BELLSOUTH TELECOMMUNICATIONS, INC.

DIRECT TESTIMONY OF W. KEITH MILNER

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

DOCKET NO. 960786-TL

MAY 31, 2001

Q. STATE YOUR NAME, YOUR BUSINESS ADDRESS, AND YOUR POSITION WITH BELLSOUTH TELECOMMUNICATIONS, INC. ("BELLSOUTH").

A. My name is W. Keith Milner. My business address is 675 West Peachtree Street, Atlanta, Georgia 30375. I am Senior Director - Interconnection Services for BellSouth. I have served in my present position since February 1996.

Q. PLEASE SUMMARIZE YOUR BACKGROUND AND EXPERIENCE.

A. My business career spans over 30 years and includes responsibilities in the areas of network planning, engineering, training, administration, and operations. I have held positions of responsibility with a local exchange telephone company, a long distance company, and a research and development company. I have extensive experience in all phases of telecommunications network planning, deployment, and operations in both the domestic and international arenas.

I graduated from Fayetteville Technical Institute in Fayetteville, North Carolina, in 1970, with an Associate of Applied Science in Business Administration degree. I graduated from Georgia State University in 1992 with a Master of Business Administration degree.

Q. HAVE YOU TESTIFIED PREVIOUSLY BEFORE ANY STATE PUBLIC SERVICE COMMISSION?

A. I have previously testified before the state Public Service Commissions in Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi, and South Carolina, the Tennessee Regulatory Authority, and the North Carolina Utilities Commission on the issues of technical capabilities of the switching and facilities network, the introduction of new service offerings, expanded calling areas, unbundling, and network interconnection.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY TODAY?

A. The purpose of my testimony is to document the means by which BellSouth satisfies the network requirements of the Competitive Checklist set forth in Section 271(c)(2)(B) of the Telecommunications Act of 1996 ("Act"). In doing so, I will describe the network-related offerings that BellSouth makes available to Alternate Local Exchange Carriers ("ALECs") in Florida through BellSouth's approved interconnection agreements and Statement of Generally Available Terms and Conditions ("SGAT"). Specifically, I will address network issues identified by this Commission in Order No. PSC-01-1025-PCO-TL in Docket No. 960786-TL and BellSouth's action on those issues.

Q. HOW IS YOUR TESTIMONY ARRANGED?

A. My testimony is divided into the following sections:

Part A: Executive Summary: Pages 3 to 13.

The Executive Summary Section contains an overview of the network-related offerings BellSouth makes available to ALECs through BellSouth's approved interconnection agreements and SGAT.

Part B: Comprehensive Discussion of the Availability of Network-Related Offerings to ALECs: Pages 4 to 127.

Part B contains an extensive discussion of the availability of required offerings in Commission-approved interconnection agreements which addresses those issues, in whole or in part, that were approved for consideration in this proceeding by the Florida Commission.

PART A: EXECUTIVE SUMMARY

Q. HOW IS YOUR TESTIMONY ORGANIZED?

A. I discuss each checklist item in order. Within my discussion of various checklist items, I introduce affidavits from a number of BellSouth subject matter experts on the topics of (A) collocation; (B) access to poles, ducts, conduits and rights-of-way; (C) operator services and directory assistance ("OS/DA"); (D) white pages listings; (E) Local Number Portability ("LNP"); and (F) 911 and E911.

Q. WHAT WILL YOUR TESTIMONY DEMONSTRATE?

A. My testimony will demonstrate that BellSouth currently is in compliance with all the network requirements of the competitive checklist. Moreover, I will show that BellSouth

has a legal obligation to provide required offerings in Commission-approved interconnection agreements. In addition to the interconnection agreements cited herein, Exhibit CKC-3 to the testimony of Cynthia Cox sets forth the citations to various interconnection agreements that evidence BellSouth's legally binding obligations to provide the network requirements of the competitive checklist. BellSouth refers the Commission to CKC-3 as evidence of BellSouth's checklist compliance.

Q. WHERE CAN THE COMMISSION FIND ADDITIONAL TECHNICAL INFORMATION ON THE OFFERINGS DISCUSSED HEREIN?

A. BellSouth provides detailed administrative information, technical information, and procedures for ordering facilities and services in a number of guides, technical service descriptions, and manuals, all of which are available on BellSouth's Internet website at (http://www.interconnection.bellsouth.com/guides/guides.html) and (http://www.interconnection.bellsouth.com/products/tech_ref.html). This website is available to the Commission should the Commission desire additional detail on any of the offerings discussed herein.

Q. WHAT EVIDENCE DOES BELLSOUTH HAVE THAT INDICATES IT IS IN COMPLIANCE WITH CHECKLIST ITEM 1: INTERCONNECTION?

A. As of March 31, 2001, BellSouth had provisioned 132,850 trunks interconnecting its network with the networks of ALECs in Florida (that is, trunks from ALECs' switches to BellSouth's switches). In its nine-state region, BellSouth had installed 421,220 trunks from ALECs' switches to BellSouth's switches as of that same date. As of March 31,

2001, BellSouth had provided 203,850 two-way trunks (including transit trunks) to a total of 92 ALECs across BellSouth's nine-state region. In Florida, BellSouth has provided 64,132 two-way trunks (including transit trunks) to 52 ALECs.

