



ORIGINAL



Peggy Arvanitas

AIRBORNE

April 21, 2001

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Ms. Blanca S. Bayo
Director, Division of Records/Reporting
Florida Public Service Commission
2540 Shurard Oak Blvd.
Tallahassee, Fla. 32399-0850

RE: NUMBER POOLING COST RECOVERY DOCKET NO. 001503-TP

Ms. Bayo,

Enclosed is original and six (6) copies of Peggy Arvanitas' Comments of Cost Recovery Number pooling filing. An original and copy is attached. Please stamp filed and return same to me. Copies of Certificate of Service have been attached and have been sent to the patries.

Sincerely,

Peggy Arvanitas
Peggy Arvanitas

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BEFORE THE PUBLIC SERVICE COMMISSION OF FLORIDA

NUMBER POOLING COST)
RECOVERY AND ALLOCATION) PSC Docket No. 001503-TP
DOCKET FOR THE STATE OF)
FLORIDA)

Peggy Arvanitas' Comments

As the lone consumer on this cost recovery for number Pooling docket, I am taking this opportunity to do a very in depth filing that I feel is lacking within the Industry and the public service Commission of Florida staff employees, some who are from electric and wastewater divisions and have no previous telecom experience. Since no FORMAL notification was advertised for this filing, according to administrative procedures, one cannot close a docket to comments that was not legally and administratively open for comments. therefore, I am notifying pSC staff that I consider this timely filed.

There seems to be some misunderstanding that if florida is doing its own pooling trials outside of the scope of the national pooling trials, that federal orders from FCC 95-116, FCC 00-104, and FCC 00-429 do not apply to Florida laws. According to florida statutes 120.50, florida must incorporate federal order language in state orders. And F.S.120.80 says Florida must incorporate the language of the 1996 Telecom act into state order language. The state cost recovery is not a slush fund wherein one may dump everything including grandma's condo fees into the Industry's cost recovery for pooling. For the state of florida's cost recovery to conform to the federal pooling trials, we must follow the dictates for federal cost recovery. We are only sorry that the FCC did not select a national pooling administrator and leave the states and the Industry in this predicament.

The other concern i have as I read the filings done by the Industry especially Bellsouth, is the incredible opportunity bellsouth and other older-equipment ILECs are taking to ask for recovery for the SAME EQUIPMENT THAT THEY RECEIVED REIMBURSEMENT FOR WITH THE PORTABILITY DOCKET 95-116 in 1998, and 1999! And we cannot have this occur, because, FCC order 00-104 ¶224:

"We noted with regard to number portability cost recovery that (c)arriers already allocate general overhead costs to their rate

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for other services, and allowing general overhead loading factors ... might lead to double recovery."

So I will also identify, for the industry and pSC of florida, since equipment infrastructure seems to be your weakness, a breakdown or roadmap to sanity for you.

NUMBER POOLING COST RECOVERY WILL FOLLOW THE SAME
THREE CLASSIFICATIONS AS NUMBER PORTABILITY

FCC Order 00-104, ¶193 says:

"In this report and order, we adopt cost recovery principles that are similar to those established for number portability. We conclude that the technical requirements of 1000 block number pooling and number portability are very similar, and thus, adopting different methods of cost recovery would create an unnecessary administrative burden on the carriers and the numbering administrator."

The three classifications are 1) costs that are shared between carriers, 2) costs directly related to number pooling (portability) and 3) costs NOT directly related to number pooling (portability). Unfortunately, we have a major ILEC, Bellsouth, who hasn't read FCC orders. According to Bellsouth's Feb. 2001 filing with the pSC of Florida, they say:

"..BellSouth is unable, however, to provide a detailed cost study at this time, "... "The lack of cost information, however, should not preclude the commission from establishing an interim cost recovery mechanism, since the cost recovery mechanism is not dependent of the types of costs." (pg 5)

Unfortunately, BellSouth does not "have a handle" on FCC orders, and so I am hoping the Commissioners will be able to read Orders better.

BellSouth further advises the PSC of Florida that "all of the florida specific costs and an allocated portion based on access lines of the regional costs associated with number pooling pooling be assigned to Florida for recovery." (pg 7) Unfortunately, this is not "competitively neutral" in violation of the section 251(e)(2) of the 1996 Telecom Act. But we will revisit this later in the filing.

IF YOU WERE ALLOWED SPECIFIC COST REIMBURSEMENT FOR PORTABILITY
YOU WILL NOT BE ALLOWED IDENTICAL EQUIPMENT REIMBURSEMENT FOR
POOLING

If all is lost and Florida Commissioners are confused, the FCC has given us all a "but for" test that they used in the number portability proceedings. FCC 00-104 ¶218:

"We find that the 'but for' test used in the number portability

"preceeding should also be used by carriers to identify carrier-specific costs directly related to 1000 block number pooling and administration."...."We adopt, therefore, the two part 'but for' test described above as a method of identifying the costs that are directly related to thousand block pooling. Costs that both would have not have been incurred by the carrier 'but for' the implementation of 1000 block pooling AND were incurred 'for the provision of' 1000 block pooling are eligible for recovery and should be identified in the cost studies."

