

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Complaint of MCImetro Access Transmission Services, Inc. against BellSouth Telecommunications, Inc. for breach of approved interconnection agreement.)DOCKET NO. 980281-TP

DEPOSITION OF: W. KEITH MILNER

TAKEN AT THE INSTANCE OF: MCImetro

DATE: Thursday, July 23, 1998

TIME: Commenced at 10:30 a.m.
Concluded at 12:00 noon

PLACE: 2540 Shumard Oak Boulevard
Room 262
Tallahassee, Florida

REPORTED BY: NANCY S. METZKE, RPR, CCR

C & N REPORTERS
REGISTERED PROFESSIONAL REPORTERS
POST OFFICE BOX 3093
TALLAHASSEE, FLORIDA 32315-3093
(850)697-8314 / FAX (850)697-2263

PAGE 2

2

APPEARANCES:

CATHERINE BEDELL, ESQUIRE, FPSC, 2540 Shumard Oak Boulevard, Suite 370, Tallahassee, Florida 32399-0850.

RICHARD D. MELSON, ESQUIRE, MCImetro, Hopping, Green, Sams & Smith, Post Office Box 6526, Tallahassee, Florida 32301.

DULANEY L. O'ROARK, III, ESQUIRE, MCImetro, Suite 700, 780 Johnson Ferry Road, Atlanta, Georgia 30346.

PHILLIP CARVER, ESQUIRE, BellSouth, Suite 4300, 675 West Peachtree Street, NE, Atlanta, Georgia 30375.

ALSO PRESENT:
STAN GREER, BellSouth.
RON MARTINEZ, MCImetro.
WAYNE STAVANJA, FPSC Staff.

* * * *

PAGE 3

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CERTIFICATE OF OATH 60
CERTIFICATE OF REPORTER 62

WITNESS
W. KEITH MILNER
Examination by Mr. O'Roark 4
Examination by Ms. Bedell 51

* * * *

PAGE 4

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Whereupon,
W. KEITH MILNER
was called as a witness by MCImetro and, after being first duly sworn, was examined and testified as follows:

DIRECT EXAMINATION

BY MR. O'ROARK:

Q This would be the deposition of W. Keith Milner, taken in Docket Number 980281-TP.

Mr. Milner, I gather you've been deposed a number of times before?

A Yes, I have.

Q So you're pretty familiar with the ground rules I'm sure.

A Yes.

Q Mr. Milner, if I ask you anything that is unclear, please feel free to ask me to rephrase a question, and I'll do my best to do so.

A Thank you.

Q Let's start with count 8 of the complaint which concerns FOCs. Would you agree with me that ALECs need FOCs to manage their businesses?

A Yes, I agree with that.

Q And why is that?

A Well, the FOC is a good indicator back to the CLEC that the order has been received, that it's what I'll

PAGE 5

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call a good order; that is, it could be processed with the information that's within it.

Q And FOCs provide the date that BellSouth intends to provide the service?

A Among other things, yes.

Q What are the other things it provides?

A Well, the order number and some other information, you know, of a more general nature about -- just confirming what's been ordered and that sort of thing.

Q So an FOC enables ALECs to inform their customers when they can expect service to be turned up; is that right?

A That's correct.

Q And it also enables CLECs to plan for any cutover coordination?

A Yes, it would allow the CLEC to plan for work that that CLEC had to do to turn that service up.

Q Now BellSouth's position, as I understand it, is the performance standards in the Florida Interconnection Agreement do not apply to orders for Off-net T1s that are out of BellSouth's Access Tariff; is that right?

A That is our position, yes.

Q For the record, can you tell us what an Off-net T1 is?

A Well, I must confess that I'll give you what my

PAGE 6

6

understanding is. Perhaps we have some services that we are calling by different names, but I think what we are talking about is a -- what some other people call a tail circuit, t-a-i-l, that would leave a certain network and extend out to a customer's premises. For example, a company might build its own private network of PBXs, perhaps, and calls within that network would be handled on dedicated facilities that only that company could use.

To get to other networks or to get, as I say, off the network, then special trunk groups are established from that PBX or from the customer's premises to some other network provider's switch. I think that's what we are talking about here. So I think we are talking about a circuit that would run from one of, in this case, MCI's end-user customers to one of BellSouth's switches.

Q My understanding, and please correct me if I'm wrong, was that with an Off-net T1, you would have the loop from the customer premises and also a T1 that would connect you to MCI's switch; is that not your understanding?

A Well, I think it could be -- the term "Off-net" could be used to describe either of those, depending on whose network you were referring to being off of.

Q It could be off of the customer's network to BellSouth's network or to an ALEC's network?

A Yes, could be either way. Let me clarify the use

of your word "loop." It is a loop, or it resembles the technical capabilities of a loop. There are 24 talking paths instead of just a single one since we are talking about a T1, which is also referred to as a DS-1.
Q And you're aware that MCImetro serves many of its customers using Off-net T1s?
A I have no idea how MCI serves all of its customers, but Off-net DS-1s have been an artifact of local switching for sometime, so I presume that MCI would use some. You said a lot. I have no idea how many they might use.
Q The term I used was "many." Could you agree with me on that?
A Again, I'm sure they use some, but I don't know -- Frankly, I don't know how many they use.
Q Let me ask you to look at your direct testimony, page 4, line 21.
A Yes.
Q And there you say that MCI could have bought Off-net T1s out of the Interconnection Agreement; is that right?
A Yes, in this case as a resold service. Our service mark is called MegaLink, M-e-g-a-L-i-n-k.
Q What is MegaLink service?
A MegaLink service is what we call a point-to-point

service. It's a dedicated facility from one place or point to another, and it operates at DS-1 or higher transmission levels. DS-1 being 24 talking channels.
Q Does it involve BellSouth switching?
A No, it's not a switched service. It's a transmission service, a transport service.
Q Are there any other Off-net T1 services that BellSouth provides?
A I'm not -- By name I'm sure there are. I don't recall what some of the names might be. For example, Smart Path might be another service market we use, and I believe that would be -- provide the same technical functionality.
Q The reason I asked the question is that on line 21 you say, "for example," suggesting that there would be other services besides MegaLink.
A Yes, a lot of our transport services would provide essentially the same technical capabilities as my understanding of what an Off-net T1 does.
Q Can you tell me basically what the difference is between Smart Path and MegaLink?
A Smart Path is the same functionality, but it's part of a ring architecture, so it has some additional capabilities, such as self-healing, some redundancy, that sort of thing.
Q As we sit here today, can you think of any other

services?
A Not off the top of my head, no.
Q Is Smart Path also a resold service?
A It is.
Q And BellSouth is only willing to provide MegaLink as a resold service; is that right?
A Well, MegaLink is a retail service; so, yes, it can be provided that way. I would suppose that an unbundled DS-1 loop could also accomplish the same purpose that MCI apparently wants.
Q I'm sorry, I missed that last piece. An unbundled loop would accomplish the same purpose?
A I would think so. If the facility is from a customer's premise to the BellSouth central office, then one of our unbundled loops, one of our DS-1 loops would accomplish that same purpose.
Q And under that scenario you would use BellSouth switching?
A Again, it would not use our switching. It would be a point-to-point transport service from the customer's premise to our central office but not connected to the switch.
Q Let me ask you to turn to Exhibit WKM-7 which is attached to your rebuttal testimony. That is a letter dated June 1, 1998, from Walter J. Schmidt to Ms. Pam Lee.