In Florida, as of March 31, 2001, BellSouth had completed 1,498 physical collocation arrangements, with 37 in progress, for over 50 different ALECs, of which 845 are cageless physical collocation arrangements. Physical collocation arrangements were established in 135 different central offices out of a total of 196 central offices in Florida as of March 31, 2001. As of March 31, 2001, there were 5,303 physical collocation arrangements in place for ALECs throughout BellSouth's nine-state region. Of these, 3,353 were cageless physical collocation arrangements. An additional 161 physical collocation arrangements were in progress for over 40 different ALECs as of March 31, 2001.

In Florida, as of March 31, 2001, there were 142 virtual collocation arrangements in service, however there were three (3) virtual collocation arrangements in progress located in 74 different BellSouth central offices. Those central offices are located in 20 cities in Florida. Across BellSouth's nine-state region, over 40 different ALECs have requested and BellSouth had provided 361 virtual collocation arrangements with construction of an additional 26 arrangements underway as of March 31, 2001.

Q. WHAT EVIDENCE DOES BELLSOUTH HAVE THAT INDICATES IT IS IN COMPLIANCE WITH CHECKLIST ITEM 2: NONDISCRIMINATORY ACCESS TO NETWORK ELEMENTS?

A. As of March 31, 2001, BellSouth had 71,588 loop and port combinations in place for ALECs in Florida and 303,257 such combinations in place for ALECs across BellSouth's nine-state region. In addition, BellSouth had 1,196 loop and transport combinations in place for ALECs in Florida.

BellSouth has also provided over 80 access terminals to ALECs in its nine-state region for the purpose of gaining access to sub-loop elements.

Q. WHAT EVIDENCE DOES BELLSOUTH HAVE THAT INDICATES IT IS IN COMPLIANCE WITH CHECKLIST ITEM 3: ACCESS TO POLES, DUCTS, CONDUITS, AND RIGHTS-OF-WAY?

A. As of May 17, 2001, ALECs in Florida had executed with BellSouth 51 license agreements and 103 license agreements region-wide, (both state-specific and multi-state) that allow them to attach their facilities to BellSouth's poles and to place their facilities in BellSouth's ducts and conduits. Since July 1997, BellSouth has received 338 requests in Florida for access to poles, ducts, conduits, and rights-of-way from 26 ALECs with no requests being denied. Similarly, ALECs have leased approximately 195,000 feet of conduit space in BellSouth's nine-state region as a result of ALEC requests, of which 31,000 feet are in Florida.

Q. WHAT EVIDENCE DOES BELLSOUTH HAVE THAT INDICATES IT IS IN COMPLIANCE WITH CHECKLIST ITEM 4: LOCAL LOOP?

A. As of March 31, 2001, in Florida, BellSouth had provisioned 4,279 two-wire Asymmetrical Digital Subscriber Line ("ADSL") loops and 108 two-wire High Bit Rate Digital Subscriber Line ("HDSL") loops to over 40 different ALECs in Florida. As of the same date, BellSouth had provisioned within its region 14,102 two-wire ADSL loops, 451 two-wire HDSL loops, and 46 four-wire HDSL loops to over 90 different ALECs.

In addition, ALECs in Florida have purchased over 500 unbundled sub-loop elements. BellSouth has two (2) dark fiber arrangements in place in Florida. BellSouth has four (4) dark fiber arrangements in place in one (1) other state within BellSouth's nine-state region.

As of April 1, 2001, BellSouth had provisioned 2,542 line sharing arrangements across BellSouth's nine-state region and 714 line sharing arrangements in Florida.

In March 2001, ALECs made 4,841 mechanized Loop Makeup ("LMU") inquiries region-wide. In Florida, ALECs made 1,409 mechanized LMU inquiries. From November 2000 through March 2001, ALECs made 683 manual LMU inquiries region-wide, of which 234 were in Florida.

Q. WHAT EVIDENCE DOES BELLSOUTH HAVE THAT INDICATES IT IS IN COMPLIANCE WITH CHECKLIST ITEM 5: LOCAL TRANSPORT?

A. As of March 31, 2001, BellSouth had provided 3,336 dedicated local transport trunks to ALECs in Florida. BellSouth has provided 10,907 dedicated trunks providing interoffice transport to ALECs in its nine-state region as of that same date.

Q. WHAT EVIDENCE DOES BELLSOUTH HAVE THAT INDICATES IT IS IN COMPLIANCE WITH CHECKLIST ITEM 6: LOCAL SWITCHING?

A. As of March 31, 2001, BellSouth had 30 unbundled switch ports in service in Florida. Region-wide, BellSouth had 388 unbundled switch ports in service as of that same date. Additionally, in connection with its combined loop/port combination offering, BellSouth had 71,588 switch ports in service in Florida and 303,257 in service regionally. BellSouth offers two methods of customized routing to ALECs: Advanced Intelligent Network ("AIN") and Line Class Codes ("LCC"). BellSouth has tested both methods and both currently are available.