BellSouth, in FCC 95-116 docket-portability order had an Aug. and November 1998 filing in which they identified over 20 pieces of equipment for portability cost recovery as they are now asking, 3 years later, in a state of florida number pooling cost recovery docket. I am attaching this to the state of Florida filing, so that bellSouth and the Commission can weed through, with the ever loving CLECs, what should be excluded for fear of double recovery. I will take the opportunity to highlight a few of the most obvious "faux pas". And together, we will apply the "but for" tests together.

BellSouth has a group of "network costs" that, according to it's Feb 2001 PSC of florida filing it should be reimbursed for Switch feature upgrades- 5eSS, DMS 100, "network hardware" switch generic software upgrades It says these upgrades "will be advanced in order to provide TNP." (pg 14) According to 981444-TP docket and the order PSC-01-0051-PAA-TP, Bellsouth proclaimed it had 19 1AESS switches that are over 28 years old. BellSouth had the adacity to wait until after a pooling trial docket to proclaim it's switches were too old to pool. Lucent says the life span of AESS switches is only 20 years. So, a good 50% of BellSouth's switches in the Stat of Florida are on it's deathbead. Pray tell, how can we do switch software upgrades on 5ESS switches if we still have AESS switches? Is BellSouth expecting 100% cost reimbursement for 19 1AESS switches, too? You need to upgrade switches for POTS, UNE's with other CLEC's and the like. The "but for" test fails for number pooling. This is a portability cost upgrade.

OSS and Service management system upgrades are listed as pooling costs upgrades. (pg 15). Unfortunately, these were portability upgrades, and are only recoverable under the portability surcharge in our phone bills. OSS upgrades were also listed as costs for pOTS (plain old telephone service). How many times are we going to recover these same costs?

ATLAS and COSMOS are inventory software that they had to upgrade beacuse of number classifications changed by FCC 00-104 (administrative, reserved, intermediary numbers)Of course, I remembered these TN systems because even after the FCC gave Industry an extra six months

upgrade their TN systems, bellSouth was still a month late, and could not report their utilization thresholds. Why are they including these systems in their pooling costs? Billing and provisioning systems, by their nature, would still need to be upgraded, as they are necessary for POTS.

BellSouth also declared in our PSC 00-1046 number pooling order that it needed to be reimbursed for SS7 upgrades. SS7 networks use signalling links to transmit routing messages between switches, and switches and call related databases. Also between line information Database, Toll free calling, and AIN databases. SS7 supports AIN networks switches. An AIN capable switches are used in the deployment of number portability, wireless roaming, voice recognition services, and CLASS services.

of course, we all know that in our 1999 psc legislative report was full of proclamations that BellSouth and Verizon made to the Commission that it was none of your business how much money they made on CLASS vertical services, such as call waiting, call forwarding, voice mail... Even though over 50% of both of these ILEC's customers paid for more than POTS with these extras, your lovely ILECs would not disclose the revenue and gave NO COST ALLOCATION to equipment (lines and switches) and therefore we have a magnificent inflated cost allocation for plain old phone service. And no cost allocation for CLASS services. And so, should GTE or BellSouth be allowed to recover these equipment upgrades? "Wouldn't have to upgrade 'but for' number pooling.....?"

As I come to a frightful close of this pathetic charade of blunders from a Bellsouth filing, I am wondering if Levent Ileri and I (since we are the Mommy and Daddy of the state Cordination Group) couldn't give you the phone numbers of some good state Commissioners, so that you consult with experts who have gone before you and conquered the Industry because you are so busy dismissing the only intelligent consumer in this docket who reads. If the Industry does not want to produce costs then I demand the PSC withhold cost recovery until such time you can physically review costs and uphold your fiduciary duties to defend the pocketbook and sanity of the State of florida Consumers. Anything less would be in violation of federal orders and florida statutes.

your Lone Consumer you keep dismissing for some strange reason,

Vicky Ileri

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| OSS DEFINITIONS | | |
|------------------|---|---|
| BELLSOUTH SYSTEM | DESCRIPTION | DESCRIPTION OF LNP MODIFICATION |
| ATLAS | "Application for Telephone Number Load Administration and Selection" performs telephone number load and selection including selection of common language circuit ID serial numbers in a TN format. In addition, ATLAS supports TN selection, inventory and assignment for services beyond POTS, including complex services, small business services and AIN services. | BellSouth modified ATLAS for LNP to handle TN administration because COSMOS, which currently performs TN assignment, is a wire center based system, whereas LNP calls for a cross wire center view of TNs. BellSouth also developed a SOAC LNP interface with ATLAS to administer ported telephone numbers. |
| BONIS | <p>"BellSouth On-line NXX Information System" is a Corporate Data base system that supports the following capabilities:</p> <ul style="list-style-type: none"> • Selects a NPA NXX for assignment to a Code Applicant • Verifies that it does not pose cross-boundary seven-digit dialing conflicts • Notifies the Code Applicant of the assignment and effective date • Issues the Code Memorandum that activates the NPA NXX in the BellSouth network • Feeds P/SIMS to provide the negotiating systems and ATLAS with LNP eligibility data and to provide LNP eligibility data on BST NXXs to RDBS inputters. • Feeds ARTS for CCM routing • Provides ability to generate LNP eligibility report to OSs that are not able to accept a mechanical feed (CRIS CO data base). • Capability to generate reports for Public Utilities Commission requests for data/interrogatories. | BellSouth enhanced BONIS Data base for LNP to support new business processes related to Service Provider Portability ("SPP") including sending downstream work groups a code memorandum containing sufficient information to activate LNP NPA NXXs. |
| CABS | "Carrier Access Billing System" - Used to access, retrieve, record, process, transmit and render access customer billing data. | BellSouth modified CABS for LNP to address message processing changes required to accommodate for the loss of NPA NXX uniqueness such as LRN Lookup, 800 Data base queries made from a ported number, AMA recording, and access bill changes. |
| CARE | Carrier Access Record Exchange - used to process equal access records | BellSouth modified CARE for LNP to address design changes for recognition of telephone numbers from/to BellSouth in order to provide notification to the appropriate Primary Interexchange Carrier ("PIC") and Local Primary Interchange Carrier ("LPIC") of record. |