Do you have that in front of you?
A Yes.
Q I'd like to walk through some of the statements that Mr. Schmidt makes with you. At the beginning of the letter, he says, "As you know, on November 10, 1997 MCIm requested that BellSouth provide to MCIm combinations of unbundled network elements, UNEs, generally consisting of the following elements: Four-wire DS-1 local loop, DS-1 dedicated transfer per mile and per termination."
Is that a true statement?
A Yes, as far as I know it is.
Q Then going to the third sentence, "MCI made this request pursuant to the provisions of the MCIm/BellSouth Interconnection Agreement which require BellSouth to provide to MCIm UNE combinations at UNE rates."
Is that statement true?
A I think we are about to get into a topic that I'm not, certainly not an expert on; and that is, the topic of combinations of UNEs and especially as with regard to the Florida PSC orders regarding combinations.
Q Let me stop you for a second if I can, and I think I can narrow my question.
A Okay.
Q What I intend to ask you is whether the request was couched in those terms. In other words, was that MCI's

request rather than getting into the merits of it?
A Yeah, I can agree with that. Just to clarify, what is described here as a 4-wire DS-1 local loop is the unbundled local loop that I referred to moments ago.
Q And MCI was attempting to order this out of the Interconnection Agreement?
A Yes, that seems so here.
Q And that's your understanding?
A Yes.
Q The next sentence continues, "Despite the plain language contained in the Agreement, BellSouth refused to provide these UNE combinations to MCIm."
Is that accurate?
A Again, as far as I know it is, yes.
Q And finally, "Because MCIm had no other way to order these loops and thus serve our customers, MCIm had to resort to ordering T1s from BellSouth's Interstate Access Tariff."
Would you agree with that?
A No, that's -- In fact, that's the part I do not agree with.
Q Can you explain why you disagree?
A Yes, because any of these piece parts could have been ordered as individual unbundled network elements. I think the controversy between BellSouth and MCImetro was

regarding the provision of the combination, not the individual unbundled network elements. So again, I think if MCI wanted this Off-net T1, it could have ordered the 4-wire DS-1 loop. That would have served part of that. Apparently -- apparently MCI wanted that loop transported to its own switch, and I think that's what the transport, the dedicated transport piece was intended to address. So both of those UNEs were individually available to MCI. The part that I have a problem with is that, rather than ordering them as individual UNEs, that MCI chose to order the same technically functional elements through the Access Tariff.
Q And Mr. Milner, in the third paragraph, Mr. Schmidt says that he's notifying BellSouth that MCIm will be migrating its local T1s currently ordered from the Interstate Access Tariff to UNE combinations from the Florida Interconnection Agreement. You're aware that that is MCI's position?
A Yes.
Q And you're aware that MCI is requesting that BellSouth provide credits for all T1s ordered from November 10, 1997 forward?
A Yes, I understand that to be MCI's position. Again, I think the third -- the first sentence or so in the third paragraph reinforces my belief that MCI did have

other opportunities than ordering these through the Access Tariff. You know, this is to officially notify BellSouth that MCIm will be migrating our local T1s from the Access Tariff to UNE combinations, so apparently this had gone on for some time before this one -- before this one incident.
Q Mr. Milner, what would be involved with MCI combining these two elements itself? What would MCI have to do?
A It would -- you mean physically or technically or both?
Q I suppose both. Is there a difference between physically and technically?
A Well, there may be. I mean essentially the four wires, two wires in one direction and two wires in the other direction, have to be hooked together. That could be done either physically by physically cross connecting those things together with wire, or it could also be done with digital cross connect devices or other things that MCI might provide.
Q Would that have to be done at a collocation space?
A If both -- Yes, and, in fact, the combination that we were talking about MCI could do at a collocation space. We would provide the unbundled loop to the collocation space. We'd provide the transport to that same

collocation arrangement, and then MCI could cross connect them together in whatever method they chose.
Q Is there any other way that BellSouth would permit that interconnection?
A Well, at present the only technically feasible ways we found are through either physical or virtual collocation, and MCI could choose either one of those methods.
Q And isn't it true that BellSouth has decided that it will not sell interconnection T1s as UNE combinations under the Interconnection Agreement?
A That is BellSouth's position.
Q And that is based on the theory that that combination would recreate an existing BellSouth service, specifically MegaLink?
A Well, MegaLink or some other service like that, yes.
Q So BellSouth would not provide the requested combination even though MCI would not be using BellSouth's switching; is that right?
A That's right. MegaLink is not a switched service. Smart Path is not a switched service, neither are. They are transport services instead.
Q So as we sit here today, if MCI does not want to purchase interconnection T1s as a resale service, and it

doesn't want to combine them at a collocation space, it has no choice but to purchase the T1s out of the Access Tariff; is that right?
A Repeat -- If you'll repeat your question.
Q Sure. It was a long question.
A Did you say if MCI also did not want to combine those two things themselves?
Q Yes.
A Yes.
MR. CARVER: I just want to clarify. Your question specifically related to the collocation cage, so when you say combine themselves, I don't know if you are talking about the same thing.
MR. O'ROARK: Okay. Why don't I try to rephrase it.
MR. CARVER: Okay.
BY MR. O'ROARK (Continuing):
Q If MCI doesn't want to either, one, purchase interconnection T1s as a resale service, or two, combine the elements itself, then MCI has no choice but to purchase the T1s out of the Access Tariff; is that right?
A Well, again, I'm not sure about the no another choice, but if MCI chooses not to use the resale provisions or the unbundled network element provisions -- I mean basically that's all there is in the interconne tion

agreement -- so some other form of ordering and provisioning would have to be used.
Q And the only available option would be the Access Tariff?
A Well, the Access Tariff or the general subscriber tariff. I mean MegaLink is offered to end-user customers as well. So there are other --
Q I don't know what the subscriber tariff is. Can you tell me what that is?
A Well, I might as a residential customer buy a primary right ISDN which would provide pretty much the same technical functionality.
Q Would you agree --
A And I would not order that out of the Access Tariff.
Q Would you agree with me that as a practical matter that is MCI's only alternative?
A Well, MCI's alternative is to buy some technical capability out of some tariff, not necessarily just the Access Tariff is my point, but out of some tariff. If MCI chooses not to use its resale provisions of the agreement or the unbundled network element provisions, then it would buy it out of some tariff.
Q What other tariff offerings could MCI use?
A Well, I just named one, primary rate ISDN,

MegaLink. There are a number of transport services that are all, you know, all pretty much interchangeable with DS-1 service.
Q Is primary rate ISDN a resale service?
A It is.
Q Can you give me any other tariff provision by which MCI could order T1 service that does not involve resale?
A No.
Q Let me ask you to turn to page 4 of your direct testimony.
A Yes.
Q And looking at the Q and A starting at line 8. Just for background, I gather ASRs are submitted to the interexchange carrier service center known as the ICSC?
A Yes, that's the center that handles requests generally from long distance companies.
Q And local service requests or LSRs are submitted to the local carrier service center known as the LCSC?
A That's correct.
Q Is there any reason that you would expect the ICSC to be slower at returning FOCs than the LCSC?
A Would I expect the ICSC to be slower than the LCSC?
Q Yes.

