

ORIGINAL

1 **BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

2 **DIRECT TESTIMONY OF BRYAN GREEN**

3 **ON BEHALF OF**

4 **MCIMETRO ACCESS TRANSMISSION SERVICES, INC.**

5 **DOCKET NO. 980281-TP**

6 **May 4, 1998**

7
8 **Q. PLEASE STATE YOUR NAME, ADDRESS AND POSITION.**

9 A. My name is Bryan Green. My business address is 2520 Northwinds Parkway,
10 Alpharetta, Georgia 30004. I am employed by MCI Telecommunications
11 Corporation (MCI) in the Southern Financial Operations group as a Senior
12 Manager. MCImetro Access Transmission Services, Inc. (MCImetro) is the MCI
13 subsidiary that provides local telephone service. My responsibilities involve
14 implementing Operation Support Systems (OSS) that support MCImetro's entry
15 into local telephone markets. Among other things, I deal with BellSouth and other
16 ILECs and industry forums to facilitate OSS implementation.

17
18 **Q. PLEASE PROVIDE INFORMATION ON YOUR BACKGROUND AND**
19 **EXPERIENCE.**

20 A. Before coming to MCI last year, I worked for Pacific Bell for more than eleven
21 years. I held a number of positions with Pacific Bell ranging from data
22 communications manager, data network manager, data network design and sales and
23 new product development. The majority of my tenure with Pacific Bell was in sales
24 and marketing as a system design consultant. In this role, I was responsible for the
25 design and sale of data networks to medium and large business customers. Finally, I

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1 was a product manager with responsibility for new products and market
2 development. I obtained a Bachelor of Science degree in Business Information and
3 Computing Systems in 1984 from San Francisco State University.

4
5 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

6 A. The purpose of my testimony is to provide information to the Commission
7 concerning BellSouth's failure to comply with its duties under the Interconnection
8 Agreement (Agreement) as they relate to OSS. My testimony concerns Counts One
9 through Eight of MCImetro's complaint. Ronald Martinez, among other things, will
10 discuss the Agreement as it relates to those counts.

11

12

GENERAL CLAIM

13 ***COUNT ONE: FAILURE TO PROVIDE OSS INFORMATION***

14 **Q. HOW IS MCIMETRO AFFECTED BY BELLSOUTH'S FAILURE TO**
15 **PROVIDE INFORMATION CONCERNING THE OSS SYSTEMS AND**
16 **RELATED DATABASES IT USES FOR ITS OWN CUSTOMERS?**

17 A. When BellSouth refuses to provide MCImetro information concerning BellSouth's
18 systems and databases, it prevents us from learning all of the capabilities we should
19 expect BellSouth to afford us. When I attended the BellSouth OSS demonstration
20 with Ron Martinez and others in Florida last year, for example, I was surprised to
21 learn how much better BellSouth's own OSS is than the OSS it provides to
22 MCImetro. We need to have the same level of OSS support as BellSouth provides
23 to itself to be able to compete with BellSouth; until we learn what all of BellSouth's
24 capabilities are for itself and obtain those capabilities for MCImetro, we will not be
25 able to compete on a level playing field.

1

2 **Q. HAS MCIMETRO ATTEMPTED TO RESOLVE THIS ISSUE WITH**
3 **BELLSOUTH?**

4 A. Yes, as described in the testimony of Ronald Martinez, MCI metro has been
5 requesting this information for some time. Most recently, MCI metro requested this
6 information by letter dated December 24, 1997 (December 24 letter), a copy of
7 which is attached as Exhibit ___ (BG-1). In its response dated February 11, 1998
8 (February 11 letter) BellSouth again refused to provide the requested information.
9 A copy of the February 11 letter is attached as Exhibit ___ (BG-2).

10

11 **Q. WHAT RELIEF DOES MCIMETRO REQUEST CONCERNING COUNT**
12 **ONE?**

13 A. MCI metro is requesting that BellSouth be required to permit MCI metro to review
14 (i) a detailed listing of all OSS systems that BellSouth uses; (ii) all technical
15 specifications for each of the listed systems, including but not limited to information
16 explaining what functions the system performs, how the system performs those
17 functions, what data bases and other systems it interacts with and whether an
18 interface can be built to the system; (iii) a detailed listing of each of the data bases
19 that are used by BellSouth's OSS systems; and (iv) a description of each of the
20 listed data bases, including but not limited to a data base layout specifically
21 identifying the characteristics of all data base fields.

22

23 **CLAIMS RELATING TO PRE-ORDERING**

24 **Q. BEFORE DISCUSSING EACH OF THE PRE-ORDERING CLAIMS,**
25 **PLEASE GIVE SOME EXPLANATION OF PRE-ORDERING AND THE**

1 **INTERFACES INVOLVED. PLEASE START BY EXPLAINING WHAT**
2 **PRE-ORDERING IS.**

3 A. The pre-order function involves the exchange of information between carriers prior
4 to, and in anticipation of, the placing of an actual order. Pre-order functions
5 include, for example, address validation, telephone number reservation, and access
6 to customer service records (CSRs).

7
8 **Q. WHAT SYSTEM DOES BELL SOUTH PROVIDE TO ALTERNATIVE**
9 **LOCAL EXCHANGE CARRIERS FOR PRE-ORDERING?**

10 A. BellSouth offers its Local Exchange Navigation System (LENS) as its means for
11 Alternative Local Exchange Carriers (ALECs) to access pre-ordering functions.
12 But LENS is wholly inadequate both because LENS is not a system-to-system
13 interface and because the functionality offered through LENS is inferior to the
14 functionality available to BellSouth itself. On December 15, 1997, BellSouth
15 provided incomplete Common Gateway Interface specifications for LENS, which, if
16 successfully implemented, would provide an enhanced screen scraping capability. I
17 will discuss LENS with the CGI enhancement separately from the general discussion
18 of LENS below.

19
20 **Q. GENERALLY, WHY IS LENS DEFICIENT?**

21 A. In addition to being proprietary, LENS is deficient because it is a dedicated access
22 system that essentially involves the provision of an inferior version of BellSouth's
23 own OSS terminals (or screens) to MCI metro. Because LENS does not connect
24 ALEC systems to BellSouth systems, it requires MCI metro customer service
25 representatives to first use BellSouth systems and then use MCI metro's own internal

1 systems. In contrast, a BellSouth representative only has to use BellSouth's own
2 internal systems.

3

4 **Q. WHAT PROBLEMS ARE CAUSED BY THE LACK OF AN**
5 **APPLICATION-TO-APPLICATION INTERFACE?**

6 A. The dual data entry required of ALECs not only creates delay while the customer
7 waits on the line, it also inevitably results in order entry errors that impact
8 customers' requested services.

9

10 The lack of an application-to-application interface also forces MCImetro to rely on
11 the pre-ordering screens developed in LENS. With an application-to-application
12 interface, MCImetro could take the underlying data and present it to its customer
13 service representatives the way they wanted to. This would free MCImetro from
14 the strictures of BellSouth's design and allow MCImetro to compete to design
15 superior systems. This is particularly important for a national ALEC such as
16 MCImetro who desires to present pre-ordering information to its customer service
17 representatives in a uniform fashion no matter the region. With an application-to-
18 application interface, for example, MCImetro can design its screens to provide a
19 common name for a feature across regions, rather than having feature names vary
20 from region to region depending on the name given by the regional Bell operating
21 company (RBOC).

22

23 **Q. DOES THE LACK OF APPLICATION-TO-APPLICATION INTERFACE**
24 **CAUSE OTHER PROBLEMS?**

1 A. Yes. MCImetro customer service representatives must log into both their own
2 system and the RBOC's system and they face a greater risk of being unable to
3 access pre-order information at all because one of the systems is down. The greater
4 risk of down time exists because a ALEC will be unable to obtain pre-ordering
5 information and enter orders whenever: 1) BellSouth's back-end systems are down;
6 2) the ALEC's internal systems are down; or 3) LENS is down. BellSouth's retail
7 operation is only delayed by the first of these exigencies. If BellSouth provided an
8 application-to-application interface, on the other hand, MCImetro would be more
9 like BellSouth: it would only be precluded from entering orders when BellSouth's
10 backend systems were down or when MCImetro's own systems were down. In
11 other words, there is more potential for "down" time with LENS than with an
12 application-to-application interface.

13

14 **Q. WHAT DID THE COMMISSION CONCLUDE ABOUT LENS?**

15 A. In the order issued by the Commission in the Section 271 proceedings held in
16 Docket No. 960786-TL (271 Order), the Commission contrasted BellSouth's
17 integrated systems with LENS, which it described as a human-to-machine interface.
18 271 Order, pp. 81, 157.

19

20 **Q. WHAT DID THE FCC CONCLUDE ABOUT LENS?**

21 A. The FCC concluded that
22 new entrants using LENS cannot readily transfer information
23 electronically from LENS to their operations support systems
24 and deploy an integrated pre-ordering and ordering system. In
25 contrast, BellSouth's retail operation uses an integrated pre-

1 ordering and ordering system. Given that BellSouth has
2 chosen not to deploy a machine-to-machine interface for
3 competing carriers and has impeded the efforts of competing
4 carriers to pursue other methods of connecting LENS
5 electronically to their operations support systems and to the
6 EDI interface, we conclude that BellSouth has failed to
7 deploy a system that offers to competing carriers equivalent
8 access to OSS functions for pre-ordering.

9 In re Application of BellSouth Corporation Pursuant to Section 271 of the
10 Communications Act of 1934, as amended, to Provide In-Region, InterLATA
11 Services in South Carolina, CC Docket No. 97-208, December 24, 1997, ¶ 166
12 (FCC South Carolina Order). See also In re Application of BellSouth Corporation
13 Pursuant to Section 271 of the Communications Act of 1934, as amended, to
14 Provide In-Region, InterLATA Services in Louisiana, CC Docket No. 97-231,
15 February 3, 1998, ¶¶ 49-55 (FCC Louisiana Order).

16
17 **Q. DOES THE CGI ENHANCEMENT TO LENS CORRECT ITS**
18 **DEFICIENCIES?**

19 A. No. In the first place, BellSouth has refused to cooperate with MCImetro in
20 providing complete CGI specifications. MCImetro has made repeated requests
21 beginning in May 1997 and extending over a period of months for the LENS
22 specifications that would be necessary for MCImetro to develop the applications
23 needed to connect its systems to LENS. BellSouth first provided a user's guide
24 rather than specifications, then provided several sets of specifications that were
25 incomplete and out of date.

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Only after MCImetro filed an enforcement claim in Georgia in November 1997 seeking (among other things) the CGI specifications did BellSouth provide a more up to date set of specifications on December 15, 1997.

The FCC expressly concluded that MCImetro had requested the CGI specifications, “but that BellSouth has not met its obligation to provide the complete, detailed, and updated specifications that new entrants need to use CGI to connect electronically their operations support systems to BellSouth’s interface.” FCC South Carolina Order ¶ 161. See also FCC Louisiana Order ¶ 54.

Q. HOW DOES MCIMETRO PLAN TO USE THE CGI SPECIFICATIONS?

A. MCImetro wishes to use the CGI interface for the limited purpose of developing an enhanced screen scraping capability for CSRs using the LENS interface, as an interim measure before the development of an industry standard pre-ordering interface.

Q. DO THE CGI SPECIFICATIONS PROVIDED ON DECEMBER 15, 1997 PROVIDE ALL THE NECESSARY INFORMATION?

A. No. MCI’s information technology staff has reviewed the specifications and determined that they lack a CSR record layout and a LENS data dictionary. The specifications do contain some of the information that typically would be found in a CSR record layout or data dictionary, but that information is insufficient for MCI’s development purposes.

1 **Q. PLEASE EXPLAIN WHAT YOU MEAN BY CSR RECORD LAYOUT AND**
2 **DATA DICTIONARY.**

3 A. The CSR record layout is a visual representation of the physical layout of the data
4 contained in a CSR. Usually the CSR record layout is a picture that describes all the
5 field names, field labels, field lengths and their positioning when displayed on a
6 computer screen or when printed on paper. It also describes the positioning of all
7 the fields relative to one another. The data dictionary is a dictionary of all the data
8 elements contained in CSRs provided by LENS as well as all the data elements used
9 to develop the LENS application. A data dictionary is a document presented in a
10 dictionary style, in alphabetical order, beginning with the data element (or term) and
11 followed by its definition including the type of data (such as integer, alpha, string or
12 decimal), attributes, parameters, location within the application, exception rules and
13 examples of usage.

14
15 **Q. WHY DOES MCIMETRO NEED THE CSR RECORD LAYOUT AND LENS**
16 **DATA DICTIONARY?**

17 A. MCImetro is able to obtain CSR data using the CGI interface, but MCImetro has
18 been unable to interpret the data, primarily because it is transmitted as a continuous
19 string of characters with no indication as to how it is to be “parsed” so it can be
20 presented on a computer screen to an MCImetro customer service representative.

