

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

BELLSOUTH TELECOMMUNICATIONS, INC.
DIRECT TESTIMONY OF GLORIA CALHOUN
BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION
DOCKET NO. 960786-TL
JULY 7, 1997

Q. Please state your name, address and position with BellSouth Telecommunications, Inc. ("BellSouth").

A. My name is Gloria Calhoun. My business address is 675 West Peachtree Street, Atlanta, Georgia 30375. I am employed by BellSouth Telecommunications, Inc. as a Director of Regulatory Planning. In that position I handle matters related to operations planning and implementation for local interconnection, unbundling and resale.

Q. Please summarize your background and experience.

A. I graduated *summa cum laude* with a Bachelor of Arts degree in Economics from the University of North Florida. In 1995, I completed a management studies program at the Georgia Tech Management Institute. I began my BellSouth career in 1981 when I joined the Southern Bell Business Marketing organization in Jacksonville, Florida. In that capacity I was responsible for coordinating the interdepartmental efforts needed to implement complex voice systems and associated exchange services. I joined the economic analysis group at company

1 headquarters in Atlanta in 1985, where I analyzed operations costs for
2 dedicated services. I subsequently held positions in which I had pricing
3 and planning responsibilities for dedicated services, as well as for
4 additional testing, maintenance and other special provisioning activities
5 for access customers. I have been directly involved in operations
6 planning and implementation for local interconnection, unbundling and
7 resale since March, 1995, and was the primary interface for
8 negotiations with AT&T on operational issues between September
9 1995 and March 1996. Most recently I have testified on behalf of
10 BellSouth on electronic interfaces and other operational issues in cases
11 related to BellSouth's entry into the long distance market in Georgia
12 and Louisiana, and in arbitration hearings in Alabama, Florida, Georgia,
13 Kentucky, Louisiana, North Carolina, and Tennessee.

14

15 Q. What is the purpose of your testimony?

16

17 A. The purpose of my testimony is to describe how BellSouth provides
18 non-discriminatory access to its operational support systems as
19 required by the Telecommunications Act of 1996 ("the Act"), the
20 Federal Communications Commission's ("FCC's") orders, and previous
21 orders of the Florida Public Service Commission ("FPSC" or "this
22 Commission"). I provide the details of BellSouth's implementation for
23 each electronic interface, including testing, capacity, documentation
24 and training, and show that each interface is generally available or in
25 commercial use.

1

2 Q. How is your testimony organized?

3

4 A. I begin my testimony by addressing the meaning of non-discriminatory
5 access in the context of operational support systems. I then address
6 the electronic interfaces available for each required function. Those
7 functions are pre-ordering, ordering and provisioning, maintenance and
8 repair, and billing; I address each of these in turn. Specifically, I
9 compare BellSouth's retail access for each function to the access
10 currently available to and in use by alternative local exchange carriers
11 (ALECs). I also describe the capacity of each interface to support
12 ALEC transactions, as well as the training, documentation and other
13 support available to ALECs using the interfaces.

14

15 **Evaluating Non-Discriminatory Access**

16

17 Q. Did the FCC define non-discriminatory access to operational support
18 systems?

19

20 A. Yes. The FCC's August 8, 1996 Order in Docket No. 96-98 ("FCC
21 Order"), at paragraph 312, indicates generally that the quality of access
22 to unbundled network elements must be comparable among ALECs,
23 and between ALECs and BellSouth. In specifically addressing the
24 interfaces that are the subject of this testimony, paragraph 518 of the
25 FCC Order states that "if competing carriers are unable to perform the

1 functions of pre-ordering, ordering, provisioning, maintenance and
2 repair, and billing for network elements and resale services in
3 **substantially the same time and manner** that an incumbent can for
4 itself, competing carriers will be severely disadvantaged, if not
5 precluded altogether, from fairly competing. Thus providing non-
6 discriminatory access to these support system functions, which would
7 include access to the information such systems contain, is vital to
8 creating opportunities for meaningful competition.” (**emphasis added**)

9

10 Q. Does this mean that the functionality provided to ALECs must be
11 identical in every respect to the functionality available through
12 BellSouth's retail systems?

13

14 A. No. Paragraph 315 of the FCC's Order describes the incumbents'
15 obligations as being to provide unbundled elements, such as access to
16 operational support systems, “under terms and conditions that would
17 provide an efficient competitor with a meaningful opportunity to
18 compete.”

19

20 Q. How should this Commission evaluate whether BellSouth's electronic
21 interfaces provide non-discriminatory access to BellSouth's operational
22 support systems?

23

24 A. This Commission should apply the principle articulated by the FCC.
25 Thus, if all ALECs are provided access to the information and

1 functions in BellSouth's operational support systems in **substantially**
2 **the same time and manner** as BellSouth has access when serving its
3 retail customers, then this Commission should find that such access is
4 non-discriminatory.

5

6 Q. The United States Department of Justice (DOJ) has provided
7 comments on operational interfaces in connection with the recent
8 application for interLATA authority filed with the FCC by SBC
9 Communications, Inc. Does BellSouth agree that the DOJ's role
10 includes evaluating operational support systems?

11

12 A. No. To my knowledge, the DOJ has no particular expertise in systems
13 issues. As discussed by Mr. Varner, BellSouth's position is that the
14 DOJ's role in consulting with the FCC is limited to antitrust issues.
15 Thus, the DOJ's opinions concerning operational support systems are
16 neither binding nor persuasive, and this Commission should evaluate
17 BellSouth's operational support systems based on the record in this
18 proceeding.

19

20 Industry Standards and Non-Discriminatory Access

21

22 Q. Did the FCC establish conformance with industry standards as a
23 requirement for non-discriminatory access to operational support
24 systems?

25

1 A. No. In fact, in paragraph 13 of the FCC's Second Order on
2 Reconsideration in CC Docket No. 96-98, dated December 13, 1996,
3 the FCC stated "[i]t is apparent . . . that access to OSS functions can
4 be provided without national standards. We therefore reject the
5 petitions of LECC and Sprint to delay the requirement to provide non-
6 discriminatory access until national standards have been fully
7 developed. We conclude that such a requirement would significantly
8 and needlessly delay competitive entry." The FCC concluded, "[w]e
9 continue to encourage parties to develop national standards for access
10 to OSS functions, but decline to condition the requirement to provide
11 access to OSS functions upon the creation of such standards."
12 Implicitly, non-discriminatory access can be provided through interfaces
13 that are not nationally standardized.

14
15 Q. Does BellSouth nonetheless support developing interfaces that
16 conform with industry standards?

17
18 A. Yes. BellSouth is in fact a strong supporter of industry standards, and
19 is a regular participant in the industry bodies developing standards.
20 Also, as required by this Commission's arbitration orders, BellSouth
21 has developed its interfaces on the basis of industry standards, where
22 they exist. For example, Electronic Data Interchange (EDI), an
23 ordering interface, was adopted by the industry for ALEC local service
24 requests, and BellSouth offers ALECs an EDI ordering interface.
25 BellSouth's interface for daily billable usage is provided in the BellCore-

1 supported, industry-standard Exchange Message Record (EMR)
2 format. BellSouth offers ALECs use of the same industry-standard
3 trouble reporting interface currently used by interexchange carriers to
4 report troubles on access services; ALECs can use this interface for
5 trouble reporting on designed services, such as complex private line
6 services. BellSouth also has incorporated language in interconnection
7 agreements to the effect that BellSouth will implement interfaces
8 consistent with industry standards when those standards become
9 available or finalized. However, as stated above, this is not a
10 requirement for a finding that BellSouth's interfaces provide non-
11 discriminatory access.

12

13 Q. For which function is there currently no industry standard?

14

15 A. Most notably, there is no industry standard for pre-ordering
16 transactions. The industry prioritized the development of ordering
17 standards ahead of pre-ordering, and has devoted most of its efforts to
18 date to ordering. This is a reasonable approach for the industry to
19 have taken, given that pre-ordering information -- such as obtaining
20 telephone numbers or installation dates -- is not necessary to compete
21 for the huge installed base of existing customers who might only want
22 to switch service providers. While the industry recently has begun to
23 move forward with standards development for pre-ordering, the
24 industry's definition and implementation work is far from complete.
25 However, despite the absence of industry standards for pre-ordering

1 transactions, BellSouth offers ALECs real-time, interactive access to
2 pre-ordering information. BellSouth provides that access through its
3 Local Exchange Navigation System (LENS). LENS provides access to
4 pre-ordering information in substantially the same time and manner as
5 BellSouth's retail systems, and will be described in detail in later
6 sections of this testimony. The only current alternatives to LENS are
7 either another non-standard pre-ordering interface, such as the
8 customized interface BellSouth is designing to AT&T's specifications, or
9 no pre-ordering interface at all.

10

11 Q. Despite the fact that industry standard interfaces are not a requirement
12 for non-discriminatory access, has BellSouth agreed to implement
13 industry standards as they become available?

14

15 A. Yes. As required by this Commission's arbitration orders, BellSouth's
16 interconnection agreements with AT&T, MCI and Sprint provide that
17 BellSouth will implement industry standard interfaces within a specified
18 time of the industry's adoption of standards for local service.

19 Presumably, all ALECs could request access through any interface
20 once it is developed.

21

22 Q. Does a non-standard interface necessarily result in inferior access?

23

24 A. No. To the contrary, some of BellSouth's retail systems have
25 functionality superior to that supported by industry standards, and

1 BellSouth offers ALECs that same access. For example, BellSouth
2 offers ALECs access to the same expert maintenance and repair
3 system that BellSouth uses to handle local exchange trouble reports;
4 that interface, known as the Trouble Analysis Facilitation Interface
5 (TAFI) system, will be described in detail in a later section of this
6 testimony. The TAFI functionality is far superior to the limited
7 functionality supported by the industry standard for trouble reporting.
8 TAFI allows a repair attendant to actually clear many trouble reports
9 with the customer on the line, while the industry standard merely
10 addresses functions such as electronically opening a trouble ticket or
11 obtaining status information. While there is no industry standard for the
12 superior functionality provided by the TAFI interface, it nonetheless
13 allows ALECs to handle local exchange trouble reports in substantially
14 the same time and manner as BellSouth does for its retail customers;
15 an interface that merely conformed with industry standards would be
16 inferior.

17

18 Electronic Bonding and Non-Discriminatory Access

19

20 Q. Are "machine to machine" interfaces, also known as "electronic
21 bonding", necessary for an interface to provide non-discriminatory
22 access?

23

24 A. No. While some ALECs may prefer electronic bonding arrangements,
25 the requirement is that ALECs have access to the information and

1 functions in BellSouth's operational support systems in substantially the
2 same time and manner as BellSouth. BellSouth's interfaces meet this
3 requirement.

4
5 Q. Does BellSouth's pre-ordering interface, LENS, provide ALECs with
6 access to pre-ordering information in substantially the same time and
7 manner as BellSouth's access when serving its retail customers?

8
9 A. Yes. BellSouth's pre-ordering interface, the Local Exchange
10 Navigation System (LENS), provides ALECs with real-time interactive
11 access to BellSouth's pre-ordering information, which is substantially
12 the same time and manner as BellSouth's access for its retail
13 customers. From the customer's perspective, pre-ordering interactions
14 with an ALEC using LENS are indistinguishable from pre-ordering
15 interactions with BellSouth, regardless of whether LENS meets the
16 definition of a machine to machine interface. Moreover, electronic
17 bonding arrangements are difficult, expensive and time-consuming to
18 implement, and, as experience in the access world has shown, are of
19 interest to only the very largest potential ALECs. While BellSouth has
20 committed through its interconnection agreements to implement
21 additional electronic bonding arrangements for pre-ordering
22 information, BellSouth nonetheless has developed the LENS pre-
23 ordering interface for the entire ALEC industry. LENS provides real-
24 time, interactive access to pre-ordering information, and is available to
25 support any ALEC that chooses to enter the Florida local market today.

1

2 Q. Are there ways other than electronic bonding in which the data from
3 LENS can be integrated with an ALEC's operational support system?

4

5 A. Yes, and that means that there is no need for an ALEC to manually re-
6 enter data obtained from LENS into the ALECs' operational support
7 systems. There are several methods for doing this that vary in their
8 degree of complexity. First, an ALEC using LENS can simply "cut and
9 paste" information from LENS into any other Microsoft Windows-
10 compatible application. In addition, the data underlying the
11 presentation screens supplied through LENS is available for
12 customization by an ALEC's software developers. That underlying data
13 is depicted on Exhibit GC-1. Finally, the data also can be provided in
14 additional formats independently of the LENS presentation screens.

15

16 Q. Please describe that process.

17

18 A. The LENS data could be provided through a process known as
19 Common Gateway Interface, or CGI. CGI is a specification for
20 communicating data between an information server, such as the LENS
21 server, and another independent application, such as an ALEC
22 operations support system. A CGI script is a program that negotiates
23 the movement of data between the server and an outside application.
24 With BellSouth's CGI specification, an ALEC could obtain and
25 manipulate data from the LENS server; using CGI, therefore, provides

1 yet another method for an ALEC to integrate the data obtained through
2 LENS with the ALEC's internal systems. BellSouth's CGI specification
3 is available to any ALEC interested in pursuing that option.

4

5 Q. Despite the fact that BellSouth's LENS pre-ordering interface is
6 sufficient to provide access to BellSouth's pre-ordering information in
7 substantially the same time and manner as BellSouth's access for its
8 retail customers, how is BellSouth working with requesting carriers to
9 develop additional pre-ordering interfaces?

10

11 A. BellSouth has negotiated an individual interconnection agreement with
12 AT&T that provides for additional customized interfaces. Under the
13 agreement with AT&T, BellSouth is developing a machine-to-machine
14 pre-ordering interface designed to AT&T's specifications. Once
15 developed, this interface also would be available to any other
16 requesting carrier. In addition, BellSouth has continued to engage in
17 discussions about other development efforts that would enable ALECs
18 to integrate the data LENS provides with an ALEC's own systems.
19 However, there is a difference between what BellSouth is willing to do
20 for ALECs as wholesale customers and what is required to provide
21 non-discriminatory access. Despite BellSouth's considerable efforts to
22 accommodate the particular requirements of individual ALECs, the key
23 point remains that machine-to-machine interfaces are not a
24 requirement for non-discriminatory access.

25

1 Q. Would electronic bonding or a machine-to-machine interface satisfy the
2 needs of all ALECs?

3

4 A. No. In fact, of the hundreds of interexchange carriers in the access
5 market today, only the very largest use the electronic bonding
6 arrangements already available for access services. Implementing
7 electronic bonding arrangements can be expensive, difficult and time-
8 consuming. Few companies have the resources or desire to make
9 these investments. If electronically bonded interfaces were the only
10 option, most ALECs would be precluded from an electronic interface.
11 To accommodate carriers that want to engage in electronic bonding,
12 BellSouth has agreed to additional development efforts in individual
13 interconnection agreements. Meanwhile, BellSouth has developed
14 interfaces for the entire ALEC industry that are non-discriminatory as
15 contemplated by the FCC.

16

17 Manual Processes And Non-Discriminatory Access

18

19 Q. Does the non-discriminatory access requirement mean that all
20 information and functions must be electronic and involve no manual
21 handling?

22

23 A. No, and in a similar proceeding in Louisiana in May, 1997, AT&T's
24 witness, Mr. Bradbury, agreed that it is not necessary to eliminate all
25 manual intervention in order for an interface to meet the non-

1 discriminatory access requirement. (Louisiana Public Service
2 Commission, Docket No. U-22252, May 28, 1997, Hearing Volume
3 Number 7, Page 1782.) In many cases, the processes by which
4 BellSouth handles its retail customers involve manual intervention.
5 Thus, non-discriminatory access to such functions for ALECs can
6 legitimately involve manual processes also.

7

8 Q. Does BellSouth have mechanized pre-ordering and ordering processes
9 for all retail services?

10

11 A. No. These processes are not fully mechanized for all retail services.
12 Many services, primarily those known as "complex" services, involve
13 substantial manual handling by BellSouth account teams. This is
14 discussed in further detail later in this testimony.

15

16 Q. Are the manual processes BellSouth uses for complex retail services
17 substantially the same processes used for the complex resold services
18 offered to ALECs?