A For a -- you know, all other things being equal and the same complexity of order and the same type of order and that such thing, I would not expect any real difference.
Q There is no technical reason why one should be slower than the other?
A No.
Q Do you believe that the ICSC should be held to a lower standard in returning FOCs than the LCSC?
A Well, first of all, the ICSC is not held to any standard on providing FOCs. The ICSC handles requests from interexchange carriers not local carriers. It has no performance -- it's not held to any performance standard for how it provides FOCs to its interexchange customers.
Q So it's BellSouth's position that the ICSC should be held to no standard for FOCs?
A The ICSC is not required to be held to any standard regarding FOCs.
Q And that's BellSouth's position?
A Yes.
Q Does BellSouth, in fact, provide FOCs in response to an ASR or access service request?
A In a good number of cases we do, yes.
Q Are there cases when it does not return an FOC?
A I've been out of that side of the business for

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sometime, so I don't know if there are or not; but I'll agree with you that a good number of the orders received by the ICSC an FOC is returned, but I can't say that all such orders are covered by FOCs.
Q But you don't know of any, as we sit here today, that don't involve an FOC being returned?
A No, but I'm not an expert on the operations of the ICSC either.
Q To your knowledge, do other ILECs provide FOCs for access service requests?
A Again, it's been quite a while since I've been in that end of the business. I would presume that some at least do.
Q Do you know of any that don't?
A I, frankly, only know of one that does.
Q But do you affirmatively know of any ILECs that do not provide FOCs for ASRs?
A No, I don't know whether they do or do not.
Q Okay. It's hard to talk about this without getting into alphabet soup, but it makes it easier to get the words out. Does BellSouth have any internal guidelines for how fast it expects to send an FOC in response to an ASR?
A Again, I'm sure there are such standards, there are such targets; but what they are, I know they've changed

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over time to be generally shorter; but I don't know what those targets are now.
Q So you couldn't say whether the standard in the access industry is to provide an FOC within 48 hours?
A Well, let's be careful how we use the word "standard." We may have said "internal targets," but again, there is not a standard for us to meet in the interexchange side of our business.
Q I was trying to think of a better word. I don't mean it in the sense of a performance standard. I mean it more in the sense of an industry custom, or industry practice, why don't we use that term.
A Sure.
Q Can you agree with me that the industry practice is to return an FOC for an access service request within 48 hours?
A I mean, subject to check, I'll agree with that. I, frankly, don't know.
Q Okay. I was putting that out there to probe your memory, so I would ask you to accept that subject to check.
A Again, you know, here -- I don't know. You know, our belief is that MCI's request was handled by the ICSC. The ICSC has no performance standard that it is held to on FOCs. Those are not, therefore, subject to the performance standards that the LCSC is held to.

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Q Do you have Bryan Green's testimony in your stack of papers?
A I do not. That's the one set I didn't bring.
Q Well, I have to keep you on your toes. As luck would have it, I have a couple of copies, and I'd like to turn to Exhibit BG-24. It's actually in Mr. Green's rebuttal, which I'm -- a copy of which I'm putting in front of you now. Let me ask you first if you've seen this letter before?
A Briefly.
MR. CARVER: What was that number again?
MR. O'ROARK: BG-24.
BY MR. O'ROARK (Continuing):
Q The part I'm going to ask you about is paragraph 2 on FOCs. You might want to read the introductory paragraph to get yourself familiar with the letter and then please go to paragraph 2 because that's what I'm going to ask you about.
(WITNESS REVIEWS DOCUMENT)
A Okay.
Q Let me ask you generally about paragraph number 2 on FOCs. Do you have any knowledge of the discussions that are described here?
A None whatsoever.
Q And you've already said that you don't have

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knowledge of any understanding or industry practice -- well, let me be more accurate. You've said you have no knowledge of any industry practice or what the industry practice is -- Strike that, I'm sorry.
You do not know whether it is the practice in the industry to return an FOC within 48 hours?
A That is true.
Q And do you have any knowledge of the industry practice concerning whether facilities are inspected before the FOC is returned?
A On the interexchange carrier side of the business?
Q Let's take that side first.
A I know that that's always been contentious. I think there has always been a question about what checking for facilities entails. Availability of facilities, you know, is checked at some level. There have been contentious cases in the past where on the due date or shortly before it was determined that the records are inaccurate or some of the facilities themselves were defective and could not be used, and then it was contended that that should have been part of the facilities checking prior to return of the FOC; so I think checking for facilities is done. There has, at least in the past, been questions of the level to which that checking ought to be

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done.
Q Is it BellSouth's policy not to check for facilities before issuing an FOC for local orders?
A No, I don't believe so.
Q So its policy is that it will check the facilities first?
A Again, it's a -- I think we are into the gray matter of what checking for facilities means. There are certain things that will cause an order to be rejected during the processing that says there are not facilities available, and then they go into what we call PF status or pending facilities status; but there are other checks that are done later on that also could result, you know, indicate that facilities are not available; so it's a matter of degree that we are talking about here.
Q Just to clarify a little bit. I suppose one way you could check for facilities initially is to check BellSouth's computer records to see what they indicate?
A Yes.
Q And that's one thing that would be done initially?
A That is done initially I understand.
Q And then another thing would be to actually go out to the premises and see whether the facilities are actually there and work?

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A That's the other end of that spectrum, yes.
Q And that, on the local side, BellSouth does not do until after the FOC is issued?
A That's right.
Q Is that also true in the access side?
A Yes, that's also true.
Q And so the result of not checking the facilities physically can be that the FOC date will have to be changed after the facilities are physically checked?
A Yeah, that's a possibility for this situation, plus for BellSouth's retail operations as well. You know, the trade off is that the expense of doing that exhaustive a check, including dispatching a technician, for example, to the customer's premises to check those facilities on each and every order, that's a pretty expensive undertaking; so that's generally not done. In fact, not generally, I don't know of any case where it's done. Instead, concentration is on, you know, maintaining reliable records, up-to-date records, and a known efficiency level of keeping the facilities themselves in working order to obviate the need to dispatch people to physically check.
Q Now your testimony is that on the access side BellSouth has absolutely no duty to provide an FOC on an ASR?

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A Except that it's voluntarily agreed to, yes.
Q And your testimony is that BellSouth has not voluntarily agreed to do that with MCI?
A I think that those negotiations are underway now.
Q Does BellSouth, in fact, provide FOCs on ASRs to MCI?
A Generally, yes. I think --
Q How long -- I'm sorry.
A I think the question is the interval between when we receive an order and when that FOC is returned is the issue, not whether the FOC will be provided or not.
Q And does BellSouth provide FOCs on ASRs from other companies as well?
A Yes.
Q How long has BellSouth provided FOCs on ASRs?
A Oh, gosh, I don't know exactly, sometime between 1984 and now; but I don't know exactly when. They've been around several years.
Q Probably at least ten?
A I doubt that long, but again, they've been around a few years.
Q OBF stands for ordering and billing forum, does it not?
A That's what I've heard.