| OSS DEFINITIONS | | |
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| BELLSOUTH SYSTEM | DESCRIPTION | DESCRIPTION OF LNP MODIFICATION |
| COFFI | <p>"Central Office Features File Interface" - is an inventory/data base interface for service order negotiation systems and other network systems. On-line systems can access COFFI to retrieve information on services, features, PIC/LPIC data that is applicable to a particular NPA NXX.</p> | <p>BellSouth provided upgrades to COFFI for LNP to allow the users access to information to associate CLEC NXXs with: Toll Message Rate Center ("TMRC"), LNP Capability Indicator, (Indicator that NXX is owned by a CLEC), and a LNP Capable Date. For service order processing flow through, COFFI upgrades address requests from the service order negotiation systems to map the first six characters of the LRN associated with a NPA NXX to the service order.</p> |
| CRIS/BOCRIS | <p>"Customer Record Information System/Business Office" CRIS: Used to access, retrieve, record, process, transmit and render retail (Business & Residential) customer billing data. "BOCRIS" is an on-line system used to access and input customer data required to support service order and message processing and billing.</p> | <p>BellSouth modified CRIS for LNP to address service order processing and message processing changes associated with number porting. Upgrades to CRIS include changes to system features and functions designed to accept and retrieve information necessary to recognize, record, and bill for number porting services.</p> |
| DIS | <p>"Data base Integrity System" compares data elements in BOCRIS, RSAG, LFACS, COSMOS, and LMOS. In comparing the data bases, DIS identifies discrepancies, makes logical corrections based on interdepartmental rules, and generates update files to the originating systems.</p> | <p>BellSouth enhanced DIS software for LNP to recognize new loop statuses in LFACS, COSMOS, and LMOS introduced by LNP.</p> |
| DDNS | <p>"Directory Delivery Notification System" - Primary function of DDNS is to review all service orders daily to identify order activity that indicates that directories need to be delivered. DDNS passes specific field data to the BellSouth Advertising & Publishing Company ("BAPCO") Directory Delivery System for completing the processes required to deliver directories to customers.</p> | <p>BellSouth modified DDNS for LNP to support LNP address changes required to recognize and react to specific Field Identifier data, ZLSA/EXK - the service order address for NXX exchange key, identifying CLEC NPA NXX and initiating notification to BAPCO to process and complete the delivery of directories to customers.</p> |

| OSS DEFINITIONS | | |
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| BELLSOUTH SYSTEM | DESCRIPTION | DESCRIPTION OF LNP MODIFICATION |
| DOE/DSAP | "Direct Order Entry/DOE Support Application" - Service order negotiation system used by BellSouth Business Services Centers (Small Business, Complex Business, Local Customer Service Center) to process and issue orders for GA, FL, NC, SC. | BellSouth modified DOE/DSAP for LNP to provide the capabilities to negotiate and generate service orders associated with number porting, including screen changes, edits, system interface upgrades, new FIDs and Universal Service Order Codes ("USOCs"), service order negotiation and activity types. |
| DPRO | "Digital PROvisioning" - assists the Outside Plant Engineer in creating and distributing the span design for customer DSI services. | Enhanced DPRO for LNP to accept concept of CLEC NPA NXX occurring in more than one BellSouth switch. |
| E911-IREIS/BSSDI | E911/BSSDI is an arrangement by which BellSouth E911 Telephone Number ("TN") subscriber records, or any other CLEC subscriber records residing in the Interim Regional Emergency Information System ("IREIS"), can be provided to another E911 system. BellSouth has been requested to provide their TN subscriber records to other E911 Systems where BellSouth is not the lead telephone company in a county, municipality, or parish. | BellSouth implemented National Emergency Number Association ("NENA") Company-ID values for data exchange, use of NENA Company-ID values from unauthorized data base updates, and inclusion of NENA Company-ID values in the Address Location Identifier ("ALI") data stream. |
| HAL | "Hands-Off Assignment Logic" is a terminal emulation system that resolves Request for Manual Assistance (RMA) in the AFIG. | BellSouth enhanced HAL for LNP to recognize the new LNP FIDs and screen changes associated with this data. ATLAS TN inquiries will also be added to support TN Administration move from COSMOS. |
| IBIS | "Interdepartmental Billing Investigation System" - Billing accuracy control that is used to initiate the investigation of billing defects. | BellSouth modifications to IBIS for LNP were the development of a new field to supply the LRN for WFA to dispatch/initiate completion of billing investigation cases that are forwarded to network for resolution. |
| IBISDI | IBISDI - is a Taskmate interface between IBIS and WFA-DI. It mechanizes both the loading of billing investigations to the appropriate person within the NISC and the closing of IBIS cases back to the originator. | Prior to LNP, IBISDI makes loading decisions to send to WFA-DI based on AMA Office Identification or on NPA NXX. With LNP the NPA NXX can no longer be used to select the WFA-DI location. BellSouth modified IBISDI to recognize the LRN that IBIS is supplying |
| ISP | "Installation Support Package" screens and reformats the service order for download to mapper, a programming language. | BellSouth enhanced ISP to accept new LNP FIDs to derive the appropriate unit number |