To date, no ALEC has requested BellSouth's AIN method of customized routing. BellSouth stands ready to provide the AIN method upon request. BellSouth has provided the LCC method of customized routing to one ALEC in Georgia. No ALEC in Florida has requested this method of customized routing; BellSouth, however, stands ready to provide it.

Q. WHAT EVIDENCE DOES BELLSOUTH HAVE THAT INDICATES IT IS IN COMPLIANCE WITH CHECKLIST ITEM 7: 911/E911, DIRECTORY ASSISTANCE AND OPERATOR CALL COMPLETION?

A. As of March 31, 2001, ALECs had requested and BellSouth had provided 1,078 E911 trunks for ALECs in Florida. In its nine-state region, BellSouth had 4,400 trunks in service connecting ALECs' switches with BellSouth's E911 arrangements as of that same date. In Florida, 38 ALECs were sending mechanized updates to BellSouth for inclusion

in the 911 database as of March 31, 2001; and in BellSouth's nine-state region, 66 ALECs were doing so as of that same date.

As of March 31, 2001, ALECs in Florida had 1,031 directory assistance trunks in place between those ALECs' switches and BellSouth's Directory Assistance ("DA") platform. In BellSouth's nine-state region, there were 2,929 such directory assistance trunks in place serving ALECs. In BellSouth's nine-state region, 30 ALECs were purchasing Directory Assistance Access Service ("DAAS") and 41 ALECs were purchasing Directory Assistance Call Completion ("DACC") service from BellSouth as of March 31, 2001.

As of March 31, 2001, eight (8) service providers were using BellSouth's Florida subscriber listings, via Directory Assistance Database Service ("DADS"), to provide DA service and third party listing data to end users. Nine (9) service providers were using DADS across BellSouth's nine-state region as of that same date. As of March 1, 2001, two (2) service providers in the region were using Direct Access to Directory Assistance Services ("DADAS") to provide the service to ALECs.

As of March 31, 2001, BellSouth had provided ALECs in Florida with 1,042 operator services trunks. Across its nine-state region, BellSouth had provided ALECs with 2,903 operator services trunks as of that same date. In Florida, BellSouth had provided ALECs with 155 verification trunks as of March 31, 2001. Across its nine-state region, BellSouth had provided ALECs with 503 verification trunks as of that same date.

BellSouth offers four service levels of branding to ALECs when ALECs order Directory Assistance and/or Operator Call Processing. The options are: BellSouth branding; unbranded; custom branding; and self-branding. Unbranded, custom branding, and self-branding are all provided via customized routing. BellSouth will complete its deployment of Originating Line Number Screening ("OLNS") in Florida by June 11, 2001.

Q. WHAT EVIDENCE DOES BELLSOUTH HAVE THAT INDICATES IT IS IN COMPLIANCE WITH CHECKLIST ITEM 8: WHITE PAGES LISTINGS?

A. BellSouth has long made its white pages listing capabilities available to independent LECs and other service providers. Because methods and procedures have been in place to allow other carriers access to BellSouth's white pages listing capabilities for many years, the necessary methods and procedures pursuant to which ALECs may obtain such listings are business as usual for BellSouth.

Q. WHAT EVIDENCE DOES BELLSOUTH HAVE THAT INDICATES IT IS IN COMPLIANCE WITH CHECKLIST ITEM 9: NUMBER ADMINISTRATION?

A. At this time, BellSouth no longer performs the central office code assignment function. NeuStar assumed all North American Numbering Plan Administrator ("NANPA") responsibilities on November 17, 1999 when the FCC approved the transfer of Lockheed-Martin's Communication Industry Service division to NeuStar.

As to its responsibilities, BellSouth has responded to ALEC concerns about accurate and timely activation of central office codes ("NXXs") by establishing, effective May 15, 1998, its NXX activation Single Point of Contact ("SPOC") to provide assistance to ALECs and independent LECs. The NXX SPOC processes requests for NXX activity coordination, and provides information concerning BellSouth's architecture arrangements, assistance in trouble resolution for code activation, and assistance in preparing the Code Request. If an ALEC or independent LEC intends to interconnect directly with BellSouth, or if interconnection arrangements with BellSouth are already in place, the ALEC or independent LEC should send to BellSouth a courtesy copy of its Central Office Code Request in conjunction with the submission of its CO Code Request to the NANPA (NeuStar). If the ALEC gives BellSouth a copy of its Central Office Code Request, BellSouth is better able to activate the Central Office Code in BellSouth's network.

Q. WHAT EVIDENCE DOES BELLSOUTH HAVE THAT INDICATES IT IS IN COMPLIANCE WITH CHECKLIST ITEM 10: ACCESS TO DATABASES AND ASSOCIATED SIGNALING?

A. BellSouth's signaling service is available as evidenced by the fact that, as of May 17, 2001, there were 16 ALECs that had directly connected to BellSouth's signaling network in Florida.

BellSouth's region-wide Line Information Database ("LIDB") processed more than 1.5 billion queries from ALECs and others during the period from January 1997 through February 2001.

As of April 1, 2001, BellSouth has over 70 Calling Name ("CNAM") database customers, consisting of both ALEC and independent LECs, across BellSouth's nine-state region.