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Q Just so we can communicate.
A Yes.
Q To your knowledge, does the OBF require that an FOC be returned for an ASR?
A I have no idea.
Q Are you familiar with BellSouth's Access Tariff?
A Generally so, yes.
Q Let me show you a copy of BellSouth's Access Tariff that was given to me. I'm going to refer you to section 5 under access service, and this has an effective date of October 14th, 1997. I assume but cannot represent that that is the most recent that BellSouth has. And let me ask you to take a look at the first paragraph which appears to call for the returning of a firm order confirmation. Can you take a look at that and tell me if you still agree that there is no allegation to provide one?
(WITNESS REVIEWED DOCUMENTS)
A There is nothing in here, that I see at least, on a quick read, that specifies that the FOC will be returned in one hour, 24 hours, 48 hours or any other time frame.
Q But it does refer to an FOC being returned, doesn't it?
A Yes, it does.
Q The reason I ask, Mr. Milner, looking at your rebuttal testimony at page 3, looking at the Q and A

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starting on line 9 --
A Hold on just one moment, please.
Q Sure.
A I'm sorry, what page?
Q Page 3.
A Okay.
Q The Q and A starting at line 9: "To your knowledge, is there a requirement to provide FOCs on interstate access orders?" And your answer is no. I understood the position that you were taking was that BellSouth didn't have to provide one at all.
A Let me clarify. What I mean by that is that there is not any particular time frame under which BellSouth has to provide an FOC.
Q Let me refer now to Exhibit BG-16. Since you don't have Mr. Green's testimony, I can show it to you.
A It must be in his direct.
Q Yeah, it is in his direct. Let me put it in front of you. You'll see at the bottom there is a summary of MCI's statement of when FOCs -- how long it takes to receive FOCs for a certain period. Does BellSouth dispute those figures, to your knowledge?
A Not to my knowledge, no.
Q And so BellSouth, as far as you know, doesn't dispute that between June and July of 1997 it was taking

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about seven days or more to return an FOC on an ASR for this T1 service for MCI?
A That's what it says here. Again, let me point out that these are services not being handled by the local carrier service center, but rather they are being handled, apparently, on the interexchange carrier side of the house. I don't -- you know, I can't confirm that these intervals are accurate or not. I haven't heard any -- I haven't heard that BellSouth has contested these. We are not disagreeing with your numbers. I'm just saying simply that MCI is sending its orders to the wrong center if it wants performance standards on FOC deliveries.
Q And then in Mr. Green's testimony he says that the average for the first quarter of 1998 was 5.48 days. The same question, do you have any basis to dispute those numbers?
A I don't have any basis to dispute it, primarily because I'm not involved in that side of our business.
Q I understand, but you're the only witness I've got to ask about this, so --
A Okay.
Q Let's talk about count 10 for a little while, which concerns local tandems.
A Yes.
Q BellSouth first permitted local tandem

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interconnection in June of 1997; is that right?
A There is a date in here. That sounds about right, yes. Let me confirm.
Q Sure.
(WITNESS REVIEWED DOCUMENTS)
A Yes, June 30, 1997.
Q Let me refer you to Exhibit BG-1, page 6. This is a letter from Marcel Henry at MCI to Mr. Feidler at BellSouth. I'm sure you've seen it before.
A Yes.
Q And let me just refer you to the paragraph on local tandem interconnection and ask you to take a look at it, please.
MR. CARVER: What exhibit number is that?
MR. O'ROARK: BG-1.
MR. CARVER: Okay.
BY MR. O'ROARK (Continuing):
Q Have you had a chance to review that paragraph?
A Yes.
Q And is it fair to say that basically MCI was requesting that, among other things, that BellSouth confirmed that once MCI was interconnected at the BellSouth local tandem that its traffic would travel on the same trunk groups as BellSouth's local traffic?
A Yes.

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Q And also that existing ITC local and EAS traffic groups served by the local tandem be identified and made available to MCI traffic?
A Yes, that's what the words say.
Q Okay. In fact, I ended up quoting more than paraphrasing, but let me ask you to turn to Exhibit BG-2, page 5, and you'll see under issue 2, subheading 3, there is a reference to local tandem interconnection. Do you see that?
A Yes.
Q And BellSouth says that it will permit interconnection at a local tandem, but it does not answer the other questions, does it?
A This one statement does not. It talks instead about whether BellSouth will terminate traffic to independent companies or other CLECs at that same local tandem.
Q It really just states what BellSouth's contention of the issue is, doesn't it?
A No, I think this is an affirmation that BellSouth will provide access to a CLEC at its local tandem.
Q I agree with that, but the second sentence doesn't answer the remaining questions; that is really my point. It just states what BellSouth contends the issue is; is that fair?

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A No. In this letter -- No, I don't agree with that at all. I mean subsequent to this letter we've provided lists of end offices that subtend our tandems, and we have confirmed how that traffic will be handled; and it will use the same trunk groups as BellSouth traffic, so this is not an accurate statement of our position.
Q Well, that wasn't my question. I really am just referring to the four corners of this document. We will get to subsequent things that happened.
A Okay.
Q As far as this exchange of correspondence, BellSouth didn't answer the questions about interconnection with independent telephone companies and traffic being routed along the same trunk groups, did it?
A This one letter does not, no, but it does affirm that the interconnection will be allowed. It does not -- On the other hand, it doesn't say that BellSouth won't provide that other information either.
Q It really just dodged the question, didn't it?
A Well, I don't think that is an accurate depiction of this response. I mean I don't see any evasive words in here.
MR. CARVER: By the way, we would object to the form of the question for the same reasons the witness just stated in his answer.

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BY MR. O'ROARK (Continuing):
Q Looking at page 7, the Q and A beginning at line 6. I am in your direct testimony.
A Yes.
Q In your answer you say that MCImetro has two requests. The first is that BellSouth allow MCImetro to send transit traffic to BellSouth's local tandem for completion, and then you talk about a second request where BellSouth has more than one local tandem serving, given the local calling area, that MCImetro be allowed to send its transit traffic to only one of those local tandem switches. What is your basis for understanding that that is MCI's second request? Is that based on some discussions between MCI and BellSouth?
A Yes, I was not party to that. Let me explain what I was trying to get at here. In some cases BellSouth may have more than one tandem serving a given local calling area. There was some question, at least in our product team's minds, as to whether MCI, when MCI spoke of the local tandem interconnection, whether MCI intended to interconnect at only a single local tandem within a given local calling area or -- and if that were the case, then it would be BellSouth's responsibility to take that traffic that was served by the other tandems and get it to those tandems for completion, or whether MCI intended to

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interconnect its switches with each of those local tandems. And by the way, BellSouth will do it either way. But this was just trying to clarify that there may be more than one form of local tandem interconnection; that is, either connecting to only the one and then BellSouth gets it to the right tandem or that MCI would connect to all.
Q And just so I'm clear, that was not a request that you inferred from the exchange of correspondence we looked at after, is it?
A No, but I think that is part of local tandem interconnection in those cases where there is more than one tandem, is to make that decision as to do you want to interconnect with one, two or all.
Q Let's turn to page 9, the Q and A beginning at line 8, and I just want to get one thing clarified. In the middle of your answer, beginning at line 16, you say, "BellSouth will not accept traffic for end offices that are not within the local calling area. Also, BellSouth will not handle traffic from an ALEC that is routed to BellSouth's local tandem in error." And what I was trying to figure out is how -- is there a call that could be made to a local tandem in error that wasn't included within that first sentence concerning traffic for end offices that are not within the local calling area?
A Yes. For example, in the second sentence, the