19

20 A. Yes. The manual processes BellSouth relies on for providing many
21 complex services to its retail customers are the same processes in
22 place to support ALEC orders for the same services. The specialized
23 and complicated nature of complex services, together with their
24 relatively low volume of orders relative to basic exchange services,
25 renders them less suitable for mechanization, whether for retail or

1 resale applications. Complex, variable processes are relatively difficult
2 to mechanize, and BellSouth has concluded that mechanizing many
3 lower-volume complex retail services would be imprudent, in that the
4 benefits of mechanization would not justify the cost. Given that the
5 same manual processes are in place for both ALEC and BellSouth
6 retail orders, the processes are competitively neutral. If MCI or any
7 other CLEC, in exercising its independent business judgment, were to
8 reach a different conclusion, it could certainly fund the cost of complex
9 service mechanization through a bona fide request for additional
10 functionality. Later in this testimony, I will describe in detail how the
11 manual processes used by BellSouth for complex retail services are
12 virtually identical to those processes used for complex resold services.

13

14 Q. Are there other circumstances in which manual processes might be
15 appropriate?

16

17 A. Yes. Manual processes for some ALEC functions can be appropriate
18 where the volume of anticipated transactions would not justify the
19 expense of developing mechanized processes.

20

21 Interconnection Agreements and Non-Discriminatory Access

22

23 Q. Does the fact that BellSouth may have agreed to develop and provide
24 additional or different interfaces in interconnection agreements with

25

1 certain ALECs mean that BellSouth's generally available interfaces are
2 discriminatory?

3

4 A. No. The appropriate question with regard to non-discriminatory access
5 is whether both ALECs and BellSouth have access to the information
6 and functionality in BellSouth's operational support systems in
7 substantially the same time and manner. All ALECs have such access
8 to BellSouth's operations support systems pursuant to the terms of
9 BellSouth's Statement of Generally Available Terms and Conditions
10 ("SGAT" or "Statement"). In addition, any ALEC may negotiate an
11 interconnection agreement that provides substantially the same
12 operations support system access to which BellSouth may have agreed
13 in an interconnection agreement with any other ALEC.

14

15 ALEC Development Effort and Non-Discriminatory Access

16

17 Q. Does the fact that an ALEC may have to train its personnel, undertake
18 development work on its systems, or make other ongoing adjustments
19 to use BellSouth's ALEC interfaces mean that BellSouth's interfaces
20 are discriminatory?

21

22 A. No. Again, the relevant question with regard to non-discriminatory
23 access is whether both ALECs and BellSouth have access to the
24 information and functionality in BellSouth's operational support systems
25 in substantially the same time and manner. BellSouth continually

1 updates its internal systems and trains its personnel; it is reasonable to
2 expect ALECs to do likewise. For example, the Regional Negotiation
3 System (RNS) used by BellSouth retail service representatives for
4 residence services has been in use for several years, yet RNS changes
5 monthly with new software "releases" that enhance its capabilities.
6 Retail service representatives, in turn, are continually trained with each
7 new release. That ALECs may have to keep pace with similar changes
8 in the ALEC systems would appear inevitable, but not discriminatory.

9

10 **FUNCTIONAL COMPARISON OF ALEC INTERFACES**
11 **AND BELLSOUTH RETAIL SYSTEMS**

12

13 Q. Is BellSouth now able to provide non-discriminatory access to its
14 operational support systems for pre-ordering, ordering, provisioning,
15 maintenance and repair, and billing?

16

17 A. Yes. Each interface is fully operational, and is in actual use. I will
18 describe the interface for each required function below, and will show
19 how the ALEC interface provides access to the required information
20 and functions in substantially the same time and manner as BellSouth's
21 access when serving its retail customers.

22

23 Q. Does BellSouth offer interfaces in addition to those you are about to
24 describe?

25

1 A. Yes. The interfaces described in this testimony are the recommended
2 interfaces offered by BellSouth for each required function. However,
3 on the basis of legislative and regulatory activity in its region during
4 1995 and 1996, BellSouth began offering a number of interim
5 arrangements intended to support the early market entry of local
6 competitors. These interim interfaces involved a combination of
7 manual and mechanized processes, and, given that some ALECs have
8 chosen to continue with those processes rather than avail themselves
9 of BellSouth's recommended interfaces, the earlier interfaces are still
10 available as well. In addition, BellSouth has committed in individual
11 interconnection agreements to develop customized interfaces built to
12 the specifications of individual parties, such as AT&T.

13

14 PRE-ORDERING

15

16 Q. How is pre-ordering defined?

17

18 A. The FCC's Part 51 Interconnection Rules define pre-ordering and
19 ordering collectively as including "the exchange of information between
20 telecommunications carriers about current or proposed customer
21 products and services or unbundled network elements or some
22 combination thereof."

23

24 Q. What does pre-ordering information mean in customer terms?

25

1 A. As the FCC's definition implies, there is no strict delineation between
2 pre-ordering and ordering, as many "pre-ordering" activities generally
3 occur in the context of actually negotiating a service order. As will be
4 discussed later in this testimony in the context of complex services,
5 pre-ordering activities can vary considerably depending upon the
6 service involved. However, pre-ordering information generally refers to
7 accessing the following information and functions while discussing an
8 order for basic exchange service with an end user customer: (1) street
9 address validation; (2) telephone number information; (3) services and
10 features information; (4) due date information; (5) customer service
11 record information.

12

13 Q. Is pre-ordering information necessary for most service orders an ALEC
14 might place?

15

16 A. No. There is a limited need for pre-ordering information for orders
17 involving existing customers who already have telephone numbers and
18 installed services and who just want to switch service providers.

19

20 Q. Did this Commission require BellSouth to provide an electronic
21 interface for pre-ordering information?

22

23 A. Yes. In the MCI and AT&T arbitration orders, this Commission required
24 BellSouth to develop real-time and interactive interfaces to support pre-
25 ordering; BellSouth's pre-ordering interface meets this requirement.

1

2 Q. How does BellSouth perform pre-ordering transactions for its retail
3 customers?

4

5 A. BellSouth primarily uses three systems, based on whether the
6 customer is a residence or business subscriber, and based on the
7 customer's location. BellSouth uses a system known as the Regional
8 Negotiation System (RNS) for most types of residence orders. For
9 business customers in Alabama, Kentucky, Louisiana, Mississippi and
10 Tennessee, BellSouth uses a system known as the Service Order
11 Negotiation System (SONGS); for business customers in Florida,
12 Georgia, North Carolina and South Carolina, a system known as Direct
13 Order Entry (DOE) is used. SONGS and DOE also are used by service
14 representatives for residence customer transactions not supported by
15 RNS. Each of these systems accesses the necessary operational
16 support systems and databases to obtain most pre-ordering information
17 on a real-time, interactive basis. RNS is a newer system that provides
18 more English-language and point-and-click capabilities. SONGS and
19 DOE are older systems that are less user friendly, relying more on the
20 use of special codes and function keys.

21

22 Q. Please describe the ALEC interface for pre-ordering transactions.

23

24 A. The LENS interface discussed earlier offers ALECs real-time,
25 interactive access to pre-ordering information, and an integrated direct

1 order entry capability that will be described in the ordering section of
2 this testimony. LENS is superior to the BellSouth systems in that it
3 provides a single interface for both residence and business, and
4 supports all states in the BellSouth region. LENS allows the ALEC to
5 enter a pre-ordering transaction interactively, using prompts and screen
6 displays. The interface converts the ALEC inputs into support system
7 commands and database queries as appropriate to obtain the
8 information from a number of BellSouth operations support systems
9 and corporate databases, freeing the ALEC from having to separately
10 access each downstream system and database. The information is
11 collected in real-time from the various sources, and is returned
12 electronically to the ALEC on a real-time basis. A chart showing that
13 LENS and RNS access BellSouth's pre-ordering databases in
14 substantially the same time and manner is provided as Exhibit GC-2.
15 Pre-ordering consists of a number of functions, which I now will
16 address individually.

17

18 Address Validation

19

20 Q. Does BellSouth provide ALECs with access to BellSouth's address
21 validation information and functions in substantially the time and
22 manner as BellSouth's access for BellSouth's retail customers?

23

24 A. Yes.

25

1 Q. How does BellSouth perform address validation when serving its retail
2 customers?

3

4 A. Again, this depends upon the type of customer, and the customer's
5 location. For residence customers, BellSouth uses the address
6 validation screen in RNS. A copy of an actual address validation
7 screen seen by a BellSouth service representative using RNS is
8 attached as Exhibit GC-3. For business customers in Florida,
9 BellSouth uses the address validation screens in DOE. A copy of
10 actual address validation screens seen by a BellSouth service
11 representative using DOE is attached as Exhibit GC-4. Using these
12 screens, the BellSouth service representative sends an inquiry to, and
13 receives a response from, the BellSouth database containing address
14 information.

15

16 Q. How does an ALEC perform address validation?

17

18 A. The ALEC uses the address validation screens in LENS. A copy of
19 such screens as seen by the ALEC using LENS is provided as Exhibit
20 GC-5. Using these screens, the ALEC representative sends an inquiry
21 to, and receives a response from, the same BellSouth database
22 containing address information that is accessed by RNS and DOE.
23 That database returns address information without regard to whether
24 the request originated from an ALEC or from BellSouth. As seen on

25

1 those screens, LENS provides community name abbreviations required
2 for service orders, and other useful information, such as zip codes.

3

4 Q. Does LENS provide an exact duplicate of the information seen on the
5 address validation screens in BellSouth's retail systems?

6

7 A. No, not necessarily. In some cases the same information is provided in
8 a different location. For example, the address validation screen in DOE
9 provides the identification of the serving central office for the
10 customer's address. However, the serving central office information
11 affects both the telephone numbers that can be assigned and the
12 services available in that office. Therefore, LENS displays this
13 information on both the telephone number screen and the products and
14 services screens. This is shown on Exhibits GC-6 and GC-7 in the
15 fields labeled "CLLI".

16

17 Telephone Number Selection

18

19 Q. Does BellSouth provide ALECs with access to telephone number
20 information and functions in substantially the same time and manner as
21 BellSouth's access for its retail customers?

22

23 A. Yes.

24

25

1 Q. How does BellSouth perform telephone number selection when serving
2 its retail customers?

3

4 A. Again, this depends upon the type of customer, and the customer's
5 location. For residence customers, BellSouth uses the telephone
6 number selection screen in RNS. A copy of an actual telephone
7 number selection screen seen by a BellSouth service representative
8 using RNS is attached as Exhibit GC-8. For business customers in
9 Florida, BellSouth uses the telephone number selection screen in DOE.
10 A copy of an actual telephone number selection screen seen by a
11 BellSouth service representative using DOE is attached as Exhibit GC-
12 9. Using these screens, the service representative sends an inquiry to,
13 and receives a response from, the BellSouth database containing
14 telephone number information.

15

16 Q. How does an ALEC perform telephone number selection?

17

18 A. The ALEC uses the telephone number selection screen in LENS. A
19 copy of the telephone number selection screen seen by the ALEC
20 using LENS is provided as Exhibit GC-6. Using this screen, the ALEC
21 representative sends an inquiry to, and receives a response from, the
22 same BellSouth database containing telephone number information
23 that is accessed by RNS and DOE. That system provides telephone
24 number information without regard to whether the request originates
25 from an ALEC or from BellSouth.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

Q. Does the LENS system allow for selection of special telephone numbers, such as contiguous blocks of numbers, vanity numbers and easy numbers, without manual intervention of BellSouth service representatives?

A. Yes. All telephone number inventory management functions are done by the same BellSouth telephone number support system, regardless of whether the telephone numbers are being selected through LENS, RNS or DOE. Thus, the ALEC has substantially the same ability to select special telephone numbers using LENS as BellSouth would have using RNS or DOE, and in several respects the special number capabilities of LENS are superior to those available to BellSouth's service representatives. The easiest way to compare these capabilities is to look at the actual screens seen by BellSouth service representatives and by users of LENS. For example, referring again to Exhibit GC-8, the RNS telephone number selection screen used by BellSouth's residence service representatives has selections for "easy" number, "stylist" numbers, and "sequential" numbers. (The terms stylist and vanity are interchangeable, as both allow a search for a number that spells a particular word of interest to the customer.) Again, Exhibit GC-6 shows the telephone number selection screen from LENS. The first page of that exhibit shows the basic capability to request a random number assignment, as well as requesting a vanity number, by filling in the desired number in the "special number" fields. It also shows that

1 the customer can request that a number exclude specific digits that the
2 customer might consider, for example, to be "bad luck" numbers. The
3 second page of the LENS exhibit shows that in addition to those
4 capabilities, by clicking on the drop-down box for "Options", the ALEC
5 can request number assignments of specific patterns, such as "easy"
6 numbers, ascending or descending line digits, identical line digits, or
7 sequential line numbers. Thus, the ALEC using LENS currently has
8 more telephone number assignment options to offer its customers than
9 BellSouth's service representatives have available for BellSouth's retail
10 customers.

11

12 Q. Does BellSouth limit new entrants to a maximum of 100 reserved
13 telephone numbers in a given central office at any point in time, and if
14 so, why?

15

16 A. BellSouth does limit telephone numbers that can be pre-reserved (i.e.,
17 held independently of an associated request for service) to 100 per
18 central office, or five percent of the numbers available in an office,
19 whichever is less. This is not a LENS limitation, but is a practice
20 implemented by BellSouth as a means to administer the finite pool of
21 numbers for the benefit of all, as ALECs have the capability to reserve
22 telephone numbers in anticipation of future orders for service. This
23 practice does not limit an ALEC's ordering activity, as numbers
24 associated with actual orders for service do not count against the total
25 reserved numbers, and the supply of numbers can be replenished

1 daily. This practice merely prevents any one carrier from "locking up"
2 available telephone numbers in the absence of actual customer orders.

3

4 Products and Services

5

6 Q. Does BellSouth provide ALECs with access to product and service
7 information and functions in substantially the same time and manner as
8 BellSouth's access for its retail customers?

9

10 A. Yes.

11

12 Q. How does BellSouth check the availability of products and services
13 when serving its retail customers?

14

15 A. Again, this depends upon the type of customer, and the customer's
16 location. For residence customers, BellSouth uses services screens in
17 RNS. A copy of an actual services screen seen by a BellSouth service
18 representative using RNS is attached as Exhibit GC-10. For business
19 customers in Florida, BellSouth uses the product and services screens
20 in DOE. A copy of the actual product and services main menu screen
21 seen by a BellSouth service representative using DOE is attached as
22 Exhibit GC-11. Using these screens, the service representative sends
23 an inquiry to, and receives a response from, the BellSouth database
24 containing product and service information.

25

1 Q. How does an ALEC check the availability of products and services?

2

3 A. The ALEC uses the comparable product and services screens in LENS.

4 An example of a product and services screen seen by an ALEC using

5 LENS is provided as Exhibit GC-7. Using these screens, the ALEC

6 representative sends an inquiry to, and receives a response from, the

7 same BellSouth databases containing product and service information

8 that are accessed by RNS and DOE. These databases provide

9 product and service information without regard to whether the request

10 originates from an ALEC or from BellSouth.

11

12 Obtaining Due Dates

13

14 Q. Does BellSouth provide ALECs with access to BellSouth's due date

15 information and functions in substantially the same time and manner as

16 BellSouth's access for its retail customers?

17

18 A. Yes.

19

20 Q. How does BellSouth obtain due dates when serving its retail

21 customers?

22

23 A. Again, this depends upon the type of customer, and the customer's

24 location. For residence customers, BellSouth uses the due date screen

25 in RNS. A copy of an actual due date screen seen by a BellSouth

1 service representative using RNS is attached as Exhibit GC-12. For
2 business customers in Florida, there is a space on a DOE screen
3 where a service representative can input a due date; this is shown in
4 Exhibit GC-13. By these methods, the service representative sends an
5 inquiry to, and receives a response from, the BellSouth database
6 containing due date information, known as the Direct Order Entry
7 Support Application Program (DSAP).

8

9 Q. How does an ALEC obtain due dates?

10

11 A. The ALEC uses the due date fields in LENS. A copy of the screen
12 seen by the ALEC using LENS for this purpose is provided as Exhibit
13 GC-14. Using this screen, the ALEC representative sends an inquiry to,
14 and receives a response from, DSAP; this is the same BellSouth
15 database containing due date information that is accessed by RNS and
16 DOE. DSAP provides due date information without regard to whether
17 the request originates from an ALEC or from BellSouth.