| OSS DEFINITIONS | | |
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| BELLSOUTH SYSTEM | DESCRIPTION | DESCRIPTION OF LNP MODIFICATION |
| LCCAM | "Line Class Code Assignment Module" mechanically assigns line class codes. | BellSouth enhanced LCCAM for LNP to read the data following the Field Identifier Exchange Key ("FID EXK") and use the data to determine which NPA NXX table in LCCAM to use to apply a line class code. |
| LEACS | "LMOS Error Analysis and Correction System" provides terminal emulation for error resolution. | BellSouth enhanced LEACS to read new LMOS screens implemented for LNP to support accounts that include Primary Line Identifiers ("PLIDs") and Secondary Line Identifiers ("SLIDs"), Ported Out ("POUT") scenario for LMOS data base update, TN Reclaim, and to update screen to BOCRIS to identify POUT FID. |
| LEAP/TAP | "Testing and Analysis Program" performs testing, analysis and referral of troubles on Service Orders ("SO") due today. | BellSouth enhanced TAP for LNP to use FID LRN instead of NPA NXX for routing test requests to the correct central office test system. |
| LIST | LIST - Provides directory information to the Operator Services Systems for Directory Assistance. LIST feeds Directory Assistance and Operator Services wholesale products data bases and validates service order listing entries. | BellSouth modified LIST for LNP to include changes to recognize CLEC NPA NXX based on the FID ZLSA/EXK and to retrieve and distribute to the Directory Assistance and Operator Services data bases listing data associated with number porting. |
| LMOS HOST -ALRU | "Automated Line Record Update" reads Service Orders in completed status from SOCS and executes batch runs to LMOS to update LMOS line records with Service Order activity. | BellSouth enhanced ALRU for LNP to mark Service Orders as Hybrid D or Port-Out, moved POUT FID in Unfielded identification section of SO to Service and Equipment ("S&E") section, changed the ported inventory update field identifier ("INVU FID") to ZNVU and changed POUT to ZPOUT when there is an appearance of the FID INVU on an outward action code (O) on a D order or C order in the S&E and a POUT FID on the same outward USOC line, and utilized EXK FID for Port-In SOs. |
| MISOP | "Mechanized Interface to the Service Order Processor" - Mechanized service order generator, for automated systems such as RightTouch, Complex Services Profile System ("CSPS"), Directory Orders, Online Treatment, and Independent Company Number Services ("ICONS"). MISOP feeds information to the service order negotiation systems, SONGS and DOE to generate service orders. | BellSouth modified MISOP for LNP to provide system capability to recognize and retrieve FID data for NPA NXX in association with a BellSouth switch when a CLEC order is being issued or when the service request pertains to a ported number. |

| OSS DEFINITIONS | | |
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| BELLSOUTH SYSTEM | DESCRIPTION | DESCRIPTION OF LNP MODIFICATION |
| MSA Test Terminations | "Metropolitan Statistical Area Test Terminations" for LNP testing (both intra-company and inter-company). Local test terminations will allow the testing of BellSouth's ability to Port-Out and Port-In telephone numbers as well as the testing of a CLEC switching network inter-connectivity to BellSouth's. Also, will be used to test the internal BellSouth ordering, provisioning, billing and maintenance process and by the CLECs in their LNP test cases. LNP tests provide the BellSouth work centers with a working knowledge of the new service capabilities and switching requirements of LNP. | Same |
| NETTS | "Network Trunk Translations System" application is used to automatically generate trunk group and member level translations for the Circuit Provisioning Group ("CPG"). | BellSouth enhanced system to support new LNP trunk group options and architecture changes for new CLEC facility based trunk groups. |
| ORION | "On-Line RSAG Interface for Order Negotiation" is an interface used by service reps to view the RSAG information based on service address. ORION provides an on-line presentation of RSAG address and living unit data for users of the service order negotiation systems for service input and address validation. | BellSouth modified ORION for LNP to display information (NPA NXX - first six characters of the LRN) to the service representative when an address validation occurs in RSAG in connection with a ported number. ORION will display data for the CLECs based on data received from RSAG and COFFI. |
| OVERTURE/ ROS | "Regional Ordering System" is a service order negotiation system that will replace the SONGS and DOE/DSAP legacy systems to provide regional service order negotiation and generation functionality for the Business Services Centers. | BellSouth modified ROS for LNP to provide center capabilities to negotiate and generate services orders for Port-Out and for Port-In to the appropriate central office switch in the BellSouth TMRC. |

