

CONFIDENTIAL**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In Re: Consideration of BellSouth's
Entry into InterLATA Services
Pursuant to Section 271 of the Federal
Telecommunications Act of 1996

Docket No. 960786-TL

**LATE-FILED EXHIBIT NO. 1 TO THE
DEPOSITION OF MELISSA L. CLOSZ**

Documentation of Rate Adjustments

The attached documentation details SMNI's request for bill adjustments for only the months of May, June and July, 1997. Previous adjustments were requested but have been omitted due to the volume of information that would be required to represent SMNI's experiences thus far. Also, this is just one of several bills that SMNI receives monthly for services purchased from BellSouth. Adjustments have been requested on other bills as well.

The "Bill Adjustment Investigation Requests" submitted by SMNI and the "CABS Billing Adjustment Notifications" are being provided for July bill issues only due to the volume of documents which were submitted for previous months.

Adjustments requested for SMNI's May invoice were submitted by SMNI on June 4, 1997, and adjustments were not issued by BellSouth until July 31, 1997.

June adjustments were requested by SMNI July 8, 1997, and were issued by BellSouth between August 8 and August 12, 1997.

See pages 1-21 attached hereto.

DOCUMENT NUMBER-DATE

08573 AUG 25 5

FPSC-RECORDS/REPORTING

Aug-20-97 08:30A Sprint Metropolitan

1+407-875-0056

P-02

Late-Filed Deposition Ex. 1

Melissa L. Closz

Docket No. 960786-TL

Page 1

To: SMTP[linda.haynes@bridge.bellsouth.com]
From: Beth Day@MKT-MTLD
Cc: inet [lynn.a.smith@bridge.bst.bls.com], Melissa Closz@MKT-MTLD,
SMTP[linda.s.mcgrue@bridge.bst.bls.com]
Bcc:
Subject: July Bill Issues for Ban 407-N16-0088-088 and 407-N19-0147/ 147
Attachment: jul97.doc, jul147.doc
Date: 8/5/97 11:36 AM

Linda Haynes,

The attached file JUL97.xls contains 6 Billing Adjustment Investigation Reports for the July Bill Ban 407-N16-0088-088.

The attached file JUL147.xls contains 2 Billing Adjustment Investigation Reports for the July Bill Ban 407-N19-0147-147.

I will also be faxing you a copy since the files do not transfer very well to you. Please call if you need more detail or have any questions.

Thanks for your help in resolving this issues.

Melissa/Lynn/Linda,

Just to give you a summary

407-N16-0088-088

32 new orders this month

2 orders had interoffice elements where they don't apply

3 orders had extra Local Channel elements where they don't apply

407-N19-0147-147

1 new orders this month

The order had extra Local Channel elements where they don't apply

These are the same two issues we have had since the beginning.

The rates for DSO local channel have been cleared up for the monthly recurring. However, the Non Recurring still needs to be credited.

I know Linda Haynes is working on these issues because I have begun receiving responses from our May issues. Hopefully, June and July won't be far along.

Thanks and please call if anyone has any questions.

Beth Day

Business Administrator

(407) 206-0010

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Page 2

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Billing Adjustment Investigation Request

Date: 8/5/97

CLEC Tracking #: 0797801

BST Tracking #: _____

To: Linda Haynes

We believe that a billing error appears on the following account:

Account Name: Sprint Metro Networks, Inc. Account: 407-N16-0088-088

Line # _____
(if applicable)

Circuit #: 58.I.YFU.700597..SB thru 58.I.YFU.700610..SB
(if applicable)

Reason amount in question:

Currently, we are being billed for two local channels. However, these fourteen circuits have been assigned to an existing DS3 from Magnolia to Magnolia Collocate. We should only be charged for one local channel from Magnolia to the customer's premise.

- Attached is a marked-up copy of the page(s) on which the questioned item(s) appear.
- A marked-up copy is not attached. Following is additional information for your investigation (i.e., page number of bill, item on bill).

In-Service Date: 6/19/97
Service Order Number: CY4T1Y10
PON Number: N001033

Other: _____

If you have any questions or need clarification you may contact:

Name: Beth Day Tel #: 407-206-0010

Concur: _____ Fax #: 407-875-0056

Date: _____

Please Fax signed concurrence to fax number shown above by 8/15/97.

Sincerely,
Beth Day

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Billing Adjustment Investigation Request

Date: 8/5/97

CLEC Tracking #: 0797802

BST Tracking #: _____

To: Linda Haynes

We believe that a billing error appears on the following account:

Account Name: Sprint Metro Networks, Inc.

Account: 407-N16-0088-088

Line # _____
(if applicable)

Circuit #: 58.LYFU.700968-SB
(if applicable)

Reason amount in question:

Currently, we are being billed for two local channels. However, this circuit has been assigned to an existing DS3 from Sandlake to Magnolia. We should only be charged for one local channel from Sandlake to the customer's premise.