18

19 Q. Are due dates calculated as a stand-alone pre-ordering function for
20 either BellSouth retail customers or ALEC customers?

21

22 A. No. During the arbitrations we became accustomed to calling due
23 dates "pre-ordering" because the due date is information that typically
24 is given to customers for basic exchange services while discussing a
25 customer's order. In actuality, though, the due date cannot be

1 calculated by BellSouth's system until that system has all the
2 information about what is actually being ordered and can evaluate the
3 service order as a package. Due date calculation from a system
4 perspective is not a stand-alone pre-ordering function.

5

6 Q. How are due dates calculated through LENS?

7

8 A. Due dates are calculated through LENS via real-time, interactive
9 access to BellSouth's due date information, in substantially the same
10 time and manner as through BellSouth's access. LENS obtains due
11 date information from the Direct Order Entry Support Application
12 Program (DSAP), just as BellSouth's negotiation systems do. DSAP
13 calculates due dates based on an intricate set of logic incorporating all
14 the variables that can influence due dates. For both LENS orders and
15 BellSouth retail orders, DSAP looks at the totality of the services on a
16 particular order, determines the nature of the work that must be
17 performed (such as whether an outside technician is required),
18 evaluates such factors as the work load for the area in which service
19 will be provided, and returns the due date that should be offered to the
20 customer. For both retail and ALEC orders, however, for this
21 evaluation to take place, DSAP must know which services are being
22 ordered, and must look at the entire order as a package. Although
23 DSAP does not calculate a due date for a LENS due date inquiry that is
24 not associated with an order, this is not discriminatory. Due dates are
25 not calculated independently of the ordering function for BellSouth's

1 retail customers, either. BellSouth service representatives using DOE
2 can view the installation calendar from DSAP. Likewise, BellSouth has
3 loaded LENS with an installation calendar from DSAP that contains a
4 dynamic table of projected service intervals and other due-date
5 affecting information from DSAP that the ALEC can use to respond to
6 inquiries not associated with the ordering function. This accommodates
7 ALECs who wish to use LENS for pre-ordering and another option for
8 ordering.

9

10 Q. Does LENS provide due date information for all products and services?

11

12 A. No. LENS does not contain due date information for all products and
13 services, however, due dates are not available electronically for all
14 BellSouth retail services, either. For example, due dates for complex
15 services can vary considerably, depending upon the complexity and
16 scope of the service involved, and typically are offered on either a
17 negotiated or "Customer Desired Due Date" basis.

18

19 Customer Record Information

20

21 Q. Has this Commission required BellSouth to provide ALECs with on-line
22 access to customer service record (CSR) information?

23

24 A. Yes. This Commission required BellSouth to develop a real-time
25 operational interface to deliver CSRs to ALECs, and further ordered that

1 the interface should provide only the customer information necessary for
2 MCI and AT&T to provide telecommunications services.

3

4 Q. Has BellSouth complied with this requirement?

5

6 A. Yes. On-line access to customer service record information is available
7 through LENS. Copies of actual customer service record screens seen
8 by ALECs using LENS are provided as Exhibit GC-15.

9

10 LENS ARCHITECTURE

11

12 Q. In similar proceedings in other states, AT&T has raised concerns about
13 the "web-based architecture" in LENS, and introduced decisions from
14 state commissions outside the BellSouth region about a supposedly-
15 similar interface provided by U.S. West. Is there a state commission
16 decision within the BellSouth region that addressed the actual pre-
17 ordering interface being provided by BellSouth?

18

19 A. Yes. During the AT&T arbitration proceedings, the Georgia Public
20 Service Commission heard extensive testimony from both AT&T and
21 BellSouth on the technical aspects of the interface BellSouth proposed
22 for pre-ordering, now known as LENS. In that proceeding, the Georgia
23 Commission heard AT&T's claims that LENS requires a new entrant to
24 manually re-enter data, or that the web server architecture would result
25 in inferior access to pre-ordering information.

1

2 Q. What did the Georgia Commission decide?

3

4 A. The Georgia Commission found that BellSouth's proposed interfaces,
5 which included the "web-based" interface for pre-ordering information --
6 now known as LENS -- complied with previous orders of that
7 commission; those previous orders required BellSouth to provide
8 access to resellers equivalent to that of the incumbent LEC. (Orders of
9 Georgia Public Service Commission dated December 3, 1996 in
10 Docket No. 6801-U, and June 13, 1996 in Docket No. 6352-U.)

11

12 Q. In the other state proceedings, has AT&T provided any information to
13 support its contention that BellSouth's LENS pre-ordering interface and
14 the U.S. West "web page" interface are technically alike?

15

16 A. No. First, other than AT&T's assertion that U. S. West's and
17 BellSouth's interfaces are both "web-based" (and the fact that the word
18 "web" -- web-based vs. web page -- appears in descriptions of both),
19 AT&T provides no facts to indicate that the interfaces are technically
20 alike. Furthermore, based on my review, the state commission orders
21 cited by AT&T do not contain any information indicating that the U.S.
22 West interface is comparable to BellSouth's LENS interface. In
23 contrast, the Georgia Public Service Commission looked specifically at
24 the merits of BellSouth's interface in reaching its decision that
25 BellSouth's proposed development was consistent with that

1 commission's requirements.

2

3 ORDERING AND LOCAL ACCOUNT MAINTENANCE

4

5 Q. How does the FCC define ordering information?

6

7 A. Again, the FCC's Part 51 Local Interconnection Rules define pre-
8 ordering and ordering together as including the exchange of
9 information about current or proposed customer products and services
10 or unbundled network elements or some combination thereof.

11

12 Q. Does BellSouth provide ALECs with access to ordering information in
13 substantially the same time and manner as BellSouth's access for its
14 retail customers?

15

16 A. Yes.

17

18 Q. Has this Commission previously required BellSouth to provide
19 electronic ordering?

20

21 A. Yes. In its order in the AT&T and MCI arbitration proceeding, this
22 Commission noted that BellSouth was developing electronic interfaces
23 for this process, and required BellSouth to continue to develop the
24 electronic interfaces for order processes.

25

1 Q. Has BellSouth complied with this requirement?

2

3 A. Yes.

4

5 Q. How does BellSouth handle ordering and local account maintenance
6 transactions for its retail customers?

7

8 A. BellSouth primarily uses four systems. BellSouth has different systems
9 for residence and business customers, for local exchange service and
10 for access. The systems also vary by customer location. Three of
11 these systems -- RNS, DOE and SONGS -- are the same ones already
12 described in the pre-ordering section of this testimony. The fourth
13 system is the Exchange Access Control and Tracking system (EXACT),
14 which has been used for access orders for all BellSouth states for 12
15 years. Each system functions somewhat differently, and they vary
16 considerably in their degree of "user friendliness." In general, however,
17 these systems accomplish the task of accumulating and formatting the
18 information, such as the pre-ordering information described earlier in
19 this testimony, required to enter an order into BellSouth's Service Order
20 Control System, also known as "SOCS." For RNS and DOE,
21 BellSouth's service representatives use RNS and DOE screens such
22 as those provided as exhibits for the pre-ordering section of this
23 testimony, as well as additional ordering screens of the same nature.
24 Copies of EXACT screens used to process access service requests are
25 provided as Exhibit GC-16.

1

2 Q. Please describe BellSouth's ALEC ordering systems.

3

4 A. There are two industry-standard ALEC ordering systems, depending on
5 the service type. The first is Electronic Data Interchange (EDI) for
6 resale orders and simple unbundled network elements such unbundled
7 ports. The second is the same Exchange Access Control and Tracking
8 (EXACT) system used for access orders; EXACT is used by ALECs for
9 interconnection trunking and other complex unbundled network
10 elements . In addition, while LENS is primarily a pre-ordering interface,
11 BellSouth offers an interactive, direct order entry capability through
12 LENS. While there is no industry standard for the pre-ordering
13 capability in LENS, the LENS ordering capability does support the
14 Ordering and Billing Forum's (OBF)-approved local service ordering
15 requests.

16

17 Q. Please describe the EXACT ordering interface in more detail.

18

19 A. The EXACT ordering system is the same industry-standard interface
20 used by BellSouth for processing access service requests from
21 interexchange carriers. This interface also supports ALEC
22 "infrastructure" orders, primarily for interconnection trunking and many
23 unbundled network elements. This system supports industry standard
24 ordering processes.

25

1 Q. Please describe the EDI ordering interface in more detail.

2

3 A. EDI is the electronic interface sanctioned by the national Ordering and
4 Billing Forum (OBF) for local service request communications. Using
5 this interface, the ALEC will transmit service requests in OBF standard
6 format to BellSouth. BellSouth has no way of knowing precisely how
7 the screens used by an ALEC using EDI will look, because EDI defines
8 only the standards for the exchange of information, and not for how it is
9 displayed by either party's computer system. However, to provide this
10 Commission with a view of how an ALEC can use EDI to order resold
11 services or simple unbundled network elements from BellSouth, I have
12 attached several prints of screens from a commercially-available
13 version of EDI-compatible software that an ALEC can use to order from
14 BellSouth via EDI if the ALEC chooses not to develop its own
15 presentation system. Copies of those screens are attached as Exhibit
16 GC-17.

17

18 Q. Are there other EDI options available?

19

20 A. Yes. For ALECs choosing to use an off-the-shelf, commercially
21 available version of EDI desktop software, training and documentation
22 on that software is provided by Harbinger, the third party that
23 developed the software package based on the specifications that
24 BellSouth made available. That software package also is covered in
25 the ALEC conferences.

1

2

3 Q. Which services can be ordered via the EDI interface today?

4

5 A. The EDI interface currently supports electronic ordering for 34 resale
6 services, and some unbundled network elements.

7

8 Q. Does this include any complex business services?

9

10 A. Yes. EDI currently can be used to order some complex business
11 services, including PBX trunks, SynchroNet® (a private line data
12 service), ISDN-Basic-Rate service, and hunting. Complex services
13 requiring account team handling, such as MultiServ® service, are not
14 currently supported by EDI, but are handled in the same manner for
15 both ALEC and BellSouth retail customers.

16

17 Q. Can ALECs order unbundled network elements (UNEs) via the EDI
18 interface?

19

20 A. Yes. While it is important to note that many unbundled network
21 elements are infrastructure elements, such as trunking, that are
22 ordered via EXACT, EDI supports the simpler, more end user
23 customer-oriented elements and combinations, such as loops, ports,
24 and interim number portability that have been defined by the Ordering
25 and Billing Forum. These UNEs also can be ordered via LENS. As

1 shown on page one of Exhibit GC-17 (the EDI ordering screens), in the
2 "Document Type" column, the menu includes purchase orders (PO-
3 850) and purchase order confirmations (PO-860) for both resale and
4 unbundled network elements. Page two of that exhibit shows the UNE
5 folder of a local service request, with the appropriate quantity fields to
6 request the number of paths for a ported number.

7

8 Q. Please describe the LENS ordering capability.

9

10 A. For ALECs who choose to forego the industry-standard EDI interface,
11 LENS offers an integrated ordering capability. ALECs choosing to
12 order through LENS use LENS screens such as those provided as
13 exhibits for the pre-ordering section of this testimony, as well as
14 additional LENS ordering screens of the same nature.

15

16 Q. When an ALEC submits orders through either EDI or LENS, what is the
17 first step in processing those orders on BellSouth's side of the ordering
18 interface?

19

20 A. Requests successfully received and processed by EDI or LENS will be
21 passed to BellSouth's Local Exchange Ordering (LEO) database. This
22 is depicted in the drawing provided as Exhibit GC-18. LEO will
23 perform certain edit checks and data formatting checks to determine if
24 the required information has been provided. If not, the system will
25 return error messages similar to those received by BellSouth service

1 representatives. This helps to ensure a complete and correct order
2 entry.

3

4 Q. What is the next step?

5

6 A. LEO will pass a complete and correct service request to BellSouth's
7 Local Exchange Service Order Generator (LESOG) for mechanized
8 order generation, or to a Local Carrier Service Center worklist for
9 further handling by a BellSouth service representative. This also is
10 depicted on Exhibit GC-18. LESOG will mechanically format many
11 service requests into BellSouth service order record formats which can
12 be handled by SOCS and the other downstream systems through
13 which BellSouth's service orders are also processed; LESOG requires
14 no manual intervention by a BellSouth service representative.

15

16 Q. Which orders are mechanically generated by LESOG?

17

18 A. Exhibit GC-19 lists the orders for which mechanized order generation is
19 available. Collectively these services represent most of BellSouth's
20 total retail operating revenue.

21

22 Q. Does BellSouth's EDI ordering interface nonetheless provide ordering
23 functionality in substantially the same time and manner as BellSouth's
24 access for its retail customers?

25

1 A. Yes, because BellSouth does not use mechanized ordering, with the
2 customer on the line, for all of its retail services.

3

4 Q. Can you give an example of a complex service for which retail ordering
5 is not fully mechanized?

6

7 A. SmartRing® service is a private line service available to both retail
8 customers and to resellers. In both cases, the pre-ordering and
9 ordering processes for SmartRing® service are largely manual.
10 Nonetheless, the pre-ordering and ordering processes are virtually
11 identical for both retail and ALEC orders, except that retail services are
12 handled primarily by the appropriate business unit for each situation --
13 BellSouth Business Systems (BBS) personnel for retail services, and
14 InterConnection Services (ICS) personnel for resale services.

15

16 Q. Please describe some of the manual activities involved in providing a
17 retail or resold SmartRing® service.

18

19 A. To perform the pre-ordering activity known as the "service inquiry", a
20 systems designer on the appropriate account team fills out an
21 extensive paper form, and then provides that form to a project manager
22 for further manual activities. This is done for both retail and resale
23 orders. Upon approval of either the retail customer or the ALEC, as
24 appropriate, the paper service inquiry is re-initiated as a firm order,
25 which also is an extensive paper form with subsequent manual

1 distribution. In both the retail and the resale cases, the Firm Order
2 Package is manually handed off to the service center, where paper
3 service order worksheets are created to assist in initiating service
4 orders in the ordering system. At that point, orders are typed into the
5 appropriate service order system for the customer's location, which is
6 substantially the same system regardless of whether the SmartRing®
7 service order is for a retail or ALEC customer. This subsequent order
8 entry is the same for both the retail and the resale situations, and thus
9 does not result in a different customer "experience" in either case.
10 After the typist inputs the service orders, the account team and project
11 manager are notified by e-mail of the service order numbers and due
12 dates. The account team then manually reviews the service orders for
13 accuracy and follows up as necessary. Again, these processes, with
14 their substantial reliance on manual handling and paper forms, are
15 common to both retail and ALEC orders.

16
17 Q. Does a BellSouth Interconnection Services Account Team provide the
18 same level of support to ALECs ordering complex services as the
19 BellSouth Business Systems Account Team provides to retail
20 customers ordering such services?

21
22 A. Yes. Account teams have a critical role in pre-ordering and ordering
23 activities for both retail and resale complex services. For complex
24 services such as SmartRing® service, the appropriate BellSouth
25 account team is an integral part of the pre-ordering and ordering

1 processes for both retail and ALEC customers. For both retail and
2 ALEC SmartRing® service orders, as well as for other types of complex
3 orders, the process involves manual intervention and is handled by an
4 account team. The outcome therefore is competitively neutral.

5

6 Q. Does the "batch" nature of the EDI interface mean that an ALEC's
7 orders will be delayed?

8

9 A. No. Batch times can be adjusted to accommodate the needs of
10 ALECs. While the EDI batches currently are set up to run every 30
11 minutes, they can be adjusted to accommodate specific market needs.
12 For example, access service requests sent through the EXACT batch
13 method are processed every fifteen minutes; the intervals can be even
14 shorter, depending on the market need.

15

16 PROVISIONING

17

18 Q. How does the FCC define provisioning?

19

20 A. According to the FCC's Part 51 Local Interconnection Rules,
21 "provisioning" involves the exchange of information between
22 telecommunications carriers where one executes a request for a set of
23 products and services or unbundled network elements or combination
24 thereof from the other with attendant acknowledgments and status
25 reports. The type of information to which these rules refer generally is

1 described in terms of firm order confirmations, completion notifications,
2 and other types of order status reports, such as those indicating missed
3 appointments.