| OSS DEFINITIONS | | |
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| BELLSOUTH SYSTEM | DESCRIPTION | DESCRIPTION OF LNP MODIFICATION |
| P/SIMS | "Products/Services Inventory Management System" is an inventory system that is used to access information on central office services, features, availability dates and NPA NXX. | BellSouth modified P/SIMS for LNP to associate all LNP capable NXXs belonging to CLECs with a BellSouth Central Office. Information regarding feature availability and service for a given NXX is maintained by P/SIMS and distributed to the service order negotiation systems to process service orders in connection with a ported number. |
| RE-LOG | "Referred to Engineering Log" system provides Outside Plant Engineering, Construction, Installation & Maintenance, the Address Facilities Group, and Consumers a means of mechanically tracking all held service orders in BellSouth. | BellSouth expanded the SOCS/ReLOG interface for LNP to include new LNP FIDs and tags. SOCS must be able to set a flag via FIDs to capture orders that fall into the LNP category. BellSouth enhanced ReLOG to receive this new data and store it for retrieval. |
| RICC (DBAS II INTERFACE) | RICC is a BellSouth mainframe interface system which receives service order data from SOCS and passes it to DBAS II for use in calling card validation. | BellSouth modified RICC for LNP to provide the capability to recognize ported number data on orders received from SOCS and is passed to DBAS II. |
| RIGHTTOUCH | RightTouch is an automated BellSouth system used by Consumer customers to make payment arrangements and order calling services. | BellSouth upgraded RightTouch for LNP to address changes for the system to recognize numbers that are ported-In from a CLEC as a BellSouth customer to provide customers with ported numbers access to automated features for making payment arrangements and for ordering calling services. |
| RNS | "Regional Negotiation System" is a service order negotiation system used by BellSouth Consumer Services Centers to process and issue retail orders for residential consumers. | BellSouth modified RNS for LNP to provide the capabilities to negotiate and generate service orders associated with number porting, including screen changes, edits, system interface upgrades, new FIDs/USOCs, service order negotiation and activity types. |
| RSAG | "Regional Service Address Guide" is an inventory system that maintains an association of street addresses to BellSouth wire centers used for service order processing. | BellSouth modified RSAG to allow a CLEC NPA/NXX to be associated with the appropriate BellSouth switch within a TMRC for processing orders associated with number porting |

| OSS DEFINITIONS | | |
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| BELLSOUTH SYSTEM | DESCRIPTION | DESCRIPTION OF LNP MODIFICATION |
| SNECS | SNECS interfaces between TAFI and MARCH to create line recent changes that correct customer trouble reports. | SNECS selects the switch that requires the line recent change based on NPA NXX tables provided by MARCH. Because LNP will require that NPA NXXs be duplicated within rate centers, this table will be obsolete. BellSouth modified SNECS to allow it to obtain the switch for LNP lines from TAFI. |
| SOCS | "Service Order Control System" provide routing and distribution of service orders to associated service order processing systems (for example, network systems, billing, systems, Service Order Edit Routine, LNP Gateway, etc.). | BellSouth upgraded SOCS for LNP for navigator contract arrangements with the LNP Gateway to send information on Port-Out and Port-In orders to the LNP Gateway. The information is used to provide routing information (LRN) to the NPAC. |
| SOER | "Service Order Edit Routine" is a subtask of SOCS, and interfaces with all the service order negotiation, provisioning, and billing systems associated with service order processing. | BellSouth upgraded SOER for LNP to mechanically validate/edit service orders containing LNP FIDs and/or USOCs, required for service order flow through. |
| SONGS | "Service Order Negotiation System" is a service order negotiation system used by BellSouth Business Services Centers (Small Business, Complex Business, Local Customer Service Center) to process and issue orders for AL, MS, KY, TN LA. | BellSouth enhanced SONGS for LNP to provide the capabilities to negotiate and generate service orders associated with number porting, including screen changes, edits, system interface upgrades, new FIDs/USOCs, service order negotiation and activity types. |
| TAFI | "Trouble Analysis Facilitator Interface" provides a mechanized interface to OSS involved with the repair process. TAFI uses rules based logic to provide automated trouble receipt, screening, and resolution for repair technicians in the Business Repair Center ("BRC") and the Residential Repair Center ("RRC"). | BellSouth provided changes to TAFI for LNP to accommodate corresponding changes to LMOS and M.I.T. Software changes were made to interface with the LNP TA application to allow repair technicians to access TAFI data through the LNP TA GUI. |

| OSS DEFINITIONS | | |
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| BELLSOUTH SYSTEM | DESCRIPTION | DESCRIPTION OF LNP MODIFICATION |
| TCN | The "Tightly Controlled Network" is a TCP/IP network that is highly secured. It consists of Bay Networks Routers and T1s connected to the BellSouth Open Systems Interconnection Platform ("BOSIP") through a single connection point in the Atlanta Data Center. Filters in the Atlanta routers inspect every packet to validate the source and destination address. Two major projects on TCN are AIN SMS and Electronic Communications Gateway. | BellSouth updated the current configuration of TCN for LNP because the prior configuration had one entry point to BOSIP for all traffic to and from TCN. Network redundancy was not provided so a single point of failure existed and represented a potential performance bottleneck. BellSouth established a new TCN Gateway interface in Charlotte, N.C to meet the requirements of LNP. |
| TIRKS/GTAS | "Generic Trunk Administration System" is a submodule of the Bellcore TIRKS® system. GTAS gives BellSouth the ability to create new or modify existing TIRKS GTAS trunk translations screen in order to support new switch generic changes. | BellSouth enhanced the SESS trunk translation screen to add one new field required for the SE12 generic feature, Port-In in Locations with Overlay NPAs. This new field was required for ISDN PRI trunk groups. |
| TRAFFIC-WISE | Traffic-WISE is a system that performs subscriber line usage studies | BellSouth developed an Intranet page to provide a manual workaround for determining a Common Language Location Identifiers ("CLLI") from a 10 digit Ported-in Telephone Number. |
| VNS | "Virtual Negotiation System" is used by telemarketing vendors to negotiate and issue service orders. | BellSouth upgraded VNS to recognize and provide a message to the user that a number is a port-in CLEC number and to support service order format changes associated with numbers ported-in. |