21
22 **Q. HAS MCIMETRO REQUESTED BELLSOUTH TO PROVIDE THE CSR**
23 **RECORD LAYOUT AND LENS DATA DICTIONARY?**

24 A. Yes, but BellSouth has refused to provide them.

25

1 **Q. ONCE IMPLEMENTED, WILL THE LENS CGI INTERFACE PROVIDE**
2 **AN ACCEPTABLE PRE-ORDERING INTERFACE?**

3 A. No. The CGI LENS interface is proprietary and nonstandard and subject to the
4 general deficiencies of LENS that I already have described. Unlike an application-
5 to-application interface that operates largely independent of a LENS type front-end
6 system, new development costs would accrue each time that BellSouth changed the
7 functionality of LENS, because this would change the way in which the screen
8 scraper needed to grab data. Further, development of screen scraping is at best a
9 make-shift solution; it is far inferior to use of a standardized application-to-
10 application interface. A screen scraping application would go into BellSouth's
11 backend systems and act as if it were a human using LENS -- it would work through
12 each of the BellSouth screens to grab BellSouth's data and put it into MCImetro's
13 screens. In contrast, an application-to-application interface would grab the data
14 directly with no need to work through BellSouth's screens.

15
16 **Q. HOW DO BELLSOUTH'S INTERNAL SYSTEMS COMPARE TO THE**
17 **OSS IT PROVIDES TO ALECS?**

18 A. The problems I have described relating to LENS generally do not exist in
19 BellSouth's internal systems. BellSouth's systems provide it with superior
20 capabilities with respect to address validation, access to CSR data, telephone
21 number reservation, due date calculation, and determination of feature availability.

22
23 **Q. WHAT PRE-ORDERING SYSTEM SHOULD BELLSOUTH USE INSTEAD**
24 **OF LENS?**

1 A. BellSouth should be required to provide a pre-ordering interface based on emerging
2 industry standards that support security (nonrepudiation) and data integrity that can
3 be integrated with ALECs' ordering systems. Although national standards for
4 electronic interfaces for pre-ordering have not yet been approved, the industry has
5 agreed, through consensus in the ECIC Committee of ATIS, that EDI via TCP/IP
6 SSL3 is an appropriate interim interface for pre-ordering. EDI TCP/IP/SSL3 is a
7 particularly rapid form of EDI that connects the ALEC's systems to the RBOC's
8 system and enables pre-ordering information to be sent in near real-time. The EDI
9 subcommittee already has mapped the vast majority of data elements needed for this
10 interface; it has done so in the process of developing an EDI interface for ordering.
11 Although inferior to the electronic bonding solution that MCI advocates as the long
12 term solution the industry should adopt, EDI TCP/IP/SSL3 is a good solution for
13 pre-ordering for the intermediate term.

14
15 **Q. WHAT POSITION HAS BELLSOUTH TAKEN CONCERNING THE**
16 **ADOPTION OF EDI TCP/IP SSL3?**

17 A. In mid-1997, MCImetro requested BellSouth to discuss the development of EDI
18 TCP/IP SSL3 as a pre-ordering interface. BellSouth informed MCImetro in late
19 1997 that it intends to develop a new interface called the Application Program
20 Interface (API) using another protocol called CORBA. BellSouth has informed
21 MCImetro that the API interface will be designed for medium sized ALECs that do
22 not use the EDI ordering interface. MCImetro has requested that BellSouth also
23 support the EDI TCP/IP/SSL3 protocol, but to date, BellSouth has made no
24 commitment to support it.

25

1 **Q. WHAT IS THE CURRENT STATUS OF MCIMETRO'S ABILITY TO**
2 **INTEGRATE THE PRE-ORDERING AND ORDERING INTERFACES?**

3 A. Today, MCImetro has no effective way of integrating the pre-ordering and ordering
4 functions.

5

6 ***COUNT TWO: FAILURE TO PROVIDE A DOWNLOAD OF THE SAG DATA***

7 **Q. WHY IS THE ADDRESS VALIDATION FUNCTION IMPORTANT?**

8 A. Perhaps the most important pre-order function is address validation. Prior to
9 placing an order a ALEC must validate the customer's address against the RBOC's
10 database to ensure that the address is entered in the exact format present in the
11 RBOC's systems. Even slight differences, such as entering 19th Street instead of
12 19th St., can result in rejection of an order. BellSouth recently has acknowledged
13 that invalid address constitutes the second most common reason for order rejection.
14 Further, MCImetro has been informed by BellSouth that an address must be correct
15 before it can be entered into the E911 database. Orders rejected because of an
16 invalid address increase the cost of doing business and potentially delay a customer's
17 service.

18

19 **Q. DOES BELL SOUTH CURRENTLY PROVIDE AN ACCEPTABLE MEANS**
20 **OF ACCESSING THE RSAG DATA?**

21 A. No. Currently BellSouth requires ALECs to access the Regional Street Address
22 Guide (RSAG) through LENS or Interexchange Carrier Reference Validation
23 (ICREF). Neither of these interfaces provides the RSAG data to ALECs so they
24 can integrate their pre-ordering and ordering functions, and tailor their usage of the
25 data to their own needs. Rather, LENS and ICREF provide on-line access to RSAG

1 data only on a transaction-by-transaction basis for only one address at a time.
2 ALECs remain completely dependent on BellSouth for access to this critical
3 information. Thus, for example, because the address validation system has
4 scheduled outage totaling forty-two hours per week, ALECs are limited by
5 BellSouth's system availability.

6
7 **Q. WHY DOES MCIMETRO NEED A DOWNLOAD OF THE RSAG?**

8 A. A download of the RSAG with periodic updates would allow MCImetro to
9 electronically enter the information into its own system to be available to customer
10 service representatives. That way MCImetro representatives would not have to use
11 the BellSouth system and then re-enter the data manually into the MCImetro system.
12 They could simply use the MCImetro system to validate addresses and thus
13 substantially reduce the risk of rejected orders.

14
15 **Q. HAS MCIMETRO REQUESTED THAT BELL SOUTH PROVIDE A**
16 **DOWNLOAD OF THE SAG DATA?**

17 A. Yes, several times. In response to my initial request for a download of the RSAG,
18 BellSouth stated in an E-Mail dated June 13, 1997 that BellSouth was unable to
19 provide a download because of the size of the RSAG and the daily activity
20 associated with it, and because MCImetro and other ALECs had access to the
21 RSAG through LENS and ICREF. A copy of this E-Mail is attached to my
22 testimony as Exhibit ___ (BG-3). By letter dated June 16, 1997, MCImetro again
23 requested BellSouth to provide SAG data. A copy of this letter is attached as
24 Exhibit ___ (BG-4). By letter dated June 26, 1997, BellSouth responded and again
25 refused to provide a download of the RSAG, stating that BellSouth was "unable to

1 provide the initial SAG data and daily updates in batch form” A copy of this
2 letter is attached as Exhibit ____ (BG-5).

3
4 MCImetro requested a download of the RSAG again by letter dated August 18,
5 1997, in which it was pointed out that MCImetro “is capable of accepting an
6 electronic download of this data via NDM [Network Data Mover] until a regular
7 mechanized daily batch process can be implemented to accommodate daily updates.”

8 A copy of this letter is attached as Exhibit ____ (BG-6). BellSouth responded by
9 letter dated August 20, 1997, stating that “the RSAG database files are extremely
10 voluminous for downloading” and that because the database changes so rapidly, “it
11 would be outdated by the time MCIIm would be in receipt of the database files.”

12 BellSouth further contended, for the first time, that the RSAG technical
13 specifications were proprietary. The letter suggested that MCImetro submit a bona
14 fide request (“BFR”) if it continued to want a download of the RSAG. A copy of
15 this letter is attached as Exhibit ____ (BG-7).

16
17 **Q. WERE BELLSOUTH’S RESPONSES TO MCIMETRO’S REQUESTS**
18 **ACCEPTABLE TO MCIMETRO?**

19 **A.** No. As discussed in the testimony of Ronald Martinez, the Agreement entitles
20 MCImetro to a download of the SAG data with updates the same day changes are
21 made. Access via LENS or ICREF does not comply with the Agreement.

22
23 BellSouth’s unsubstantiated contention that the RSAG is too voluminous cannot
24 justify its refusal to comply with the Agreement. The time for asserting that

1 objection was when the Agreement was negotiated, not when it came time to
2 comply with it.

3

4 Likewise, BellSouth's assertion that the RSAG database changes rapidly does not
5 excuse BellSouth's failure to perform. Indeed, the fact that it changes often only
6 emphasizes MCImetro's need to obtain frequent updated information. The
7 Agreement contemplated that updates would be provided, and MCImetro stands
8 ready to receive updates and incorporate them into its systems.

9

10 BellSouth's claim that the RSAG technical specifications are proprietary lacks
11 validity for similar reasons. BellSouth has failed to state why it considers the
12 specifications to be proprietary, and, in any event, to the extent that the disclosure of
13 proprietary information is necessary for BellSouth to comply with its contractual
14 obligations, BellSouth must make the disclosure.

15

16 Finally, BellSouth's suggestion that MCImetro submit a BFR is misplaced because
17 MCImetro is entitled to a download of the SAG data at no cost, and a BFR only
18 would delay matters. Under the BFR process, MCImetro submits a request to
19 change a service or element provided under the Agreement, and BellSouth submits a
20 firm quote for the requested service or capability within ninety days of receiving the
21 BFR. Agreement, Part A, Exhibit 1. No BFR is necessary to request a download of
22 the SAG data because the Agreement requires that BellSouth provide it.

23

24 **Q. HAS MCIMETRO MADE ANY ADDITIONAL ATTEMPTS TO OBTAIN**
25 **THE SAG DATA?**

1 A. Yes. By letter dated September 18, 1997, MCI Regional Vice President Marcel
2 Henry requested BellSouth to provide the RSAG. A copy of this letter is attached
3 to my testimony as Exhibit ___ (BG-8). BellSouth initially responded by letter
4 dated October 10, 1997, in which it stated that "BellSouth is open to working with
5 MCI to understand the information that MCI needs out of RSAG and to develop the
6 time and costs required to develop this enhancement." A copy of this letter is
7 attached as Exhibit ___ (BG-9). Then, by letter dated November 13, 1997,
8 BellSouth Interconnection Services President Mark Feidler stated that "[w]ithin the
9 next two weeks, BellSouth will be able to provide you cost estimates and the time
10 and price for developing the detailed design, project plan, and a firm quote for the
11 overall delivery." A copy of this letter is attached as Exhibit ___ (BG-10).

12

13 **Q. DID BELL SOUTH EVENTUALLY GIVE A QUOTE FOR PROVIDING A**
14 **DOWNLOAD OF THE RSAG?**

15 A. Yes. By letter dated December 2, 1997, BellSouth proposed to provide an extract
16 of the RSAG database based on the following cost structure: \$30,000 for a project
17 plan, a timeline and a final proposal; \$538,030 for total start-up costs for the new
18 connections; and \$8,650 per month on an ongoing basis. A copy of this letter is
19 attached as Exhibit ___ (BG-11). By letter dated December 16, 1997, MCI metro
20 rejected this proposal because the Agreement entitles MCI metro to obtain a
21 download of the RSAG at no cost. A copy of this letter is attached as Exhibit ___
22 (BG-12). MCI metro restated its position in the December 24 letter and BellSouth
23 again rejected it in the February 11 letter.

24

1 **Q. WHAT RELIEF DOES MCIMETRO REQUEST CONCERNING COUNT**
2 **TWO?**

3 A. MCImetro is requesting that BellSouth be required to provide download of the
4 RSAG to MCImetro and then provide downloads of changes to the RSAG on the
5 same day as the changes to the data are made, at no cost to MCImetro. MCImetro
6 also is requesting that BellSouth be required to provide a description of the RSAG
7 data base, including but not limited to a database layout specifically identifying all
8 database fields.

9

10 ***COUNT THREE: FAILURE TO PROVIDE PARITY IN DUE DATE INTERVALS***

11 **Q. WHAT DOES THE DUE DATE FUNCTION ENABLE A CUSTOMER**
12 **SERVICE REPRESENTATIVE TO DO?**

13 A. The due date function enables a customer service representative to tell the customer
14 when he or she can expect service to be turned up. To provide this information
15 accurately to the customer over the telephone, the customer service representative
16 must be able to access due date information electronically through an application-to-
17 application interface and then submit an order electronically that immediately is
18 processed by BellSouth's systems.

19

20 **Q. PLEASE DESCRIBE YOUR UNDERSTANDING OF HOW BELLSOUTH'S**
21 **CUSTOMER SERVICE REPRESENTATIVES ARE ABLE TO**
22 **CALCULATE DUE DATES.**

23 A. For BellSouth's own customer service representatives, BellSouth's systems
24 calculate due dates based on the availability of BellSouth's work force, the type and
25 size of a customer's order and other factors. The customer service representative

1 can then quote that due date over the phone to the customer. On the screen
2 presented to a BellSouth customer service representative in BellSouth's Regional
3 Navigation System (RNS), the first available due date is automatically calculated
4 and highlighted in green. In addition, because a BellSouth order flows immediately
5 from pre-ordering to ordering, the due date calculation will not have changed by the
6 time the order is submitted, so the due date can be quoted much more confidently to
7 the customer. My understanding is that BellSouth's system for business orders
8 works much the same way, although it is not as user friendly.