4

5 Q. Does BellSouth provide ALECs with access to provisioning information
6 in substantially the same time and manner as BellSouth's access for its
7 retail customers?

8

9 A. Yes.

10

11 Q. How does BellSouth obtain a notification that an order has been
12 released for processing?

13

14 A. When a BellSouth service representative using RNS releases a service
15 order, the system returns a message indicating that the order has been
16 issued. This is a confirmation that the order has been released for
17 processing by BellSouth's Service Order Control System (SOCS), and
18 is not a confirmation that the order has passed all SOCS edit checks.
19 A copy of the RNS message screen is attached as Exhibit GC-20.

20

21 Q. How would an ALEC obtain similar information?

22

23 A. If the ALEC were ordering through LENS, the ALEC would receive a
24 message similar to that received by the BellSouth service
25 representative, indicating that the order had been submitted. A copy of

1 the relevant LENS screen is provided as Exhibit GC-21; that screen
2 provides the same level of detail available to a BellSouth service
3 representative through RNS, as seen on Exhibit GC-20.

4

5 Q. Can ALECs obtain other provisioning information?

6

7 A. Yes. ALECs can obtain firm order confirmations, completions
8 information, error notifications, and other status information. For
9 example, Exhibit GC-22 shows a LENS screen used to obtain firm
10 order confirmations and completions information. Exhibit GC-23 shows
11 a LENS error notification screen. Exhibit GC-24 shows a LENS status
12 information screen.

13

14 Maintenance and Repair

15

16 Q. How does the FCC Order define maintenance and repair?

17

18 A. The FCC rules define "maintenance and repair" as involving the
19 exchange of information between telecommunications carriers where
20 one initiates a request for maintenance or repair of existing products
21 and services or unbundled network elements or combination thereof
22 from the other with attendant acknowledgments and status reports.

23

24

25

1 Q. Has BellSouth provided ALECs with access to the maintenance and
2 repair function in substantially the same time and manner as
3 BellSouth's access for its retail customers?

4
5 A. Yes.

6
7 Q. Has this Commission ordered BellSouth to provide a trouble reporting
8 interface?

9
10 A. Yes. In the AT&T and MCI arbitration proceedings, this Commission
11 ordered BellSouth found that a real-time interactive operational interface
12 for trouble reporting is necessary, and should be provided by BellSouth.

13
14 Q. Has BellSouth complied with this requirement?

15
16 A. Yes.

17
18 Q. What system is used by BellSouth's repair attendants when handling
19 trouble reports for basic exchange service customers?

20
21 A. BellSouth repair attendants process these trouble reports using a
22 system known as the Trouble Analysis Facilitation Interface (TAFI).
23 BellSouth's business and residence repair center attendants use either
24 a business or residence version of TAFI, respectively.

25

1 Q. Please describe the BellSouth TAFI system.

2

3 A. TAFI is a user friendly interface that often enables trouble reports to be
4 cleared remotely, by the repair attendant handling the initial customer
5 contact, often with the customer still on the line. With this system, any
6 repair attendant can correctly handle a trouble report on any BellSouth-
7 provided basic exchange service.

8

9 Q. Does TAFI provide electronic access to other BellSouth systems that
10 might be involved in resolving a trouble report?

11

12 A. Yes. TAFI automatically interacts with the correct BellSouth system for
13 a given situation. The system will automatically go to the correct
14 system associated with a given telephone number, and will execute the
15 appropriate test or retrieve the appropriate data. For example, if a
16 customer were to report that the customer's call forwarding feature was
17 not working, the TAFI system might check the customer's records to
18 see if the line should be equipped with the feature, and would
19 electronically verify that the feature was programmed in the switch
20 serving that customer's line. Once the TAFI analysis of the trouble is
21 complete, TAFI provides a recommendation of what is needed to
22 correct the problem, and in some cases actually implements the
23 corrective action. In the above example, TAFI might instruct the repair
24 attendant to have the customer contact the business office to add the

25

1 feature, or might correct the trouble by implementing a translation
2 change in the switch to add the feature to the line.

3

4 Q. How does a repair attendant use TAFI ?

5

6 A. TAFI is a common presentation expert system that provides rapid,
7 consistent, and efficient automated trouble receipt, screening and
8 problem resolution. It is an interactive system that prompts the repair
9 attendant with questions and instructions while automatically interacting
10 with other internal systems as appropriate. TAFI also provides for the
11 queuing of reports enabling the repair attendant to work on several
12 customer troubles simultaneously, and it also provides on-line
13 reference tools. TAFI also can be used to view maintenance histories.

14

15 Q. Has BellSouth provided ALECs with access to its TAFI system in
16 substantially the same time and manner as BellSouth's access for its
17 retail customers?

18

19 A. Yes, and in some respects, the access is superior. The ALEC TAFI
20 system contains all the functionality described above that is contained
21 in the BellSouth TAFI system. Furthermore, the ALEC TAFI systems
22 combines the functionality of the separate business and residence
23 versions of TAFI used by BellSouth's repair attendants, giving the
24 ALEC a single system for all types of basic exchange service trouble
25 reports. In addition, by providing access to TAFI, BellSouth is making

1 available to ALECs the functionality inherent in the many systems with
2 which TAFI connects.

3

4 Q. Are there any differences between the ALEC TAFI system functionality
5 and the BellSouth TAFI system functionality?

6

7 A. The only difference is a security step that occurs electronically and
8 nearly instantaneously. The ALEC TAFI system contains a security
9 screening step that is required to ensure the confidentiality of each
10 ALEC's information, because the ALEC TAFI system will be used by
11 repair attendants from multiple ALECs. Therefore, TAFI identifies each
12 ALEC's repair attendants by company, and allows each ALEC's repair
13 attendants to access records only for that ALEC's customers. Once
14 that validation check has been performed, the ALEC repair attendant
15 has access to the full range of TAFI functionality that is available to
16 BellSouth repair attendants for both business and residence exchange
17 services.

18

19 Q. What services does TAFI support?

20

21 A. BellSouth uses TAFI to handle trouble reports for both business and
22 residence basic local exchange services, including a wide range of
23 features and functions associated with both residence and business
24 basic exchange services. The function and sub-function menus
25 included in Exhibit GC-25 provide an indication of the depth of TAFI's

1 abilities to process troubles. Furthermore, even for trouble reports on
2 complex services that involve exchange services, such as MultiServ®
3 service or PBX trunks, an ALEC can use TAFI to input trouble reports,
4 obtain commitment times, and check the status of previously entered
5 reports. A ALEC also can use TAFI in this manner to report troubles
6 associated with unbundled network elements that can be identified with
7 a telephone number, such as unbundled ports or interim number
8 portability.

9

10 Q. Other than the security check described above, does TAFI function
11 identically for ALECs and for BellSouth?

12

13 A. Yes. Exhibits GC-25 provides examples of the screens seen by both
14 ALEC and BellSouth repair attendants for a trouble report involving the
15 call forwarding feature. While there are numerous screens that could
16 be involved depending on the nature of the trouble report, the key point
17 is that no matter what the situation, both the ALEC and BellSouth repair
18 attendants have access through TAFI to substantially the same
19 information and functions.

20

21 Q. Do ALECs use TAFI in substantially the same time and manner as
22 BellSouth's use for its retail customers?

23

24

25

1 A. Yes, and again, the ALEC access is superior in that, unlike BellSouth's
2 systems, ALECs have a single interface for both residence and
3 business services.

4

5 Q. Do ALECs have other options for electronic trouble reporting?

6

7 A. Yes. For "designed" or "special" services -- principally those identified
8 with a circuit number rather than the telephone number-identified
9 services handled by TAFI -- ALECs can report troubles through the
10 same electronic bonding interface currently used by interexchange
11 carriers for access services. In addition, at AT&T's request, BellSouth
12 has agreed to develop a local exchange trouble reporting system
13 similar to the existing interexchange carrier gateway, known as the
14 Electronic Communications Gateway. This will be developed by
15 December, 1997.

16

17 Billing Interfaces

18

19 Q. How does the FCC define billing?

20

21 A. The FCC's Part 51 Local Interconnection Rules define "billing" as
22 involving the provision of appropriate usage data by one
23 telecommunications carrier to another to facilitate customer billing with
24 attendant acknowledgments and status reports. It also involves the

25

1 exchange of information between telecommunications carriers to
2 process claims and adjustments.

3

4 Q. Does BellSouth provide ALECs with access to billable usage
5 information in substantially the same time and manner as BellSouth's
6 access for its retail customers?

7

8 A. Yes.

9

10 Q. Is a Carrier Access Billing System (CABS)-formatted bill for all services
11 a requirement for non-discriminatory access to billing information?

12

13 A. While this is a requirement of this Commission's AT&T and MCI
14 arbitration decision, BellSouth does not bill its end user customers
15 through a single CABS bill for all services. Therefore, this is not
16 necessary for BellSouth to offer ALECs access to BellSouth's billing
17 information and functions in substantially the same time and manner as
18 BellSouth's access. Nonetheless, BellSouth is implementing this
19 capability, and is scheduled to begin testing with ALECs in July.

20

21 Q. Through which billing systems does BellSouth render bills to its end
22 user customers?

23

24 A. BellSouth uses two billing systems to bill its end user customers.
25 Depending on the services being provided, the same customer will

1 receive two types of bills. For services ordered from the General
2 Subscriber Services Tariff (GSST) and the Private Line Services Tariff
3 (PLT), BellSouth renders bills from CRIS. For services ordered from
4 the Access Services Tariff (AST), BellSouth renders bills from the
5 CABS, even if the access service is ordered by and billed to the end
6 user customer. This means that one end user customer with services
7 from both billing systems will receive both CABS and CRIS bills.
8 BellSouth's non-discrimination obligation is to provide new entrants with
9 access to information and functions in substantially the same time and
10 manner as BellSouth's access; BellSouth currently does just that.

11

12 Q. Please describe BellSouth's billing interface for customer billable usage
13 data.

14

15 A. An electronic interface for customer billable usage data transfer, known
16 as the Billing Daily Usage File, is an optional interface that provides
17 ALECs with a daily file including items such as directory assistance or
18 other billable usage associated with a resold line, interim number
19 portability account, or unbundled network element such as an
20 unbundled port. The specific types of data provided include:
21 intraLATA toll, billable local calls, billable feature activations, operator
22 services, and WATS/800 service. The file provides billable call detail
23 records in a BellCore-supported, industry-standard format known as
24 Exchange Message Record (EMR) format, and is offered with several
25 methods of data delivery.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

Q. Does this Commission's AT&T and MCI arbitration order require BellSouth to provide such an interface?

A. Yes, and as noted by the Commission in its order, BellSouth already has the capability to do so.

Q. Does the billable usage data provided through this interface provide ALECs with timely and useful access to billable usage information?

A. Yes. Usage data is provided in substantially the same time frame as it is available to BellSouth. In addition, for ALECs who choose the option of receiving rated usage, the billable call detail records are provided in a manner that adds significant value compared with the original message recording BellSouth receives from its switches. BellSouth performs extensive processing to add such details as the From Place, To Place, jurisdiction, retail charge and other items in each call detail record. Also, regardless of whether the ALEC chooses to receive unrated usage or rated usage, BellSouth performs extensive edits to ensure the integrity of the data. BellSouth runs its billing system five work days a week. Usage processing begins each morning and the billing system cycle completes the following morning with the creation of actual bills. For ALECs who establish electronic data transmission capability with BellSouth, the usage is then transmitted immediately.

1 **SYSTEM AVAILABILITY AND ACTUAL USE**

2

3 Q. Are BellSouth's interfaces for each required function currently available
4 for use by ALECs?

5

6 A. Yes. Exhibit GC-26 provides a summary of BellSouth's currently
7 available electronic interfaces for each function, and provides the
8 availability date for each.

9

10 Q. How long have the EXACT, EDI and LENS ordering interfaces been
11 available for use by ALECs?

12

13 A. EXACT has been available for about 12 years. The BellSouth ALEC
14 EDI interface has been available since December, 1996; EDI itself has
15 been used in commerce for about 30 years. LENS has been available
16 since April, 1997.

17

18 Q. Are any ALECs actually using these interfaces?

19

20 A. Yes. EXACT is substantially the same mechanized process that IXCs
21 have used for years to order access trunks, and as such, is a "tried and
22 true" process with which both BellSouth and many potential ALECs
23 have significant experience. ALECs currently are using EXACT to
24 process orders for local interconnection trunking and unbundled
25 network elements. AT&T has used BellSouth's EDI interface to

1 conduct testing that AT&T's local interconnection agreement with
2 BellSouth calls "Service Readiness Testing" and "Market Readiness
3 Testing". Several ALECs have been trained on LENS, and ALECs are
4 actually using LENS to conduct business with BellSouth.

5

6 Q. How long have the ALEC TAFI system and the Electronic
7 Communications Interface for Trouble Reporting been available to
8 ALECs?

9

10 A. The ALEC TAFI system was released to the ALEC community on
11 March, 1997. The electronic bonding trouble reporting interface has
12 been available since December, 1995.

13

14 Q. Are these interfaces currently in use by ALECs?

15

16 A. Yes. Two ALECs have entered trouble reports via TAFI. BellSouth
17 also has conducted TAFI training for personnel from ten other ALECs,
18 and has scheduled training for ten additional ALECs. The electronic
19 bonding trouble reporting interface is in use by two interexchange
20 carriers (IXCs) who also are ALECs. BellSouth build these systems by
21 which ALECs enter trouble reports based on the forecasts provided to
22 BellSouth by the ALECs. These forecasts indicated a much higher
23 demand than has to date been realized from the ALECs. Since BST
24 structured its capabilities to meet the forecast, there exists today a

25

1 substantial level of available capacity for additional ALEC trouble
2 reporting.

3

4 Q. Is the billing daily usage file currently available to ALECs?

5

6 A. Yes. This interface has been available to ALECs since March, 1996.
7 An AT&T-requested modification to the original design also was
8 completed in September, 1996.

9

10 Q. Are any ALECs currently obtaining billing data through this interface?

11

12 A. Yes. BellSouth has twelve ALEC customers now receiving the daily
13 usage files. Nine other ALEC customers are currently working with
14 BellSouth in preparation for receiving daily usage. There exists today a
15 substantial level of available capacity for handling additional ALEC
16 demand.

17

18 **SYSTEM TESTING**

19

20 Q. Please describe the general steps undertaken by BellSouth in testing
21 its ALEC systems.

22

23 A. As with any other software development effort, testing generally
24 consists of five steps. In generic terms, the first of these is unit testing,
25 in which small units of programming code are tested independently by

1 the software developers. For example, in LENS a small unit of code is
2 used to handle a single field, such as the street name, for the address
3 validation function. The next step is called string testing, in which the
4 smaller units of code are strung together and tested using test input
5 data in a test database with a planned set of expected results. The
6 third step is called system testing, in which units of code are tested at a
7 subsystem and then at a complete system level. For example, the
8 address validation subsystem in LENS was tested separately prior to
9 testing the complete LENS system. This step verifies that the software
10 meets the identified business requirements for the system. The fourth
11 step is interoperability testing, which tests the hardware, software and
12 network interfaces between the new system and external systems. For
13 example, this stage of LENS testing verified that the connections
14 between LENS and the pre-ordering databases were operating
15 properly. The last step is called acceptance testing, which involved
16 BellSouth personnel, other than computer professionals, testing the
17 systems to determine whether the systems met the business
18 requirements provided to the systems developers.

19

20 Q. Has BellSouth undertaken additional testing to determine the capacity
21 of its systems?

22

23 A. Yes. BellSouth has conducted volume testing, also known as load
24 testing.

25

1 Q. Based on that testing, what is the capacity of BellSouth's EDI and
2 LENS ordering systems?

3

4 A. The combined ordering capacity of these systems, including the
5 mechanized order generation capability in LESOG, has been verified
6 as being at least 5000 local service requests per day for the BellSouth
7 region, which is the capacity for which these systems initially were
8 designed. These volumes are depicted on Exhibit GC-27. **It is**
9 **important to note that local service requests do not equate to**
10 **lines, because a single service request can involve multiple lines.**

11

12 Q. On what basis were the systems sized?

13

14 A. BellSouth has sized the initial capacity on the basis of BellSouth
15 forecast information for 1997, incorporating ALEC forecast information,
16 where available. For effective system capacity management, it is
17 essential that ALECs cooperate in providing appropriate forecast
18 information that can be used to estimate their system usage.