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sentence that starts, "Also, BellSouth will not handle traffic from an ALEC that is routed to BellSouth's local tandem in error." For example, if MCI has chosen to interconnect with each local tandem at a given local calling area, then BellSouth expects it to send the right traffic to the right tandem. If it has not, if it sends traffic to tandem A that really should have been sent to tandem B, then we won't complete that traffic. You know, that traffic would be blocked, sent to an announcement.
On the other hand, if MCI said, I want you to figure that out, BellSouth, I'm only going to interconnect with one of your tandems, then we are already prepared to do that. We know that when traffic comes in from one of MCI's trunk groups, we know that we are to complete it to whichever of our local tandems it really belongs. So, again, that's why I think it was important to set out that there are really two forms of local tandem interconnection. So if you've said I'll meet you -- I'm going to interconnect at all of your tandems, but then you send the wrong traffic to one of them, then we won't complete that traffic. If you've sent all of your traffic to one tandem, then we know it's our job to figure out where it goes to; and that's really all that was speaking to.
Q Okay. Thank you.
What kind of announcement do you get if you send

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it to the wrong tandem?
A Probably, "Your call cannot be completed as dialed," something of that nature. Now, obviously, this is something we all want to avoid. Translations and such are worked out between the companies well in advance of putting traffic on there, including a test plan. This is an error situation where one company or another has put the wrong traffic on the wrong trunk group.
Q Let's talk for a little bit about the enhanced service offering.
A Yes.
Q I'm looking at page 11 of your direct testimony. Starting at line 11 you say, "BellSouth is in the process of expanding the offering to an enhanced service offering." Is BellSouth still in the process of doing that, or is it complete?
A No, we have offered this, so that's complete. In fact, that is probably a poor choice of words, that it says we are in the process of expanding. Again, we are offering that today.
Q The sentence beginning at line 16, it says, "Enhanced local tandem interconnection allows an ALEC to terminate the traffic to and receive traffic from all network service provider end office switches within a local calling area served by a given BellSouth local tandem

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assuming the two parties have negotiated appropriate local interconnection agreements."
My question is simply whether the existence of appropriate local interconnection agreements is a BellSouth requirement or something that's just left to be -- that is left to the interconnecting parties?
A Well, it's more to the latter. BellSouth would rather not be in the business of policing anybody's interconnection agreements other than our own. We are going to handle the traffic, and we are going to assume that the two parties had worked out the interconnection agreements.
Q So you're not going to require that the two parties provide the interconnection agreements to you?
A We don't need evidence that the interconnection agreement has been signed, but that's not to say that -- I can't speak for third parties who may choose not to have, you know, not to terminate traffic that they receive from another ALEC.
Q Let me ask you about the final sentence in that paragraph. It says, "An ALEC's traffic would travel over the same trunk groups as are used from the BellSouth local tandem to the BellSouth end office switch."
Now when we are talking about transit traffic, that would mean the traffic would be coming from, say, MCI,

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interconnecting at the local tandem and then going to the independent's end office?
A Right.
Q And BellSouth's would go to its local tandem and then to the ITC's end office?
A That's right.
Q What I want to ask you about is that last leg of that journey, from the local tandem to the ITC's end office. Would that traffic travel over the same trunk groups as between, say, MCI and BellSouth?
A It may or may not depending on how that -- well, in that case the answer would be yes. Although some ALECs have requested what they call transit trunk groups that carries traffic to our tandem. In other words, there is no BellSouth traffic on a transit traffic group. It didn't originate from a BellSouth end office and won't terminate to a BellSouth end office.
Q But where BellSouth does have trunks going to the ITC's end office, it will permit the ALEC traffic to travel over those same trunk groups?
A Over the same trunk group that BellSouth traffic is carried over, yes.
Q And how many local tandems does BellSouth have in Florida?
A Oh, gosh, I hope it's in here. I don't know.

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Q Can you give me an order of magnitude?
A Oh, somewhere between 10 and 20, I'm sure. Some very large, some fairly small.
Q Do Florida local tandems have their own CLLI codes?
A They do.
Q And for the record, what is a CLLI code?
A CLLI stands for common language location identification. It's a -- I want to say 8-character, either an 8-character or an 11-character code that shows the city, state, building and what we call traffic unit; that is, the switch within a building that is being designated. So it's just a shorthand for identifying a particular switching unit or a frame or some piece of equipment.
Q Okay.
A But the answer to your question, the local tandem has its own CLLI code which is separate and distinct from the access tandem's CLLI, even though that may be the same switch.
Q And when you say it's the same switch, I gather there are sort of two pieces of it, the access piece and the local piece?
A Well, it's really not that distinct. It's really one switch that handles both functions, but when it

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receives a trunk group, that trunk group is assigned either to the access tandem functionality of the switch or to the local tandem functionality. They are not separate parts that you could walk over and put your hand to and say this is the local part and over here is the toll part. It's one big switch that serves two different functions.
Q So the access tandem would have its own CLLI code, and the local tandem would have a separate CLLI code?
A That's right.
Q And is that true for local and access tandems generally at BellSouth?
A Yes.
Q And does BellSouth maintain those CLLI codes in the LERG for its local tandems?
A For our own switches we do, yes.
Q What do you mean "for our own switches?"
A Well, there are some switches that subtend our tandems that are not our switches, independent company switches, other CLEC switches; and some of those companies put their own information into the LERG. L-E-R-G is local exchange routing guide. So we don't have ultimate control over the accuracy of the LERG because -- we do to the extent that they are our switches and we have the responsibility for updating that guide. Other companies update their own inputs to that same guide.

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Q So if we were to look in the LERG today, we could find the CLLI codes for each of BellSouth's local tandems in Florida?
A Yes.
Q And all the subtending BellSouth switches?
A You would find at least all the BellSouth subtending offices, and I would hope you'd find all of the offices, presuming that all the other switch owners had updated the LERG appropriately.
Q Are any ALECs using the enhanced local tandem interconnection option today?
A At this moment, no.
Q Does BellSouth intend to charge anything extra to use that option?
A No.
Q Are there any different terms and conditions that would apply to that option?
A No.
Q So when you use the term "option," you've just got to decide are we going to go with the basic local tandem interconnection or the enhanced?
A Right.
Q And it's got to be one or the other, but no extra cost in terms and conditions?
A That's right. Now there are extra costs to

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BellSouth because there are measurement packages that I talk about in my testimony that have to be installed just for measuring and recording traffic on behalf of CLECs so they can charge each other reciprocal compensation as appropriate. So there is a cost that goes along with those, but that cost is not passed along to the CLEC.
Q Let's talk about count 12, which is directory listing information, something we had a chance to talk about in Tennessee not too long ago.
A Yes. May I -- Let me ask my lawyer something. In my testimony, just yesterday we found that there was an error -- not an error but an omission in the testimony, and I'd be glad to tell you about it now.
Q Sure.
MR. CARVER: Well, do you have something you want to ask me?
THE WITNESS: Oh, yeah. Is this the appropriate time to do this? Is there another way to do this?
MR. O'ROARK: This is a good time for a break.
MR. CARVER: Yeah, why don't we talk about it.
(BRIEF RECESS TAKEN)
BY MR. O'ROARK (Continuing):
Q Mr. Milner, let's take up one last question about local tandems. Has it always been the case that BellSouth's local and access tandems have had different