9
10 **Q. DOES BELLSOUTH PROVIDE THE SAME DUE DATE FUNCTIONALITY**
11 **TO MCIMETRO?**

12 A. No. LENS has no method of calculating due dates for unbundled network element
13 (UNE) orders. None of the due date information in LENS applies to UNEs. To the
14 extent MCImetro relies on a UNE-based entry strategy, therefore, it will lack the
15 same capabilities that BellSouth affords itself.

16
17 If MCImetro were to pursue a resale strategy (which it does not intend to do under
18 current conditions), the due date capability available to it would not be much better.
19 In the past, BellSouth has indicated that its Direct Order Entry Support Applications
20 Program (DSAP) used by BellSouth representatives is available for use by ALECs.
21 This is only true, however, if ALECs are using LENS for ordering. Because
22 MCImetro will not be using LENS for ordering, MCImetro will not have access to
23 BellSouth's due date calculation function.

24

1 **Q. PLEASE DESCRIBE THE DUE DATE RESERVATION FUNCTION IN**
2 **THE INQUIRY MODE OF LENS.**

3 A. In reality, MCImetro only will have access to LENS' own interval calendar for pre-
4 ordering (provided in the inquiry rather than the firm order mode of LENS). In
5 order to use this function, however, an MCImetro customer service representative
6 must rely on a cumbersome presentation screen to manually calculate a due date
7 after taking into account several separate pieces of information -- typically
8 installation intervals, normal working days, and days the particular end office may be
9 closed. Finally, because there is a gap between MCImetro's use of pre-ordering
10 functions and submission of an MCImetro order, by the time MCImetro submits the
11 order, the dates calculated as available using LENS might no longer be available.
12 As a result, MCImetro cannot reliably quote this date to its customer.

13

14 **Q. WHAT HAS THE COMMISSION CONCLUDED WITH RESPECT**
15 **BELLSOUTH'S DUE DATE RESERVATION FUNCTION OFFERED TO**
16 **MCIMETRO?**

17 A. The Commission twice concluded that "BellSouth has not offered an efficient due
18 date recognition system for LENS users." 271 Order, pp. 81, 158.

19

20 **Q. WHAT HAS THE FCC CONCLUDED WITH RESPECT TO**
21 **BELLSOUTH'S DUE DATE RESERVATION FUNCTION OFFERED TO**
22 **ALECS?**

23 A. The FCC recently agreed that BellSouth does not offer nondiscriminatory
24 access to due dates. FCC South Carolina Order ¶ 167; FCC Louisiana
25 Order ¶ 56. As the FCC stated:

1 New entrants do not obtain actual due dates from
2 LENS during the pre-ordering stage. Instead, the
3 actual, firm due date is assigned once BellSouth
4 processes the order through SOCS. A new entrant
5 therefore will not be informed of the actual due date
6 until it receives a firm order confirmation (FOC) from
7 BellSouth.

8 FCC South Carolina Order ¶ 168. See also Louisiana Order ¶ 56. The FCC
9 went on to note in the South Carolina case that even though BellSouth
10 representatives do not receive actual due dates, they can be confident of the
11 due dates they quote customers because their orders are processed without
12 the same delays that ALECs experience. Because of these delays, ALECs
13 cannot give dates to customers with the same confidence. FCC South
14 Carolina Order ¶ 168; FCC Louisiana Order ¶ 57.

15
16 **Q. HAS MCIMETRO ATTEMPTED TO RESOLVE THIS ISSUE WITH**
17 **BELLSOUTH?**

18 A. Yes. In its December 24 letter, MCImetro requested that BellSouth provide
19 through a system-to-system interface the capability to determine due dates efficiently
20 and to expedite those due dates when appropriate. In its February 11 letter,
21 BellSouth did not agree to comply with this request.

22
23 **Q. WHAT RELIEF DOES MCIMETRO REQUEST CONCERNING COUNT**
24 **THREE?**

1 A. MCImetro is requesting that BellSouth be required to provide to MCImetro the
2 same capability to calculate due dates that BellSouth has through a system that can
3 be integrated with MCImetro's ordering system.

4

5 ***COUNT FOUR: FAILURE TO PROVIDE PARITY IN ACCESS TO TELEPHONE***
6 ***NUMBERS AND TELEPHONE NUMBER INFORMATION***

7 **Q. DOES BELLSOUTH PROVIDE NONDISCRIMINATORY ACCESS TO**
8 **THE TELEPHONE NUMBER RESERVATION FUNCTION?**

9 A. No. LENS does not permit MCImetro to integrate the telephone number
10 reservation function with its ordering system. With LENS, MCImetro encounters
11 the problems of dual data entry and dependence on the availability of LENS. In
12 RNS and BellSouth's DOE system for business orders, the telephone number
13 reservation function is integrated with the ordering function.

14

15 **Q. IS THE TELEPHONE NUMBER RESERVATION FUNCTION**
16 **DISCRIMINATORY IN ANY OTHER RESPECT?**

17 A. Yes. LENS only allows a customer service representative to reserve a maximum of
18 six telephone numbers at a time for a customer (as compared to 25 telephone
19 numbers that can be reserved by BellSouth for its customers). LENS is therefore
20 particularly cumbersome to use for big business customers. In contrast to the
21 process that MCImetro must follow in LENS, a BellSouth customer service
22 representative using RNS automatically sees an "assigned" telephone number which
23 he or she can offer to the customer; only if the customer does not want this number
24 does the BellSouth representative have to use the number reservation function.

25

1 **Q. HOW DOES THE ABILITY OF BELLSOUTH REPRESENTATIVES TO**
2 **VIEW NXX CODES COMPARE TO THAT OF ALEC**
3 **REPRESENTATIVES?**

4 A. In offering customers a choice of numbers, an ALEC has no way of viewing the
5 NXX codes available to the customers; in contrast, a BellSouth representative using
6 RNS can easily view such codes. This is also true in BellSouth's business system
7 DOE as can easily be seen by comparing the number reservation screen in DOE with
8 the comparable screen in LENS.

9

10 **Q. WHAT DID THE COMMISSION CONCLUDE CONCERNING**
11 **TELEPHONE NUMBER ISSUES?**

12 A. The Commission concluded that an ALEC cannot reserve the same number of phone
13 numbers through LENS as BellSouth can in RNS; that RNS, unlike LENS,
14 automatically assigns a phone number when an order is being taken for a new
15 customer; and unlike RNS and DOE, LENS does not provide a list of available
16 NXXs for a specific address. 271 Order, pp. 82, 157.

17

18 **Q. HAS MCIMETRO ATTEMPTED TO RESOLVE THESE ISSUES WITH**
19 **BELLSOUTH?**

20 A. Yes. MCImetro raised these issues in its December 24 letter. In its February 11
21 response, BellSouth did not address these issues.

22

23 **Q. WHAT RELIEF DOES MCIMETRO REQUEST CONCERNING COUNT**
24 **FOUR?**

1 A. MCImetro is requesting that BellSouth be required to permit MCImetro to reserve
2 telephone numbers through a system that can be integrated with MCImetro's
3 ordering system. Further, MCImetro is requesting that BellSouth be required to
4 permit MCImetro to reserve the same number of telephone numbers per order as
5 BellSouth and to provide the same NXX information that is provided to BellSouth
6 representatives.

7

8 ***COUNT FIVE: FAILURE TO PROVIDE PARITY IN ACCESS TO USOC***
9 ***INFORMATION***

10 **Q. WHAT ARE USOCS AND WHAT IS THEIR SIGNIFICANCE?**

11 A. "USOCs" are Universal Service Order Codes corresponding to BellSouth service
12 features. BellSouth has acknowledged that it is essential for ALECs to have
13 accurate information on USOCs and associated field identifiers (FIDs) so they can
14 place valid orders. There are thousands of USOCs. BellSouth recently has
15 acknowledged that USOC and FID errors are the most common cause of rejected
16 orders. To have accurate information on USOCs and FIDs, an ALEC must know
17 the states in which a specific USOC is valid and which FIDs are associated with
18 each USOC.

19

20 **Q. HOW DOES BELLSOUTH PROVIDE USOC AND FID INFORMATION TO**
21 **MCIMETRO?**

22 A. Currently, BellSouth provides USOCs and FIDs in the Local Ordering Guide ("LEO
23 Guide") and provides the USOCs on a website. The USOC list on the BellSouth
24 web page does not indicate the states in which the USOCs are valid, and thus the
25 web page list must be used in conjunction with another source -- the LEO Guide.

1 The website also does not list FID information, so the LEO Guide must be
2 referenced to obtain that data as well. This process of referencing two different
3 sources for the necessary USOC and FID information is cumbersome and inefficient.
4 To make matters worse, updates to the USOC website do not highlight changes,
5 making it more difficult for MCImetro to incorporate BellSouth's information into
6 MCImetro's own systems.

7

8 **Q. CAN MCIMETRO INTEGRATE USOC INFORMATION INTO ITS**
9 **SYSTEMS BY DOWNLOADING USOC INFORMATION FROM THE**
10 **WEBSITE?**

11 A. No. MCImetro is not able to download USOCs from the website such that USOC
12 information can be integrated into its front-end pre-ordering systems.

13

14 **Q. HOW DO BELLSOUTH REPRESENTATIVES OBTAIN ACCESS TO**
15 **USOC AND FID INFORMATION?**

16 A. MCImetro suspects that BellSouth customer service representatives have electronic
17 access to computer databases with USOC (and perhaps FID) information. In any
18 event, ALECs are experiencing much higher rejection rates than are BellSouth's
19 retail units and USOCs are the biggest culprit. Whether BellSouth's advantage
20 derives from having substantial USOC information in its computer databases or a
21 workforce that has been trained over the years to master the idiosyncrasies of
22 USOCs and FIDs, the playing field currently is not level.

23

24 **Q. HAS MCIMETRO ATTEMPTED TO RESOLVE THE USOC ISSUE WITH**
25 **BELLSOUTH?**

1 A. Yes. In its December 24 letter, MCImetro requested that BellSouth provide via
2 electronic transmission a description or definition of each of its USOCs along with
3 other pertinent information. In its February 11 letter, BellSouth did not agree to
4 take this action.

5

6 **Q. WHAT RELIEF DOES MCIMETRO REQUEST CONCERNING COUNT**
7 **FIVE?**

8 A. If ALECs are to overcome the obstacles created by BellSouth's ordering system,
9 they must obtain USOC and FID information in a format that they can incorporate
10 into their systems and use efficiently. Accordingly, MCImetro is requesting that
11 BellSouth should be ordered to provide MCImetro via fixed format NDM a
12 description or definition of each of its USOCs, including the required field identifiers
13 and their descriptions and the states in which the USOCs are valid. BellSouth
14 should be required to update this information on a biweekly basis and should give
15 notice of the implementation or deactivation of a USOC forty-five days in advance.

16

17 ***COUNT SIX: FAILURE TO PROVIDE CUSOMER SERVICE RECORD***
18 ***INFORMATION***

19 **Q. IS BELLSOUTH PROVIDING NONDISCRIMINATORY ACCESS TO CSR**
20 **DATA?**

21 A. No. BellSouth has made a decision not to include all of the information in its CSRs
22 in LENS. As a result of BellSouth's business decision, LENS does not provide
23 access to CSRs at parity. LENS only provides ALECs access to a subset of the
24 information available to a BellSouth customer service representative who accesses a
25 CSR. For example, BellSouth initially provided pricing information on CSRs, but

1 now strips that information off CSRs provided to ALECs. BellSouth categorizes
2 CSR information as necessary (which is provided to ALECs) and unnecessary or
3 proprietary (which is not). BellSouth claims that ALECs do not need the additional
4 information. But ALECs may be able to use this information to design new services
5 BellSouth has not even thought of. It is not for BellSouth to decide that ALECs do
6 not need information to which BellSouth itself has access. One of the major
7 potential benefits of competition is the possibility of innovation in services offered.

8

9 **Q. HAS MCIMETRO ATTEMPTED TO RESOLVE THIS ISSUE WITH**
10 **BELLSOUTH?**

11 A. Yes. In its December 24 letter, MCImetro requested BellSouth to provide
12 additional CSR data that BellSouth has been withholding. In its February 11 letter,
13 BellSouth refused to provide any additional information.

14

15 **Q. WHAT RELIEF DOES MCIMETRO REQUEST CONCERNING COUNT**
16 **SIX?**

17 A. MCImetro has requested that BellSouth be required to provide MCImetro with
18 access to all CSR data, except such data as BellSouth can prove it is not authorized
19 to release by its customers or under applicable law, rule or regulation.