19

20 Q. Can this capacity be readily increased should that become necessary?

21

22 A. Yes. Exhibit GC-27 also shows that the additional capacity available
23 for rapid turn-up would double the ordering capacity of these systems
24 to at least 10,000 orders per day. For LENS and LESOG, this is
25 because "hot spare" arrangements, i.e., additional processors, already

1 are in place. These protect not only against unforeseen demand
2 surges but also against equipment failure. For EDI and LEO, the
3 additional capacity is available because these systems are operating
4 on a small portion of large, well-established mainframe systems, and
5 significant excess capacity exists on both mainframes.

6

7 Q. Beyond the LENS ordering capacity, does LENS have additional
8 capacity for pre-ordering transactions?

9

10 A. Yes. LENS has been designed to support multiple pre-ordering
11 transactions for the expected 5,000 per day combined volume of LENS
12 and EDI orders.

13

14 Q. Has BellSouth discontinued its volume testing of these systems?

15

16 A. No. Having established through load testing that the systems could
17 sustain the forecasted volumes, BellSouth continues to maintain test
18 copies of the systems used for ongoing stress testing. Stress testing is
19 designed to determine the true upper limits of the systems.

20

21 Q. Has BellSouth tested its LENS and EDI systems with ALECs?

22

23 A. Yes. As each ALEC is added to LENS, BellSouth works cooperatively
24 with the ALEC in a process known as connectivity testing, which
25 ensures that the connections between BellSouth and the ALEC are

1 working properly. Also, BellSouth has engaged in extensive EDI
2 testing with AT&T.

3

4 Q. Has ALEC pre-ordering or ordering activity come close to approaching
5 the forecasted volumes?

6

7 A. No. The combined peak daily ordering volume over the EDI and LENS
8 interfaces has thus far been about 200 orders, which is significantly
9 less than the current capacity of at least 5,000 orders per day.

10 BellSouth established the required capacity for these systems based
11 on a series of discussions and negotiations with the CLECs as well as
12 on internal BellSouth forecasts, and has provide adequate capacity to
13 handle those volumes, even though the current volume of orders is not
14 even close to the forecast.

15

16 Q. What is the capacity of the ALEC TAFI system?

17

18 A. TAFI currently will support 65 simultaneous users with a volume of
19 1300 troubles handled per hour for the BellSouth region. In addition,
20 as this testimony is being filed, a second processor is being activated
21 that will double the capacity, to 130 simultaneous users and 2600
22 troubles handled per hour. A "hot spare" arrangement also is in place
23 for TAFI. This can be activated almost immediately if necessary, and
24 would increase capacity by an additional 65 users and 1300 troubles
25 per hour, for a combined total of 195 simultaneous users and 3900

1 troubles handled per hour. The spare arrangement also protects
2 against equipment failure should one of the primary processors fail.

3

4 Q. Can this capacity be readily increased if that should become
5 necessary?

6

7 A. Yes. Additional processors can be added within 60 days to continue
8 increasing capacity should that become necessary.

9

10 Q. Is the current capacity adequate to meet the needs of ALECs who have
11 indicated their intent to use TAFI?

12

13 A. Yes, it is far more than adequate, and will accommodate additional
14 potential users as well.

15

16 Q. How does this compare with the actual ALEC use of TAFI to date?

17

18 A. The current capacity of the ALEC TAFI system far exceeds the current
19 usage. Between March 28 and May 30, 1997, a total of two ALECs,
20 with one user each, had generated a combined total of 12 trouble
21 reports using TAFI. However, as the usage of TAFI currently is
22 increasing as additional ALECs are trained, I plan to provide an update
23 with the most current information available at the time of the hearings in
24 this docket. The current capacity also exceeds what is required to

25

1 support the expected number of repair reports associated with the
2 forecasted volume of ALEC lines.

3

4 Q. Has the ALEC TAFI system been tested to ensure it could handle
5 commercial volumes?

6

7 A. Yes. From March 17, 1997 until April 16, 1997, BellSouth repair
8 attendants from BellSouth's business and residence repair centers
9 used the ALEC TAFI system in a live mode to process actual trouble
10 reports from BellSouth retail customers. During that month
11 approximately 10,000 customer trouble reports were successfully
12 processed using a single ALEC TAFI processor.

13

14 Q. Has BellSouth tested TAFI with ALECs?

15

16 A. Yes. BellSouth engages in connectivity testing with each new ALEC.

17

18 Q. Has BellSouth tested its ALEC daily billable usage file?

19

20 A. Yes. In order to test both the service order process and the new
21 applications for delivery of daily usage data, BellSouth established test
22 accounts for resale in the production environment. Employee accounts
23 and certain official company lines were "transferred" to an internally-
24 defined reseller for the test. The service order flows were monitored
25 and verified for both residence and business accounts. Usage

1 associated with the test accounts was captured and flowed to the Daily
2 Usage File application to test the process. Since the end-to-end test
3 data contained limited volumes, data was also contrived to further test
4 the Daily Usage File functions prior to their deployment more than a
5 year ago.

6

7 Q. What is BellSouth's capacity to provide daily billable usage
8 information?

9

10 A. Because these files are generated through mainframe-based systems
11 with existing spare capacity, BellSouth has not identified any
12 constraints to its capacity to process daily usage files for ALECs.
13 Average daily message volumes delivered to the combined twelve
14 ALECs during April was 13,040 messages per day for the BellSouth
15 region. Total regional average daily volume for May was 22,213
16 messages per day.

17

18 Q. Has BellSouth tested its processes for providing the billing daily usage
19 file with ALECs?

20

21 A. Yes. In addition to the initial testing conducted to validate the process
22 prior to offering the service, BellSouth conducts individual tests with
23 each ALEC prior to their establishing a daily production feed.
24 BellSouth provides a comprehensive test file containing many
25 examples of record types that the ALEC may encounter in the live

1 environment. The test data is delivered in the manner specified by the
2 ALEC *i.e.*, magnetic tape or data transmission. BellSouth also
3 conducts testing in a 'live' mode if an ALEC requests it. The ALEC can
4 actually establish 'live' accounts, such as services involving the ALECs'
5 employees, or friendly users, and place calls of varying types keeping
6 manual records of each call. BellSouth delivers the associated billable
7 usage in the production mode, and the ALEC can verify that the daily
8 usage records match the test calls that were made.

9

10 Q. How will the capacity of BellSouth's ALEC interfaces be managed on a
11 going forward basis?

12

13 A. The same process of monitoring usage and making any needed
14 adjustments that is used to manage BellSouth's other computer
15 systems will be used to maintain the ALEC systems.

16

17

18 **SYSTEM TRAINING, DOCUMENTATION AND ONGOING SUPPORT**

19

20 Q. Has BellSouth provided new entrants with training and documentation
21 on its systems?

22

23 A. Yes. BellSouth has conducted ALEC training sessions that include
24 many aspects of doing business with BellSouth, including systems
25 training. BellSouth also provides appropriate system user guides and

1 other information. The most recent of BellSouth's ongoing series of
2 ALEC conferences, which also include systems demonstrations and
3 hands-on experience with the systems, was held on June 24-26, 1997.

4

5 Q. Please describe LENS training.

6

7 A. Initial LENS training was held May 13, 1997 at the BellSouth Learning
8 Center in Atlanta. Invitations were sent to all ALECs who had signed
9 interconnection agreements or were in the process of negotiating
10 agreements. During the training the ALEC representatives sat at
11 computer terminals, and the trainer guided them step by step through
12 pre-ordering inquiries and order processing. There were as many as
13 eight BellSouth staff working in the room in addition to the trainer to
14 help the ALEC representatives as they worked through the exercises.

15

16 There also is a training lab in Birmingham with a staff focused on
17 providing training, where BellSouth trains the ALECs' trainers. ALECs
18 are offered this training as part of the process of connecting them to the
19 system. During LENS training the ALECs also are provided with a
20 LENS User Guide. BellSouth also has provided technical assistance at
21 ALECs' premises.

22

23 Q. Please describe BellSouth's training and documentation on EDI.

24

25

1 A. Training on EDI is conceptually different, because of the fact that an
2 ALEC has the option of developing its own systems on its side of the
3 EDI interface. For example, BellSouth has worked extensively with
4 AT&T to develop the EDI ordering interface, and has worked
5 cooperatively with AT&T as AT&T brings its ordering processes on-line.
6 The documentation for BellSouth's EDI interface is contained in two
7 large volumes known as the Local Exchange Ordering Implementation
8 Guide that have been provided to ALECs.

9

10 Q. Has BellSouth changed the supporting documentation for its EDI
11 interface since that interface was deployed in December, 1996?

12

13 A. Yes. In an effort to accommodate the early market entry of ALECs,
14 BellSouth began its EDI implementation on the basis of the industry's
15 recommendation to use EDI, but prior to the time the industry actually
16 had undertaken its more detailed development work. As the industry's
17 standards work has progressed, BellSouth has updated its
18 implementation guides to reflect changes resulting from the standards
19 developed by the national Ordering and Billing Forum (OBF), as
20 BellSouth had indicated all along it would.

21

22 Q. Please describe TAFI training and documentation.

23

24 A. TAFI training is provided in the Birmingham training lab, where
25 BellSouth trains the ALECs' trainers. ALECs are offered this training as

1 part of the process of connecting them to the system. During this
2 training the ALECs are provided with an extensive TAFI User Guide,
3 which consists of approximately 300 pages of reference material.

4

5 Q. In a similar proceeding in another state, AT&T has suggested that
6 BellSouth's ALEC systems training is not as lengthy as the training for
7 BellSouth's customer support personnel. Is this an appropriate
8 comparison?

9

10 A. No, not at all. The scope is not intended to be the same. Therefore, it
11 is inappropriate to compare the length of BellSouth's ALEC systems
12 training with BellSouth's internal employee training. BellSouth's
13 training for service representatives and repair attendants trains new
14 employees on many aspects of BellSouth's business, not just systems.
15 ALECs are in the best position to teach their employees how the ALEC
16 chooses to do business. For example, training for new BellSouth
17 representatives may include non-system training such as customer
18 contact skills and role-playing, basic concepts of telephony, basic
19 keyboard skills, and product and service training. While not part of
20 systems training, product and service training, also is available to
21 ALECs.

22

23 Q. Does BellSouth offer "help desk" support for ALECs using its
24 interfaces?

25

1 A. Yes. A help desk is in place to handle LENS and TAFI problems. That
2 desk is staffed from 8:00 a.m. until 5:00 p.m. central time. After hours
3 assistance is available via pager access. Information on the help desk
4 is included in both the LENS and TAFI user guides. BellSouth has a
5 group known as EDI Central that handles EDI matters for BellSouth's
6 other EDI applications, such as those involving the exchange of
7 information with BellSouth suppliers. ALEC EDI problems requiring
8 BellSouth involvement also would be handled by the EDI Central
9 group.

10

11 Q. Does BellSouth provide training or other support to ALECs using the
12 interface for the billable daily usage file?

13

14 A. Yes. BellSouth has provided generic training on the daily usage file at
15 the ALEC conferences held in December, 1996 and April, 1997. The
16 Billing Administrators in the Customer Billing Services organization
17 serve as initial contacts for ALECs with questions about either their
18 monthly bills from BellSouth or the daily usage files. They involve the
19 appropriate subject matter experts needed to respond to any needs the
20 ALECs may have. Further, in preparation for establishing daily usage
21 file service for each individual ALEC, BellSouth personnel from both
22 Customer Billing Services and Information Technology routinely
23 participate in numerous meetings and conferences with the ALEC to
24 explain the service, respond to questions, review test results,
25 coordinate installation of data transmission capability if needed and

1 resolve any issues that may arise. General Daily Usage File
2 information is provided in the ALEC Daily Usage File (CDUF)
3 Requirements Document, which is provided as Exhibit A of the
4 contract ALECs sign to obtain this service.

5

6 Q. Please summarize your testimony.

7

8 A. BellSouth's interfaces should be evaluated in accordance with the
9 principle of non-discriminatory access as articulated by the FCC.
10 BellSouth's interfaces provide ALECs with access to the required
11 information and functions in substantially the same time and manner as
12 BellSouth's access for its retail customers; such access provides
13 competitively neutral outcomes in the marketplace. Therefore,
14 BellSouth respectfully asks this Commission to find that BellSouth's
15 interfaces provide non-discriminatory access to BellSouth's operational
16 support systems for the functions of pre-ordering, ordering and
17 provisioning, maintenance and repair, and billing.

18

19 Q. Does this conclude your testimony?

20

21 A. Yes.

22

23

24

25

Address Validation

Street Number: Suffix: Street Name:

Dir-Prefix: T/F Dir-Suffix:

Unit: Elevation: Structure:

City: State: ZIP:

```

Notepad - X0PQAN08.TXT
File Edit Search Help
Objects/Lens.woa/97550000008945100000012710000096/NewAddressValidate.wa/5441001
>><FONT SIZE=+1 >Address Validation</FONT></STRONG> <HR> </TH>
ID COLSPAN=2 ><INPUT maxLength=8 size=8 type=text name="basicStreetAddressNumber"
value="" type="text name="basicStreetAddressSuffix" value=""
value="44 type=text name="basicStreetAddressStreetName" value="PEACHTREE">

COLSPAN=2 ><SELECT name="basicStreetDirPrefix"><OPTION> </OPTION><OPTION>E</OPTI
addressThor"><OPTION> </OPTION><OPTION>AV</OPTION><OPTION>ALY</OPTION><OPTION>F
PTION>PL</OPTION><OPTION>PLZ</OPTION><OPTION>PR</OPTION><OPTION>PROM</OPTION><O
icStreetDirSuffix"><OPTION> </OPTION><OPTION>E</OPTION><OPTION>NK</OPTION><OPTI

N=2 ><SELECT name="supplementalAddressUnitType"><OPTION> </OPTION><OPTION>APT<
addressElevationType"><OPTION> </OPTION><OPTION>FLR</OPTION></SELECT><INPUT si:

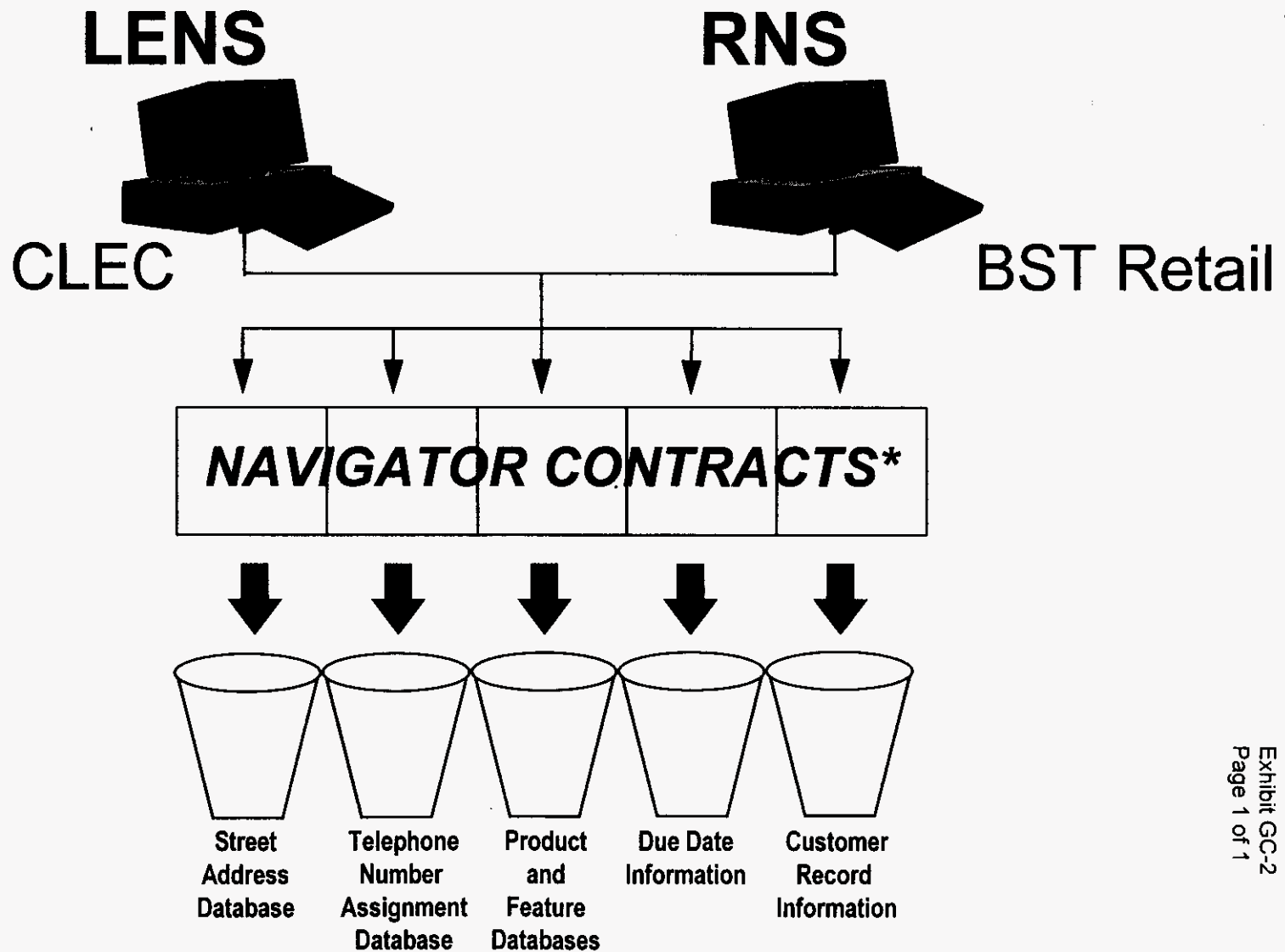
```

Descriptive

Telephone

BellSouth
FPSC Docket No. 960786-TP
Exhibit C-4
Page 1 of 1

CLEC and BellSouth Access to Pre-Ordering Information



*Navigator contracts refer to software that defines a set of queries and responses to and from a database.