BellSouth has offered independent LECs and other service providers access to its Toll Free Number database for years. The necessary methods and procedures for obtaining such access by ALECs are business as usual for BellSouth. Moreover, the availability of these services is evidenced by the fact that, from January 1997 through March 31, 2001, ALECs and other service providers across BellSouth's nine-state region completed approximately 8.2 billion queries to BellSouth's Toll Free Number database.

Q. WHAT EVIDENCE DOES BELLSOUTH HAVE THAT INDICATES IT IS IN COMPLIANCE WITH CHECKLIST ITEM 11: SERVICE PROVIDER NUMBER PORTABILITY?

A. BellSouth ported 19,971 lines in Florida using Interim Number Portability ("INP"). However, as of May 22, 2001, BellSouth had converted 19,283 (97%) of those lines to Local Number Portability ("LNP"). In its region, BellSouth ported 117,010 numbers, of which 108,934 (93%) have been converted to LNP as of that same date.

As of March 31, 2001, BellSouth had ported 258,227 business directory numbers and 49,523 residence directory numbers in Florida using LNP. In its nine-state region, BellSouth has ported 1,113,649 business and 133,703 residence directory numbers as of March 31, 2001, which confirms the availability of LNP.

Q. WHAT EVIDENCE DOES BELLSOUTH HAVE THAT INDICATES IT IS IN COMPLIANCE WITH CHECKLIST ITEM 12: LOCAL DIALING PARITY?

A. BellSouth's interconnection arrangements do not require any ALEC to use access codes or additional digits to complete local calls to BellSouth customers. Neither are BellSouth customers required to dial any access codes or additional digits to complete local calls to the customers of any ALEC.

While BellSouth is unable to determine the full extent of ALEC dialing policies, BellSouth is not aware of any complaints from ALEC customers that they are required to dial any access codes or additional digits to complete local calls.

Q. WHAT EVIDENCE DOES BELLSOUTH HAVE THAT INDICATES IT IS IN COMPLIANCE WITH CHECKLIST ITEM 13: RECIPROCAL COMPENSATION?

A. Reciprocal compensation arrangements are provided for in BellSouth's interconnection agreements as well as through its SGAT. Reciprocal compensation is discussed further in the testimony of Cynthia Cox.

Q. WHAT EVIDENCE DOES BELLSOUTH HAVE THAT INDICATES IT IS IN COMPLIANCE WITH CHECKLIST ITEM 14: RESALE OF THE INCUMBENT LEC'S RETAIL TELECOMMUNICATIONS SERVICES AT A DISCOUNT?

A. As of March 31, 2001, there were 850,902 units being resold by ALECs in Florida while 3,002,701 were being resold throughout BellSouth's region.

PART B: COMPREHENSIVE DISCUSSION OF THE AVAILABILITY OF NETWORK-RELATED OFFERINGS TO ALECS.

CHECKLIST ITEM 1: INTERCONNECTION

The following issue was approved for consideration in this proceeding by the Florida Commission:

2. Does BellSouth currently provide interconnection in accordance with the requirements of Sections 251(c)(2) and 252(d)(1) of the Telecommunications Act of 1996, pursuant to Section 271(c)(2)(B)(i) and applicable rules promulgated by the FCC?

(a) Has BellSouth implemented physical collocation requests in Florida consistent with FCC rules and orders?

(b) Does BellSouth have legally binding provisioning intervals for physical collocation?

(c) Does BellSouth currently provide local tandem interconnection to ALECs?

(d) Does BellSouth currently permit the use of a Percent Local Usage (PLU) factor in conjunction with trunking?

(e) Does BellSouth currently provide ALECs with meet point billing data?

(f) Has BellSouth satisfied other associated requirements, if any, for this item?

Q. GENERALLY DESCRIBE BELLSOUTH'S COMPLIANCE WITH CHECKLIST ITEM 1.

A. According to the Federal Communications Commission ("FCC"), interconnection refers "to the physical linking of two networks for the mutual exchange of traffic." *Local Competition Order*, ¶ 176. Checklist Item 1 obligates BellSouth to provide ALECs access to points of interconnection that are equal in quality (as defined by 47 C.F.R. § 51.331) to what BellSouth provides itself, and that meet the same technical criteria and standards used in BellSouth's network for a comparable arrangement, except where a ALEC requests otherwise. 47 U.S.C. § 251(c)(2)(C) and (D) and 47 C.F.R. § 51.305(a)(3), (4).[1] As detailed below, BellSouth's interconnection agreements and its Florida SGAT fully satisfy this mandate.

Checklist item 1 has three requirements. First, BellSouth must provide interconnection at any technically feasible point in the carrier's network. Second, BellSouth must provide ALECs with interconnection that is at least equal in quality to that provided by BellSouth

[1] *See also,* Implementation of the Local Competition Provisions in the Telecommunications Act of 1996, CC Docket Nos. 96-98 & 95-185, 11 FCC Rcd 15499, 15614 (1996) ("Local Competition Order"), modified on recon., 11 FCC Rcd 13042 (1996), vacated in part on other grounds sub nom. Iowa Utils. Bd. V. FCC, 120 F. 3d 753 (8th Cir. 1997), cert. granted sub nom. AT&T Corp. v. FCC, 118 S. Ct. 879 (1998).

to itself. Third, BellSouth must provide interconnection on rates, terms and conditions that are just, reasonable and nondiscriminatory.