20

21 **ORDERING AND PROVISIONING CLAIMS**

22 ***COUNT SEVEN: FAILURE TO PROVIDE PARITY IN SERVICE JEOPARDY***
23 ***NOTIFICATION***

24 **Q. IN THE CONTEXT OF COUNT 7 OF THE COMPLAINT, WHAT DOES**
25 **THE TERM JEOPARDY MEAN?**

1 A. A jeopardy situation occurs when a customer's order cannot be completed on the
2 due date. BellSouth divides jeopardy notifications into "missed appointment"
3 jeopardies and "service" or "facilities" jeopardies. Missed appointment jeopardies
4 involve situations in which, for example, the customer is not home when the
5 technician comes out to install service. Service jeopardies involve situations in
6 which, for example, fulfilling the order will take longer than anticipated because
7 BellSouth finds out that it lacks outside plant and must install such plant before
8 completing the order.

9

10 **Q. WHY DOES MCIMETRO NEED TO RECEIVE NOTICE OF SERVICE**
11 **JEOPARDIES?**

12 A. It is critical for MCI metro to receive notice of service jeopardies so it can notify its
13 customers immediately and track the status of its orders accurately.

14

15 **Q. HOW HAS BELLSOUTH AGREED TO NOTIFY MCIMETRO OF MISSED**
16 **APPOINTMENTS?**

17 A. BellSouth has agreed to provide missed assignment jeopardies via EDI, although I
18 should note that to date that notification process is untested by MCI metro.

19

20 **Q. HOW DOES BELLSOUTH'S NOTIFICATION TO MCIMETRO OF**
21 **SERVICE JEOPARDIES COMPARE TO THE NOTICE BELLSOUTH**
22 **PROVIDES TO ITSELF?**

23 A. BellSouth provides notice of service jeopardies to its customer service
24 representatives who call BellSouth's customers, and to other representatives who
25 call MCI metro. ALECs thus cannot relay jeopardy notifications to their customers

1 as rapidly and efficiently as BellSouth. The relevant comparison is what BellSouth
2 provides to ALECS versus what it provides to itself, not versus what BellSouth
3 provides to its customers. The disparity in notification is made worse because
4 MCImetro is unable to track orders once they have been submitted. BellSouth's
5 policy is to continue working on an order as long as possible and not to give notice
6 of a problem to an ALEC until it becomes clear that the order cannot be installed on
7 time. Such notice usually is given on the day the order is scheduled to be installed.

8
9 **Q. WHAT IS THE IMPACT OF MCIMETRO NOT RECEIVING TIMELY**
10 **NOTIFICATION OF SERVICE JEOPARDIES?**

11 A. The manual process for informing MCImetro of service-based jeopardies will
12 negatively impact MCImetro, which may not receive notice of the changed due date
13 in sufficient time to notify its customers. When the customers call MCImetro to find
14 out why their service has not been turned up MCImetro will not know the reason.
15 Not only will this anger the customer, but MCImetro will have to waste time and
16 money attempting to track down the status of the order.

17
18 **Q. HAS MCIMETRO REQUESTED ELECTRONIC NOTIFICATION OF**
19 **SERVICE JEOPARDIES?**

20 A. Yes. In an E-Mail dated August 18, BellSouth stated that it had the capability to
21 support jeopardy notifications via EDI. I responded by E-Mail dated August 21,
22 1997, requesting that BellSouth provide specifications and sample transactions for
23 mechanized jeopardy notices. Copies of these E-Mails are attached as Exhibits ____
24 (BG-13) and ____ (BG-14), respectively. Follow-up requests were made by letters
25 dated August 27 and September 18, 1997, copies of which are attached as Exhibits

1 ___ (BG-15) and ___(BG-8), respectively. BellSouth refused to provide the
2 requested specifications and sample transactions, and informed MCImetro that it
3 would not provide notification of service jeopardies via EDI after all. BellSouth
4 stated this position formally in a letter dated October 10, 1997, a copy of which is
5 attached as Exhibit ___ (BG-9).

6
7 **Q. DOES THE LACK OF A NATIONAL STANDARD FOR JEOPARDIES**
8 **EXCUSE BELLSOUTH'S REFUSAL TO PROVIDE NOTIFICATION FOR**
9 **SERVICE JEOPARDIES VIA EDI?**

10 A. No. BellSouth provides notification for missed appointment jeopardies via EDI
11 even though no national standard exists, and should do the same with respect to
12 service jeopardies.

13
14 **Q. WHAT RELIEF DOES MCIMETRO REQUEST CONCERNING COUNT**
15 **SEVEN?**

16 A. MCI is requesting that BellSouth be required to provide commercially functional
17 EDI support for service jeopardy notifications.

18
19 ***COUNT EIGHT: FAILURE TO PROVIDE FOCs IN COMPLIANCE WITH THE***
20 ***INTERCONNECTION AGREEMENT***

21 **Q. WHAT IS AN FOC?**

22 A. FOC stands for "firm order confirmation." After an MCImetro order has been
23 processed, BellSouth sends MCImetro an FOC, which verifies that the order has
24 been accepted and includes the date on which service installation is to occur.

25

1 Q. **BASED ON MCIMETRO'S RECORDS, HOW LONG IS IT TAKING**
2 **BELLSOUTH TO SEND FOCs TO MCIMETRO?**

3 A. As noted in a letter from MCI to BellSouth dated January 28, 1998, MCI metro has
4 experienced substantial delays in receiving FOCs from BellSouth for orders for of
5 off-net T1s (lines used to connect the customer's premises to BellSouth's network)
6 for MCI metro local customers. A copy of that letter is attached as Exhibit ____
7 (BG-16). As noted in the letter, data collected by MCI over the seven month period
8 ending December 1997 reveals that the average time for BellSouth to return FOCs
9 on orders for off-net for MCI metro local customers was more than seven days. This
10 data was collected for four states, including Florida.

11

12 Q. **SINCE THE JANUARY 28, 1998 LETTER WAS WRITTEN, HAS**
13 **MCIMETRO COLLECTED ADDITIONAL DATA?**

14 A. Yes, based on a sample of 356 ASRs submitted during the first quarter of this year,
15 the average time to receive an FOC was 5.48 days. That record of performance
16 remains highly unsatisfactory.

17

18 Q. **WHAT RELIEF DOES MCIMETRO REQUEST CONCERNING COUNT**
19 **EIGHT?**

20 A. MCI metro is requesting that BellSouth be required to modify its OSS to provide
21 FOCs within the timeframes specified in the Agreement.

22

23 Q. **DOES THIS CONCLUDE YOUR TESTIMONY?**

24 A. Yes, at this time.

25

December 24, 1997

724 - FEDEX
800847264167

Mr. Mark L. Feidler
President - Interconnection Services
BellSouth Telecommunications, Inc.
Suite 4511
675 West Peachtree Street
Atlanta, GA 30375

Dear Mr. Feidler:

As we have discussed, there are a number of open issues between our companies concerning BellSouth's provision of local service capabilities to MCI. Some of those issues were addressed in the Florida Public Service Commission's November 19, 1997 order rejecting BellSouth's Section 271 application and clarifying the obligations BellSouth must meet as a prerequisite to entering the in-region long distance market. The Commission addressed deficiencies in BellSouth's systems relating to Operations Support Systems ("OSS"), interconnection, unbundled network elements ("UNEs"), directory assistance, reciprocal compensation, resold services and performance measures. Although MCI does not agree with all of the conclusions reached in the order, the order provides a useful starting point in addressing some (but certainly not all) of the issues that have arisen under our Interconnection Agreement.

A discussion of the issues identified in the Florida Commission order follows. Although this discussion necessarily focuses on changes we wish to be made in Florida, we request that these changes be made outside Florida on a nationwide basis as well. Please respond to this letter by January 8, 1998. In your response, please state in detail BellSouth's plan for addressing each of the problems discussed below and confirm that these solutions will be implemented no later than January 31, 1998 (unless otherwise specified below). If it is BellSouth's position that a solution for a particular problem cannot be put in place by January 31, please provide a detailed explanation why and state when the problem will be remedied.

1. OSS

A. General requirements

The Florida Commission required BellSouth to demonstrate that its interfaces provide nondiscriminatory access to OSS functions. The Commission identified four characteristics of a nondiscriminatory interface:

- 1) The interface must be electronic: The interface must require no more human or manual intervention than is necessarily involved for BellSouth to perform a similar transaction itself.

- 2) The interface must provide the capabilities necessary to perform functions with the same level of quality, efficiency, and effectiveness as BellSouth provides to itself.
- 3) The interface must have adequate documentation to allow an ALEC to develop and deploy systems and processes, and to provide adequate training to its employees.
- 4) The interface must be able to meet the ordering demand of all ALECs, with response times equal to that which BellSouth provides itself.

Order, pp. 97, 174. The Commission concluded that none of the OSS functions provided by BellSouth meet these criteria. As a first step in moving toward compliance, MCI requests that BellSouth provide a detailed listing of all OSS systems that BellSouth uses, along with technical specifications for each system, and a detailed listing of each of the data bases that are used by BellSouth's OSS systems, along with a description of each data base (including data base layouts). That information will enable MCI to determine the capabilities that BellSouth provides itself and thus what is required for parity of service.

B. Pre-ordering

The Commission determined that BellSouth must provide a pre-ordering interface that is integrated with the EDI ordering interface. Order, pp. 92, 167. As you know, MCI has sought to meet with BellSouth to discuss the implementation of an interface for pre-ordering using EDI TCP/IP SSL3 that would be integrated with the EDI ordering interface. We now repeat our request that our companies meet and begin discussing how to implement an interface using this protocol.

The Commission also noted deficiencies in the following areas:

- 1) LENS requires multiple address validations for the same fields in different screens. In accordance with the Commission's order, MCI requests that any pre-ordering interfaces offered by BellSouth not require multiple address validations. On a related point, MCI previously has requested that BellSouth provide a download of the RSAG, as required by our Interconnection Agreement, so that we may remedy other address validation problems we have encountered. In response, BellSouth has offered to sell MCI an extract from the RSAG for an amount exceeding \$500,000 plus recurring charges. Under our interconnection agreement, MCI is entitled to obtain a download of the RSAG at no additional cost, and we repeat our request that it be provided on that basis.



- 2) No on-line customer credit checking capability and limited availability of customer service records. In addition to the problems identified by the Commission, MCI notes that BellSouth's system is deficient in that BellSouth refuses to provide CSR data that it unilaterally deems to be proprietary or unnecessary. Further, CSR access is limited to fifty pages of data and CSR information is not fielded, which means that MCI cannot load and edit CSR data and use the data to generate orders. Please redress these problems.
- 3) BellSouth can reserve more telephone numbers than ALECs. BellSouth's RNS system permits it to reserve up to twenty-five numbers per order, as compared to six for ALECs. Moreover, unlike the system afforded to ALECs, RNS automatically assigns numbers for its customers and provides BellSouth representatives with lists of available NXXs. In addition, BellSouth has a list of available vanity numbers that it does not provide to ALECs. We request BellSouth afford these same capabilities to MCI.
- 4) Cumbersome and inefficient methods of locating long distance company, and product and service information selected by customer. In addition to addressing the problems specifically identified by the Commission, MCI requests that BellSouth provide via fixed format NDM a description or definition of each of its USOCs, including the required field identifiers and their descriptions and the states in which the USOCs are valid. This information should be updated on a biweekly basis and should give notice of the implementation or deactivation of a USOC forty-five days in advance.
- 5) LENS does not provide access to calculated due dates in the inquiry mode. BellSouth should provide in a system-to-system interface the capability to determine due dates efficiently and to expedite those due dates when appropriate.

C. Ordering and provisioning

The Commission ruled that a number of problems in BellSouth's ordering and provisioning systems require improvement. Order, pp. 83-94, 158-68. These problems are discussed below:

- 1) EDI does not have electronic edit capability at parity with BellSouth's RNS and DOE systems. Because we intend to order via EDI, we are particularly concerned with the functionality of that interface. We request that BellSouth provide the same on-line editing capability in EDI that BellSouth has for itself. On a related point, please provide a detailed description of how order rejections are handled and a list of all reasons that both fatal and non-fatal errors occur, including descriptions and error codes.



- 2) No order summary screen exists in EDI as in RNS. BellSouth should provide access to pending orders in its systems, a recap of the services ordered on the FOC and a recap of the services installed on the completion notice.
- 3) ALECs cannot access or make changes to pending orders. We request that BellSouth provide the capability to change pending orders at parity with what BellSouth provides itself. Further, please (i) provide the business rules for making changes to existing orders; (ii) the circumstances that will cause due dates to be changed on a pending order when a change is submitted; and (iii) a detailed description of the process used to make changes to pending orders.
- 4) BellSouth has not provided requesting carriers with the technical specifications of the interfaces. We have requested CGI specifications before and twice BellSouth has provided outdated specifications that are of little use. BellSouth recently has provided another set of CGI specifications that we are now reviewing. Once we have completed our review, we will inform you if further action is necessary.
- 5) Interfaces are not fully electronic or integrated, and require manual intervention. Measures needed to integrate BellSouth's and MCI's systems include (but are not limited to) the following: (i) supplemental orders should be processed mechanically without human intervention; (ii) ordering for complex services should be automated; (iii) ALECs should have systems available that allow ALECs to determine if loops and lines are ISDN capable; (iv) service orders for all unbundled loops, unbundled ports, transport and loop/port combinations should be mechanically generated and should flow through BellSouth's systems without manual intervention; and (v) the percentage of POTS resale orders processed mechanically for ALECs should be increased to equal the percentage of BellSouth POTS orders processed mechanically. Please provide MCI with these capabilities.
- (6) Sufficient capacity to meet demand. MCI concurs with the Commission's conclusion that BellSouth's system lacks sufficient capacity and requests that sufficient capacity be provided.
- (7) Installation intervals not at parity with BellSouth. Performance measures and standards are discussed below.