Service Address-RNS

Number/Street:

[Redacted]

Unnumbered Address

Apt:

[Redacted]

Bldg:

[Redacted]

Floor:

[Redacted]

City:

[Redacted]

State:

GA

Zip Code:

[Redacted]

Route:

[Redacted]

Box:

[Redacted]

Descriptive:

[Redacted]

Driving Instructions:

[Redacted]

Previous Occupant's Phone#:

([Redacted]) [Redacted] - [Redacted]

STATUS:

[Redacted]

Previous Occupant's Name:

[Redacted]

Neighbor's Phone#:

([Redacted]) [Redacted] - [Redacted]

BellSouth
FPSC Docket No. 960786-TP
Exhibit GC-3
Page 1 of 2

Validate Address

Reverse Search

Order(s) Pending for Address Restrictio

Service Address-RNS

Number/Street: 320 Bob White Ct

Unnumbered Address

Apt:

Bldg:

Floor:

City: Daytona Beach

State: FL

Zip Code: 32119

Route:

Box:

Descriptive:

Driving Instructions:

Previous Occupant's Phone#: (904) 767 - 4546

STATUS: WORKING

Previous Occupant's Name: Moss, Dick & Carolyn

Neighbor's Phone#: () -

BellSouth
FPSC Docket No. 960786-TP
Exhibit GC-3
Page 2 of 2

The Address Selected Is VALID.

The Last Order Issued For This Address Was Service Order# on 00-00-00.

Validate Address

Auto Date Search

Order(s) Pending for Address Restrictio

GA_DOE_A

File Edit Special Fonts Help

C █

SERVICE ADDRESS 2738 SPRING ST SE,
DCLA

LOCATION

LISTED ADDRESS 2738 SPRING ST SE,
DCLA

FCTN 770 339-6417;OS

QSN

AHN ROUT BOX

BN

BA

PO DCLA GA 30211

CITY TAR 022 COUNTY TAR 704 TAX

TA █

ADR/BIL

C 0.00 N 0.00 + 0.00 N

ADDR MAPPED/VERIFY COMMUNITY

(TOP)-----IDENTIFICATION-----

A ZRTI\$,R,770 962-5717,SJG,77

-----SERVICE AND EQUIPMENT

B IO BSXUP

-----BOTTOM-----

C
D
E
F
G
H
I
J
K
L
M
N
O
P
Q
R

BellSouth
FPSC Docket No. 960766-T
Exhibit GC-4
Page 1 of 2

02



GA_DOE_A

File Edit Special Fonts

Help

ORION

END 0000 COMPLETED SUCCESSFULLY

REQ PREM L# CN

ADDR 2738 SPRING ST SE

COM DCLA ST GA

ZIP 30211 COUNTY GWINNETT

LOC APT FLR BLDG

AHN RT BOX PO DCLA

DES TN LN STATUS

ZIP 30211 EX LRCV WC LRVLGAOS NPA 770

BO 95 DIR CR RTZ CO 962 GSG G26

PC BSEG 03 TAR 022704 RSEG 01

SRV

RSTR

1 STAT WORKING / / TN 770 339-6417 CT N CNF N DIP QS

LN DEBRA, TOM & SHARI

2 STAT NON-WORK 02/19/94 TN 770 822-0775 CT N CNF DIP QS

LN CHATHAM, JOSH

TA

BellSouth
FPSC Docket No. 96078-T
Exhibit GC-4
Page 2 of 2



Inquiry Only

Inquiry Only Menu

Please select one of the following:

Validate Address

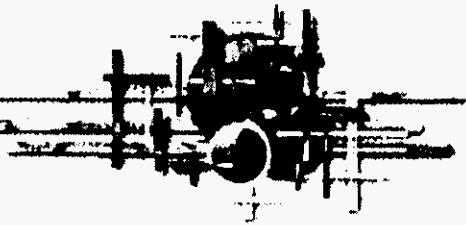
Note: A valid address must be entered before attempting to reserve telephone numbers, viewing features and services, or viewing an installation calendar. You may validate address by entering the telephone number and state in the fields below. If you have chosen to view a customer record, you must enter the telephone number and state below then click 'OK' to continue.

Telephone Number

State

BellSouth
FPSC Docket No. 960786-TP
Exhibit GC-5
Page 1 of 2

BELLSOUTH
LOCAL EXCHANGE NAVIGATION SYSTEM



Inquiry Only

Address Validation

Street Number: Suffix: Street Name:

Dir-Prefix: T/F Dir-Suffix:

Unit: Elevation: Structure:

City: State: ZIP:

Descriptive Address:

Route: Box:

Telephone Number:

BellSouth
FPSC Docket No. 960786-TP
Exhibit GC-5
Page 2 of 2

0000 COMPLETED SUCCESSFULLY

Firm Order - New Installation

Select Telephone Numbers

NPA	TTA	CLLI	Community
904	761	DYBHFLPO	DAYT BCH

Select Telephone Numbers

Options: Random Numbers

Special Number Pattern :NXX : [] LINE []

Number Exclusions : []

Previously Reserved Telephone Numbers

[]	[]
[]	[]
[]	[]

OK Cancel Reset

Firm Order - New Installation

Firm Order - New Installation

Select Telephone Numbers

NPA	TTA	CLLI	Community
904	761	DYBHFLPO	DAYT BCH

Select Telephone Numbers

Options:

- Random Numbers
- Random Numbers**
- Vanity Numbers
- Easy Numbers
- Ascending Line Digits
- Descending Line Digits
- Identical Line Digits
- Sequential Line Numbers

Special Number Pattern :NXX :

Number Exclusions :

Previously Reserved T

OK Cancel Reset



Firm Order - New Installation

BellSouth
FPSC Docket No. 960786-TP
Exhibit GC-6
Page 2 of 3

Select Telephone Numbers

NPA	TTA	CLLI	Community
904	761	DYBHFLPO	DAYT BCH

Note: A maximum of 6 numbers may be kept.

Available		Selected
904 304-3548	 	904 304-3264
904 304-8921		
904 304-8943		
904 304-9858		
904 756-0693		
904 756-3612		
904 788-7049		
904 788-8963		
904 788-9014		
Replace	Cancel	Keep

TRANSACTION SUCCESSFUL 1

Firm Order - New Installation

BellSouth
 FPSC Docket No. 960786-TP
 Exhibit GC-6
 Page 3 of 3

View Available Features and Services for 904 304 3264

Service: TOUCHSTAR

Please click on a feature in the table below to add a feature.

Name	Extended Name	Status	Date Avail	USOC	Tariff Notes
ANONYMOUS CALL REJECTION		A	1992/08/24	HBY	
CALL BLOCK		A	1991/12/11	NSY	
CID BASIC NBR		A	1991/09/06	NSD	
CID-ENHANCED W/ACR		N		NXECR	
CID DELUXE W/ACR		A	1994/10/10	NXMCR	
CLG NBR DL BLOCK PERM	PER LINE - AGENCY	A	1991/09/06	NOB	
CALL RETURN		A	1991/09/06	NSS	
CALL RET. USAGE SENSITIVE	BLOCKING OF	A	1996/07/03	BCR	
CALL RETURN - ENHANCED		A	1993/12/01	NSS	
CALL SELECTOR		A	1991/12/11	NSK	
CALL TRACING		A	1991/09/06	NST	
CALL TRACING, DENIAL OF	PER ACTIVATION	A	1994/09/20	HBG	
CALL TRACKING	WITH DID	N		NXB	
CALL TRACKING	WITH MULTILINE HUNT	N		NXK	
CID DELUXE, MULTI LN		A	1995/06/05	NXMMN	
PREFERRED CALL FORWARDING		A	1991/12/11	NCE	
REPEAT DIALING		A	1991/09/06	NSQ	
REPEAT DIAL, USAGE SENS.	BLOCKING OF	A	1996/07/03	BRD	

[Return to Switch Details](#)

DEFINE NUMBER USAGE

Line(s)	Telephone #	Dual	Available Telephone #
Main Line	# : (803) 731-8280		(803) 731-8280 (Auto)

Assign

Override...

SELECT REQUEST CRITERIA

Easy
 Stylist
 Sequential

Exchange... Any
 Quantity: 1
 Get New Number(s)

Bill Date... Any

Search For #: (803) -

Review Search & Assign

BellSouth
 FPSC Docket No. 960786-TP
 Exhibit CC-8
 Page 1 of 1

GA_DOE_A

File Edit Special Fonts Help

770 339 6417 909 TNS
C C 0.00 N 0.00 + 0.00 N

LNA PHONE NUMBER 770 391 6511
NNX SAME SWITCH 237 277 338 339 513 822 962 963 995 682

SELECT TYPE OF NUMBER (REQUIRED)

- SINGLE NUMBER
- SPECIFIC NUMBERS NNX LINE HOW MANY?
- STYLIST NUMBER NNX LINE HOW MANY?
- MULTIPLE NUMBERS HOW MANY? SPECIFIC NNX?
- CIRCUIT ID PREFIX SVC CDE MODIFIER HOW MANY?
- MISC ACCOUNT NUMBER NPA PREFIX
- KEEP QS TN (USE ACCT QS COMMAND)

SPECIFY REQUEST (OPTIONAL)

- ADDITIONAL NUMBER RINGMASTER
- EASY NUMBER HUNTING
- CUSTOM DIAL PKG LEAD # SPECIFIC BILL DATE
- FOREIGN CO NPA NNX SEQUENTIAL NUMBERS

BellSouth
FPSC Docket No. 960785
Exhibit GC-9
Page 1 of 1

08

TA



Residence Lines

Long Distance

Optional Services

Outgoing Call Blocking

Optional Calling Plans

Toll Exceptions

Jacks & Wiring

Equipment

(803) 731-8280

New line

Alphabetical Order

OFFERED SERVICES:

Sold	Product/Service	Date Available	Monthly Rate	One Time Charge
<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	Area Plus Service	06-14-94	8.00	
		Notes		Options
<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	20% Discount Option		2.00	
				Options
<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	Unlimited Local Calling Option		30.00	
				Options

CURRENT SERVICES:

Retained	Product/Service	Date Ordered	Monthly Rate	Telephone #

BellSouth
FPSC Docket No. 960786
Exhibit GC-10
Page 1 of 1

Remove Line

Apply

Cancel

Refresh

Help...

GA_DOE_A

File Edit Special Fonts Help

770 339 6417 909 FOR: SERVICES - MAIN MENU
C C 0.00 N 0.00 + 0.00 N

SWITCH TYPE: 5ES GENERIC: 5E9.1 LNA PHONE NUMBER: 7703916511
NNX SAME SWITCH: 237 277 338 339 513 682 822 962 963 995

CO ST ADR: 305 OAK ST NW LAWRENCEVILLE 30245

ENTER X TO ACCESS SUB MENU:

- CC CUSTOM CALLING
- CCR CUSTOMIZED CODE RESTRICTION
- CDP CUSTOMIZED DIALING PACKAGE
- MMC MEMORY CALL
- PC PRESTIGE COMMUNICATIONS
- PD PRESTIGE DELUXE
- PS PRESTIGE SINGLE LINE (GRNDFTHRD)
- P1 PRESTIGE I (GRANDFATHERED)
- P2 PRESTIGE II (GRANDFATHERED)
- RM RINGMASTER
- TS TOUCHSTAR
- WMLN WARM LINE SERVICE
- HTLN HOT LINE SERVICE
- MWIA MESSAGE WAITING INDICATION
- CTR CUST CLNG/TCHSTR/RM (MF)
- PT PRESTIGE/TOUCHSTAR/ (MF)
- TR TOUCHSTAR/RINGMASTER (M)
- SCOCs SELECT CLASS CALL SCR
- VI VISUAL DIRECTOR
- BUL BACK-UP LINE

CAUTION - HIGHLIGHTING DOES NOT NECESSARILY MEAN AVAILABLE
CHECK SUB MENU FOR INDIVIDUAL FEATURE AVAILABILITY

BellSouth
FPSC Docket No. 960788
Exhibit GC-11
Page 1 of 1

TA

909

April 1997

Su	M	Tu	W	Th	F	Sa
		1	2	3	4	5
6	7	8	9	10	11	12
13	14	15	16	17	18	19
20	21	22	23	24	25	26
27	28	29	30			

Wednesday, April 23, 1997



Offered Due Date

Pre-Survey Uncommon Dispatch

Appointment Time

Start Time All Day :

End Time :

Choose Access Remarks

- Call (Name and Number)
- Call (Name and Reason)
- Knock Loudly (Reason)
- Nearby
- See (Name and Reason)

Enter/Edit Access Remarks

Empty text area for entering or editing access remarks.

Customer Contact Phone Number

Extension/Other

Phone number input fields: () -

Extension/Other input field

Restrictions...

Apply

Refresh

Cancel

Help

GA_DOE_A

File Edit Special Fonts Help

770 339 6417 909

C

DD 06 11 97 SDP MTWTFSS EBD
AD 06 05 97 HU 1113 APPT CODE W
ZOSD
FDD DUAL SERVICE?
ACCESS AM? PM? ZTM
ZCBR ACC

RMK? RMKR? RMKD?

IDENT FIDS? BILLING FIDS? S&E?

ORDER NUMBER NOYCY328 AVL? AVLF?
SYS REQ ROUTE AC Y SOI

EXCHANGE LRCV SWITCHING IND
BOCAP/TELSAM BF TI

CLOSE 2

C 0.00 N 0.00 + 0.00 N

DUE DATE DAY = WEDNESDAY

(TOP)-----IDENTIFICATION-----

A ZRTI\$,R,770 962-5717,SJG,77

-----LISTING-----

B ILA 2738 SPRING ST SE, DCLA

C ISA 2738 SPRING ST SE, DCLA

D IFCTN770 339-6417;OS

-----BILLING-----

E ITAR 022,704

F IPO DCLA GA 30211

-----SERVICE AND EQUIPMENT

G IO BSXUP

-----BOTTOM-----

H
I
J
K
L
M
N
O
P

BellSouth
FPSC Docket No. 9607841F
Exhibit GC-13
Page 1 of 1

02



Determine Due Date

Customer Carrier Name Abbreviation: 2	Company Code: 8000	Version: 00
Customer Name: CUSTOMER NAME 1	Purchase Order Number: TESTPON	

NPA	TTA	CLLI	Community
904	761	DYBHFLPO	DAYT BCH

Desired Due Date

AM/PM

Type of Service: **Business**

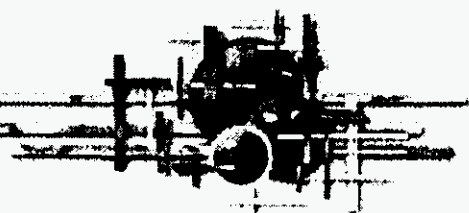
Number of Lines: 1

Connect Through: **No**

Calculated Due Date: Jun 23 1997

BellSouth
 FPSC Docket No. 960786-TP
 Exhibit GC-14
 Page 1 of 1

BELLSOUTH
LOCAL EXCHANGE NAVIGATION SYSTEM



Inquiry Only

Inquiry Only Menu

Please select one of the following:

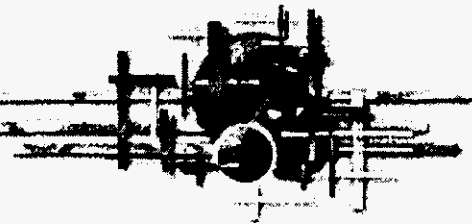
View Customer Record

Note: A valid address must be entered before attempting to reserve telephone numbers, viewing features and services, or viewing an installation calendar. You may validate address by entering the telephone number and state in the fields below. If you have chosen to view a customer record, you must enter the telephone number and state below then click 'OK' to continue.