POINTS OF INTERCONNECTION

Q. DOES BELLSOUTH PROVIDE INTERCONNECTION AT ANY TECHNICALLY FEASIBLE POINT?

A. Yes. Local interconnection is available at any technically feasible point in BellSouth's network, including meet point interconnection arrangements, on terms and conditions that are just, reasonable and nondiscriminatory. 47 U.S.C. § 251(c)(2); 47 C.F.R. § 51.305(a)(2); *see* Interconnection Agreement Between BellSouth and e.spire Communications, Inc., effective July 2000 ("e.spire Agmnt."), GTC-A, § 7.0. Consistent with FCC rules, BellSouth makes interconnection available at the following points: line-side of the local end office switch; trunk-side of the local end office switch; trunk interconnection points for local end office and tandem switches; central office cross-connect points; out-of-band signal transfer points; and the points of access to unbundled elements. *See* Interconnection Agreement between BellSouth and DIECA Communications, Inc. d/b/a Covad Communications Co., effective December 1, 1998 ("Covad Agmnt."), Att. 3, § 1.2. ALECs have the option to interconnect at only one technically feasible point in each LATA. *See* Interconnection Agreement between BellSouth and Intermedia Communications Inc., effective October 3, 2000 ("Intermedia Agmnt."), Att. 3, § 1.2. In cases in which dual entrance points are available in a given central office building, and space is available, BellSouth will make dual entry facilities available to ALECs. *See* e.spire Agmnt., Att. 4, § 5.2.1. Moreover, an ALEC may

request, via the Bona Fide Request ("BFR") process, to utilize another interconnection point when it is determined to be technically feasible.[2] *See* Covad Agmnt., Att. 3, § 1.2.6; Intermedia Agmnt., Att. 3, § 1.1. BellSouth will provide ordering and provisioning of interconnection services that is equal to the ordering and provisioning services BellSouth provides to itself. *See* Intermedia Agmnt., Att. 6, § 1.1.

MEANS OF INTERCONNECTION

Q. WHAT MEANS OF INTERCONNECTION DOES BELLSOUTH OFFER?

A. BellSouth offers the following means of interconnection: (1) physical collocation; (2) virtual collocation; (3) assembly point arrangements; (4) fiber optic meet arrangements; and (5) interconnection via purchase of facilities from the other party. *See* Intermedia Agmnt., Att. 3, §§ 1.1; 1.11; 1.8; Att. 4; SGAT, § II.D.1 BellSouth provides equal-in-quality interconnection on terms and conditions that are just, reasonable, and nondiscriminatory in accordance with the requirements of Sections 251(c)(2) and 252(d)(1). Moreover, an ALEC may request, via the BFR process, to utilize another means of interconnection when it is determined to be technically feasible. *See* Interconnection Agreement Between BellSouth and ICG Telecom Group, Inc., effective August 18, 2000 ("ICG Agmnt.), Att. 3, § 1.1.

Q. DESCRIBE MULTIPLE TANDEM ACCESS (MTA).

[2] The BFR process, and the intervals associated with it, are addressed in the testimony of Cynthia Cox.

A. BellSouth MTA provides for LATA-wide BellSouth transport and termination of ALEC-originated local and BellSouth transported intraLATA traffic by establishing a Point of Interconnection at a BellSouth access tandem with routing through multiple BellSouth access tandems as required. The terms and conditions for such offering are set forth in interconnection agreements. *See* e.g., Intermedia Agmnt., Att. 3, § 1.9; Interconnection Agreement Between BellSouth and DSL.net Communications, LLC, effective December 28, 1999, ("DSL.net Agmnt."), Att. 3, § 1.9.

INTERCONNECTION TRUNKS

Q. DESCRIBE THE TRUNKING ARRANGEMENTS AVAILABLE TO ALECS FOR ROUTING TRAFFIC.

A. BellSouth provisions, maintains and repairs interconnection trunks for ALECs in a manner that is equal in quality to the way in which BellSouth provisions trunks for its own services. 47 C.F.R. § 51.305(a)(3); *see also* Intermedia Agmnt., Att. 3, § 3.3; Interconnection Agreement Between BellSouth and TriVergent Communications, Inc. effective June 30, 2000 ("TriVergent Agmnt."), Att. 3, § 3.3. BellSouth designs its interconnection facilities to meet the same technical criteria and service standards that are used within its own network. *See* Intermedia Agmnt., Att. 3, §§ 3.2 – 3.4; Interconnection Agreement Between BellSouth and The Other Phone Company d/b/a Access One Communications, Inc., effective February 17, 2000 ("Access One Agmnt."), Att. 3, §§ 3.2-3.3. BellSouth offers ALECs various options to route local/intraLATA toll traffic and transit traffic over separate trunk groups or over a single trunk group. *See* Covad Agmnt., Att. 3; Intermedia Agmnt., Att. 3; ICG Agmnt., Att. 3, § 2.0;

Interconnection Agreement between BellSouth and Florida Digital Network, Inc., effective July 1, 1998 ("FDN Agmnt."), Att. IV, § 1.