- Attached is a marked-up copy of the page(s) on which the questioned item(s) appear.
- A marked-up copy is not attached. Following is additional information for your investigation (i.e., page number of bill, item on bill).

In-Service Date: 6/24/97
 Service Order Number: CY47X8Y4
 PON Number: Derchva.DS0

Other: _____

If you have any questions or need clarification you may contact:

Name: Beth Day

Tel #: 407-206-0010

Concur: _____

Fax #: 407-875-0056

Date: _____

Please Fax signed concurrence to Fax number shown above by 8/15/97.

Sincerely,
Beth Day

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Billing Adjustment Investigation Request

Date: 8/5/97

CLEC Tracking #: 0797803

BST Tracking #: _____

To: Linda Haynes

We believe that a billing error appears on the following account:

Account Name: Sprint Metro Networks, Inc.

Account: 407-N16-0088-088

Line # _____
(If applicable)

Circuit #: 58.L.YFU.700691_SB thru 58.L.YFU.700699_SB
(if applicable)

Reason amount in question:

Currently, we are being billed for two local channels. However, these nine circuits have been assigned to an existing DS3 from Azalea Park to Magnolia. We should only be charged for one local channel from Azalea Park to the customer's premise.

- Attached is a marked-up copy of the page(s) on which the questioned item(s) appear.
- A marked-up copy is not attached. Following is additional information for your investigation (i.e., page number of bill, item on bill).

In-Service Date: 7/2/97
Service Order Number: CY808G04
PON Number: N001764

Other: _____

If you have any questions or need clarification you may contact:

Name: Beth Day

Tel #: 407-206-0010

Concur: _____

Fax #: 407-875-0056

Date: _____

Please Fax signed concurrence to Fax number shown above by 8/15/97.

Sincerely,
Beth Day

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Melissa L. Cloz
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CONFIDENTIAL

Billing Adjustment Investigation Request

Date: 8/5/97

CLEC Tracking #: 0797804

BST Tracking #: _____

To: Linda Haynes

We believe that a billing error appears on the following account:

Account Name: Sprint Metro Networks, Inc.

Account: 407-N16-0088-088

Line # _____
ORLDFL.PCK01

Circuit #: 5007 TIZF ORLDFLMAWAG

(if applicable)

(if applicable)

Reason amount in question:

This order was for DS1 Muxing to DS0. No interoffice elements should apply.

- Attached is a marked-up copy of the page(s) on which the questioned item(s) appear.
- A marked-up copy is not attached. Following is additional information for your investigation (i.e., page number of bill, item on bill).

In-Service Date: 7/11/97
 Service Order Number: CYB1G4G1
 PON Number: PC.MUX.4

Other: _____

If you have any questions or need clarification you may contact:

Name: Beth Day

Tel #: 407-206-0010

Concur: _____

Fax #: 407-875-0056

Date: _____

Please Fax signed concurrence to fax number shown above by 8/15/97.

Sincerely,
Beth Day

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Billing Adjustment Investigation Request

Date: 8/5/97

CLEC Tracking #: 0797805

BST Tracking #: _____

To: Linda Haynes

We believe that a billing error appears on the following account:

Account Name: Sprint Metro Networks, Inc. Account: 407-N16-0088-088

Line # _____
(if applicable)

Circuit #: 58.HCFS.707170.SB
(if applicable)

Reason amount in question:

Currently, we are being billed for interoffice elements on this DSL. We should only be charged for one local channel from Maconolia to the customer's premise.

- Attached is a marked-up copy of the page(s) on which the questioned item(s) appear.
- A marked-up copy is not attached. Following is additional information for your investigation (i.e., page number of bill, item on bill).

In-Service Date: 7/14/97
Service Order Number: CYFNWG18
PON Number: Univerprtsdsutla

Other: _____

If you have any questions or need clarification you may contact:

Name: Beth Day Tel #: 407-206-0010

Concur: _____ Fax #: 407-875-0056

Date: _____

Please Fax signed concurrence to Fax number shown above by 8/15/97.

Sincerely,
Beth Day

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Billing Adjustment Investigation Request

Date: 8/5/97

CLEC Tracking #: 0797806
BST Tracking #: _____

To: Linda Haynes

We believe that a billing error appears on the following account:

Account Name: Sprint Metro Networks, Inc. Account: 407-N16-0088-088

Line # _____ Circuit #: _____
(if applicable) (if applicable)

Reason amount in question:

Late Fee-Due to issues with this bill, Sprint has been short paying. Please remove the July Late Payment Fee of \$404.19.