Telephone Number

State

BELLSOUTH
LOCAL EXCHANGE NAVIGATION SYSTEM



Inquiry Only

I certify that I (or another representative of my company) have received this customer's permission to access, review and/or copy his or her records.

Inquiry Only



© 1997 BellSouth Telecommunications, Inc. All Rights Reserved.

BellSouth
FPSC Docket No. 960786-TP
Exhibit GC-15
Page 2 of 6

Inquiry Only

Customer Record

205 234 5555 454 *CSR*

LN SMITH, JOHN
LA 101 MAIN ST
SA 101 MAIN ST, ALEXANDER
CITY, AL
DZIP 35010

---DIR

DDA JOHN SMITH
101 MAIN ST
ALEX CITY AL 35010

DEL A1

---BILL

BN1 JOHN SMITH
BA2 101 MAIN ST
PO ALEX CITY AL 35010

BellSouth
TPSC Docket No. 960786-TP
Exhibit GC-15
Page 3 of 6

Return To Inquiry Menu

Inquiry Only

Customer Record

---S&E

(OTHER)

1 NW101 Network interface-Outside+
/CSN MOA/ZSER 3C10000001

(LINES & STATIONS)

1 LW1CL Low Use Measured Resident+
/PIC 0752/PCA CM, 04-24-96
/ZSER 4310000002

1 TTR Touch-Tone
/ZSER 4A10000003

1 AH8 Telecommunications Relay +
/CSN MOA/ZSER 5110000004

1 ESC Three-Way Calling
/ZSER 5810000005

205 234 0909 454 *CSR*

ALXC LW1CL

3

BellSouth
FPSC Docket No. 960786-TP
Exhibit GC-15
Page 4 of 6

Return To Inquiry Menu

Inquiry Only

Customer Record

QTY	USOC	S&E	J
1	ESL	8 Code Speed Calling /ZSER 5F10000006	
1	ESM	Call Forwarding /ZSER 6610000007	
1	ESX	Call Waiting /ZSER 6D10000008	
1	NSD	TouchStar Service, Calle+ /CSN M4A/SED 03-03-94 /ZSER 7410000009	
1	SEQ1X	Inside Wire Maintenance S+ /ZSER 7B1000000A	
1	9LM	FCC Charge for Network Ac+ /ZSER 821000000B	
---RELATED ACCOUNTS			
---BILLING TRANSFERS			

BellSouth
 FPSC Docket No. 960786-TP
 Exhibit GC-15
 Page 5 of 6

Return To Main Menu



Inquiry Only

Customer Record

/ZSER 821000000B

---RELATED ACCOUNTS

---BILLING TRANSFERS

---RMKS

---COMPLETED ACTIVITY

BellSouth
FPSC Docket No. 960786-TP
Exhibit GC-15
Page 6 of 6

[Return To Inquiry Menu](#)



File Edit Disconnect Script Settings Help



/FOR: ICASR *ICSC: ACCESS SERVICE REQUEST* 05/09/97 16:23
COMMAND _____ TARGET _____

ASR _____ OWNER _____ ORD _____ JEP _____ STATUS _____ ACA _____
D/TPROC _____ NSR VER _____ SUPP-ADD _____
ECCKT _____ FMT _____ LTERM _____ ASI _____

***** ADMINISTRATIVE SECTION *****

CCNA _____ PCH _____ VER _____ SPA _____ ICSC _____ BY _____
D/TSENT _____ QA _____ DDD _____ FDT _____ PRJCT _____
PPTD _____ PEPTD _____ NOR _____ LUP _____ BSA _____ REQ TYP _____ ACT _____ SUP _____ AFO _____
TO _____ EXP _____ AENG _____ ALB _____ AGAUT _____ DATED _____ CUST _____

FBA _____ CKR _____
UNIT _____ PIU _____ LTP _____

ECCKT _____ QTY _____
FMT _____ CFMT _____ QTY _____

BAN _____ ASG _____ BIC _____ TEL _____ BIC-ID _____
TSC _____ ACTL _____ LA _____ AI _____ APOT _____

RORD _____
RPON _____ CCVN _____ ASG-EC _____ TSP _____

SAN _____ AFG _____ SPEC _____
REMARKS _____

BellSouth
FPSC Docket No. 960786-TP
Exhibit GC-16
Page 1 of 4

File Edit Disconnect Script Settings Help



/FOR: ICADH *ICSC: ASR ADMINISTRATION INFORMATION * 05/09/97 16:26
COMMAND TARGET

ASR OWNER ORD JEP STATUS ACA
REQTYP ACT CCNA PON VER RPOH
ECCKT FMT LTERM ASI

***** BILLING INFORMATION *****

BILENM SBILNM ACNA TE
STREET FL RM
CITY ST ZIP
BILLCON TEL SCL
VTA EBP

***** CONTACT INFORMATION *****

INIT TEL STREET
FL RM CITY ST ZIP FDRC
DSGCON TEL STREET
IMPCON RM CITY ST ZIP DRC
D/TREG TEL MTCE TEL

BellSouth
FPSC Docket No. 960786-TP
Exhibit GC-16
Page 2 of 4

File Edit Disconnect Script Settings Help



/FOR: ICI GB *ICSC: ASR FEATURE GROUPS B,C,D* 05/09/97 16:26
COMMAND TARGET

ASR OWNER ORD JEP STATUS ACH
REOTYP ACT CCHA PON VER RPOH
ECCKT FMT LTERM ASI

***** SERVICE DETAILS *****

NC MCI TLV D/CDLRD DFDRD
DDLDR DFOC OACI TTT TRFTYP MI
SECTLV EML CIC TRN

RECCKT
RECCKT

GFA CFAU ACSWLOC
CKR1 ACSWTYPE

SCFA HBAN

FACTL CSPC TCIC LT SLC NCI
IMPTEL MUXLOC PRIADM CPT

SSPC PCU TYP SSPC PCU
SSPC PCU TYP SSPC PCU
SSPC PCU TYP SSPC PCU
SSPC PCU TYP SSPC PCU
RMKS

BellSouth
FPSC Docket No. 960786-TP
Exhibit GC-16
Page 3 of 4



/FOR: ICI B2 *ICSC: ASR FEATURE GROUPS B,C,D* 05/09/97 16:27
COMMAND _____ TARGET _____

ASR _____ OWNER _____ ORD _____ JEP _____ STATUS _____ ACA _____
REQTYP _____ ACT _____ CCHA _____ PON _____ VER _____ RPON _____
ECCKT _____ FMT _____ LTERM _____ ASI _____

***** SERVICE OPTIONS *****

SR _ MBA _ OPS _ GETO _ MAC _ CDND _ DIDQ _ PACT _ REL TSC _____
ALTRO _____ FGD-950 _____
SCRT _____
CHOK _____ CGAP _____ SECADM _____

***** LOCATION SECTION *****

SECLOC _____ DNPA/HXX _____
RMKS _____

TrustedLink Commerce Document Manager

File Edit Document Exchange Window Help



Document Worklist (OUTBOUND)



Status

New In Work To Be Sent Complete

Action

Our Division	Trading Party	Document Type	Subject	Last Update	Action
MY LOCAL DIVI:	Harbinger/Harb	Email(800)	Email	02/04/96	[Icons]
BST_DEMO	BellSouth/CLEC	Test-PO(850)	BellSouth Resal	03/27/97	[Icons]
BST_DEMO	BellSouth/CLEC	PO(850)	BellSouth UNE(03/27/97	[Icons]
BST_DEMO	BellSouth/CLEC	POC(860)	BellSouth Resal	03/27/97	[Icons]
BST_DEMO	BellSouth/CLEC	POC(860)	BellSouth UNE(03/27/97	[Icons]

BellSouth
 FPSC Docket No. 960786-TP
 Exhibit GC-17
 Page 1 of 3

4/26/97

4:33:08 PM



LSR

LSR +

LSR ++

CC/EU

Addl Addr

UNE

UNE +

More...

Ref Num *	Line Class	Service Id

# of Paths for Ported Number	
Quantity	

Line Activity:*

BellSouth
CLEC - Test
PO

Telephone Number:

Service Characteristics

Service Type	Service Id

Date Information

Date Type	Date	Century

Number of Line Items:

0

* denotes required field

TrustedLink Commerce Document Manager

File Edit Document Exchange Window Help



BellSouth / CLEC - Test / PO / [OUTBOUND]

LSR LSR + LSR ++ CC/EU Add Addr Resale Resale + More...

Ref Num*	Line Class	Service Id

Line Activity:

- Add
- Change
- Conversion as is
- Conversion as spec.
- Deny Non-payment
- Disconnect

Telephone Number:

BellSouth
CLEC - Test
PO

Service Characteristics

Service Type	Service Id

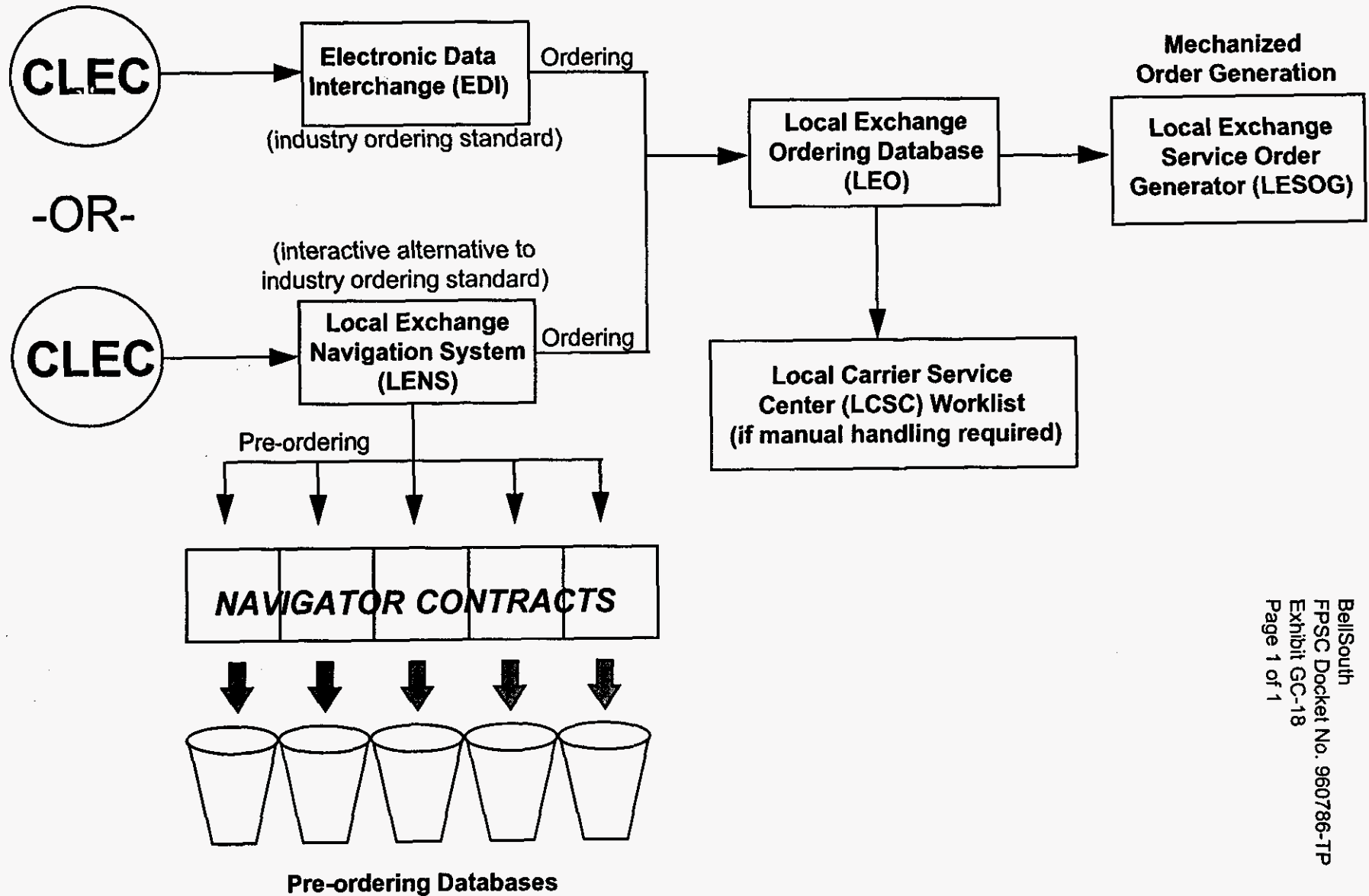
Date Information

Date Type	Date	Century

Number of Line Items:

* denotes required field

Electronic Ordering Flow



Services Available for Ordering through Electronic Data Interchange with Mechanized Order Generation, as of 4/28/97

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. Measured Rate/Residence
16. Measured Rate/Business
17. Memory Call
18. Memory Call Answering Service
19. MTS
20. Optional Calling Plan
21. RCF
22. RingMaster® Services
23. Call Tracing
24. Call Block
25. Repeat Dialing
26. Call Selector
27. Call Return
28. Preferred Call Forwarding
29. Touchtone
30. Visual Director

Summary-RNS

Select Order #

Order #

Service order (NO15MLL3) was ISSUED
Account: (770) 466-6349 Customer Code: 656

BellSouth
FPSC Docket No. 960786-TP
Exhibit GC-20
Page 1 of 1

Rate Order

PREV

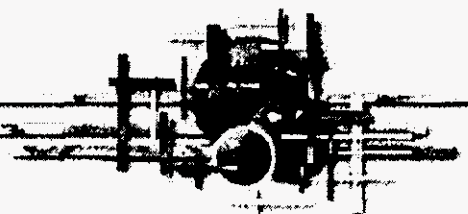
NEXT

Issue Order

Hold Order

Cancel Negotiation

BELLSOUTH
LOCAL EXCHANGE NAVIGATION SYSTEM



Firm Order

Customer Carrier Name Abbreviation: 2

Company Code: 8000

Version: 00

Customer Name: CUSTOMER NAME 1

Purchase Order Number:

Related Purchase Order Number:

Acknowledgement

Thank You!

Purchase Order Number: LENS0509001

Version: 00

was submitted to BellSouth on Friday, 05/09/1997 at 03:41 PM EDT

BellSouth
FPSC Docket No. 960786-TP
Exhibit GC-21
Page 1 of 1

View FOC/CN

Please select a "From Date" to retrieve the list of PON's.
The selected day should be within 45 days from the current day.

From Date: Apr 26 1997

Retrieve PON's

Please click on a PON in the table below to view details.

PON	Version	Date	Time	FOC/CN
CONVASIS2050997	00	970510	1632	FOC

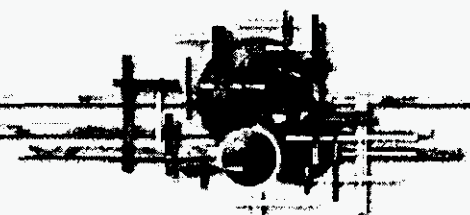
Previous Next

The PON details are shown in the table below .

EBD	
ENDUSER PHONE	4049999999

BellSouth
FPSC Docket No 960786-TP
Exhibit GC-22
Page 1 of 1

BELLSOUTH
LOCAL EXCHANGE NAVIGATION SYSTEM



View LSR Errors

Please select a "From Date" to retrieve the list of LSR Errors.
The selected day should be within 45 days from the current day.