| OSS DEFINITIONS | | |
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| BELLCORE SYSTEM | DESCRIPTION | DESCRIPTION OF LNP MODIFICATION |
| COSMOS | "Computer System for Mainframe Operations" performs TN assignment and administration, preferential assignment of equipment, frame jumper reuse, tie-pair management, and frame work management. | COSMOS is a wire center based system, whereas, LNP calls for a cross wire center view of telephone numbers. New data fields must be added to meet FCC requirements. TN administration will be removed from COSMOS and handled by another system. BellSouth was required to enhance software for Dial Transfer, Area Transfer, and Frame transfer to support LNP environment. |
| DBAS II | "Data Base Administration System" is a Bellcore product used for updating BellSouth's Line Information Data Base (LIDB) for calling cards, third number and collect billing. DBAS supports and disseminates information to LIDB. | BellSouth was required to upgrade DBAS II to include LNP capability support for service provider ID being added to LIDB for administering calling cards, third number and collect billing in connection with ported numbers. The system required upgrade to recognize activity at the line level versus the NPA NXX level. |
| ITE/SG | "Integrated Traffic Engineering/Strategy Generator" monitors the SS7 network and traffic on switches. | BellSouth was required to update the ITE Common Channel Signaling (CCS) model library to include up to 50 new models to support performance monitoring and sizing for LNP. |
| LFACS | "Loop Facility Assignment and Control" system maintains a mechanized inventory of outside plant facilities and assigns the outside plant facilities to Assignment Requests received from SOAC as a result of customer service order activity. LFACS also generates work sheets for cable transfers. | BellSouth was required to expand the SOAC interface to LFACS for LNP to include the new FIDs and tags indicating that service is being ported-in or ported-out. Changes are required to the current connected facilities processing to permit different rules when the customer is disconnecting because they are porting out versus a normal disconnect. |
| LIDB | "Line Information Data Base" is a national level administrative system for calling cards, third number and collect billing. | BellSouth was required to upgrade LIDB for LNP to add service provider ID to administer calling cards, third number and collect billing in connection with ported numbers. |

| OSS DEFINITIONS | | |
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| BELLCORE SYSTEM | DESCRIPTION | DESCRIPTION OF LNP MODIFICATION |
| MARCH | MARCH system provides automated service order flow-through and/or facilitates the manual entry of service request information into end offices. MARCH translates line-related service order data into switch provisioning messages to targeted stored program control system switches. | BellSouth was required to expand the SOAC interface to MARCH for LNP to include new FIDS and tags indicating that service is being ported-in or ported-out. MARCH must be able to set the terminating trigger in the original (ported-out) Local Digital Switch. It also was upgraded to correctly sequence the LNP orders to reduce the amount of downtime the customer will experience during a transition and to establish the correct intercept treatment that the customers will receive. |
| MYNAH (AETG) | MYNAH is used by the Interproduct test group to test network applications. | BellSouth was required to enhance MYNAH for LNP to more rapidly create thorough automated software tests for the increase test that are required to support LNP implementation. |
| NETPILOT | NetPilot is the Memory Administration Operations System for recent change updates to the Common Channel Signaling Network Elements. | BellSouth was required to enhance NetPilot for LNP to utilize the 10 Digit Destination Point Code Translation versus the 6 Digit Destination Point Code. This feature supports the Memory Administration of new Global Title Translations that will route Transaction Capabilities Application Part messages to the Message Relay node function for ported 10 digit telephone numbers involved in LNP. |
| NSDB | "Network and Services Data Base" supports the provisioning and maintenance of customer services and network infrastructure. It retains layout records for all design services including specials, message and carrier. It also contains some non-design circuits or services. | BellSouth was required to enhance NSDB to process, store and display the new FIDs and tags associated with LNP. The LNP indicators must be stored and displayed in NSDB to facilitate provisioning and maintenance as well as the Centers personnel interfacing with the CIECs for these activities. |
| SOAC INTERFACE TO ATLAS | "Service Order Analysis and Control interface to Application for Telephone Number Load Administration and Selection" provides access to BellSouth's internally developed ATLAS system | BellSouth was required to provide an interface from SOAC to ATLAS to support LNP implementation. |