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CLLI codes, or was there a time when they might share the same CLLI code?
A It's certainly possible that sometime in the past we've had a single code, but the information I got from our folks who do our updates to the local exchange routing guide say that there are separate codes now for local access and local tandems; so I don't know how long that practice has been around, but it is practiced now.
Q Okay. And now to count 12.
A The point --
MR. CARVER: Yeah, Mr. Milner will need to add a couple of words to his testimony which we'll make him answer on the stand, but we just want to give you notice of it now since we know about it.
A This is on page 12 of my -- I guess this is direct. I learned yesterday that there is a local tandem in Pensacola, and obviously, not a very large one; and that that is -- the Pensacola tandem is not yet arranged with those software packages. So to amend the testimony on line 6, it should read -- or even starting back on line 5 so it will have some continuity, "Except for the Gainesville and Pensacola local tandems, period, BellSouth will equip the Gainesville and Pensacola local tandems with required software --" so the rest of the sentence is okay. Let me just read the rest of the sentence. "Upon request from an

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ALEC."
So my point is that we are offering enhanced local tandem interconnection in all of our tandems. We thought we had the right software in all of them except Gainesville. It turns out that Pensacola does not have the right software as well, but we are certainly willing to provide that software upon request of a CLEC.
BY MR. O'ROARK (Continuing):
Q About how long would it take you to do that after the request was made?
A Not very long. Weeks, maybe a couple of months. It's not a very large job.
Q Mr. Milner, we acknowledge that when MCImetro accesses directory assistance data through the DADS or DADAS, MCImetro does not get access to the complete directory assistance data base that BellSouth has?
A Unfortunately that is true.
Q And that's because BellSouth feels duty bound by its contracts with certain ALECs not to disclose their listings without their permission?
A That's right. Let me say, as I do in my testimony, that it's BellSouth's position that those CLECs should provide BellSouth with the right to disclose their listings. We have written to them asking for that right. Some have agreed; some still have not agreed. But we

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believe all ALECs should make all their listings available to everybody else.
Q Can you describe the contractual provision -- Strike that.
Does BellSouth use standard agreements with independent telephone companies, and -- that is, with independent telephone companies?
A Well, standard agreements. There are some parts that are, you know, boiler plate, I guess we'd say, that are used in most or all of our interconnection agreements with independent companies; but there is not one standard that they all have signed with us. Within the last six months or so, we have renegotiated a good number of those contracts with independents to make them more standard. Certainly we would like them to all be standard, but they are not that way today.
Q Is there a standard provision that prohibits BellSouth from disclosing ALEC or ITC directory listings?
A In some of those interconnection agreements there is that language, yes.
Q Is that BellSouth's language or the ITC's language?
A I'm sorry, you said ITC and ALECs. I thought we were talking about the interconnection agreements between BellSouth and Independents or between BellSouth and ALECs.

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Q Yes, and I'm sorry. In my question I intended to refer to both sets of interconnection agreements.
A Okay.
Q And the question is, is there -- in those contracts where there is a prohibition on disclosure, is that language BellSouth language or the other party's language?
A No, it's the other party's language. You know, again, what we would like to see is for all service providers to include their listing or to allow us to include their listings in DADS and in DADAS service offerings. I might also point out that in Florida there is not an issue with the independent telephone companies, or what we call incumbent LECs. The remaining issues are with companies operating as ALECs. So there is not an issue in our interconnection agreements with the independent companies and, in fact, of all of the ALECs certificated in Florida, only four still refuse -- are either still considering the matter or have refused to amend their contracts with us.
Q And it's your testimony that in those contracts with the ALECs that don't want to provide their listings that there is an express prohibition on BellSouth providing them to others?
A Yes.

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Q I'd like to request that BellSouth provide as a late-filed exhibit an example of such a provision.
A I think there may be one attached. Not to be argumentative, but I think --
Q If there is, please direct me to it. That will solve the problem.
A Perhaps there is not, but --
(WITNESS REVIEWED DOCUMENTS)
A No, the one I recall was the amendment to the agreement with Enterprise showing the new language that allows us to use those subscriber listings.
Q Okay. Then what we would request as a late-filed exhibit is a portion of one of these contracts that includes that provision. We would have no problem with the company involved name being redacted and so forth. What we are interested in is the actual language of the provision.
MR. CARVER: Okay. Let me just make a general point about these. The discovery cutoff is the 29th, and for a production request to have been done properly, it would have needed to have been served upon us 30 days before that. Now I don't have a problem with trying to get this information. You know, I don't have a problem with responding to the request for late-fileds generally, as long as it's not burdensome to do it within the remaining time frame

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before the hearing and as long as they are not too extensive; so, you know, with that caveat, we'll do what we can.
MR. O'ROARK: Thank you.
MR. MELSON: Can we go off the record just a minute?
MR. CARVER: Sure.
(DISCUSSION OFF THE RECORD)
MR. O'ROARK: Let's go back on the record then. We'll revise our request, but if you could either provide us the copy as a late-filed exhibit or give us the docket number if the agreement is in the record and we can look it up ourselves.
MR. CARVER: Okay.
BY MR. O'ROARK (Continuing):
Q Mr. Milner, if the Florida Public Service Commission orders BellSouth to provide its complete data base to MCI through DADS and DADAS, will BellSouth do so?
A Well, BellSouth complies with all the orders of the Florida PSC; so, yes, we would. But I'm no lawyer, so I'm not qualified to talk about what the consequences may be, but that would immediately put us in breach of our agreement, so I'm not sure what the ramification of that would be.
Q But, in fact, it would be BellSouth's preference

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to provide the complete data base?
A Well, we've said that all along. We think that all service providers should provide their listings to all other service providers such that those -- so anybody that wants to create their own directory assistance services using their own operators can do so. We provide all of ours. We think everybody should, likewise, do the same.
Q In fact, your proposed resolution would be for the Commission to hold a hearing and determine once and for all that all parties have to provide these to each other?
A Yes, and that's exactly right. We would like a generic proceeding to determine whether the PSC agrees with us that all ALECs should make their listings available, and that would give us some basis for setting aside those provisions of those interconnection agreements.
Q And then let's talk about what was originally count 14 of our complaint, which is now issue 13, which is the soft dial issue. And let me ask you to turn to page 19 of your direct, and I'm referring now to lines 22 and 23 which describes the BellSouth announcement: "You can only dial 911 from this line. To reach BellSouth or another local service provider you must call from another location." Do you see that?
A Yes.
Q Wouldn't you agree that mentioning BellSouth by

name gives BellSouth a competitive advantage over unnamed other local service providers?
A No, I wouldn't necessarily agree with that.
Q Why not?
A Well, first of all, this line is not in service. This is a case where -- it's a case where BellSouth is not using the line for its own purposes. The line is not being resold by any CLEC. It's not being used as an unbundled loop that is connected to some CLEC's switch, so it's simply not in service. BellSouth incurs all the costs of maintaining that loop and that line without any other source of contribution for it. I don't think there is anything -- I don't think there is any competitive advantage since BellSouth is bearing the entire cost of this facility now to mention its own name.
Q Why does BellSouth mention its own name if there is no competitive advantage to do so?
A Well, because this is a facility we are paying for in essence.
Q The purpose of mentioning BellSouth's name is to announce to the world that it's paying for the service?
A Is to let people that pick up that phone know that BellSouth is providing that facility.
Q Isn't the reason for mentioning BellSouth's name, is that BellSouth hopes that whoever hears the message will