From Date: May 2 1997

Retrieve LSR Errors

Please click on a PON in the table below to view details of LSR Errors.

PON	Version	Date	Time
CONVSPEC2051097	02	970510	1648

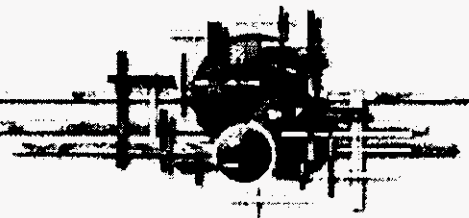
Error Details for CONVSPEC2051097
MISSING - TELEPHONE NUMBER

Main Menu

BellSouth
FPSC Docket No. 960786-TP
Exhibit GC-23
Page 1 of 1



BELLSOUTH
LOCAL EXCHANGE NAVIGATION SYSTEM



View a Service Order

Please enter the "PON" of the service order

PON:

Status: Awaiting assignments

BellSouth
FPSC Docket No. 960786-TP
Exhibit GC-24
Page 1 of 1



BELLSOUTH

© 1997 BellSouth Telecommunications, Inc. All Rights Reserved.

05-9-97 Trouble Analysis Facilitation Interface NRTAFIZM BST R97.2 SIM1

TN [redacted] [redacted] [redacted] NAME [redacted]
OOS [redacted] LIU [redacted] ADDRESS [redacted]

Dial TN [redacted] [redacted] [redacted]
Outgo
Incom Is the line currently in use? [redacted]
Trans
memor F2profile F3queued F4supervise F6exit
Memor

calling plans/billing (ANI)
Long distance
Physical
data pRblems
Enhanced Services

[redacted]

BellSouth
FPSC Docket No. 960786-TP
Exhibit GC-25
Page 1 of 13

No troubles in queue

03:11:38

05-9-97 Trouble Analysis Facilitation Interface NRTAFIZM BST R97.2 SIM1

TN [redacted] [redacted] [redacted] NAME [redacted]
00S [redacted] LIU [redacted] ADDRESS [redacted]

Dial TN 999 949 5038
Outgo
Incom Is the line currently in use? Y
Trans
memor F2profile F3queued F4supervise F6exit
Memor

calling plans/billing (ANI)
Long distance
Physical
data pRblems
Enhanced Services

BellSouth
FPSC Docket No. 960786-TP
Exhibit GC-25
Page 2 of 13

No troubles in queue

03:12:29

05-9-97 Trouble Analysis Facilitation Interface NRTAFIZM BST R97.2 SIM1

TN 999 949 5038

00S N LIU Y
NAME ADDRESS

WAITING FOR LMOS
MAINT CONTR INFO NOT AVAIL

Analyzing DownStream Systems

BellSouth
FPSC Docket No. 960786-TP
Exhibit GC-25
Page 3 of 13

00:02 03:12:53

05-9-97 Trouble Analysis Facilitation Interface NRTAFIZM BST R97.2 SIM1

TN 999 949 5038

NAME DUNCAN, JACK M

1AES

OOS N LIU Y

ADDRESS 867 RENEE DR , HAUGH

WKG RES MAINT CONTRACT TDG
1049 DAYS SINCE LAST TROUBLE
MCAL B-9995559141 FRAME 999-555-4948

TDG

- Dial tone
- Outgoing call
- Incoming call
- Transmission
- memory Service
- MemoryCall
- calling plans/billing (ANI)
- Long distance
- Physical
- data pRblems
- Enhanced Services

- TouchStar
- Call Forwarding
- Flexible Call Forwarding
- Call Waiting
- Call waiting Deluxe
- Caller ID
- Visual Director
- Ringmaster
- Three Way calling
- Speed calling

BellSouth
FPSC Docket No. 960786-TP
Exhibit GC-25
Page 4 of 13

05-9-97 Trouble Analysis Facilitation Interface NRTAFIZM BST R97.2 SIM1

TN 999 949 5038

NAME DUNCAN, JACK M

1AES

OOS LIU

ADDRESS 867 RENEE DR , HAUGH

WKG RES MAINT CONTRACT TDG

1049 DAYS SINCE LAST TROUBLE

MCAL B-9995559141 FRAME 999-555-4948

TDG

Dial tone

Outgoing call

Incoming call

Transmission

memory Service

MemoryCall

calling plans/billing (ANI)

Long distance

Physical

data pRoblems

Enhanced Services

TouchStar

Call Forwarding

Flexible Call Forwarding

Call Waiting

Call waiting Deluxe

Caller ID

Visual Director

Ringmaster

Three Way calling

Speed calling

BellSouth
FPSC Docket No. 960786-TP
Exhibit GC-25
Page 5 of 13

LMOS Data Available for 9999495038

00:50 03:13:41

05-9-97 Trouble Analysis Facilitation Interface NRTAFIZM BST R97.2 SIM1

TN 999 949 5038

NAME DUNCAN, JACK M

1AES

OOS N LIU Y

ADDRESS 867 RENEE DR , HAUGH

WKG RES MAINT CONTRACT TDG

1049 DAYS SINCE LAST TROUBLE

MCAL B-9995559141 FRAME 999-555-4948

TDG

- Dial tone
- Outgoing call
- Incoming call
- Transmission

TouchStar
 Call Forwarding

- memory Service
- MemoryCall
- calling plans/billing
- Long distance
- Physical
- data pRblems
- Enhanced Services

- Variable call forwarding
- Don't answer call forwarding
- Busy line call forwarding
- Remote Access call forwarding
- Customer Control of Busy line call forward
- Customer Control of Don't answer call forward
- Multiple Simultaneous Don't answer call forward
- Multiple Simultaneous Busy line call forward
- Remote Call forwarding

LMOS Data Available for 9999495038

01:16 03:14:07

BellSouth
 FPSC Docket No. 960786-TP
 Exhibit GC-25
 Page 6 of 13

05-9-97 Trouble Analysis Facilitation Interface NRTAFIZM BST R97.2 SIM1

TN 999 949 5038

NAME DUNCAN, JACK M

1AES

00S N LIU Y

ADDRESS 867 RENEE DR , HAUGH

-
Advise customer not paying for service.
Does the customer want Call Forwarding?

RES MAINT CONTRACT TDG
DAYS SINCE LAST TROUBLE
B-9995559141 FRAME 999-555-4948

No service order activity
CRIS: Not Paying for CFWD

TouchStar
Call Forwarding

iable call forwarding
't answer call forwarding
y line call forwarding
ote Access call forwarding
tomer Control of Busy line call forward
tomer Control of Don't answer call forward
tiple Simultaneous Don't answer call forward
tiple Simultaneous Busy line call forward
ote Call forwarding

LMOS Data Available for 9999495038

01:46 03:14:37

BellSouth
FPSC Docket No. 960786-TP
Exhibit GC-25
Page 7 of 13

05-9-97 Trouble Analysis Facilitation Interface NRTAFIZM BST R97.2 SIM1

TN 999 949 5038

NAME DUNCAN, JACK M

1RES

00S LIU

ADDRESS 867 RENEE DR , HAUGH

RES MAINT CONTRACT TDG

----- BOCRIS Features -----

- Memory Call
- Message Waiting/Stutter Dialtone
- Long Distance Carrier (0288)
- Touch Tone
- Call Waiting
- Cancel Call Waiting
- Call Forwarding Busy Line
- Call Forwarding Don't Answer
- Call Forwarding Ringing Cycle (4)
- Call Return
- Wire Maintenance Plan

----- PRED Features -----

Features not available yet.

LMOS Data Available for 9999495038

02:15 03:15:06

BellSouth
 FPSC Docket No. 960786-TP
 Exhibit GC-25
 Page 8 of 13

05-9-97 Trouble Analysis Facilitation Interface NRTAFIZM BST R97.2 SIM1

TN 999 949 5038

NAME DUNCAN, JACK M

1AES

OOS N LIU Y

ADDRESS 867 RENEE DR , HAUGH

-
Advise customer not paying for service.
Does the customer want Call Forwarding?

RES MAINT CONTRACT TDG
DAYS SINCE LAST TROUBLE
B-9995559141 FRAME 999-555-4948

No service order activity
CRIS: Not Paying for CFWD

TouchStar

TAFI MASTER HELP MENU

iab

't

y l

ote

tom

tom

Phone list

Feature aids

Application overview

TAFI help

orward

l forward

tiple Simultaneous Don't answer call forward

tiple Simultaneous Busy line call forward

ote Call forwarding

BellSouth
FPSC Docket No. 960786-TP
Exhibit GC-25
Page 9 of 13

LMOS Data Available for 9999495038

03:27 03:16:18

05-9-97 Trouble Analysis Facilitation Interface NRTAFIZM BST R97.2 SIM1

TN 999 949 5038

NAME DUNCAN, JACK M

1AES

OOS LIU

ADDRESS 867 RENEE DR , HAUGH

-
Advise customer not paying for service.
Does the customer want Call Forwarding?

RES MAINT CONTRACT TDG
DAYS SINCE LAST TROUBLE
B-9995559141 FRAME 999-555-4948

No service order activity
CRIS: Not Paying for CFWD

TouchStar
Call Forwarding

iable call forwarding
't answer call forwarding
y line call forwarding
ote Access call forwarding
tomer Control of Busy line call forward
tomer Control of Don't answer call forward
tiple Simultaneous Don't answer call forward
tiple Simultaneous Busy line call forward
ote Call forwarding

BellSouth
FPSC Docket No. 960786-TP
Exhibit GC-25
Page 12 of 13

CANCEL INITIAL REPORT

TN 999 949 5038

REPEAT N

EC 999

UNIT 47147200

LOC TDG

NAME DUNCAN, JACK M

SUB N

SO N

ADDRESS 867 RENEE DR , HAUGH

REACH#

ACCESS#

CALLED#

REMARKS

OK/

REP BY

TRBL DESC MEM ***

NOTE

NARRATIVE -CF not wkg-Cust not paying for feature-.-

NEW COMM AS

ACCESS: A B

OS 07-29-95 0600P

CUS DT

CAT CD

IRATE N

CC N

AS 07-29-95 0600P

DT RECVD

SUB: CLSALT

NI N

BC

TEST RES

HANDLE

MISC T1

RECOMMEND CANCEL-Transfer To Business Office

NRTAFIZM

LMOS Data Available for 9999495038

06:20 03:19:11

BellSouth
FPSC Docket No. 960786-TP
Exhibit GC-25
Page 13 of 13

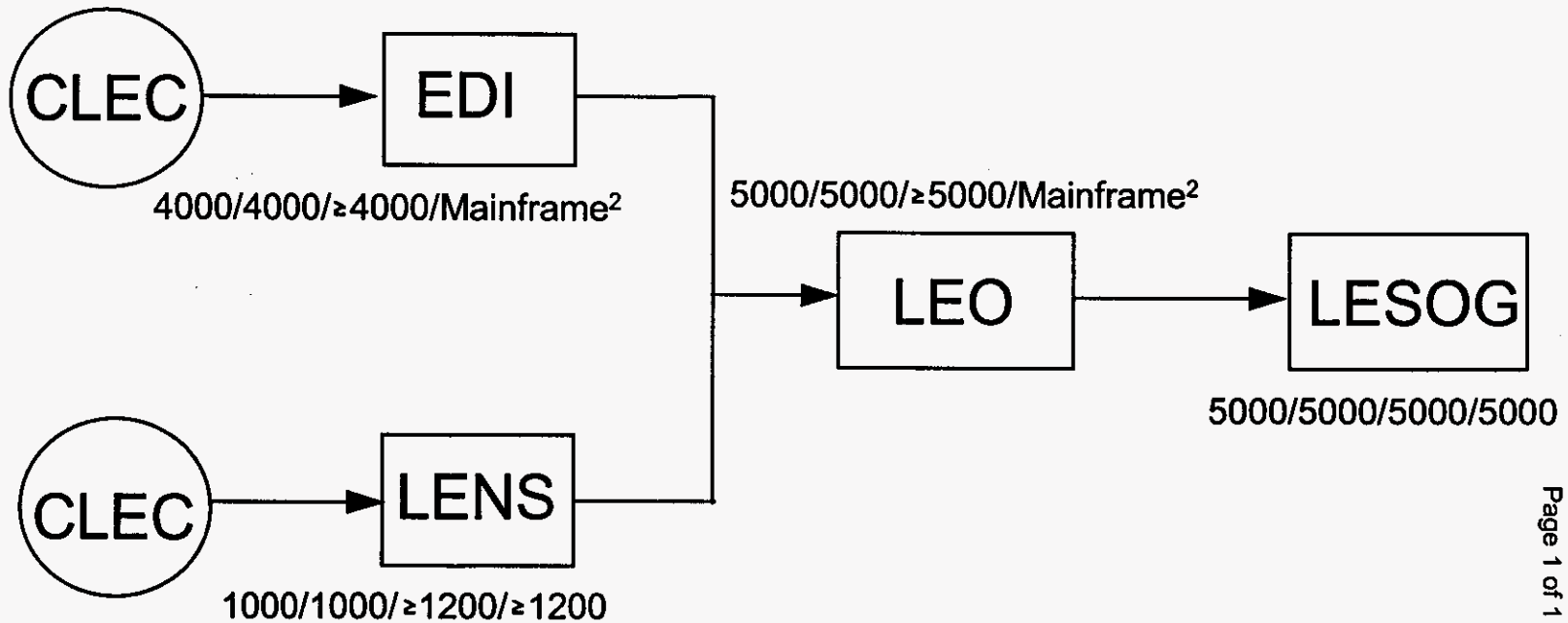
BellSouth's Currently Available Electronic Interfaces*

Process	CLEC Interface	Functions	Available Since
Pre-Ordering	<ul style="list-style-type: none"> Local Exchange Navigation System (LENS) Provides electronic, real-time, interactive access to the same databases from which BellSouth obtains pre-ordering information 	<ul style="list-style-type: none"> Address validation Telephone number selection Products and services information Due dates Customer service record information 	<ul style="list-style-type: none"> April 1997 April 1997 April 1997 April 1997 June 1997
Ordering/ Provisioning	<ul style="list-style-type: none"> Industry-standard Electronic Data Interchange (EDI) interface Industry-standard Exchange Access Control and Tracking system (EXACT) Interactive ordering through LENS 	<ul style="list-style-type: none"> 34 resale services, including four complex services, plus unbundled loop, port, and interim number portability Complex network elements (trunking, transport, tandem switching, etc.) 30 resale services plus unbundled loop, port, and interim number portability 	<ul style="list-style-type: none"> December 1996 1985 April 1997
Maintenance and Repair	<ul style="list-style-type: none"> Trouble Analysis Facilitation Interface (TAFI) Provides electronic, real-time interactive access to the same trouble handling system used by BellSouth for exchange services Industry-standard Electronic Gateway Interface Same electronic bonding interface currently used by interexchange carriers 	<ul style="list-style-type: none"> Trouble reports for both business and residence local exchange services and unbundled network elements identified with telephone numbers (e.g., port) Trouble reports for designed resold services and circuit-number identified unbundled network elements (e.g., trunks) 	<ul style="list-style-type: none"> March 1997 1995
Billing	<ul style="list-style-type: none"> CLEC Daily Usage File Provided in industry standard data format 	<ul style="list-style-type: none"> Daily file containing such items as directory assistance or other billable usage associated with a resold line, interim number portability account, or unbundled network element such as an unbundled port 	<ul style="list-style-type: none"> March 1996

*This chart describes BellSouth's recommended interfaces for each process. In addition, some CLECs have chosen to continue using certain manual or interim electronic interfaces BellSouth deployed prior to 1997 to support the earlier market entry of local exchange competitors, so BellSouth continues to make those available. BellSouth also is building customized interfaces for some functions in accordance with individual interconnection agreements.

Ordering Capacity

Daily ordering stated as *aa/bb/cc/dd*, where:
aa = Forecast by year-end 1997
bb = Designed capacity of each system¹
cc = Capacity verified through internal volume testing
dd = Additional capacity available for rapid turn-up



¹Assuming a 10-hour production day as a conservative estimate. Systems actually are available approximately 20 hours per day on average.

²Both EDI and LEO account for a small fraction of the currently used capacity on two BST mainframe systems. Significant excess capacity (35% to 40%) exists on both mainframes.