D. Maintenance and repair

The Florida Commission concluded that BellSouth must provide ALECs with the technical specifications of TAFI so that ALECs can integrate their OSS with BellSouth's OSS for maintenance and repair. Order, pp. 94-96, 168-69. Please comply with this requirement.

E. Billing

The Commission concluded that BellSouth cannot render accurate bills for resold services. Order, p. 171. Please remedy this problem, or, if it already has been fixed, provide the date on which it was fixed.

Because the Commission dealt with UNE billing issues together with other UNE issues, we will follow suit and deal with those issues under the UNE heading below.

2. Interconnection

1. Collocation

The Commission notes that "in Docket No. 960846-TP, we specifically allowed MCI to interconnect with other collocators who are interconnected with BellSouth in the same central office; to purchase unbundled dedicated transport from BellSouth between the collocation facility and MCI's network; to collocate subscriber loop electronics in a BellSouth central office; and to select virtual over physical collocation, where space and other considerations permit." Order, p. 44. Please provide the methods and procedures necessary to perform these functions.

2. Network blockage and End Office Trunking

The Commission required BellSouth to "provide ALECs with more frequent and better data on their traffic over BellSouth's network"; "to demonstrate that any blockages experienced by ALECs are not excessive in comparison to the blockages experienced by BellSouth"; to work together with ALECs to improve intercompany communications; and to "provide data sufficient to show that blockage levels are comparable between BellSouth and ALEC traffic." Order, p. 59. Accordingly, please provide the most recent three months of blockage data on all common trunk groups utilized for ALEC traffic that experienced blockage; for the same three month period, blockage data on all of MCI's interconnection trunk groups from your end offices and tandems to our points of termination that experienced blockage; for the same three month period, blockage data on all ALEC interconnection trunk groups from your end offices and tandems to ALEC points of termination that experienced blockage; and for the same three month period, similar blockage data on all trunks carrying BellSouth local traffic. Please provide the same information on a month-to-month basis going forward.



3. Local Tandem Interconnection

The Commission made clear that BellSouth must provide interconnection at its local tandems without requiring a BFR. Order, p. 60. Previously, BellSouth had made inconsistent statements as to whether it would allow such interconnection. Please confirm that BellSouth will permit MCI to interconnect at BellSouth's local tandems, and please provide all information necessary to permit us to do so. Further, please confirm that, once MCI is interconnected at the BellSouth local tandem, MCI's traffic will travel on the same trunk groups as BellSouth's local traffic and that all existing independent telephone company local and EAS traffic routes served by the local tandem will be identified and made available to MCI traffic.

3. Unbundled Network Elements

The Commission required BellSouth to provide mechanized billing statements for usage sensitive UNEs in a CABS formatted billing statement. Order, pp. 76-77. Please begin providing UNE bills in a CABS format.

The Commission further required BellSouth to provide access usage detail to requesting carriers. Order, p. 77. As you know, this issue is already the subject of a pending action. In light of the Commission's order, however, we again request that BellSouth provide this information on a going-forward basis and provide the historical data that should have been provided on all UNEs from the time of installation.

4. Directory Assistance

The Florida Commission determined that BellSouth is not providing all directory listings to requesting carriers, specifically listings from other local exchange companies. Order, pp. 117, 119. Our agreement provides that "BellSouth shall provide to MCI, to the extent authorized, the residential, business and government subscriber records used by BellSouth to create and maintain its Directory Assistance Data Base, in a non-discriminatory manner." Interconnection Agreement, Attachment VIII, § 6.1.6.1. Under the Federal Act, BellSouth not only is authorized but is required to provide the directory listings it has for the customers of other telephone companies. MCI requests that BellSouth provide these listings as required by our agreement.

5. Reciprocal Compensation

In its discussion of the reciprocal compensation issue, the Commission acknowledged the dispute that has arisen concerning ISP traffic – that is whether MCI and other ALECs are entitled to compensation for traffic originating from BellSouth customers and routed to an ALEC's ISP customer. The Commission did not resolve this dispute, although it did express concern over the allegations that BellSouth failed to comply with contractual dispute resolution procedures.



For several months, BellSouth has been withholding funds that should have been paid to MCI in reciprocal compensation for the termination of local traffic. Please pay all amounts due by December 31, 1997 and confirm that BellSouth will pay all amounts due for reciprocal compensation (including amounts due for ISP traffic) in the future.

6. Resale Services

The Commission addressed the following resale issues, in addition to the OSS issues discussed above:

A. Services not being provided on an a branded or unbranded basis to MCI

The Commission noted that the Interconnection Agreement provides that BellSouth will brand all services at every point of customer contact exclusively as MCI services unless MCI requests that the services be unbranded. Order, pp. 171-72. Please confirm that BellSouth is prepared to provide voice mail, operator services and directory assistance on an MCI branded basis. In this connection, please note compliance with the agreement should not require the use of selective routing, because these calls already are routed to the BellSouth operator platform.

The branding or unbranding requirement of the Interconnection Agreement also applies to BellSouth's softdial product known as QuickService. As you know, this product permits a customer whose telephone line has been disconnected to call 911. If the customer dials any other three digits, QuickService provides a recording informing the customer that he or she should call BellSouth or another local service provider. This recording should be unbranded so that there is no reference to BellSouth.

BellSouth also is required to provide its 611 service on an unbranded basis as provided in our Interconnection Agreement, but to date has not done so. (See Attachment VIII, § 5.1.14.) MCI requests that BellSouth begin complying with this requirement.

B. Parity in conversions

The Commission ruled that BellSouth is not providing parity with respect to customer conversions. Order, p. 175. Please rectify this problem.



7. Performance Measurements

The Commission found that "BellSouth should provide performance measures that are clearly defined, permit comparison with BellSouth retail operations, and are sufficiently disaggregated to permit meaningful comparison." BellSouth was required to provide statistically valid commercial usage data showing:

- A. average installation intervals for resale;
- B. average installation intervals for loops;
- C. comparative performance information for unbundled network elements;
- D. service order accuracy and percent flow through;
- E. held orders and provisioning accuracy;
- F. bill quality and accuracy; and
- G. repeat trouble reports for unbundled network elements.

Order, pp. 185-86.

The Commission also required BellSouth to "provide the necessary historical data to facilitate the establishment of initial benchmarks" that "should, at a minimum, address all of the functions listed in the LCUG." Order, p. 185. Please begin providing the performance measures and standards information required by the Commission. We request that BellSouth disaggregate this information in accordance with the LCUG Service Quality Measures report, including geographic disaggregation by state, city and wire center. In addition, we request that BellSouth provide the performance measures and standards information required by the Interconnection Agreement in a mutually agreed upon format.

We look forward to your response specifying how BellSouth plans to address these concerns, must be resolved in order for MCI to enter the local market in an effective manner.

Sincerely,

A handwritten signature in black ink that reads "Marcel Henry". The signature is written in a cursive, flowing style.

Marcel Henry

MLH/mle

W. Scott Schaefer
President Interconnection Services
Suite 4511
675 West Peachtree Street, N.E.
Atlanta, Georgia 30375

February 11, 1998

Marcel Henry
Regional Vice President
Southern Financial Operations
Two Northwinds Center - 5th Floor
2520 Northwinds Parkway
Alpharetta, GA 30004

Dear Mr. Henry:

This is a follow-up to Mark Feldler's January 8, 1998 letter in which he stated that BellSouth would provide a point-by-point response to the issues raised in your December 24, 1997 letter. As he mentioned in his initial response, BellSouth strongly disagrees with MCI's assertion that BellSouth's position on these issues in any way affects MCI's entry into the local market.

BellSouth's response to each of the issues raised in your letter are set forth below. Please note, however, that by responding to the issues as posed, BellSouth is not consenting to MCI's characterization of the November 19, 1997 Order of the Florida Public Service Commission in BellSouth's Section 271 proceeding (the "Florida Order").

BellSouth strongly disagrees with MCI's characterization that BellSouth's electronic interface product line contains deficiencies. The electronic interfaces were developed and implemented pursuant to BellSouth's contractual obligations, existing industry standards, the technical capabilities then available to BellSouth. BellSouth is proud of the development it has done in this area.

Issue 1 OSS:

A. General Requirements

BellSouth has provided access to the ordering, pre-ordering, and repair databases required by the Florida Commission in the MCI's arbitration proceeding and has met the requirements imposed by the Interconnection Agreement. Therefore, there is no legal obligation to comply with the overly broad and burdensome request stated in MCI's December 24, 1997 letter. The obligation regarding access to BellSouth's operating support systems through electronic interfaces is found in Attachment VIII, Section 2.1.1.1. BellSouth is in compliance with that section. BellSouth is continually planning, as standards become available, upgrades, refinements and additions to its electronic interface product line. Both the API/Corba gateway and EDI/SSL3 interface have been conditionally recommended by the ECIC with an indication that API/Corba will be the long-term recommendation. BellSouth is advancing in its development of API/Corba and would be delighted to discuss its plans with MCI.

B. Pre-ordering

1) LENS requires multiple address validations for the same fields in different screens

This is not the case in the firm order mode. Address validation is a necessary input for other pre-ordering functions and can be accomplished in a matter of seconds. For example, the list of telephone numbers that can be offered to a particular customer is driven by the set of available numbers in the central office serving that customer's address, which is determined during the course of address validation. The inquiry mode includes address validation for telephone number selection, product and service availability, and due date information, because associating a central office with an address is a prerequisite for each of these functions, and in the inquiry mode, each of these functions can be performed independently. This does not have a negative impact on the CLECs' ability to obtain pre-ordering information; rather, it allows CLECs to choose which particular pre-ordering functions they desire without having to go through all available options.

In a continuing effort to be responsive to CLECs' requests and suggestions, BellSouth, as of February 2, 1998, provided a modified inquiry mode that eliminates multiple address validations.

With respect to your request for a download of the RSAG database, BellSouth disagrees with MCI's assertion that the BellSouth-MCI Interconnection Agreement entitles MCI to a download of RSAG. MCI is entitled to electronic access to the RSAG database and BellSouth provides that access via LENS. BellSouth will provide access through the API gateway when API becomes available. BellSouth provided a proposal to MCI for extracts of the RSAG on a daily basis for a fee. MCI rejected that proposal and raised this issue in a complaint to the Georgia PSC. This issue is now being addressed in that proceeding for the Georgia Interconnection Agreement.

2) No on-line customer credit checking capability and limited availability of customer service records

BellSouth currently meets all contractual obligations regarding access to customer service records including credit history. The obligation regarding credit history is contained in Attachment VIII of the Interconnection Agreement.

EC-Lite and LENS provide CLECs with on-line access to view and print customer service record information in substantially the same time and manner as BellSouth retail service representatives. The CLEC can obtain, via the EC-Lite and LENS pre-ordering interfaces, Customer Service Record (CSR) information. Using this capability and with the same condition regarding page limitations as experienced by BellSouth retail operations, the CLEC can obtain account information on-line for customers. The LCSC will continue its customer support function of providing account information where conditions impose page limitations.

3) BellSouth can reserve more telephone numbers than ALEC's

The 100 telephone number limit was removed effective January 15, 1998.

4) Cumbersome and insufficient methods of locating long distance company, and product and service information selected by customer.

The Local Exchange Ordering Implementation Guide contains the required products and services USOCs/ordering codes and valid combinations that constitute business rules. Additionally, BellSouth is providing interested CLECs an electronic copy of the extensive edits used by SOCS. Further, effective January 20th, CLECs can access via the Internet the entire non-proprietary list of USOCs. PIC codes are shown randomly per a regulatory equal access requirement.

5) LENS does not provide access to calculated due dates in the inquiry mode

The use of the due date calendar in the inquiry mode is in compliance with BellSouth's contractual and parity obligations.

LENS calculates a due date as part of a firm order, which is the same situation in which BellSouth's retail systems actually calculate a due date. The installation calendar tables used to calculate the due date are shown in the inquiry mode as well. The installation calendar also is accessed separately by BellSouth's retail service representatives to respond to retail customer inquiries.

C. Ordering and Provisioning

1) EDI does not have electronic edit capability at parity with BellSouth's RNS and DOE systems.

BellSouth will handle all rejects mechanically by March, 1998. This capability will be based on BellSouth requirements developed in advance of the national standards. BellSouth can currently perform 68% of all mechanized rejects as of November, 1997.

2) No order summary screen exists in EDI as in RNS

BellSouth does make a summary screen available in EDI.

3) ALECs cannot access or make changes to pending orders.

CLECs currently have the capability to do a single "C" (change) order. As of January 30, 1998, the extensive SOER edits were distributed on disk, and copies of the LEO and LESOG edits were given to the CLECs.

CLECs can submit supplemental orders, or changes to pending orders, via the 860 transaction. Currently, 860s are handled manually in substantially the same time and manner as 860s are handled for BellSouth's retail customers. As of March 16, 1998, 860s will be handled mechanically.

4) BellSouth has not provided requesting carriers with the technical specifications of the interfaces

To the best of BellSouth's knowledge and belief, BellSouth has, to date, provided MCI with all technical specifications for requested interfaces. As MCI indicated, BellSouth provided MCI the updated CGI specification on December 15, 1997. Apparently, these are still under review by MCI.

5) Interfaces are not fully electronic or integrated, and require manual interventions

(i) As stated previously, BellSouth has met the contractual obligations regarding electronic interfaces as set forth in Attachment VIII. MCI requested supplemental orders be processed mechanically and EDI can process supplemental orders mechanically.

(ii) With respect to your request for the automation of ordering complex services, that is an Ordering and Billing Forum (OBF) issue. BellSouth does not have the capability for mechanical ordering of complex services itself. There are no industry standard for MCI's request. MCI can take this issue to the OBF for resolution.

(iii) BellSouth currently does not determine if a loop or line is Basic Rate ISDN capable prior to issuing a service order. BellSouth makes the determination on BRISDN compatibility after the service order is received. If a loop or line is not compatible the order drops out and will be evaluated by the local outside engineering plant district. Normal service order coordination occurs subsequent to this.

(iv) BellSouth does offer mechanized ordering and mechanized order generation for loops and ports. BellSouth is progressing on the development of the necessary ordering and provisioning capabilities for loop/port combinations in accordance with applicable state regulatory requirements and the terms of the interconnection agreement with MCI. However, there is no industry standard available.

(v) As for the mechanical processing of POTS resale orders, BellSouth has submitted evidence in OSS and Performance Measurements affidavits and exhibits filed with PSCs and the FCC demonstrating that CLECs can achieve flow-through rates exceeding 95% - if they use the systems correctly. This success rate is dependent on how well the CLEC's service representatives are trained.

6) Sufficient capacity to meet demand

The capacity requirements for BellSouth's interfaces were established by incorporating CLECs' forecasts in BellSouth's aggregated forecasts. The aggregate forecast was then used to set the capacity requirements for the interfaces. BellSouth also has undertaken capacity testing to insure that the interfaces are capable of supporting the planned volumes. This testing process has been documented in several different venues, including the recent Section 271 FCC filings for South Carolina and Louisiana. BellSouth has the capacity to handle pre-ordering transactions for more than 10,000 orders per day, and has appropriate capacity plans in place to increase capacity as the CLECs' volume increases. At present, however, there is significant excess capacity, as the highest individual day's electronic pre-ordering and ordering volume for 1997 reached approximately 3,300 orders, with associated pre-ordering transactions, which is only one-third of the initial capacity for which BellSouth planned and has tested.

7) Installation intervals not at parity with BellSouth

BellSouth responds to this issue in Issue No. 7 below.

D. Maintenance and repair

The TAFI specifications were sent to MCI again on January 30, 1998.

E. Billing

BellSouth is currently billing the appropriate resale discount rates for MCI. This capability was implemented in Florida on September 20, 1997. In addition, BellSouth implemented the discounting of nonrecurring charges in Florida on September 11, 1997.

Issue 2 Interconnection:

1. Collocation

You have requested the methods and procedures necessary "to interconnect with other collocators who are interconnected with BellSouth in the same central office; to purchase unbundled dedicated transport from BellSouth between the collocation facility and MCI's network; to collocate subscriber loop electronics in a BellSouth central office; and to select virtual over physical collocation, where space and other considerations permit".

The requested procedures have already been made available to MCI. The procedures to purchase unbundled dedicated transport between the collocation facility and MCI's network reside in the Local Exchange Ordering (LEO) Implementation Guide which is on the BellSouth website, and in the BellSouth Collocation Handbook. BellSouth has always permitted the placement of digital loop carrier (DLC) equipment as part of a collocation arrangement given that specific DLC is considered transmission equipment. BellSouth offers CLECs both virtual and physical collocation.

2. Network blockage and End Office Trunking

BellSouth responds to this issue in Issue No. 7 below.

3. Local Tandem Interconnection

Consistent with the Florida Order and the BellSouth-MCI Interconnection Agreement, BellSouth will allow a CLEC to interconnect with BellSouth at a local tandem. MCI's issue, and the issue not addressed by the contract, is whether BellSouth will terminate MCI's traffic to an independent telephone company or another CLEC at the local tandem.

Issue 3 Unbundled Network Elements

There are no national standards for record layouts and data elements for billing UNEs in a CABS Billing Data Tape (BDT) format. However, BellSouth will implement an interim process during April, 1998 to provide a CABS formatted UNE bill.

Although national standards for this UNE billing do not exist, BellSouth is nevertheless prepared to meet the needs of its CLEC customers. In addition, BellSouth will work cooperatively with the CLEC industry to develop the national standards through the OBF, and pursue other means of providing to all CLECs billing data that is useful.

BellSouth has the capability to provide the interstate access records to CLECs to enable them to bill interexchange carriers for the provision of interstate access. As stated on page 74 of the Florida Order, this file is provided to "requesting CLECs". BellSouth requires contract provisions (either in the form of the Access Daily Usage File (ADUF) contract or as part of or an amendment to the existing interconnection agreement) before the ADUF will be provided.

With the files that have been generated through this process thus far, according to BellSouth's knowledge and belief, MCI has had no interstate access records that would have been provided for December, 1997, or January, 1998.

Issue 4 Directory Assistance

As you indicated, the BellSouth-MCI Interconnection Agreement states: "BellSouth shall provide to MCI, to the extent authorized, the residential, business and government subscriber records used by BellSouth to create and maintain its Directory Assistance Data Base, in a non-discriminatory manner." Attachment VIII, Section 6.1.6.1. The words "to the extent authorized" were not in the original language initially proposed by MCI. Rather, they were proposed by BellSouth, and agreed to by MCI, in recognition of the fact that certain agreements with CLECs and independent telephone companies restrict BellSouth's ability to provide this information to MCI.

BellSouth has not changed its position and believes that MCI should honor its contractual obligation.

Issue 5 Reciprocal Compensation

On January 23, 1998, BellSouth sent to MCI via overnight delivery checks totaling \$665,569.91 representing the amount claimed due for the termination of intraLATA minutes and local reciprocal compensation less the amount representing Internet Service Provider (ISP) traffic. BellSouth and MCI agreed to an additional amount of \$199,012.61, which is associated with the usage cap under the agreement that was in effect until May, 1997.

With respect to your request that BellSouth will in the future pay for ISP traffic, BellSouth's position has been made clear on this point time and time again. Internet-bound traffic is not local traffic and is therefore not eligible for reciprocal compensation. BellSouth's position has not changed.

Issue 6 Resale Services

A. Services not being provided on a branded or unbranded basis to MCI

Voice Mail

BellSouth voluntarily agreed to offer to CLECs the ability to resell BellSouth's MemoryCall® service, even though this service is not a telecommunications service. BellSouth agreed to do so but did not agree to change the service offering. BellSouth is willing to discuss and assess the development of a MemoryCall® service to include MCI custom branding.

Operator Services and Directory Assistance

BellSouth is prepared to provide operator services and directory assistance on an MCI branded basis. The interconnection agreement in Attachment VIII does, however, require selective routing.

QUICKService

BellSouth is currently in the process of changing its present QUICKService recording to:

"You can only dial '911' from this line. To reach BellSouth or another local service provider, you must call from another location."

Due to the number of BellSouth's main central offices affected by this change (approximately 800), BellSouth estimates that, barring any unforeseen obstacles, the change will be completed by February 27, 1998. BellSouth is providing QUICKService on a competitively neutral basis. Competitive neutrality does not mean BellSouth is restricted from mentioning itself on its QUICKService recording. BellSouth's QUICKService recording strikes a balance by stating that other local service providers are available while continuing to allow BellSouth an opportunity to market its services provided through its own facilities.

611 Service

BellSouth will attempt to work with MCI in reaching a mutually acceptable resolution of this issue.

B. Parity in conversions

BellSouth believes it is in compliance with "switched-as-is" customer conversions. The due date for MCI's customers is calculated in the same manner as the due date for BellSouth's own retail customers.

Issue 7 Performance Measurements

MCI stated that BellSouth was required to provide statistically valid commercial usage data showing:

- A. average installation intervals for resale;
- B. average installation intervals for loops;
- C. comparative performance information for unbundled network elements;
- D. service order accuracy and percent flow through;
- E. held orders and provisioning accuracy;
- F. bill quality and accuracy; and
- G. repeat trouble reports for unbundled network elements.

The seven specific items (A-G) above will be provided as part of a larger set of service quality measurements currently under development by BellSouth. These forthcoming measurements are in response to the recent requirements set forth by the Georgia Public Service Commission in Docket No. 7892-U and will meet and/or exceed the needs of all BellSouth's CLEC customers, including MCI. These measurements will provide a standard basis for comparison across the region. A complete list of the standard data to be collected and reported is set forth in the table below. BellSouth expects to have this regional data available in report format by the end of March, 1998.

The BellSouth MCI account team is currently working with representatives from MCI to develop a methodology for reporting Performance Measurements as called for in the Florida Interconnection Agreement.

Standard CLEC/ILEC Measurements:

CATEGORY	FUNCTION
Pre-Ordering	<ol style="list-style-type: none"> 1. Average Response Interval 2. OSS Interface Availability
Ordering	<ol style="list-style-type: none"> 1. Firm Order Confirmation Timeliness 2. Reject Interval 3. Percent Rejected Service Requests 4. Percent Flow-through Service Requests 5. Total Service Order Cycle Time 6. Service Request Submissions per Request 7. Speed of Answer in Ordering Center
Provisioning	<p>Order Completion Intervals</p> <ol style="list-style-type: none"> 1. Average Completion Interval 2. Order Completion Interval Distribution <p>Held Orders</p> <ol style="list-style-type: none"> 3. Mean Held Order Interval <p>Installation Timeliness, Quality & Accuracy</p> <ol style="list-style-type: none"> 4. Percent Missed Installation Appointments 5. Percent Provisioning Troubles within 30 days 6. Percent Order Accuracy
Maintenance & Repair	<ol style="list-style-type: none"> 1. Customer Trouble Report Rate 2. Missed Repair Appointments <p>Quality of Repair & Time to Restore</p> <ol style="list-style-type: none"> 3. Out of Service > 24 Hours 4. Percent Repeat Troubles within 30 days 5. Maintenance Average Duration 6. Average Answer Time - Repair Center
Billing	<p>Invoice Accuracy & Timeliness</p> <ol style="list-style-type: none"> 1. Invoice Accuracy 2. Mean Time to Deliver Invoices
Operator Services and Directory Assistance	<p>Directory Assistance</p> <ol style="list-style-type: none"> 1. Average Speed to Answer 2. Mean Time to Answer <p>Operator Services</p> <ol style="list-style-type: none"> 3. Average Speed to Answer 4. Mean Time to Answer
E911	<ol style="list-style-type: none"> 1. Timeliness 2. Accuracy
Trunking	<ol style="list-style-type: none"> 1. CLEC Trunk Group Service Report 2. BellSouth CTTG Blocking Report 3. Local Network Trunk Group Service Report 4. BellSouth Local Network Blocking Report

Other:

1. BST will provide state level reports only.
2. These quality measurement reports are designed to meet the requirements of the Interconnection Agreement and will be delivered in either electronic or printed format to the CLEC(s).

I trust the above answers the issues raised in your letter. BellSouth, as it has consistently done in the past, is prepared to discuss any and all issues with MCI. To the extent you have any further questions or comments regarding BellSouth's policies or issues concerning implementation of the MCI/BellSouth Interconnection Agreement, your BellSouth Account Team Representative can assist you.

Sincerely,

Scott Schaefer

Beverly Gordon

From: Arthur, Helen (MCI) [Helen.Arthur@mci.com]
Sent: Wednesday, September 17, 1997 1:28 PM
To: 'Beverly Gordon'
Subject: FW: Technical Specifications



Excerpts for SAG
data.doc



Technical

Helen Arthur
V825-6580
404-267-6580
1-888-866-2376 pager

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

From: Bryan Green [SMTP:Bryan.Green@MCI.Com]
Sent: Saturday, June 14, 1997 2:59 PM
To: Kathy Pounds [Kathy.Pounds@MCI.Com] (E-mail);
Marsha Ward (E-mail); Martha McMillin (E-mail); Ron Martinez (E-mail)
Cc: Helen Arthur [Helen.Arthur@MCI.Com] (E-mail);
Charlene Keys (E-mail); Daren Moore (E-mail); Debra A. Henson (E-mail);
Marcel Henry [E-mail] (E-mail); 'Thomas O Seitz' (E-mail); Wally Schmidt
(E-mail)
Subject: FW: Technical Specifications

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

From: Ilene.M.Barnett
[SMTP:Ilene.M.Barnett@bridge.bellsouth.com]
Sent: Friday, June 13, 1997 2:03 PM
To: Bryan Green
Cc: Helen Arthur; Lee Pamela K/AL_BRHM07
Subject: Technical Specifications

Bryan,

On May 30, 1997, I provided to you the Atlas Design Document. Based on your 6/5/97 e-mail, either you are not in receipt of the document or the material was not sufficient for your purposes. If you did not receive it along with the LENS Applications User Guide, let me know and I will send another copy. The document that was sent, is the only specifications available.

I have requested the ICREF technical specifications; to date I have not received the document. I followed up on my request today and it is being worked. I will immediately notify you when I receive this and have it delivered to you.

ATLAS was not a temporary solution that would be replaced with LENS. The NDM connection to ATLAS was the temporary

solution which was replaced with LENS connection. ATLAS remains the same, the connection vehicle changed.

You also requested a download of the RSAG database. In today's environment, MCI has two methods to access the data in that database - ICREF and LENS. I currently send your organization a weekly report of the hits by MCI on ICREF. Scott Brown was the recipient of this information. In discussing this request with Linda Tate (BST), Linda said that BellSouth at this time is not in a position to provide a download of this database due to the following:

- 1) The database size is massive and not manageable with the daily activity and
- 2) MCI and other CLECs currently have access to the data through LENS and ICREF.

If you would like to discuss this further, please call me on (770)492-7525.

Exhibit BG-3
MCI: Green
Docket No. 980281-TP
Page 2 of 2



MCI Telecommunications Corporation

780 Johnson Ferry Road
Suite 500
Atlanta, GA 30342

Exhibit BG-4
MCI: Green
Docket No. 980281-TP
Page 1 of 1

June 16, 1997

Ilene M. Barnett
Sales Director
MCI Account Team
BellSouth Interconnection Services
Suite 420
1960 West Exchange Place
Tucker, Georgia

Dear Ilene,
Thanks for the prompt response regarding the Regional Street Address Guide. For your reference, I have included in this letter an excerpt from the MCImetro - BellSouth Georgia Interconnection Agreement, Attachment VIII, Section 2.1.3:

"2.1.3 Street Address Guide (SAG)

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

It is my understanding that the SAG data is to be provided to MCI, not simply the access to the data. As per the Interconnection Agreement, MCI is requesting the Regional SAG data be provided for the states of Georgia, Tennessee and North Carolina. Please respond in writing by June 25, 1997.

If you have any questions, please contact me on 404-267-6580. Thanks again for your assistance in this matter.

Helen Arthur

Cc: Bryan Green
Georjean Simmons



BellSouth Telecommunications, Inc.
Room 34591 BellSouth Center
675 West Peachtree Street, N.E.
Atlanta, Georgia 30375

June 26, 1997

Ms. Helen Arthur
MCI Telecommunications Corporation
Suite 500
780 Johnson Ferry Road
Atlanta, Georgia 30342

RE: MCI/BellSouth-GA Interconnection Agreement - Attach VIII, Sect 2.1.3

Dear Ms. Arthur:

This letter is in response to your inquiry of June 16, 1997 in reference to the following stipulation in the MCI/BellSouth Interconnection Agreement:

Attachment VIII
2.1.3 .1 Street Address Guide (SAG)

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

Your interpretation of the above stipulation is that BellSouth will provide the Street Address Data, not online access, to MCI. However, the stipulation states that BellSouth is to provide the SAG data to MCI or its equivalent in electronic form. Since, BellSouth is unable to provide the initial SAG data and daily updates in batch form the only available equivalent would be using online access.

Sincerely,

Cathy Forbes
Compliance Manager
Interconnection Services

cc: Ilene Barnett



**MCI Telecommunications
Corporation**

780 Johnson Ferry Road
Atlanta, GA 30342
404 267 5500

Exhibit BG-6
MCI: Green
Docket No. 980281-TP
Page 1 of 2

August 18, 1997

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

Dear Ms. Barnett:

This letter is in response to Cathy Forbes' June 26 letter, which replied to Helen Arthur's June 16, 1997 inquiry in reference to the following section in the MCI/metro-BellSouth Interconnection Agreement:

Attachment VIII

2.1.3 Street Address Guide (SAG)

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

This section clearly requires BellSouth to provide to MCI/m in electronic form either the SAG data or its equivalent. As it is more than thirty (30) days since the interconnection agreements became effective in Georgia, Florida, Tennessee, and North Carolina, BellSouth is overdue in providing to MCI/m in electronic form the SAG data.

Ms. Forbes letter states, and I quote, "Since, BellSouth is unable to provide the initial SAG data and daily updates in batch form the only available equivalent would be using online access". MCI/m is capable of accepting an electronic download of this data via NDM until a regular mechanized daily batch process can be implemented to accommodate daily updates.

MCI/m insists that BellSouth comply with the terms of its interconnection agreements with MCI/m and provide MCI/m in electronic form with the SAG data no later than August 29, 1997. Failure to do so will significantly hamper MCI/m's entry into the local market by forcing MCI/m to continue to contend with manual intervention in the pre-ordering/ordering process to verify customer street address information, and, will demonstrate BellSouth's continued lack of compliance with the contracts.

Please reply to this letter no later than August 22, 1997.

Sincerely,


Walter J. Schmidt

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

BellSouth Interconnection Services 770 492-7500
Suite 420 Fax 770 621-0632
1960 West Exchange Place
Tucker, Georgia 30084

MCI Account Team

August 20, 1997

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

Dear Wally,

This is in response to Bryan Green's verbal request to provide MCI with a copy of BellSouth's Regional Street Address Guide (RSAG) database files and RSAG record layouts and to your letter dated August 18, 1997, regarding the same subject. In accordance with the MCI/BST Interconnection Agreement, MCI can access BellSouth's RSAG database through the Local Exchange Navigation System (LENS) and/or via Interexchange Carrier Reference Validation (ICREF) service.

The RSAG database files are extremely voluminous for downloading and the fact is that the database changes so rapidly it would be outdated by the time MCI would be in receipt of the database files. The RSAG technical specifications are proprietary.

MCI may pursue receipt of the RSAG database files in a form other than that described in the Interconnection Agreement through the Agreement's Bona Fide Request (BFR) process. I trust that the above provides you with the desired information.

Sincerely,

for Pam Lee
Sales Assistant Vice President

cc: Joe Baker - BST
Marcel Henry- MCI
Charlene Keys - MCI
Bryan Green - MCI
Jeremy Marcus - MCI



**MCI Telecommunications
Corporation**

Three Ravinia Drive
Atlanta, GA 30346
770 280 7840
Fax 770 280 7849
Internet: 2161607@MCI Mail.Com

Marcel Henry
Regional Vice President
Southern Financial Operations

Exhibit BG-8
MCI: Green
Docket No. 980281-TP
Page 1 of 1

September 18, 1997

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

Dear Joe:

This is a follow-up to our breakfast meeting on August 29th. These are issues that have been brought to my attention that have yet to be resolved. As a result, I am asking for BellSouth executive involvement (yours specifically) to get these issues resolved.

- 1) CARE Processing
- 2) Regional Street Address Guide
- 3) EDI Transactions (Jeopardies/Rejects/Loss Notification)

In the case of the first two items, BellSouth states that it is not obligated to provide the service. However, while not addressing this claim, I would note that the absence of these items affects our ability to either process orders or keep accurate records. In either case lack of a workable solution will create more work for both companies in the form of longer order processing intervals and/or manual processing.

Regarding the last item: I do not understand why BellSouth would provide notification of jeopardies, rejects, or losses via fax. It is an inefficient way to do business, especially when electronic communications exist between our two companies.

In my opinion, the resolution of these issues should be based on what makes good business sense, rather than taking the stance that it doesn't get done unless BellSouth is ordered to do so. This is particularly true in cases, such as these three, where BellSouth has the ability to provide what MCI is requesting, and where MCI's requests advance the goal of true competition in the local exchange market. I trust that in your review you will agree and your involvement will bring these issues to closure.

Please call me if you have any questions about these issues. I have additional details if needed.

Regards,

Marcel Henry

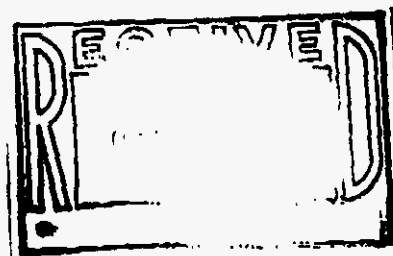
MH/mle
Sfo07971tr

BellSouth Interconnection Services 770 492-7510
Suite 420 Fax 770 621-0632
1960 West Exchange Place MCI ID 361-2846
Tucker, Georgia 30084

Pam Lee
Sales Assistant Vice President
MCI Account Team

October 10, 1997

Mr. Marcel Henry
Regional Vice President
Southern Financial Operations
MCI Telecommunications, Inc.
Three Ravinia Drive
Atlanta, Georgia 30346



Dear Marcel:

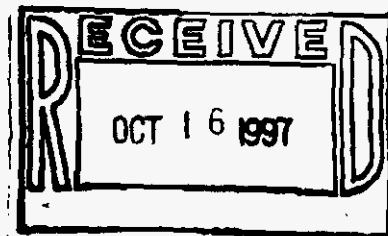
This is in response to your September 18, 1997, letter to Joe Baker regarding the three issues you asked him to review and to assist in a resolution for each issue. We value our relationship with MCI and are continuously striving to meet your needs whenever and wherever we can. However, we are not always able to meet MCI's requests in the specific manner requested. Unfortunately, with the exception of our plans for handling rejects through EDI, this is the case with the issues you have brought to our attention. The following is a summary of BellSouth's position on each of the three issues:

1) CARE Processing:

Our position is still the same as that described in the September 19, 1997, email from Kim Uhles of BellSouth to Phyllis Maslia of MCI and the July, 1997, letter from Susan Arrington of BellSouth to Helen Arthur of MCI. BellSouth has not yet established a process for advising CLECs when their customers change their PIC. However, BellSouth will work with MCI to document your requirements and develop a time and price estimate to deliver this enhancement if you desire.

2) Regional Street Address Guide (RSAG):

BellSouth is open to working with MCI to understand the information that MCI needs out of RSAG and to develop the time and costs required to develop this enhancement.



3) EDI Transactions:

* **Jeopardies:** As explained verbally to MCI on several occasions, BellSouth's position is generally to adhere to national standards for EDI. To date, national standards have not been established for jeopardies.

* **Rejects:** This will be addressed in Release 2.0 as part of our upgrade to TCIF Issue 7, which is tentatively scheduled for January 30, 1998.

* **Loss Notification:** As described in Cliff Bowers', BellSouth, August 8, 1997, letter to Helen Arthur, MCI, BellSouth does not have the capability at this time to offer the EDI 836 transaction set for loss notification nor does BellSouth have plans to develop that capability. However, BellSouth will work with MCI to document your requirements and to develop a time and price estimate to deliver this enhancement if you desire.

Although we are unable to commit to addressing all of the issues in the manner MCI originally requested, BellSouth's Account Team and Product Team representatives met on September 30, 1997, with Bryan Green, MCI, and members of his staff to discuss these issues as well as other topics. In the meeting both companies agreed to investigate and seek other mutually satisfactory means of addressing each issue. I will keep you informed as to our progress, and in the meantime, please let me know if you have any questions or need additional information.

Sincerely,



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11/20

Exhibit BG-10
MCI: Green
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BellSouth Telecommunications, Inc.
Suite 4511
675 West Peachtree Street, N.E.
Atlanta, Georgia 30375

404 927-7020
Fax 404 521-2311

Mark L. Feldler
President - Interconnection Services

November 13, 1997

Mr. Marcel Henry
Regional Vice President
Southern Financial Operations
MCI Telecommunications
Three Ravinia Drive
Atlanta, Georgia 30346



Dear Marcel:

Recently, you brought to the attention of the BellSouth MCI Account Team your concerns over MCImetro's ("MCI") perceived lack of progress on several MCImetro OSS issues, including Change Management, Loss Notification/NDM, RSAG, and Common Graphical Interface (CGI). We then discussed these items on the phone last week. I am now in a position to provide you with an update.

At present, BellSouth is in compliance with the interface obligations and interface duties set forth in the MCImetro/BellSouth Interconnection agreements. The OSS requirements were negotiated between the parties and are contained within Attachment VIII of the Interconnection Agreements. In that Attachment you will find that MCI agreed to accept, on an interim basis, the interfaces approved by BellSouth.

I want to assure you that BellSouth has been very focused in its quest to meet the additional requests from MCI. The outstanding MCI requests are complex and BellSouth must make sure that the responses are fully researched and as correct and current as possible. To ensure MCI understands where BellSouth stands on these issues, I have summarized below their current status and BellSouth's plans for addressing each one.


- **Change Management:** BellSouth is in the process of developing a change management plan. BellSouth appreciates and will consider MCI's input, including MCI's proposal entitled "BellSouth/MCI Change Management Process for OSS Interfaces" that you provided recently. BellSouth's goal is present the plans to you by mid December.

As information, our plans will address BellSouth's support of dual OSS platforms. At this time, BellSouth will support dual platforms associated with EDI releases for 60 days. When technically feasible, the CLECs will have the opportunity to negotiate longer periods for the dual platforms, however, due to the potentially significant expenses associated with supporting multiple platforms, there will likely be additional charges to the CLECs should BellSouth agree to extending the dual platforms beyond 60 days. We will address dual platforms for LENS and other systems as part of our change notification plan that should be finalized in early December.

- **Loss Notification/NDM:** Currently MCI is receiving information regarding disconnections via paper. Pursuant to Attachment VIII, section 2.2.12, MCI has agreed, in a September 10, 1997 letter to Cliff Bowers of BellSouth, to an interim method of notification via Network Data Mover. BellSouth can provide such data via Network Data Mover in June 1998. We understand your desire that we implement this arrangement by the end of the year. This possibility is being reviewed by appropriate BellSouth management. The account team will notify the appropriate MCI representatives by Friday, November 21, 1997, as to whether this delivery date can be moved up.
- **RSAG:** Within the next two weeks, BellSouth will be able to provide you cost estimates and the time and price for developing the detailed design, project plan, and a firm quote for the overall delivery. Please note that BellSouth is exploring the development of an Application Programming Interface (API) that may better suit your needs. It is my understanding that five MCI employees will be at a BellSouth meeting on November 14, 1997 to discuss this interface. At present, BellSouth is meeting its contractual obligations regarding MCI's access to SAG data.
- **Common Graphical Interface (CGI):** CGI specifications were sent to you by the account team on November 7, 1997. These specifications will allow MCI to build its Common Graphical Interface. The next release of specifications is in development. This will be a supplement to the existing specifications and will allow MCI to add some fields that are not represented in the current specifications. MCI does not have to wait for the next release to begin building its Common Graphical Interface since the next release will simply be an extension of the existing specifications. Once MCI has reviewed the specifications, BellSouth can establish a Joint Implementation Team (JIT) with MCI to begin developing plans, including timelines, to implement CGI.

We will keep you apprised as to our progress on each of these important issues. Meanwhile, if you have any questions or need additional information, please call me at 404-927-7530.

Sincerely,



Mark Feidler



BellSouth Interconnection Services
Room 34A35
675 West Peachtree Street, N.E.
Atlanta, Georgia 30375

12/02/97

Bryan Green
Sr. Manager - Systems Implementation
MCI Telecommunications
780 Johnson Ferry Road
Suite 500
Atlanta, Ga. 30342

Dear Bryan:

This letter is a response to your request that BellSouth provide MCI extracts from our Regional Street Address Guide (RSAG) database of the information necessary to perform address validations.. The cost estimate has been developed based on your stated need of submitting Local Service Requests with valid address. Your objective is to use the RSAG data to support your front end edits.

The proposal is for two extract files to be produced and sent to MCI every night. Please note that these are complete files and not updates. The data will be sent via Connect:Direct. MCI will be responsible for the cost of the circuit and modem equipment to connect to BellSouth as well as all hardware and software at your location needed to receive and process the data. The cost for that connection is not included here.

The following is a preliminary estimate of the costs to build and maintain the RSAG data delivery system. The final price for this project will be within +- 15% of this estimate. In order to proceed, BellSouth must put a project team in place, develop a project plan and timelines for this work in conjunction with MCI, and develop a final price for the project. The cost for this initial phase is \$30,000 which will count toward the overall price. You will be asked to approve the project plan and final price before we move into the development phase.

Project plan, timeline, and final proposal	\$30,000
Total Startup costs for the new connection	\$538,030
Monthly recurring charge	\$8,650

Please sign below and return this letter to me if you accept this estimate and agree to pay the \$30,000 cost for the development of the project plan, timelines, and final price. Upon completion of the project plan, timelines, and final proposal, you will be asked to approve the project plan and final price before proceeding with the implementation of this arrangement. Your signature below will authorize BellSouth to proceed with final costs and a project plan for this work.

Bob Siegel - BellSouth

Authorized Signature - MCI

Date

Date

BELLSOUTH INTERCONNECTION SERVICES

MARCOM GROUP

*34p70 BellSouth Center
675 West Peachtree Street, N.E.
Atlanta, Georgia 30375*

FAX NUMBER

*(404) 927-8577
523 - 7074*

- FROM:**
- TOM MOQUIN (404) 927-7382
 - ANN SMITH (404) 927-7599
 - JOELLYN SARGENT (404) 927-7199
 - PATTI BAUERNFEIND (404) 927-7927
 - SHERYL CHAPMAN (404) 927-7996
 - MARION DYE (404) 927-7928
 - AMY MERSHON (404) 927-7557
 - BRIAN FAIN (404) 927-7553
 - TEMPLE MCDANIEL (404) 927-7565
 - JIM JACKSON (404) 927-7516
 - KIM DICKIE (404) 927-8639
 - Rob Siegel* (404) 267-6556

TO: *Bryan Green*

PHONE NUMBER: _____

FAX NUMBER: *404-267-6556*

NUMBER OF PAGES INCLUDING COVER SHEET *3*



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

Exhibit BG-12
MCI: Green
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December 16, 1997

Bob Siegel
Product Manager
BellSouth Interconnection Services
Room 34A35
675 W. Peachtree Street, N.E.
Atlanta, Georgia 30375

Bob,

This letter is in response to the proposal provided to MCI on 12/04/97 relative to the cost to provide an extract of your RSAG database.

As you know, for several months we have been requesting that BellSouth provide MCI with a download of the RSAG database. The RSAG database is necessary to allow MCI to validate addresses in our own front end system prior to submitting an order to BellSouth. This capability will improve order processing time, reduce the amount of rework for both companies due to errors and decrease the cost of doing business. As you are aware, the RSAG issue is now pending before the Georgia Public Service Commission.

As an interim measure pending the outcome of the PSC proceeding, you have proposed that BellSouth provide an extract of the RSAG database based on the following cost structure:

- \$30,000 – Project plan, timeline, and final proposal
- \$538,030 – Total Start of costs for the new connections; and
- \$8,650 – Monthly recurring charge

MCI rejects this offer because our Interconnection Agreement entitles us to receive a download of the entire RSAG at no cost. MCI again requests BellSouth to comply with the agreement by providing a complete RSAG download to MCI immediately.

Respectfully,

Bryan K. Green
Sr. Manager –OSS Implementation
404-267-5515

cc: Marcel Henry
Pam Lee
Charlene Keys
Joe Baker

Helen Arthur
125-6580
267-6580
888-866-2376 pager

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

From: Rueblinger_Judy/AL_BRHM05@bridge.bellsouth.com
SMTP:Rueblinger_Judy/AL_BRHM05@bridge.bellsouth.com]
Sent: Monday, August 18, 1997 3:56 PM
To: helen.arthur@mci.com
Cc: Sowers_Clifford_H/AL_BRHM07@a1244034
Subject: Jeopardies/ Rejects/836 Transaction

Helen,

Per our conversation today this is what I have been able to find out on the above.
Jeopardies - The capability is there in EDI today.
Rejects - BST is working on this now. No standards in place. Will do in phases, late Nov/Dec. I have a call into Linda to see what we see the implementation date being.
836 Transaction - BST is working on this. We are checking with Bob Siegel to see if he can provide us an implementation date.
Looking forward to seeing you tomorrow.
Judy

Message-ID: <01BCAE0C.A04135C0@infolink-204.189.237.158.Chicago.mci.net>
From: Helen Arthur <helen.arthur@mci.com>
To: "'Clifford H. Bowers'" <Clifford.H.Bowers@bridge.bst.bls.com>,
 "'Judy Rueblinger'" <Judy.Rueblinger1@bridge.bellsouth.com>
Cc: "'Bryan Green'" <Bryan.Green@mci.com>
Subject: Jeopardy Notification
Date: Thu, 21 Aug 1997 08:31:29 -0400

Cliff,

Prior to our 8/19 meeting, it was BST's position that jeopardy notices would be handled manually. In the 8/19 meeting we discussed BellSouth's position that mechanized jeopardy notices are supported today. Specifications for mechanized jeopardies are not included in the LEO Guide. Please provide specifications and sample transactions for mechanized jeopardy notices by 8/22. This information is required in order to continue development.

Thanks,
Helen Arthur



MCI Telecommunications
Corporation
780 Johnson Ferry Road
Suite 500
Atlanta, GA 30342

Exhibit BG-15
MCI: Green
Docket No. 980281-TP
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August 27, 1997

Pamela Lee
Sales Assistant Vice President
BellSouth
1960 West Exchange Place, Suite 420
Tucker, Georgia 30084

Dear Pam,

On August 8, 1997 BellSouth confirmed that they would support mechanized loss notification via an EDI 836 transaction, and jeopardy and reject notifications manually. During a meeting on 8/19/97, MCI was informed that BellSouth would support mechanized jeopardies but rejects and loss notifications would be manual. Not only are we bothered by the lack of support for automated processes, but also by the fact that each time a meeting was held, BellSouth changed its position. In order to expedite this process, MCI has offered specifications in response to the manual processes (see attachment).

In response to our request BellSouth committed to get back to MCI with an answer to our specifications by 8/22/97. On 8/25/97 we received the following comments from Judy Ruebflinger, "According to our staff this will take additional time to research. They have advised they will pursue further and provide me a status on their progress on Friday, 8/29. We want to make sure the staff has time to do the appropriate research before giving us an answer."

I need your support to help bring closure to this issue. What we need on or before 8/29 is a response to our request not just status. A delay would only further delay our ability to enter the local market. Your assistance in resolving this matter would be greatly appreciated.

Please provide a response by August 29, 1997 detailing whether BellSouth will support the manual process proposed by MCI or an alternative process.

Sincerely,

Helen H. Arthur
Local Systems Implementation Specialist
Enclosure (1)

→ cc: Bryan Green
Joe Baker
Cliff Bowers
Marcel Henry



MCI Telecommunications Corporation
 780 Johnson Ferry Road
 Suite 500
 Atlanta, GA 30342
 404 267 5727

Exhibit BG-16
 MCI: Green
 Docket No. 980281-TP
 Page 1 of 2

January 28, 1998

Ms. Pam Lee
 BellSouth Interconnection services
 1960 West Exchange Place
 Tucker, GA 30084

Re: Late Firm Order Confirmations

Dear Pam:

I am writing concerning the excessive time periods associated with "returned FOCs" after MCI submits an ASR for local service to BellSouth. On average it is taking in excess of seven days for BellSouth to return a FOC.

MCI's expectations are that BellSouth provide Firm Order Confirmations (FOCs) for each order MCI places for local service. The Florida Interconnection Agreement requires BellSouth to provide FOCs for orders submitted electronically within four (4) hours and for manual orders within twenty-four (24) hours (Attachment VIII, section 2.5.3); the Tennessee Interconnection Agreement requires BellSouth to provide MCI with FOCs within twenty-four (24) hours. It is MCI's expectation that BellSouth will comply. Also, because BellSouth uses the same Operations Support Systems throughout its region, if BellSouth is capable of meeting the time frames for Florida, BellSouth therefore should be capable of meeting these time frames region wide.

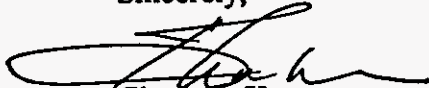
In analyzing the time it takes BellSouth to provide MCI with an FOC for ASRs submitted for OFF-NET T1's we found that BellSouth exceeded the times specified in the Florida contract by a wide margin. During June through December 1997, MCI submitted 1,037 ASRs for which the average return FOC was seven days.

MON.	JUN	JUL	AUG	SEPT	OCT	NOV	DEC
DAYS	3.75	4.02	5.82	8.52	8.18	8.21	7.12

This delay significantly impedes MCI's ability to turn up customers in a reasonable time period. Therefore, MCI requests that BellSouth adopt the Florida FOC Intervals region wide.

Please respond by February 9, 1998, with the steps you are taking to substantially lessen the time it takes BellSouth to provide MCI with FOCs, and to bring BellSouth into compliance with the Florida and Tennessee contracts.

Sincerely,



Charlene Keys
Director of Carrier Markets
MCI Southern Financial Operations

cc: Wally Schmidt
Andri Weathersby
De O'Roark
Jeremy Marcus

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was furnished to the following parties by Hand Delivery this 4th day of May, 1998.

Will P. Cox
Florida Public Service Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Suite 370
Tallahassee, FL 32399-0850

Nancy White
c/o Nancy Sims
BellSouth Telecommunications
150 South Monroe Street
Suite 400
Tallahassee, FL 32301

W. P. Cox

ATTORNEY