call BellSouth and connect up service?
A Again, our intent is to make it clear to whoever picks up that phone that service is available from us and from other local service providers and, in fact, how to go about ordering that service.
Q And so the reason you put BellSouth's name in there has nothing to do with your hope that the customer will call BellSouth rather than another provider?
A Personally I hope that the customers will choose BellSouth for their service. Again, this is a case where there is no -- this is not a resold line. This is not an unbundled loop. This is a BellSouth provided facility, and I think we are within our rights to name ourselves as providing that facility. Similarly, if this were an unbundled loop connected to MCI's switch but didn't have active service on it, I would expect MCI would advertise their -- you know, themselves as the provider of that service.
Q Wouldn't you agree that BellSouth is advertising its services here, wouldn't you?
A I don't think this is an advertisement. I think this is just an informational announcement to a customer that says, you know, if you want to place service for BellSouth or anybody else, you need to do it from another phone. You know, there is no advertising talk about, you

know, our being the right choice or what we have to offer or our terms and conditions or anything else. It just says if you want to reach us or anybody else you've got to call from some other phone.
Q That's all we have.
A Thank you.
MR. O'ROARK: Thank you, Mr. Milner.
MR. MELSON: Cathy, you want to move up here?
MS. BEDELL: No, I think we can do this from here. We only have a few questions.
CROSS EXAMINATION
BY MS. BEDELL:
Q But you'll have to excuse me if we seem to jump around a little bit with this because they've poked holes in any kind of organization we had to start with.
A That's quite all right.
Q Do you have the Interconnection Agreement with you?
A No, I do not.
Q Okay. Hang on one second.
A You mean the Interconnection Agreement between BellSouth and MCI since we've talked about a number of them?
Q I'm sorry, yes, I did.
A Okay.

Q And if you could turn to part B, which is the definition part. On page 1 of the definitions there is a definition of ASR. Could you read that to us?
A Oh, yes, here it is. "ASR, access service request, means the industry standard forms and supporting documentation used for ordering access services. The ASR may be used to order trunking and facilities between MCIm and the ILEC for local interconnection."
Q And would you agree that that definition permits MCI to use the ASR to order trunks for facilities, or facilities for local interconnection?
A That's what the word is saying. I believe what it is really getting to is that here is an industry form for placing an order. If you want to use that same form for ordering local services as access services, use the same form; but that doesn't make the underlying goods local services. They're still access services being purchased even though the form is identical to one that might be used on the access side.
Q Okay. So MCI can order these trunks and lines through the interconnection agreement by using the ASR?
A Yes.
Q Okay. And, but it might not necessarily be priced out of the agreement as opposed to being priced out of an access tariff?

A Yes, and I think that is what this gets to is simply the standard form that might be used in that transaction, but not to govern any other conditions.
Q So it doesn't control the rate that you would be paying for it?
A No.
Q Okay. Is the DS-1 -- the 4-wire DS-1 offering that is in the Interconnection Agreement the same type of line that could be used as an Off-net T1?
A It has many or all of the same technical characteristics, yes.
Q Is it the same element that is used to provide the MegaLink?
A Yes, it is.
Q Do you know whether the rate for a T1 in the Interconnection Agreement would be the same rate that would be charged in the Access Tariff?
A I don't know the answer to that. Generally I would expect that the unbundled DS-1 loop would be priced closer to cost than as an access service or an Off-net T1 as we are talking about here.
Q The access service would be a higher charge?
A I think so.
Q And if the Interconnection Agreement specifically allows MCI to order T1s at a price that might be perhaps

lower than the Access Tariff, then why is it BellSouth's position that MCI must disregard the Interconnection Agreement and order the T1s in accordance with the tariffs?
A Well, we haven't said that.
Q Okay.
A MCI has chosen to order an access service, the Off-net T1. The equivalent technical capabilities are available to it as an unbundled network element which it chose not to order. They placed its order through the interexchange carrier service center, which is our long distance side of the business, rather than the local carrier service center, or LCSC. So MCI ordered an access service through the center that handles access services, and yet MCI apparently believes that FOCs should be delivered in accordance with the terms of the Interconnection Agreement even though this service was not ordered by MCI under those provisions.
Q But the service could be ordered under those provisions?
A Could have been.
Q But was not?
A But was not. It could have been ordered as an unbundled DS-1 loop, or as I pointed out earlier, it could have been ordered as a resold MegaLink service. So either on a resale basis or an unbundled network element basis,

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MCI could have chosen either of those two routes through the local carrier service center to get the equivalent functionalities. Instead, it ordered, using the ASR, an access service handled by the interexchange carrier service center.
Q You'll have to forgive me if this sounds like a really stupid question, but do they actually -- is it MCI's responsibility to know and -- to know where to send their request?
A Absolutely.
Q Because, see, I -- I mean they --
A Yeah, absolutely.
Q It's your assumption that they would know when they are sending a request to BellSouth that they, if they were to believe that they were filing it under the Interconnection Agreement but it ended up at your I --
A ICSC.
Q IS -- yeah, right.
A Let me point out that the long distance of MCI places ASRs through the ICSC by the dozens and that was business on a usual basis.
Q It's not something that MCI would assume that you all would separate out when you got the request?
A I'm not sure whether they expected us to or not, but we did not; however, we treated these as requests for

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access service provisioned through the ICSC.
Q Would it be correct to say that you stated earlier that MegaLink is only a DS-1 or higher loop from the customer's premises to BST's central office?
A Yes. I'm sorry, MegaLink may or may not end at our central office, but generally it does. I mean MegaLink is a, what we call a point-to-point transport service. It starts at someplace and ends at another. Those two end points may be a customer's premise in our central office or a customer's premise in some other location.
Q And would it be correct that you also stated that the problem that BellSouth has with MCI is that MCI wants to combine the DS-1 loop with the DS-1 transport?
A Yes, I think that's the issue here, that MCI decided on that basis -- or as an access service rather than as a local service.
Q And when they ordered the loop and the transport, did they also order switching at the same time?
A No, they would not order switching in that case. I presume they would provide their own switching. So this is to take a loop from a customer's premise that apparently terminates in our central office. They would want that to be combined with transport, interoffice transport between our central office and theirs such that that extended loop, as its been called, could be terminated to their switch

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rather than to ours.
Q Okay. And can you tell us what exactly BellSouth's problem is with providing the combination, the services, the transport and the loop?
A Well, only at a very high level because, as you know, Mr. Varner who has been a witness in our 271 case has talked extensively about our obligations under the law to provide combinations; but I'll give you sort of my second-hand understanding, is that our belief is based on the eighth circuit court of appeals decision that concluded that while BellSouth must provide unbundled network elements to others such that they could be combined, that BellSouth was not required to do that combination.
Q And if not required -- scratch that. I can't finish that question.
We have one more question. Are there any other CLECs that are ordering unbundled elements using ASRs instead of LSRs?
A Not to my knowledge, no.
Q Okay.
A Let me clarify that. Again, they may be using the ASR as a -- the form itself to order certain things, but they are -- but the content of the order, the goods, are being supplied through the LCSC rather than from our interexchange carrier service center.