First, BellSouth provisions local/intraLATA toll trunks for traffic between ALEC end users and BellSouth end users or Wireless Service Providers and visa versa. Local traffic or local/intraLATA toll traffic may be delivered at the BellSouth local tandem, the BellSouth access tandem, or the BellSouth end office. Local/intraLATA toll trunks may use multi-frequency ("MF") or Signaling System 7 ("SS7") signaling and may be one-way or two-way. *See* TriVergent Agmnt., Att. 3, §§ 2.4; 2.5.2; 2.5.3; 2.5.4.

In addition, BellSouth provides transit trunks for traffic between an ALEC and a third party such as an Independent Company, Interexchange Carrier, or another ALEC (i.e. where a BellSouth end user is not involved). Transit trunk groups are generally two-way trunks, but may be built as one-way trunks. They may use MF or SS7 signaling. Transit intraLATA toll traffic from the ALEC must be delivered at the BellSouth access tandem. Transit local traffic may be delivered at the BellSouth access tandem or at the BellSouth local tandem. *See* TriVergent Agmnt., Att. 3, §§ 2.5.2; 2.5.3; 2.5.4; 2.5.5; Access One Agmnt., Att. 3, § 2.0.

If the ALEC chooses, additional trunk groups may be established for operator services, directory assistance, emergency services and intercept. *See* TriVergent Agmnt., Att. 3, § 2.5.2.1.

Q. ARE ALECS PURCHASING INTERCONNECTION TRUNKS?

A. Yes. As of March 31, BellSouth had provisioned 132,850 trunks interconnecting its network with the networks of ALECs in Florida (that is, trunks from ALECs' switches to BellSouth's switches). In its nine-state region, BellSouth had installed 421,220 trunks from ALECs' switches to BellSouth's switches as of that same date. As of March 31, 2001, BellSouth had provided 203,850 two-way trunks (including transit trunks) to a total of 92 ALECs across BellSouth's nine-state region. In Florida, BellSouth has provided 64,132 two-way trunks (including transit trunks) to 52 ALECs.

Q. HOW DO ALECS REQUEST INTERCONNECTION TRUNKS?

A. ALECs request interconnection trunks by submitting an Access Service Request ("ASR") to BellSouth's Interconnection Purchasing Center ("IPC"). BellSouth established the IPC during the second quarter of 1998 to facilitate BellSouth's handling of ASRs submitted by the ALECs and payment of ALECs' reciprocal compensation charges. The IPC receives ASRs from the ALECs, captures information required for Carrier Access Billing System (CABS) billing purposes, screens the ASR for accuracy, and routes the ASR via the Telcordia (formerly Bell Communications Research, Inc. or "Bellcore") Exchange Access Control and Tracking ("EXACT") System to BellSouth's Circuit Capacity Management ("CCM") center. The BellSouth CCM Center establishes the trunk group identification for new trunk groups or increases the trunk quantities in BellSouth's mechanized systems in the case of trunk augmentations. The ASR is then forwarded via EXACT to BellSouth's Circuit Provisioning Group ("CPG"). The CPG is responsible for issuing required trunk and facilities orders to BellSouth's Network Infrastructure Support Center ("NISC"), which prepares required switch translations, and BellSouth's Local Interconnection Switching Center ("LISC"), which coordinates the testing and turn-up of

the trunks. The LISC forwards the orders to BellSouth's Work Management Center ("WMC") and BellSouth's Field Work Groups ("FWGs") for testing and turn-up of the trunks. *See* ICG Agmnt., Att. 6, § 1.1 and BellSouth's Local Interconnection and Facility Based Ordering Guide.

From July 1999 through March 2001, BellSouth's IPC processed 1,935 orders from ALECs for interconnection trunks in Florida and processed 6,920 orders from ALECs across BellSouth's nine-state region.

Q. HOW DOES BELLSOUTH PROCESS ITS OWN TRUNK AUGMENTATIONS TO BELLSOUTH'S POINT OF INTERCONNECTION WITH ALECS?

A. For trunks originating on BellSouth's network and terminating on the ALEC's network, the process for establishing and augmenting trunks is the same as the ALEC process to establish interconnection trunks with BellSouth, except for the billing. The CCM issues an "external" ASR to the ALEC and an "internal" ASR to the IPC. The IPC screens the "internal" ASR for accuracy, and routes the ASR via the EXACT System to the CCM Center. The CCM Center establishes the trunk group identification for new trunk groups or increases the trunk quantities in BellSouth's mechanized systems in the case of trunk augmentations. The ASR is then forwarded via EXACT to the CPG. The CPG is responsible for issuing required trunk and facilities orders to the NISC, which prepares required switch translations, and BellSouth's LISC, which coordinates the testing and turn-up of the trunks. The LISC forwards the orders to BellSouth's Work Management Center and BellSouth's Field Work Groups for testing and turn-up of the trunks.