| OSS DEFINITIONS | | |
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| BELLCORE SYSTEM | DESCRIPTION | DESCRIPTION OF LNP MODIFICATION |
| SOAC | "Service Order Analysis and Control" is a key system of the FACS family. It receives and parses service orders and creates the Flexible Computer Interface Format ("FCIF") messages that go downstream to provisioning systems. | BellSouth was required to expand the SOAC interface to COSMOS, LFACS, TIRKS, and NSDB to include new FIDS and tags for LNP. The new FIDS and tags, required to identify ported-out and ported-in TNs, must be processed on service orders. |
| WFA/C | "Work and Force Administration" systems manage and automate most of the work assignments required to install and repair BellSouth facilities, trunks, special service circuits, and business/residence lines. WFA/C (WFA-Control) is an automated on-line system that serves to mechanize, within a control center, the overall coordination and tracking of the Installation & Maintenance ("I&M") activities associated with special service, message carrier and non-designed circuits or services. | BellSouth was required to enhance WFA/C interface to NSDB, WFA/DO, and WFA/DI to support new LNP FIDs and tags. Line record information for exported TNs will be available for WFA/C processing via NSDB. Certain algorithms that use NPA NXXs as a criterion were enhanced to ignore ported-out circuits. |
| WFA/DI | "WFA/Dispatch In" is a work and force management system which serves to mechanize the overall coordination and tracking of the I&M activities for BellSouth work centers. | BellSouth was required to enhance WFA/DI to support new tags and FIDs for LNP. In addition, the WFA systems will have to be able to handle new order status for ported-out TNs, as well as enhanced USOC/FID processing to support new line record fields. |
| WFA/DO | "WFA/Dispatch Out" automates the work assignments of technicians who work outside the Central Offices to install and maintain telephone services. It automates such tasks as loading and prioritizing work requests, estimating the time required to do jobs, and scheduling the work. It provides on-line status tracking of work requests and helps track productivity of a work center for management use. | BellSouth was required to enhance WFA/DO to support new tags and FIDs for LNP. In addition, the WFA systems will have to be able to handle new order status for ported out TNs, as well as enhanced USOC/FID processing to support new line record fields. |

| OSS DEFINITIONS | | |
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| BELLCORE SYSTEM | DESCRIPTION | DESCRIPTION OF LNP MODIFICATION |
| Bellcore Professional Services - National LNP Coordination | Professional Services Work Order No. 7286BS - Local Number Portability - National LNP Coordination: Pursuant to FCC order, all LECs were required to implement LNP starting in October, 1997 in targeted Metropolitan Statistical Areas (MSAs). By December 31, 1998 the top 100 MSAs must have LNP capabilities. This work effort will assist the BellSouth in complying with the FCC order. | <p>The scope of this work is defined as:</p> <ul style="list-style-type: none"> Bellcore will provide 33 consulting days of LNP national coordination support consisting of the following activity: <ul style="list-style-type: none"> Bellcore will convene & support an LNP national coordination team consisting of participating clients. The mission will be to identify & share LNP implementation issues. <p>The specific work to be performed for BellSouth under this Work Order will be determined by Bellcore in 1997, based upon BellSouth & other participating clients' input.</p> |
| Bellcore Professional Services - LNP Operation Team Consulting for BellSouth | Work Statement # 6LNPBS - LNP Operation Team Consulting - BellSouth: Bellcore provided BellSouth an experienced consultant to support BellSouth's LNP Network Operations Team and to represent BellSouth's interests and needs to Bellcore. | Fixed fee includes BellSouth's share of Bellcore's travel & living expenses for Bellcore consultant to travel to BellSouth sites. |
| Bellcore LNP NPA Split Support (SOAC/LFACS) | <p>Software Services Work Statement # G42300 - LNP NPA Split Support (SOAC/LFACS):</p> <p>Licensed software enhancement delivered on OS2200 & MVS platforms for the FACS/Dual SOE SOAC (DSF) Release 20.5.</p> <ul style="list-style-type: none"> SOAC software will provide tools to split NPA NXXs in new tables for LNP, rather than splitting them manually. LFACS software will accept a new data item, EXG KEY, form SOAC & store it in the LFACS data base. The new item will include NPA NXX information, which is needed for an NPA split. | Same |

| OSS DEFINITIONS | | |
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| BELLCORE SYSTEM | DESCRIPTION | DESCRIPTION OF LNP MODIFICATION |
| Common Bellcore Package | <p>Software Services Work Statement # LNP304 -LNP - Software Solutions Common Support Carryover: Licensed software enhancements for the following OSS: SOAC, LFACS, MARCH, NSDB, WFA/C.</p> <ul style="list-style-type: none"> • On-site LNP Implementation Manager <ul style="list-style-type: none"> • Bellcore will provide an experienced Field Implementation Manager to assist with the Licensed Software implementation planning and management. • Installation services will be provided for NSDB, WFA/C, WFA/DI, & WFA/DO Licensed software. • Certify that the Licensed Software is functioning in Customer's test runtime environment, after the installation environment certification is completed, by executing a set of functional test cases. • LNP Project Management Support - 40 weeks of on-site support. | Same |