- Attached is a marked-up copy of the page(s) on which the questioned item(s) appear.
- A marked-up copy is not attached. Following is additional information for your investigation (i.e., page number of bill, item on bill).

In-Service Date: _____
Service Order Number: _____
PON Number: _____

Other: _____

If you have any questions or need clarification you may contact:

Name: Beth Day Tel #: 407-206-0010

Concur: _____ Fax #: 407-875-0056

Date: _____

Please Fax signed concurrence to Fax number shown above by 8/15/97.

Sincerely,
Beth Day

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Form 5311
(11-89)



CABS Billing Adjustment Notification

ATTN: Beth Day Contact Number: 407 306 0010
 ACNA: SMW Disputed Amount: 1071.42
 Billing Account Number: 407 N16 0088 CKR: _____
 Circuit ID: 58.LYFU.700597..SB Dispute Type: Chan Term
58.LYFU.700610..SB
 Bell Order Number/PON Number: _____ Disputed Invoice #: _____
 Adjustment Audit Number: 0797801 Disputed Date: 9
 Credit Amount: 1071.42 Issued on Invoice: 97197 July
 Debit Amount: _____ Issued on Invoice: _____
 Balance Due BellSouth: _____ Due By: _____
 Reason For Dispute: _____

Remarks: NRC 627.20
REC 944.22 06-19/08.15

An order will be issued to correct

Invoice Adjustment Will Appear On: Aug 16

Concurs: _____ Does Not Concur: _____ Date: _____

Analyst: _____ Analyst Number: _____

BST Contact: L. Haynes BST #: 800 823 2455 EXP 550177

Date: 08-13-97 Fax Number: 205 972 2124

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CONFIDENTIAL

Form 5311
(11-98)



CABS Billing Adjustment Notification

ATTN: Beth Day Contact Number: 407 206-0010
 ACNA: SMW Disputed Amount: 73.70
 Billing Account Number: 407N160088 CKR: _____
 Circuit ID: 58.LYFU.700968..SB Dispute Type: Chan Term
 Bell Order Number/PON Number: _____ Disputed Invoice #: _____
 Adjustment Audit Number: 0797802 Disputed Date: _____
 Credit Amount: 73.70 Issued on Invoice: 97197
 Debit Amount: _____ Issued on Invoice: _____
 Balance Due BellSouth: _____ Due By: _____
 Reason For Dispute: _____

Remarks: Chan Term does not apply at Cke 1
An order will be issued to correct

Invoice Adjustment Will Appear On: Aug 16
 Concur: _____ Does Not Concur: _____ Date: _____
 Analyst: _____ Analyst Number: _____
 BST Contact: L. Haynes BST #: 800 823 2455
 Date: 8-14-97 Fax Number: 205 972 2124

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CONFIDENTIAL

Form 5511
(11-96)



CABS Billing Adjustment Notification

ATTN: Beth Day Contact Number: 407 206-0010
 ACNA: SMW Disputed Amount: 622.53
 Billing Account Number: 407 N16 0088 CKR: _____
 Circuit ID: 58.LYFU. 700 691..SB Dispute Type: Chan Term
58.LYFU. 700 699..SB
 Bell Order Number/PON Number: _____ Disputed Invoice #: 97197
 Adjustment Audit Number: 0797802 Disputed Date: _____
 Credit Amount: 622.53 Issued on Invoice: 97197
 Debit Amount: _____ Issued on Invoice: _____
 Balance Due BellSouth: _____ Due By: _____
 Reason For Dispute: _____

Remarks: Chan Term at CEI does not apply
orders will be issued to correct

Invoice Adjustment Will Appear On: Aug 16
 Concur: _____ Does Not Concur: _____ Date: _____

Analyst: _____ Analyst Number: _____
 BST Contact: L. Harper BST #: 800 823 2455 EXT 53017#
 Date: 8-14-97 Fax Number: 205 972 2129

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Form 5511
(11-88)



CABS Billing Adjustment Notification

ATTN: Beth Day Contact Number: 407 206-0010
 ACNA: SMW Disputed Amount: 414.39
 Billing Account Number: 407 N16 0088 CKR: _____
 Circuit ID: 5007 T12E ORLDFLMAWAG Dispute Type: _____
ORLDFLPCR01
 Bell Order Number/PON Number: _____ Disputed Invoice #: 97197
 Adjustment Audit Number: 0797804 Disputed Date: _____
 Credit Amount: 414.39 Issued on Invoice: 97197
 Debit Amount: _____ Issued on Invoice: _____
 Balance Due BellSouth: _____ Due By: _____
 Reason For Dispute: _____

Remarks: Mileage does not apply, an order will be issued to correct

Invoice Adjustment Will Appear On: Aug 16
 Concur: _____ Does Not Concur: _____ Date: _____