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Q Okay.
MS. BEDELL: We don't have any more questions.
MR. CARVER: No questions.
MR. O'ROARK: Nothing further.
(WHEREUPON, THE DEPOSITION WAS CONCLUDED)

* * * *

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ERRATA SHEET
DOCKET NUMBER 980281-TP
W. KEITH MILNER
JULY 23, 1998

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STATE OF FLORIDA)
COUNTY OF LEON) CERTIFICATE OF OATH

I, the undersigned authority, certify that W. KEITH MILNER personally appeared before me and was duly sworn.

WITNESS my hand and official seal this 24th day of July, 1998.

NANCY S. METZKE
Notary Public - State of Florida

CERTIFICATE OF DEPONENT

This is to certify that I, W. KEITH MILNER, have read the foregoing transcription of my testimony, Page 1 through 58, given on July 23, 1998 in Docket Number 980281-TP, and find the same to be true and correct, with the exceptions, and/or corrections, if any, as shown on the errata sheet attached hereto.

_____
W. KEITH MILNER

Sworn to and subscribed before me this _____ day of _____, 19____

NOTARY PUBLIC
State of
My Commission Expires:

REPORTER'S DEPOSITION CERTIFICATE

STATE OF FLORIDA)
COUNTY OF LEON)

I, NANCY S. METZKE, Certified Shorthand Reporter and Registered Professional Reporter, certify that I was authorized to and did stenographically report the deposition of W. KEITH MILNER; that a review of the transcript was requested; and that the transcript is a true and complete record of my stenographic notes.

I FURTHER CERTIFY that I am not a relative, employee, attorney or counsel of any of the parties, nor am I a relative or employee of any of the parties' attorney or counsel connected with the action, nor am I financially interested in the action.

DATED this 24th day of July, 1998.

NANCY S. METZKE, RPR, CCR

PART A
GENERAL TERMS AND CONDITIONS

Section 1. Scope of this Agreement

1.1 This Agreement, including Parts A, B, and C, specifies the rights and obligations of each party with respect to the purchase and sale of Interconnection, Local Resale, Network Elements and ancillary services. This PART A sets forth the general terms and conditions governing this Agreement. Certain terms used in this Agreement shall have the meanings defined in PART B -- DEFINITIONS, or as otherwise elsewhere defined throughout this Agreement. Other terms used but not defined herein will have the meanings ascribed to them in the Act and the applicable FCC Rules and Regulations in effect. PART C sets forth, among other things, descriptions of the services, pricing, technical and business requirements, and physical and network security requirements.

LIST OF ATTACHMENTS COMPRISING PART C:

I. Price Schedule
II. Local Resale
III. Network Elements
IV. Interconnection
V. Collocation
VI. Rights of Way
VII. Number Portability
VIII. Business Process Requirements
IX. Security Requirements
X. Credits for Performance Standards Failures

1.2 BellSouth shall provide the services pursuant to this Agreement. Except as provided below, BellSouth shall not discontinue or refuse to provide any service provided or required hereunder without MCIm's prior written agreement. Such agreement shall not be unreasonably withheld. BellSouth shall not discontinue any telecommunications service available for resale unless BellSouth provides MCIm prior written notice of its intent to discontinue any such service. BellSouth agrees to make any such service available to MCIm for resale to MCIm customers who are subscribers to such services from MCIm until the date BellSouth discontinues any such service for BellSouth's customers. BellSouth also agrees to adopt a reasonable, nondiscriminatory transition schedule for BellSouth and MCIm customers who may be purchasing any such service.

1.2.1 Left Blank Intentionally

FLORIDA PUBLIC SERVICE COMMISSION
DOCKET NO. 980281-TP EXHIBIT NO. 21
COMPANY/ WITNESS: MCI
DATE: 8-5-98

2. Telephone Directory Coverage Areas by NPA/NXX

3. Publishing Schedules

4. Processes for Obtaining Foreign Directories

5. Information about Listing AT&T's Customer Services, including telephone numbers, in the Customer Call Guide Pages.

20.2 BellSouth will provide AT&T the proper format for submitting subscriber listings as outlined in the OLEC Handbook. BellSouth and BAPCO will accord AT&T's directory listing information the same level of confidentiality that BellSouth and BAPCO accord BellSouth's and BAPCO'S own directory listing information, and BellSouth shall limit access to AT&T's Customer proprietary, confidential directory information to those BellSouth or BAPCO employees who are involved in the preparation of listings.

20.3 BellSouth will include AT&T subscriber listings in BellSouth's directory assistance databases and BellSouth will not charge AT&T to maintain the Directory Assistance database. The Parties agree to cooperate with each other in formulating appropriate procedures regarding lead time, timeliness, format, and content of listing information.

20.4 **DELETED**

21. **Subscriber List Information/Local Number Portability**

21.1 **DELETED**

21.2 BellSouth shall refer any requests from third parties for AT&T's Subscriber List Information to AT&T.

21.3 Local Number Portability shall be provided as set forth in Attachment 8.

21.A **Insurance Requirements**

At all times during the term of this Agreement, each Party shall maintain, at its own expense, (i) all insurance required by applicable Law including insurance and approved self insurance for statutory workers compensation coverage and (ii) commercial general liability coverage in the amount of not less than ten million dollars ($10,000,000) or a combination of commercial general liability and excess/umbrella coverage totaling ten million dollars ($10,000,000). Upon request from the other Party, each Party shall furnish the other Party with certificates of insurance which evidence the minimum levels of insurance set forth herein. Each Party may satisfy all or part of the coverage specified herein through self insurance. Each Party shall give the other Party at least thirty (30)

Milner Late-filed
Exhibit #22
Docket 980281-TP

BELLSOUTH

BellSouth Interconnection Services
34S91 BellSouth Center
675 West Peachtree Street, N.E.
Atlanta, Georgia 30375

June 19, 1998



Ms. Pam Nelson
AT&T
Room 12W54
Promenade II
1200 Peachtree Street N.E.
Atlanta, Georgia 30309

Dear Pam:

This letter is in response to your June 2, 1998 letter requesting additional information regarding BellSouth's request to amend the BellSouth/AT&T Interconnection agreement to allow BellSouth to provide AT&T's Directory Listing Information to third parties.

While I do not have all of the names of specific CLECs who have requested AT&T directory assistance listings, there have been complaints by CLECs at the State Commission level regarding BellSouth's inability to pass some ICO and CLEC subscriber listings in our directory assistance services, especially BellSouth's Directory Assistance Database Service (DADS). MCI has specifically requested that BellSouth work with those CLECs and Independent Telephone Companies whose current agreements restrict BellSouth from passing their listings to third parties through our DADS. Further, the Florida Public Service Commission specifically ruled that MCI should have access to such information.

At present, I have no authority to offer compensation to AT&T for inclusion of its listings in BellSouth's DADS and DADAS databases.

BellSouth believes that it would be most appropriate and beneficial to all parties involved to make all listings, both BellSouth's listings and all CLECs listings available in both the DADS and DADAS product offerings.

Sincerely,

Jerry Hendrix
Director - Interconnection Services/Pricing

cc: Mary Jo Peed
Jan Burriss

FLORIDA PUBLIC SERVICE COMMISSION
DOCKET NO. 980281-TP EXHIBIT NO. 22
COMPANY/
WITNESS: Milner
DATE: 8-5-98