Q. DISCUSS BELLSOUTH'S PROCESS FOR FORECASTING THE NUMBER OF TRUNKS REQUIRED TO PROVIDE INTERCONNECTION SERVICES.

A. All trunk forecasting and servicing for ALEC local and intraLATA toll trunk groups is based upon the same industry standard objectives that BellSouth uses for its own trunk groups. BellSouth uses the standard objective of two (2) percent overall call blocking during the time-consistent average busy hour in the busy season which consists of one (1) percent blocking from the end office to the local tandem and one (1) percent blocking from the local tandem to the end office. When an access tandem serves as the intermediary switch, the standard objective is one and one-half (1.5) percent overall blocking during the time-consistent average busy hour in the busy season. This consists of one-half (.5) percent blocking on the common transport trunk group from the end office to the access tandem and one (1) percent blocking from the access tandem to the end office.

BellSouth's forecasting process is designed to determine the amount of traffic that will be handled by each central office, and the number of trunks that will be required to carry that traffic during the forecast period (normally 5 years). BellSouth's General Trunk Forecast (the "GTF") is maintained daily and includes forecasts both for BellSouth traffic and ALEC traffic.

Twice a year, the BellSouth LISC initiates written requests for forecasts from all ALECs who have a presence in any of the nine BellSouth states. The forecasting periods cover January - June and July - December. The LISC provides the ALECs' forecasts to the BellSouth CCM Centers in each state. The ALEC forecasts are necessary in order to

incorporate the ALEC's requirements into BellSouth's GTF.

To prepare the GTF, BellSouth begins with the number of trunks currently in service. BellSouth then calculates a growth factor (that is, the percentage of growth expected over the next forecast period as well as anticipated growth in traffic that may be generated by new services.) This data is measured using "busy hour" information, measured and gathered using a BellSouth system, the Network Information Warehouse, that conforms with national industry standards. BellSouth also adjusts for planned network rearrangements, such as switch replacements, relocations, or additions. The growth factor is then applied to the trunks currently in service.

As ALECs interconnect to BellSouth's network, the transitioning of traffic from BellSouth to the ALEC often requires more trunks than would normally carry the traffic in question when BellSouth was the sole provider of service. The purpose of the ALEC forecast is to identify locations and estimated quantities to be used in developing factors to account for these transitional effects in the network. After BellSouth's growth factor is applied to the trunks in service, BellSouth applies these transitional factors. After these adjustments for growth and transitional factors are taken into account, BellSouth's forecast is reflected in the GTF.

Q. DISCUSS THE FORECASTING RESPONSIBILITIES OF BELLSOUTH AND THE ALECS.

A. BellSouth and the ALECs are jointly responsible for forecasting, monitoring, and servicing all two-way trunk groups between the two networks. *See* TriVergent Agmnt.,

Att. 3, § 2.4. BellSouth is responsible for forecasting, monitoring, and servicing the one-way trunk groups terminating to ALECs. ALECs are responsible for forecasting, monitoring and servicing the one-way trunk groups to BellSouth, including terminating, transit, operator services, directory assistance, and E911 trunks. *See* Access One Agmnt., Att. 3, § 2.8.4.1. Standard trunk traffic engineering methods are used as described in Bellcore document SR-TAP-000191, Trunk Traffic Engineering Concepts and Applications or as otherwise mutually agreed to by the parties.

BellSouth will use its best efforts in conjunction with the ALEC to create the most effective and reliable interconnected telecommunications network. *See* Intermedia Agmnt., Att. 3, § 3.1. BellSouth and the ALEC will meet periodically for the purpose of exchanging non-binding forecasts of their traffic and volume requirements for interconnection. *See* ICG Agmnt., Att. 3, § 3.6.2. Forecast meetings may be face-to-face, or by video or audio conference. *See* SGAT, §XVII.B; XVII.C.

In addition to, and not in lieu of, the required non-binding forecasts, BellSouth and the ALEC may negotiate a binding forecast that commits the forecast provider to purchase, and the forecast recipient to provide, a specified volume to be utilized as set forth in the binding forecast. The terms of such a binding forecast will be negotiated and may contain provisions regarding price, quantity, and liability for failure to perform. *See*, ICG Agmnt., Att. 3 § 3.6.4; SGAT, §XVII.D.

Q. DISCUSS BELLSOUTH'S PROCESS FOR FORECASTING SWITCH CAPACITY NEEDS.

A. BellSouth forecasts its switch capacity needs based on two inputs – the GTF and the access line forecast. As described above, the GTF is created using ALEC inputs. Thus, ALEC plans are taken into account both in BellSouth's trunk forecasting and in its switch planning and forecasting processes. For most switches, the capacity managers generally schedule additions of trunk terminations to be completed and available for service by the time the currently installed trunk capacity reaches 97 percent utilization.

Some specific switches have been identified as candidates for trunk relief when the installed trunk capacity reaches 90 percent utilization. Candidate offices are those offices that meet the following criteria:

- End office digital switches
- Switches with 100 trunking DS1s currently installed (a DS1 contains 24 voice channels)
- Switches with growth of at least 75 trunking DS1s per year

Those offices that are candidates for relief at 90 percent are larger offices typically serving business customers, and likely to also have high usage between ALEC's switches and BellSouth's switches.