| OSS DEFINITIONS | | |
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| LUCENT SYSTEM | DESCRIPTION | DESCRIPTION OF LNP MODIFICATION |
| LMOS-FE | "Loop Maintenance Operations System Front End" is used to enter, status, track and test customer trouble reports and service orders. It also has mapper capabilities used to dispatch work items to the proper work group. | BellSouth was required to enhance LMOS-FE to enable storage of ported POTS numbers in Host and Front End Specials and Special Services ("SSD") data bases. The Cross Front End (XFE) was modified to accommodate the potential location of a ported number in a data base other than the home location for its NPA NXX. |
| LMOS HOST | "Loop Maintenance Operations System-Host" maintains customer line record information via the completed service orders for the purpose of processing trouble reports in the RRC, BRC, and Work Maintenance Center ("WMC"). | BellSouth was required to modify Host for LNP to support the new functionality required to handle Port-In to a non-home switch in the LMOS FE and Predictor. BellSouth was also required to modify the Process Orders as Written (POW) features to: 1) define a new type of hybrid Multi-line D SO, and 2) given the presence of the LINE and POUT DP FIDS, prevent the line from being disconnected, and instead ported-out. |
| MLT | "Mechanized Loop Testing" provides the means for testing Plain Old Telephone Service (POTS). It is used for identifying and correcting loop problems in response to customer trouble reports. It is also utilized for testing in an effort to prevent customer reports. | BellSouth was required to add a new line record item, the Location Routing Number (LRN), to the line record data provided to MLT by LMOS. The LRN will serve as a switch identifier. The Ported status will be added to the Line Record Feature list. This will indicate the current status of the DN, such as ported-in, ported-out. In addition, the Office Equipment ("OE") number will be required for testing ported numbers on all non-ESS5D switches. |

| OSS DEFINITIONS | | |
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| LUCENT SYSTEM | DESCRIPTION | DESCRIPTION OF LNP MODIFICATION |
| MTS/APRIL | "Mechanized Translations System(MTS)/with Automated Processing of RC Input Letters (APRIL)" stores the translations routing and billing forms/tables for the IAESS, SESS, and DMS-100/200/TOPS offices in a software format within a file server. An Electronic Technician (ET) makes changes to the forms/tables on a pending basis, and MTS creates the Recent Change messages to send to the switch. APRIL delivers the changes and keeps a status, reporting same to the ET, allowing the ET to do other tasks while the changes are being made. MTS/APRIL is also the system used by the NISC to input the complex routing and billing translations changes to the central office switches. | BellSouth was required to update MTS Forms/Tables to support LNP. APRIL was upgraded in order to deliver new Recent Change messages generated by MTS to the switch. |
| SSCAS | Craft Access System allows technicians to receive and close job assignments via a hand held terminal. It also allows technicians to access other operational systems to input, retrieve and manipulate data. | CAS is a function of the LMOS systems. BellSouth was required to make changes to software to accommodate expanded tables in LMOS. Any changes in LMOS must be mirrored in CAS. |

| OSS DEFINITIONS | | |
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| OTHER VENDOR SYSTEM | DESCRIPTION | DESCRIPTION OF LNP MODIFICATION |
| PREDICTOR (LET) | PREDICTOR provides switch and test data for POTS numbers. PREDICTOR maintains a customer record data base, separate from LMOS, which associates facility information with an ALIT tested customer telephone number. | BellSouth was required to make changes to software for LNP to 1) provide line record and user transaction changes to accommodate new LMOS data, 2) support data feed input changes from LMOS, 3) support data base changes to accommodate the expanded number of NPA NXXs, and 4) modifications to the query function that requires more system CPU. |

| OSS DEFINITIONS | | |
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| NEW SYSTEM DUE TO LNP | DESCRIPTION | DESCRIPTION OF LNP MODIFICATION |
| LNP AUTOMATION | LNP Automation was designed to mechanize service representative work functions in the Local Carrier Service Center. The application automates manual work effort to speed service requests from Competitive Local Exchange Carriers (CLECs) through the provisioning process. | BellSouth had this system developed specifically for the provision of LNP services. Additionally, BellSouth purchased hardware components specifically for this application. |
| LNP GATEWAY | The LNP Gateway applications was designed to interface BellSouth applications to the Number Portability Administration Center (NPAC). The LNP Gateway transmits messages from BellSouth applications to the NPAC as well as receives and forwards messages sent from the NPAC. | BellSouth had this system developed specifically for the provision of LNP services. Additionally, BellSouth purchased hardware components specifically for this application. |
| LNP TA | LNP Trouble Administration (LNP TA) was developed to allow BellSouth service technicians to manage troubles related to ported telephone service. | BellSouth had this system developed specifically for the provision of LNP services. |
| LNP TA GUI | The LNP Trouble Administration Graphical User Interface (GUI) was developed by AMS to be used by service technicians in repair centers. The GUI allows the technicians to view multiple repair related applications to facilitate resolution of a trouble. | BellSouth had this system developed specifically for the provision of LNP services. |
| LSR ROUTER | The Local Service Request (LSR) Router was designed to support new interfaces between the CLECs and BST. The primary function is to route messages received from other carriers to the appropriate application based on a message type. The primary types of service the Router supports are: Local Number Portability, Interim Number Portability, Service Unbundling and Service Resale. | BellSouth had this system developed specifically for the provision of LNP services. Additionally, BellSouth purchased hardware components specifically for this application. |

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that true and correct copies of Peggy Arvanitas, consumer on Docket 001503-TP have been served upon the following parties by fax (*) and/or U. S. Mail this 26th day of April 2001.

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