Analyst: _____ Analyst Number: _____
 BST Contact: L Haynes BST #: 800 823 2455 EXT 350177
 Date: 08 14 97 Fax Number: 205 972 2129

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Form 5311
(11-86)



CABS Billing Adjustment Notification

ATTN: Beth Day Contact Number: 407 206-0010
 ACNA: SMW Disputed Amount: 404.19
 Billing Account Number: 407 N16-0010 CKR: _____
 Circuit ID: _____ Dispute Type: LPC
 Bell Order Number/PON Number: _____ Disputed Invoice #: 97197
 Adjustment Audit Number: 0797806 Disputed Date: _____
 Credit Amount: 404.19 Issued on Invoice: 97197
 Debit Amount: _____ Issued on Invoice: _____
 Balance Due BellSouth: _____ Due By: _____
 Reason For Dispute: _____

Remarks: _____

Invoice Adjustment Will Appear On: Aug 16
 Concur: _____ Does Not Concur: _____ Date: _____

Analyst: _____ Analyst Number: _____
 BST Contact: L Haynes BST #: 800 823 2455 EXT 550111
 Date: 8-14-97 Fax Number: 205 972 2124

Aug-20-97 09:03A Sprint Metropolitan

1-407-875-0056

P.05

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Melissa L. Cloz

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To: SMTP[linda.s.mcgrue@bridge.bst.bls.com]

From: Beth Day@MKT-MTLD

Cc: Richard Warner@MKT-MTLD,

Xchange@Sprint@CDS [G=Melissa/S=Cloz/A=felemail/P=Sprint/C=US]

Bcc:

Subject: Bill 407-N16-0088-088

Attachment:

Date: 7/9/97 4:17 PM

Linda,

We spoke last week and I expressed my concern that Sprint is continuing to see the same billing issues that were occurring in January and February. You asked for facts so I have quantified the issues into categories. Please note this is only for the bill 407-N16-0088.

The June 16, 1997 bill contained 40 new orders.

8 of the orders contained the error of 2 local channels being billed where there was only one local channel.

2 of the orders contained the error of billing interoffice elements where there was none.

32 of the orders contained the wrong rates as stated in our interconnection agreement (effective 1/1/97).

Just as an FYI-there are 16 orders from previous months that still need to be corrected.

Also, to date, the retroactive billing adjustment due to Sprint is \$9,842.42 recurring and \$61,548.02 non-recurring (from 1/1/97 to 7/19/97).

I will be sending an adjustment request form to Linda Haines on all the issues in the near future. If you need more specific information, please give me a call to discuss.

Thanks, Linda, for all your assistance in getting these issues cleared up. You are truly appreciated.

Beth Day
Business Administrator
(407) 206-0010

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Form 5511
(11-95)



CABS Billing Adjustment Notification

ATTN: Beth Day Contact Number: 407 206 0010
 ACNA: SMW Disputed Amount: 297.29
 Billing Account Number: 407 N16-0088 CKF: _____
 Circuit ID: 58-NCF5-707170.. 30 Dispute Type: Mileage
 Bell Order Number/PON Number: _____ Disputed Invoice #: 97197
 Adjustment Audit Number: 0797805 Disputed Date: _____
 Credit Amount: 297.29 Issued on Invoice: 97197
 Debit Amount: _____ Issued on Invoice: _____
 Balance Due BellSouth: _____ Due By: _____
 Reason For Dispute: _____

Remarks: Mileage does not apply, an order will be issued to correct

Invoice Adjustment Will Appear On: 08-16-97

Concurs: _____ Does Not Concur: _____ Date: _____

Analyst: _____ Analyst Number: _____

BST Contact: L. Harper BST #: 800 823 2455 5307#

Date: 08-14-97 Fax Number: 205 972 2124

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To: SMTP[linda.haynes@bridge.bellsouth.com]
From: Beth Day@MKT-MTLD
Cc: SMTP[linda.s.mcgrue@bridge.bst.bls.com]
Bcc:
Subject: June Billing Issues for 407-N16-0088 088
Attachment: jun97.doc
Date: 7/10/97 2:37 PM

As promised, attached is a file that contains 29 Billing Issues for Bill Ban 407-N16-0088-088.

Please feel free to call me to discuss any or all in detail. Thanks again.

Beth Day
Business Administrator
(407) 206-0010

CONFIDENTIAL

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To: SMTP[linda.haynes@bridge.bellsouth.com]
From: Beth Day@MKT-MTLD
Cc:
Bcc:
Subject: May Billing Issues for Bill Ban 407-N16-0088 088
Attachment:
Date: 6/4/97 8:54 AM

Linda,

Please verify the following issues:

CONFIDENTIAL

- 1) Service Order CY5H55L6
 PON # N005280

This service is for 1 DS0 from BellSouth's Sandlake office to the customer location. From the Sandlake office to SMNI's collocation at Magnolia, the line was to be assigned to an existing DS3. However, SMNI was charged for two local channels:

Partial	\$19.74
Monthly Recurring	\$21.15
Non Recurring	\$270.00

- 2) Service Order CY78R523
 PON # C001192

This service is for 1 DS0 from BellSouth's Colonial office to the customer location. From the Colonial office to SMNI's collocation at Magnolia, the line was to be assigned to an existing DS3. However, SMNI was charged for two local channels:

Partial	\$19.04
Monthly Recurring	\$21.15
Non Recurring	\$270.00

- 3) Service Order CYC1XXV9
 PON # C002300

This service is for 10 DS0s from BellSouth's Azalea Park office to the customer location. From the Azalea Park office to SMNI's collocation at Magnolia, the lines were to be assigned to an existing DS3. However, SMNI was charged for two local channels:

Partial	\$169.20
Monthly Recurring	\$211.50
Non Recurring	\$1,170.00

- 4) Service Order CY780DF8
 PON # N006462

CONFIDENTIAL

08/20/97 10:45 FAX 404 859 5174 SPRINT EXT AFF →→ E BOYD 004/008
Aug-20-97 09:27A Sprint Metropolitan 1+407+875+0056 P.03

This service is for 8 DS0s from BellSouth's Sandlake office to the customer location. From the Sandlake office to SMNI's collocation at Magnolia, the lines were to be assigned to an existing DS3. However, SMNI was charged for 1 interoffice element:

Partial	\$14.07
Monthly Recurring	\$30.15
Non Recurring	\$87.00

5) Service Order CYG1NTF0
PON # N010883

This service is for 3 DS0s from BellSouth's Colonial office to the customer location. From the Colonial office to SMNI's collocation at Magnolia, the lines were to be assigned to an existing DS3. However, SMNI was charged for two local channels:

Partial	\$21.15
Monthly Recurring	\$63.45
Non Recurring	\$470.00

6) Service Order CY1MHF60
PON # N000292

This service is for 17 DS0s from BellSouth's Lake Mary office to the customer location. From the Lake Mary office to SMNI's collocation at Magnolia, the lines were to be assigned to an existing DS3. However, SMNI was charged for two local channels:

Partial	\$119.85
Monthly Recurring	\$359.55
Non Recurring	\$1,870.00

7) Service Order CY59F2G7
PON # N000292

This service is for 6 DS0s from BellSouth's Lake Mary office to the customer location. From the Lake Mary office to SMNI's collocation at Magnolia, the lines were to be assigned to an existing DS3. However, SMNI was charged for two local channels:

Partial	\$42.30
Monthly Recurring	\$126.90
Non Recurring	\$770.00

8) Service Order CY732F38
PON # N00885

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08/20/97 10:45 FAX 404 859 5174

SPRINT EXT AFF →→ E BOYD

005/008

Aug-20-97 09:27A Sprint Metropolitan

1+407+875+0056

P.04

This service is for 2 DS0s from BellSouth's Colonial office to the customer location. From the Colonial office to SMNI's collocation at Magnolia, the lines were to be assigned to an existing DS3. However, SMNI was charged for two local channels on one of the DS0s:

Partial	\$7.05
Monthly Recurring	\$21.15
Non Recurring	\$270.00

9) Service Order CY885188
PON # N000292

This service is for 24 DS0s from BellSouth's Lake Mary office to the customer location. From the Lake Mary office to SMNI's collocation at Magnolia, the lines were to be assigned to an existing DS3. However, SMNI was charged for two local channels:

Partial	\$169.20
Monthly Recurring	\$507.60
Non Recurring	\$2,570.00

10) Service Order CY55KH13
PON # N005858

This service is for 8 DS0s from BellSouth's Sandlake office to the customer location. From the Sandlake office to SMNI's collocation at Magnolia, the lines were to be assigned to an existing DS3. However, SMNI was charged for two local channels:

Partial	\$45.12
Monthly Recurring	\$169.20
Non Recurring	\$970.00

11) Service Order CY1M38Y3
PON # N001895

This service is for 2 PRIs from BellSouth's Colonial office to the customer location. From the Colonial office to SMNI's collocation at Magnolia, the PRIs were to be assigned to an existing DS3. However, SMNI was charged for 1 interoffice element:

Partial	\$24.80
Monthly Recurring	\$247.90

12) Service Order CYC8PPG1
PON # N000292

This service is for 4 DS0s from BellSouth's Lake Mary office to the customer location. From the Lake Mary office to SMNI's collocation at Magnolia, the lines were to be assigned to an existing DS3. However, SMNI was charged for

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two local channels:

Monthly Recurring \$84.60
Non Recurring \$570.00

13) Service Order CY6THV35
PON # N010886

This service is for 2 DS0s from BellSouth's Colonial office to the customer location. From the Colonial office to SMNI's collocation at Magnolia, the lines were to be assigned to an existing DS3. However, SMNI was charged for 2 local channels on one of the DS0s:

Monthly Recurring \$27.20
Non Recurring \$44.80

Beth Day
Business Administrator
(407) 206-0010

CONFIDENTIAL

Aug-20-97 09:28A Sprint Metropolitan

1+407+875+0056

P.06

To: SMTP[linda.haynes@bridge.bellsouth.com]
From: Beth Day@MKT-MTLD
Originated by: Steve Crowe@MKT-MTLD
Cc:
Bcc:
Subject: fwd: PON MA.MUX.7567
Attachment:
Date: 6/4/97 9:33 AM

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Linda,

The following issue is related to Bill Ban 407-N16-0088 088. The PON MA.MUX.7567 was disconnected on 5/19/97 but since this bill cycle was the 16th, the disconnect will not show up until next month.

Will you please verify that when it was disconnected, SMNI received full credit back to the date of installation? The attached memo explains why SMNI should not pay anything at all for these services.

If there is an issue, please forward to Linda McGrue for her input.

Thanks for your assistance!
Beth Day
Business Administrator
(407) 206-0010

Original Text

From: Steve Crowe@MKT-MTLD@UTF, on 6/3/97 3:32 PM:
To: Beth Day@MKT-MTLD@UTF
Cc: Richard Warner@MKT-MTLD@UTF, INET(Dalrymple@magicnet.net)

Here's the information on the MA.MUX.7567 PON.

In the last weeks of April 1997, after months of discussion with numerous BellSouth engineers and project managers, BellSouth exhausted the facilities they had provisioned between the BellSouth central office located at 45 N. Magnolia and the SMNI central office at 200 E. Robinson. This resulted in BellSouth being unable to provision circuits that would enable SMNI to provision local service to their customers.

On 4/26/97, after speaking with Linda McGrue/Account Manager-BellSouth's Sprint Account Team, I requested an order (PON MA.MUX.7567) be issued to MUX three (3) T1 Ties's at the Magnolia central office. These T1's would provide 'emergency' facility provisioning for SMNI local service conversions due the week of 4/28/97, orders that were currently without BellSouth facility assignments.

The order was completed on 4/28/97. After further review of the BellSouth facilities provisioned on the SLC installed in the SMNI central office, BellSouth determined there were enough facilities to provision the customers

08/20/97 10:46 FAX 404 859 5174

SPRINT EXT AFF +--+ E BOYD

008/008

Aug-20-97 09:28A Sprint Metropolitan

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P.07

due on 4/28. Further discussion with the facilities group and Sprint Account Team, identified another efficient and cost effective method of provisioning the services in the Magnolia area. A decision was reached to provision all future services in the new method. Orders were issued to establish the new facilities and disconnect the facilities installed on PON MA.MUX.7567 (the decision to disconnect was made the same day, 4/28, the facilities were installed). The decision was discussed with the Sprint Account Team.

PON MA.MUX.7567, to provide facilities for SMNI customers, was a direct result of BellSouth's lack of facilities provisioning in their Magnolia service area. Because the lack of facilities was a result of BellSouth not reacting to SMNI requests for additional facilities in a timely manner (discussions were held as early as January 1997), it is my position that SMNI should not be billed for their installation. The circuits were never used. The decision to use an alternative method to provision customers was made the same day the circuits were installed and the intention to disconnect the facilities was discussed with the Account Team members.

I would suggest you contact Linda McGrue for her support in this manner.

Steve Crowe
SMNI Administrator-Complex
NET 73 (407)875-8645

Original text

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Consideration of BellSouth's Docket No. 960786-TL
Entry into InterLATA Services
Pursuant to Section 271 of the Federal
Telecommunications Act of 1996

LATE-FILED EXHIBIT NO. 2 TO THE DEPOSITION OF MELISSA L. CLOSZ

Performance Standards Agreed To Thus Far By Sprint and BellSouth

BellSouth has submitted for Sprint's review the Performance Measurements language that BellSouth recently agreed to with AT&T (Attachment 12 to the AT&T/BellSouth Interconnection Agreement). Sprint is currently preparing a detailed response in which clarification of certain provisions will be requested, a few additional measurements requested, and Commission-ruled performance parameters will be included.

Sprint has communicated to BellSouth that it is in agreement with many of the performance measures detailed in the Performance Measurements draft. Several examples of areas where Sprint will request further negotiation follow:

1. Firm Order Confirmation (FOC)
 - a. The Commission, in Docket No. 961150-TP, Sprint's arbitration with BellSouth, approved Sprint's proposed interconnection agreement language to require a four-hour interval to return FOCs in an electronic exchange environment (Order No. PSC-97-0714-FOF-TP).
 - b. BellSouth has proposed again to return FOCs within 24 hours of electronic order receipt.
 - c. Sprint believes that in an electronic exchange environment, the return of FOCs will likely be measured in seconds and minutes versus hours, and that a 24-hour return time frame is excessive.
2. Billing (Customer Usage Data)
 - a. The Commission, in Docket No. 961150-TP, Sprint's arbitration with BellSouth, approved Sprint's approved proposed interconnection agreement language to require transmittal of customer usage data (CDRs) within 48 hours of recording (Order No. PSC-97-0714-FOF-TP).

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- b. BellSouth has proposed again to transmit CDRs to Sprint within six calendar days of recording.
 - c. Sprint believes six days is excessive and likely not at parity with the interval processes BellSouth currently utilizes.
3. Unbundled Network Elements
- Intervals need to be negotiated for provisioning UNEs.
4. Billing (Customer Usage Data)
- a. Sprint will propose for consideration a measurement which sets an "outside limit" on the amount of time that BellSouth will take for return of CDRs to Sprint.
 - b. BellSouth's current proposed performance measurement states only that $>$ or $=$ 98% of all records are to be delivered within 30 days of the message creation. Sprint will seek a commitment for return of the remaining 2%.
5. At the national level, Sprint has submitted comments and reply comments to the FCC supporting the measurement categories (what should be measured) and measurement methodologies (how to measure - common definitions and calculation formulas) in the LCI petition for rule-making. We feel it is extremely important to have a common understanding of measurements to ensure parity among all entities. This will also allow comparison of an ILEC's (Incumbent Local Exchange Company) performance for multiple ALECs and/or a comparison of the same ILEC across state jurisdictions. Sprint maintains that ILECs should report in four ways: 1) ILEC results, 2) ILEC affiliate results, 3) individual ALEC results (provided individually to each ALEC), and 4) ALEC industry results. Parity can easily be illustrated with these comparisons.

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LATE-FILED EXHIBIT NO. 3 TO THE DEPOSITION OF MELISSA L. CLOSZ

Request by Sprint to BellSouth for EDI Information

Attached is documentation from SMNI employee Mildred Graham to BellSouth's Sprint Account Team member Linda McGrue requesting information on the availability of EDI for ordering unbundled loops, directory listings and number portability.

The BellSouth Account Team serving Sprint is a team that BellSouth has dedicated to serving the needs of Sprint as a CLEC customer of BellSouth. They are the primary point of interface within BellSouth for Sprint and SMNI. They are charged with representing Sprint and SMNI's requirements to BellSouth's internal organizations to enable Sprint and SMNI to do business with BellSouth most effectively. This includes BellSouth's ordering, provisioning, and maintenance functions, including any electronic interfaces available.

Sprint systems development personnel have had separate discussions with BellSouth's systems development personnel over the past year or so as well. The attached correspondence represents our most recent request for clarification of EDI's capabilities given BellSouth witness Calhoun's testimony that EDI will support transmission of orders for unbundled network elements.

See pages 1-3 attached.

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Late-Filed Deposition Ex. 3
Melissa L. Closz
Docket No. 960786-TL
Page 1

Aug-22-97 03:32P Sprint Metropolitan

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P.06

To: SMTP@UTF01 [<Linda.S.Mcgrue@bridge.bst.bls.com>]
From: Mildred Graham@MKT-MTLD
Cc:
Bcc: Richard Warner@mkt-mtld
Subject: Follow-up
Attachment:
Date: 7/18/97 11:56 AM

Linda,

As a follow-up to some information that was shared earlier this year, I'm interested in knowing when we will have access to EDI or any other electronic means of ordering unbundled loops, directory listings and number portability.

Let me know the latest, please.

Thanks

Mildred A. Graham
Customer Service Manager- SMNI
407-875-8306 -- Net 73 (Office)
407-980-1613 -- (Pager-Statewide)
407-875-0056 -- (Fax)

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Aug-22-97 03:32P Sprint Metropolitan

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P.07

To: "Mgraham" <mgraham@banyan.utelfla.com>
From: Linda S. Mcgrue <Linda.S.Mcgrue@bridge.bst.bls.com>
Cc:
Bcc:
Subject: RE: Follow-up
Attachment:
Date: 7/21/97 7:06 AM

Mildred -

I'm going to forward your e-mail to LaFawn; she is working closely with the folks at Sprint NIS with LENS, which will allow greater ordering ease and flexibility. I think the Unbundled Loop portion will be added third quarter, but I'm headed to a class on it in about 30 minutes and I'll update you when I get back.

Linda Thurber from NIS will be here for a LENS lab next week.

More info later...

Linda

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Late-Filed Deposition Ex. 3
Melissa L. Closz
Docket No. 960786-TL
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Aug-22-97 03:32P Sprint Metropolitan

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P.08

To: SMTP@UTF01 [<Linda S. Mcgrue
<Linda.S.Mcgrue@bridge.bellsouth.com>]
From: Mildred Graham@MKT-MTLD
Cc:
Bcc: Xchange@Sprint@CDS [G=Melissa/S=Closz/A=Telemail/P=Sprint/C=US]
Subject: Training
Attachment:
Date: 8/7/97 3:41 PM

Linda, for clarification purposes: When we discussed our team getting electronic access to place orders, am I to understand that it is LENS or EDI that we expect to be available for unbundled loop orders in the fourth quarter???

Mildred A. Graham
SPOC-Customer Service Manager- SMNI
407-875-8306 -- Net 73 (Office)
407-980-1613 -- (Pager-Statewide)
407-875-0056 -- (Fax)

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Consideration of BellSouth's
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Docket No. 960786-TL

LATE-FILED EXHIBIT NO. 4 TO THE
DEPOSITION OF MELISSA L. CLOSZ

Number of NXXs Requested by Sprint

Sprint (SMNI) has requested 8 NXXs.

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Consideration of BellSouth's Docket No. 960786-TL
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LATE-FILED EXHIBIT NO. 5 TO THE DEPOSITION OF MELISSA L. CLOSZ

Number of Numbers in Use by Sprint in Each NXX

<u>NXX</u>	<u>Numbers in Use</u>
1.	732
2.	4
3.	65
4.	0
5.	5
6.	22
7.	147
8.	0

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Consideration of BellSouth's
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Docket No. 960786-TL

LATE-FILED EXHIBIT NO. 6 TO THE DEPOSITION OF MELISSA L. CLOSZ

Lost Customers and Surrounding Circumstances Due to BellSouth's Problems

This exhibit provides several examples of SMNI customers who left SMNI due to problems in unbundled network element provisioning and/or maintenance with BellSouth.

(1) All Purpose Insurance

- o Customer cutover to SMNI;
- o Noise and static on lines after cutover; trouble-shooting led BellSouth to rework unbundled loop designs that they had been using for provisioning;
- o Callers to customer received "all circuits busy" recording (5/19/97); local numbers portability functionality had been taken out of service in error by BellSouth;
- o Unable to match data speed attained when with BellSouth; (see notes for Magna Computer);
- o Customer switched data lines back to BellSouth.

(2) Jefferson Pilot

- o Orders for unbundled loops placed with BellSouth (10/3/96);
- o BellSouth reported facilities not available; cutover postponed;
- o At cutover, BellSouth had engineering problems; cutover postponed;
- o Customer cutover (12/16/96);
- o Customer out of service; BellSouth found "open jumper" and repaired (2/25/97);

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- In-coming callers receiving "all circuits busy" recording; local number portability functionality had been taken out of service in error by BellSouth; BellSouth repaired (5/19/97);
- Repeat trouble per above; BellSouth took out Simulated Facilities Group in error which provides local number portability functionality for SMNI; BellSouth human error identified; BellSouth repaired (6/6/97);
- Repeat trouble per above incident; BellSouth human error identified; BellSouth repaired (6/24/97);
- All lines dead; bad card in SMNI central office on BellSouth side of demarcation; BellSouth replaced bad card (7/3/97);
- Customer requested to be switched back to BellSouth (7/7/97);
- Customer taken out of service by BellSouth in the process of being switched back to BellSouth; was out of service approximately 11:00 a.m. to 5:00 p.m. (7/7/97), but had BellSouth service full restored after business hours that day.

(3) Magna Computer

- Customer was cutover to SMNI;
- Problem with "squeal" on voice lines after cutover that SMNI and BellSouth were unable to isolate;
- Data speed was not matching what was achieved with BellSouth; BellSouth and SMNI unable to correct, but believe was due to multiple analog to digital conversations within the unbundled loop provisioning scenario. Contributing factor is that BellSouth initially prohibited placement of equipment in SMNI's collocation with BellSouth that would have eliminated several conversions. While BellSouth now says that the equipment can be deployed, the equipment and capital allocation had been re-deployed; project is scheduled to be reworked later this year;
- Customer requested return to BellSouth.

(4) Artesian Pools

- Orders for unbundled loops placed with BellSouth;
- Customer decided he wanted additional lines; order placed; due date changed;

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- BellSouth orders not revised; customer taken out of service in error;
- Customer was cutover to SMNI;
- Problem with "squeal" on main number after conversation; BellSouth and SMNI unable to isolate trouble; customer had been provisioned over different physical facilities than it had been serviced on when service with BellSouth;
- Customer returned to original BellSouth provisioning scenario; no further problems.