For tandem switches, the capacity managers schedule additions of trunk terminations to be completed and available for service by the time the currently installed trunk capacity reaches 85 percent utilization.

An addition of trunk terminations is scheduled to complete when the switch has reached its targeted trunk utilization percentage. In other words, BellSouth does not wait until that utilization percentage has been reached before triggering the addition. Once the

capacity manager has determined the anticipated target exhaust date for a switch, the capacity manager subtracts an appropriate amount of time from that exhaust date to allow for the equipment addition to be engineered, manufactured, shipped, and installed in the switch. Thus, BellSouth initiates the addition of trunk terminations well in advance of the targeted exhaust date. As discussed earlier, ALECs inform BellSouth of their anticipated traffic growth through the routine exchange of traffic forecasts.

Q. DOES BELLSOUTH MAKE INTERCONNECTION TRUNKS AVAILABLE ON A NONDISCRIMINATORY MANNER?

A. Yes. BellSouth's performance data for interconnection trunks will be addressed in the Commission's Commercial Data Review.

FIBER-MEET

Q. DESCRIBE THE FIBER-MEET ARRANGEMENT.

A. "Fiber-Meet" is an interconnection arrangement where by the parties physically interconnect their networks via an optical fiber interface (as opposed to an electrical interface) at which one party's facilities, provisioning, and maintenance responsibility begins and the other party's responsibility ends (i.e., at a Point of Interface). If an ALEC elects to interconnect with BellSouth pursuant to a fiber-meet arrangement, the ALEC and BellSouth shall jointly engineer and operate such. *See* e.spire Agmnt., Att. 3, § 1.11; TriVergent Agmnt., Att. 3, § 1.11.

COLLOCATION

Q. DOES BELLSOUTH MAKE SPACE AVAILABLE IN ITS PHYSICAL STRUCTURES TO FACILITATE THE INTERCONNECTION OF ITS NETWORK FACILITIES WITH THOSE OF ALECS?

A. Yes. Collocation is a process pursuant to which BellSouth permits ALECs to contract for space in BellSouth's premises so that ALECs may interconnect their network facilities with BellSouth's network facilities. BellSouth premises include land owned, leased, or controlled by BellSouth as well as any BellSouth network structure on such land housing network facilities. *See* e.spire Agmnt., Att. 4, § 1.2. BellSouth offers a variety of collocation arrangements as described below. Where technically feasible, BellSouth will make physical collocation available in any BellSouth structure that houses network facilities and has space available for collocation.

Q. DESCRIBE BELLSOUTH'S PHYSICAL COLLOCATION OFFERINGS.

A. BellSouth will provide to an ALEC at the ALEC's request, on a first-come, first-served basis, physical collocation under the same terms and conditions available to similarly situated carriers and on terms and conditions that are just, reasonable and non-discriminatory. 47 C.F.R. § 52.323 (f); SGAT, § II.B.7. Where sufficient space exists, ALECs can physically collocate in BellSouth premises to terminate ALEC cables on their own equipment. Physical Collocation is available at Central Offices, Serving Wire Centers and at Remote Sites and may be offered in the following types: Caged, Shared, (including shared cages), Cageless or Adjacent. *See* ICG Agmnt., Att. 4; Intermedia

Agmnt., Att. 4-FL, § 3; TriVergent Agmnt., Att. 4.

With physical collocation, equipment ownership, operation, maintenance and insurance are the responsibility of the collocator or its approved agent. BellSouth permits the collocation of any type of equipment that is directly related to and thus necessary, required, or indispensable for interconnection to BellSouth's network or for access to unbundled network elements in the provision of telecommunications services. *See* ICG Agmnt., Att. 4, § 1.3. In addition, BellSouth permits the physical collocation of microwave facilities when technically feasible for interconnection to BellSouth's network or for access to UNEs in the provision of telecommunications services. *See* SGAT, Attach. I. With physical collocation, BellSouth provides an interconnection point or points, physically accessible by both BellSouth and the requesting ALEC, at which the fiber optic cables carrying the ALEC's circuits enter BellSouth's premises. 47 C.F.R. § 51.323 (d)(1); ICG Agmnt., Att. 4, § 1.3. BellSouth will provide at least two interconnection points at each premises where there are at least two such interconnection points available and where capacity exists. *See* Intermedia Agmnt., Att. 4-FL, § 5.2.1. For purposes of collocation, the interconnection point is the point at which the ALEC enters BellSouth's premises, namely the manhole or the cable vault. *See* e.spire Agmnt., Att. 4, § 5.2.

Physical Collocation is a negotiated contract arrangement in all BellSouth states and also a tariffed service in Florida for the placement of collocator-owned facilities and equipment in BellSouth central premises. The terms and conditions pursuant to which BellSouth offers physical collocation are set forth in detail in the Affidavit of Wayne

Gray, Attachment A; *see* also, Intermedia Agmnt., Att. 4; Covad Agmnt., Att. 4; ICG Agmnt., