

ORIGINAL

ITC^DELTACOM COMMUNICATIONS, INC.

REBUTTAL TESTIMONY OF MICHAEL THOMAS

Before the Florida Public Service Commission
Docket No. 990750-TP
Petition for Arbitration of ITC^DeltaCom Communications, Inc. with
BellSouth Telecommunications, Inc.
September 13, 1999

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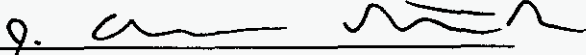
**CERTIFICATE OF SERVICE
DOCKET NO. 990750-TP**

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1 Q: PLEASE STATE YOUR NAME, POSITION AND BUSINESS ADDRESS.

2 A: My name is Michael Thomas. I am Director – Information Services for
3 ITC^DeltaCom Communications, Inc., (“ITC^DeltaCom”), and my
4 business address is 8830 U.S. Hwy 231, Arab, Alabama 35016.

5

6 Q: ARE YOU THE SAME MICHAEL THOMAS THAT FILED DIRECT
7 TESTIMONY IN THIS PROCEEDING?

8 A: Yes, I am.

9

10 Q: WHAT IS YOUR PURPOSE IN TESTIFYING TODAY?

11 A: The purpose of my testimony is to respond to some of the arguments
12 made by BellSouth's witnesses in this Docket. I would also like to clarify
13 ITC^DeltaCom's position and provide additional information on a number
14 of issues raised by BellSouth's witnesses in their direct testimony.

15

16 Q: WHAT IS YOUR GENERAL REACTION TO BELLSOUTH'S
17 TESTIMONY ON THE ISSUE YOU ADDRESS IN THIS REBUTTAL
18 TESTIMONY?

19 A: BellSouth responded to my direct testimony in three basic ways.

20 (1) For some issues, BellSouth conceded the issue to ITC^DeltaCom.
21 It is unfortunate that it required a formal filing to bring about a
22 resolution of these issues.

1 (2) For some issues, BellSouth continues to cling to positions that are
2 contrary to and inconsistent with the requirements of the Act, FCC
3 orders or orders of various state regulators.

4 (3) For some issues, BellSouth does not address the issue brought
5 forward in ITC^DeltaCom's filing.
6

7 **Issue 3(b)(1): [ITC^DeltaCom Issue 2] – Pursuant to the definition**
8 **of parity, should BellSouth be required to provide Operational**
9 **Support Systems (“OSS”)?**

10

11 Q: DO YOU AGREE WITH MR. PATE THAT BELLSOUTH CURRENTLY
12 PROVIDES NONDISCRIMINATORY ACCESS TO ITS OPERATIONAL
13 SUPPORT SYSTEMS AS REQUIRED BY THE ACT AND FCC
14 ORDERS?

15 A: No. My understanding is that BellSouth must provide OSS to
16 ITC^DeltaCom in a manner that is equal to or at parity with that which
17 BellSouth provides to itself, as discussed in my direct testimony. In
18 addition, Paragraph 520 of the FCC's First Report and Order concludes
19 that nondiscriminatory access to OSS (*i.e.* the functions of pre-ordering,
20 *ordering, and provisioning*, maintenance and repair, and billing for
21 network elements and resale services) is technically feasible. ¹

¹ *In the Matter of Implementation of the Local Competition Provisions in the Telecommunications Act of 1996, First Report and Order, CC Docket 96-98 (August 8, 1996). Paragraph 523 requires the OSS functions to be available to the CLEC as it is available to the incumbent LEC. Paragraph 525 requires that OSS functions must be made available in a nondiscriminatory manner by January 1, 1997.*

1 Nondiscriminatory access means that whatever access BellSouth
2 provides to itself, BellSouth must provide "equally" to ITC^DeltaCom. For
3 example, BellSouth cannot require ITC^DeltaCom to fax orders when
4 BellSouth can electronically submit orders on behalf of its own retail
5 customers. ITC^DeltaCom is extremely concerned that BellSouth is now
6 indicating that it may not be technically feasible for ITC^DeltaCom to
7 obtain ordering and provisioning services equal to that which BellSouth
8 provides to itself or others.

9

10 **Issue 4: [ITC^DeltaCom Issue 2(a)(i)] Should BellSouth be required**
11 **to provide the specifications to enable ITC^DeltaCom to parse the**
12 **Customer Service Records (CSRs)? If so, how?**

13

14 Q: MR. PATE DISCUSSES BELLSOUTH'S ALTERNATIVES TO THE CSR
15 PARSING CAPABILITY ITC^DELTACOM HAS REQUESTED. PLEASE
16 RESPOND TO BELLSOUTH'S POSITION ON ITC^DELTACOM'S
17 REQUEST.

18 A: As I explained in my direct testimony, ITC^DeltaCom must be able to
19 parse the LENS CSR, so that ITC^DeltaCom can build the CSR
20 information into our EDI orders without having to rekey the information.
21 Mr. Pate fails to address ITC^DeltaCom's issue, but instead, argues that
22 BellSouth has developed another interface which will provide the CSR

1 parsing capability that will allow ITC^DeltaCom to parse CSRs "just as
2 BellSouth parses CSRs in its own retail operations."

3 Interestingly, BellSouth ignored the fact, as stated in my direct testimony,
4 that ITC^DeltaCom does not use the TAG interface. Should
5 ITC^DeltaCom decide to research, develop and implement TAG, it could
6 take 6 to 12 months, and would require ITC^DeltaCom to expend great
7 resources. ITC^DeltaCom has simply requested specifications that
8 BellSouth controls to be provided to ITC^DeltaCom, so that
9 ITC^DeltaCom can do the necessary work to parse CSRs. BellSouth is
10 in no way prejudiced by providing such information to ITC^DeltaCom.

11

12 Q: CONTRARY TO MR. PATE'S TESTIMONY, HAS BELLSOUTH
13 PROVIDED ITC^DELTACOM WITH THE CSR PARSING
14 SPECIFICATIONS THAT ITC^DELTACOM HAS BEEN REQUESTING?

15 A: Yes. BellSouth has provided ITC^DeltaCom with the CSR parsing
16 specifications that ITC^DeltaCom has been requesting since an Alabama
17 Public Service Commission OSS Workshop in December of 1997². It is
18 unfortunate that resolution of this issue required a formal filing, especially
19 since paragraph 516 of the FCC's First Report and Order requires that
20 OSS and the information they contain must be unbundled upon request.

² In RE: Petition for Approval of a Statement of Generally Available Terms And Conditions Pursuant to Section 252(f) of the Telecommunications Act of 1996 and Notification of Intention to File a Petition for In-region InterLATA Authority with the FCC Pursuant to Section 271 Of the Telecommunications Act of 1996. "BellSouth OSS Demonstration," Alabama Public Service Commission Docket No. 25835, pp. 397-401 (December 18, 1997).

1 Nevertheless, ITC^DeltaCom is pleased that this issue has been
2 resolved.

3

4 **Issue 5: [ITC^DeltaCom Issue 2(a)(i)] Should BellSouth be required**
5 **to provide a download of the Regional Street Address Guide**
6 **(RSAG)? If so, how?**

7

8 Q: PLEASE EXPLAIN WHY ITC^DELTACOM NEEDS THE REGIONAL
9 STREET ADDRESS GUIDE RATHER THAN ACCESS TO THE RSAG
10 THROUGH LENS OR TAG AS SUGGESTED BY BELLSOUTH'S
11 WITNESS PATE.

12 A: BellSouth claims that it is providing nondiscriminatory access to its OSS
13 in a manner that allows ITC^DeltaCom and other CLECs to access the
14 RSAG. That broad claim is an attempt to avoid the issue. As stated in
15 my direct testimony, ITC^DeltaCom needs access to the address and
16 facility availability information resident in BellSouth's RSAG. Only with
17 such access can ITC^DeltaCom incorporate this information into its back
18 office systems to check the validity of the customer's address and the
19 facilities available at the customer's location.

20 ITC^DeltaCom has experienced significant problems with orders
21 being rejected due to the customer's wrong address being keyed into the
22 order. By incorporating the correct address information into our back
23 office systems, ITC^DeltaCom will be able to submit accurate customer

1 address information to BellSouth. As noted in my direct testimony,
2 BellSouth does not re-key address information into its orders, and
3 ITC^DeltaCom should not be required to do so. Further, as discussed
4 above, ITC^DeltaCom does not use TAG, nor should ITC^DeltaCom be
5 required to implement yet another OSS interface just to receive
6 "nondiscriminatory access" to the OSS information that BellSouth
7 controls.

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10

11 Q: HAS BELLSOUTH COMMITTED TO PROVIDE THE RSAG TO
12 ITC^DELTACOM?

13 A: Yes. It is my understanding that during negotiations, BellSouth has
14 stated that it will provide the RSAG to ITC^DeltaCom. In addition, Mr.
15 Pate, on page 8 of his testimony, confirms that BellSouth is willing to
16 provide the RSAG to ITC^DeltaCom. However, it is my understanding
17 that BellSouth has not provided its proposed rates and conditions for the
18 RSAG. ITC^DeltaCom is encouraged that BellSouth is now willing to
19 provide the RSAG, but resolution of this issue cannot take place until
20 ITC^DeltaCom is presented with an acceptable proposal from BellSouth
21 regarding the specific rates, if any, and conditions.

22

1 **Issue 6: [ITC^DeltaCom Issue 2(a)(ii)] Should BellSouth be required**
2 **to provide changes to its business rules and guidelines regarding**
3 **resale and UNEs at least 45 days in advance of such changes being**
4 **implemented? If so, how?**

5
6 Q: WHAT IS YOUR UNDERSTANDING OF BELL SOUTH'S POSITION
7 REGARDING THIS ISSUE?

8 A: BellSouth claims that it attempts to post all business rule and guideline
9 change notifications on its website 30 days prior to the implementation of
10 the change or rule. Further, Mr. Varner states on page 21 of his direct
11 testimony that this is done "as a matter of courtesy." According to Mr.
12 Varner, BellSouth has "no legal or mandated obligation" to provide
13 notification of changes to business rules that will directly affect
14 BellSouth's customers, such as ITC^DeltaCom. The Commission should
15 expressly reject Mr. Varner's contentions.

16 By not providing sufficient notification, and by not being
17 contractually obligated to do so, BellSouth is able to make changes to its
18 business rules and guidelines at will. Such a practice has severe
19 implications for all CLECs, including ITC^DeltaCom and creates an
20 enormous opportunity for anticompetitive abusive practices. As a
21 customer of BellSouth, ITC^DeltaCom must have sufficient notification of
22 changes to business rules and guidelines in order to ensure that service
23 to our customers is not disrupted. Otherwise, ITC^DeltaCom's business
24 operations are jeopardized.

1 I urge the Commission to require BellSouth to provide 45 days
2 advance notification of changes to business rules and guidelines for the
3 reasons stated in my direct testimony and enumerated above.
4 Specifically, ITC^DeltaCom requests that BellSouth be required to
5 provide advance notice to designated ITC^DeltaCom personnel of
6 changes to BellSouth business rules and guides that would affect a
7 CLEC's operations via e-mail or facsimile, whichever is more convenient
8 to BellSouth.

9

10 Q: DOES BELLSOUTH ALWAYS PROVIDE ADVANCE NOTICE TO
11 BUSINESS RULE CHANGES?

12 A: No. Although Mr. Varner asserts that BellSouth does provide advance
13 notice, ITC^DeltaCom has found instances where BellSouth does not
14 communicate such changes.

15 Q: PLEASE PROVIDE AN EXAMPLE.

16 A: For example, on June 8, 1999, ITC^DeltaCom began receiving
17 clarifications for orders that contained hunting. Hunting is a common
18 feature requested by small and large business customers. Hunting allows
19 a call to roll over to the next available line. The clarification from
20 BellSouth stated that the rotary page did not match the hunting
21 sequence. After investigation, we learned that the rotary page is a
22 screen on the BellSouth proprietary system. The LEO guides do not
23 have any documentation of such a page. Basically, BellSouth
24 implemented a new rule without issuing documentation. This particular

1 example has been resolved with BellSouth but provides an excellent
2 example to the Commission illustrating the problems associated with
3 BellSouth's approach to business rule change communications. Without
4 advance notice, orders are dropped and result in delays to the end-user.
5 In this case, BellSouth has agreed not to implement this new rule until we
6 have implemented the change in our system. BellSouth should be
7 directed to take this approach in every case.

8

9 Q: BELLSOUTH'S WITNESS VARNER OPINES THAT ITC^DELTACOM'S
10 REQUEST FOR TRAINING IS UNREASONABLE. DO YOU AGREE?

11 A: No, I do not. Mr. Varner states that ITC^DeltaCom has requested that
12 BellSouth provide two seats and a seat for each new hire in training
13 classes. It appears that Mr. Varner is confused. ITC^DeltaCom has
14 never requested that a training seat be provided for each new hire.
15 ITC^DeltaCom has simply requested that BellSouth maintain the status
16 quo of two free seats when OSS training is needed due to a change
17 being implemented by Bellsouth. Since this is the current policy that
18 BellSouth and ITC^DeltaCom operate under, it is unclear why Mr. Varner
19 views this as an "entirely unreasonable" request. I would add that
20 ITC^DeltaCom is pleased to learn from Mr. Varner that BellSouth will
21 offer "one free seat for each ALEC in OSS-related courses" and that
22 BellSouth will be implementing a web based training system for certain
23 courses in the fall. ITC^DeltaCom accepts BellSouth's compromise for
24 providing one free training seat to ITC^DeltaCom, and respectfully

1 requests that the Commission expressly acknowledge the parties
2 compromise for resolution of this issue.

3

4 **Issue 2(g) How should "order flow-through" be defined?**

5

6 Q: BELLSOUTH'S WITNESS, MR. PATE, STATES THAT IT IS NOT
7 NECESSARY TO DEFINE "FLOW-THROUGH" IN THE PARTIES'
8 INTERCONNECTION AGREEMENT? PLEASE COMMENT.

9 A: ITC^DeltaCom believes that order flow-through should be defined in the
10 parties' interconnection agreement. Order flow through is one of the
11 Performance measurements contained in Attachment 10. Put simply,
12 without a definition, this measurement cannot be accurately recorded.

13

14

15

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17 Q: WHAT IS YOUR UNDERSTANDING OF BELLSOUTH'S DEFINITION
18 OF "FLOW-THROUGH"?

19 A: Apparently, BellSouth has defined order flow-through differently for
20 CLECs than for itself. As defined by BellSouth, order flow through for
21 BellSouth includes taking information directly from its customer, and while
22 the customer is on-line with the BellSouth representative, inputting the
23 information into BellSouth's ordering system. In essence, BellSouth has

1 created the entire order and completed the pre-ordering and ordering
2 steps while the customer is on-line.

3 For CLECs, however, BellSouth defines order flow through as
4 starting when "the complete and correct electronically-submitted LSR is
5 sent via one of the ALEC ordering interfaces (EDI, TAG, or LENS)."
6 Under this definition, BellSouth has ignored the pre-ordering part of this
7 process, as Mr. Pate affirms on page 13 of his testimony. This means
8 that BellSouth is comparing the time it takes itself to complete the pre-
9 ordering and ordering steps verses the time it takes for a "complete and
10 correct" electronic order submitted by ITC^DeltaCom to work its way
11 through BellSouth's systems. By making this comparison, BellSouth
12 cannot demonstrate through performance measures whether or not it is
13 providing parity in order flow-through.

14

15 **Issue 25: [ITC^DeltaCom Issue 3(b)] Should ITC^DeltaCom and**
16 **BellSouth be required to follow the ATIS/OBF business rules?**

17

18 Q: WHAT IS ITC^DELTA COM'S POSITION ON THIS ISSUE?

19 A: It is my understanding that this issue has been resolved by the parties;
20 however, ITC^DeltaCom reserves the right to file supplemental testimony
21 on this issue, should it be further disputed.

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Issue 26: [ITC^DeltaCom Issue 3(d)] Should BellSouth be required to provide ITC^DeltaCom access to Universal Service Order Codes ("USOCs"), Field Identifiers ("FIDs") and other information necessary to process orders in a downloadable format?

Q: WHAT IS ITC^DELTACOM'S POSITION ON THIS ISSUE?

A: It is my understanding that this issue has been resolved by the parties; however, ITC^DeltaCom reserves the right to file supplemental testimony on this issue, should it be further disputed.

Issue 27: [ITC^DeltaCom Issue 3(f)] Should BellSouth be required to maintain both the current and the next previous version of an electronic interface?

Q: WHAT IS ITC^DELTACOM'S POSITION ON THIS ISSUE?

A: It is my understanding that this issue has been resolved by the parties; however, ITC^DeltaCom reserves the right to file supplemental testimony on this issue, should it be further disputed.

Issue 28: [ITC^DeltaCom Issue 3(g)] Should ITC^DeltaCom have at least 90 days advance notice prior to BellSouth discontinuing an OSS interface?

1 Q: WHAT IS ITC^DELTACOM'S POSITION ON THIS ISSUE?

2 A: It is my understanding that this issue has been resolved by the parties;
3 however, ITC^DeltaCom reserves the right to file supplemental testimony
4 on this issue, should it be further disputed.

5

6 **Issue 30: [ITC^DeltaCom Issue 3(i)] Should BellSouth be required to**
7 **maintain UNE/LCSC hours from 6 a.m. to 9 p.m.?**

8

9 Q: MR. PATE, ON PAGE 22 OF HIS TESTIMONY, STATES THAT THE
10 LCSC HOURS OF OPERATION ARE CURRENTLY 24 HOURS A DAY,
11 7 DAYS A WEEK, HOWEVER, THESE HOURS WILL SOON BE
12 CHANGED TO MONDAY THROUGH SATURDAY FROM 6:00 A.M. TO
13 MIDNIGHT. PLEASE COMMENT.

14 A: ITC^DeltaCom is encouraged that BellSouth will operate its LCSC
15 Monday through Saturday from 6:00 a.m. to midnight. During the parties'
16 negotiations, BellSouth continually presented hours of operation for the
17 LCSC from 8:00 a.m. to 5:00 p.m. A copy of BellSouth's proposed LCSC
18 hours is attached as Exhibit MT-3. Based on Mr. Pate's affirmation that
19 BellSouth will, at a minimum, operate its LCSC Monday through Saturday
20 from 6:00 a.m. to midnight, ITC^DeltaCom is willing to modify Attachment
21 6, Paragraph 4.8.1 to include these hours of operation. With this
22 modification, ITC^DeltaCom considers this portion of the issue closed.
23 However, with regard to the UNE Center hours of operation,

1 ITC^DeltaCom maintains that the appropriate hours of operation are from
2 6 a.m. to 9 p.m., as stated in my direct testimony.

3

4 **Issue 31: [ITC^DeltaCom Issue 3(j)] Should BellSouth be required to**
5 **provide a toll free number to ITC^DeltaCom to answer questions**
6 **concerning BellSouth's OSS proprietary interfaces from 8 a.m. to 8**
7 **p.m.?**

8

9 Q: WHAT IS ITC^DELTACOM'S POSITION ON THIS ISSUE?

10 A: It is my understanding that this issue has been resolved by the parties;
11 however, ITC^DeltaCom reserves the right to file supplemental testimony
12 on this issue, should it be further disputed.

13

14 **Issue 32: [ITC^DeltaCom Issue 3(k)] What information should be**
15 **included in the Firm Order Confirmation (FOC)?**

16

17 Q: WHAT IS ITC^DELTACOM'S POSITION ON THIS ISSUE?

18 A: It is my understanding that this issue has been resolved by the parties;
19 however, ITC^DeltaCom reserves the right to file supplemental testimony
20 on this issue, should it be further disputed.

21

1 **Issue 34: [ITC^DeltaCom Issue 3(m)] What type of repair information**
2 **should BellSouth be required to provide to ITC^DeltaCom such that**
3 **ITC^DeltaCom can keep the customer informed?**
4

5 Q: ON PAGES 24 AND 26 OF HIS TESTIMONY, MR. PATE CLAIMS THAT
6 BELLSOUTH PROVIDES ITC^DELTACOM WITH NON-
7 DISCRIMINATORY ACCESS TO MAINTENANCE AND REPAIR OSS.
8 PLEASE COMMENT.

9 A: ITC^DeltaCom agrees with Mr. Pate that BellSouth's maintenance and
10 repair interfaces must allow ITC^DeltaCom and other CLECs to enter
11 customer trouble tickets into the BellSouth maintenance system, retrieve
12 and track the current status of ITC^DeltaCom repair tickets, and receive
13 an estimated time to repair on a real-time basis. However, it is critical
14 that BellSouth also provide ITC^DeltaCom the ability to receive timely
15 notification if a repair technician is unable or anticipates being unable to
16 meet a scheduled repair, retrieve a list of itemized time and material
17 charges at the time of ticket closure, provide test results, and
18 electronically notify ITC^DeltaCom when the trouble is cleared.

19 It is my understanding that BellSouth agreed that it could provide timely
20 notification if a repair technician is unable or anticipates being unable to
21 meet a scheduled repair, provide test results, and notify ITC^DeltaCom
22 when the trouble is cleared via the TAFI electronic interface. Therefore,
23 it is unclear to me why Mr. Pate omitted these capabilities from the
24 functions he lists in his testimony. In addition, it is also my understanding

1 that BellSouth's electronic maintenance interfaces can not currently
2 retrieve a list of itemized time and material charges at the time of ticket
3 closure. ITC^DeltaCom is indifferent as to whether BellSouth sends
4 itemized time and material charges for maintenance and repair to
5 ITC^DeltaCom via an electronic interface or some other means. The
6 issue is that ITC^DeltaCom must receive sufficient information in order
7 to verify the charges incurred for maintenance performed by BellSouth.
8 This would include all time and material charges, itemized by time spent,
9 price of materials used, procedures employed, amounts incurred in each
10 such category, and total by customer, per event. Therefore, as stated in
11 my direct testimony, and reiterated above, the information being
12 requested by ITC^DeltaCom is required in order for ITC^DeltaCom to
13 track the resolution of its customers' troubles and to be able to inform
14 ITC^DeltaCom customers of the status of their repair. Further,
15 ITC^DeltaCom must receive timely billing information in order to verify the
16 charges that it incurs for maintenance performed by BellSouth. Without
17 this information, ITC^DeltaCom can not provide the level of service which
18 our customers expect us to provide, accurately bill our end-user and
19 verify BellSouth's charges, nor can BellSouth claim that it is providing
20 non-discriminatory access to maintenance information and interfaces.

21

22

**Issue 38: [ITC^DeltaCom Issue 6(a)] What charges, if any, should
BellSouth be permitted to impose on ITC^DeltaCom for BellSouth's
OSS?**

23

24

1

2 Q: PLEASE CLARIFY ITC^DELTACOM'S POSITION REGARDING
3 CHARGES FOR OSS.

4 A: ITC^DeltaCom's position on this issue is fully addressed by Mr. Wood
5 and Mr. Rozycki. BellSouth does not provide adequate OSS ordering
6 and provisioning to ITC^DeltaCom today and ITC^DeltaCom should not
7 have to pay for something that BellSouth is unable to deliver. Exhibit
8 MT-2 of my direct testimony marked confidential and proprietary shows
9 the ordering and provisioning intervals that ITC^DeltaCom has
10 experienced during the first six months of 1999. These intervals, which
11 are undisputed by BellSouth, clearly show that ITC^DeltaCom is not privy
12 to adequate OSS in the state of Florida.

13

14 Q: DOES THIS CONCLUDE YOUR TESTIMONY?

15 A: Yes. But I must note that information provided by BellSouth through
16 discovery may have a great impact on my testimony. For that reason, I
17 think it is crucial that I be permitted to incorporate the impact of such
18 information into my final presentation to the Commission.

19

ORDERING AND PROVISIONING

1. Quality of Ordering and Provisioning

1.1 BellSouth shall provide ordering and provisioning services to DeltaCom that are equal to the ordering and provisioning services BellSouth provides to itself or any other CLEC, where technically feasible. Detailed guidelines for ordering and provisioning are set forth in BellSouth's Local Interconnection and Facility Based Ordering Guide and Resale Ordering Guide, as appropriate, and as they are amended from time to time during this Agreement.

1.2 BellSouth will perform provisioning services during the following normal hours of operation:

Monday - Friday - 8:00AM - 5:00PM (excluding holidays)
(Resale/UNE non coordinated, coordinated orders and order coordinated - Time Specific)

Saturday - 8:00 AM - 5:00 PM (excluding holidays)
(Resale/UNE non coordinated orders)

All other DeltaCom requests for provisioning and installation services are considered outside of the normal hours of operation and may be performed subject to the application of extra-ordinary billing charges.

2. Access to Operational Support Systems

2.1 BellSouth shall provide DeltaCom access to several operations support systems. Access to these support systems is available through a variety of means, including electronic interfaces. BellSouth also provides the option of placing orders manually (e.g., via facsimile) through the Local Carrier Service Center. The operations support systems available are:

2.2 Pre-Ordering. BellSouth provides electronic access to the following pre-ordering functions: service address validation, telephone number selection, service and feature availability, due date information, and upon Commission approval of confidentiality protections, to customer record information. Access is provided through the Local Exchange Navigation System (LENS). Customer record information includes any and all customer specific information, including but not limited to, customer specific information in CRIS and RSAG. DeltaCom agrees not to view, copy, or otherwise obtain access to the customer record information of any customer without that customer's permission and further agrees that

5/15/98

EXHIBIT MT-3

o. 1

ORDERING AND PROVISIONING

The rates, terms and conditions contained within this Attachment were negotiated as a whole and each rate, term and condition within the Attachment is interdependent upon the other rates, terms and conditions.

1. Quality of Ordering and Provisioning

1.1 BellSouth shall provide ordering and provisioning services to ITC^DeltaCom that are equal to the ordering and provisioning services BellSouth provides to itself or any other CLEC, where technically feasible. Detailed guidelines for ordering and provisioning are set forth in BellSouth's Local Interconnection and Facility Based Ordering Guide and Resale Ordering Guide, as appropriate, and as they are amended from time to time during this Agreement.

1.2 BellSouth will perform provisioning services during the following normal hours of operation:

Monday - Friday - 8:00AM - 5:00PM (excluding holidays)
(Resale/UNE non coordinated, coordinated orders and order coordinated - Time Specific)

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(Resale/UNE non coordinated orders)

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03/15/99

EXHIBIT MT-3
o. 2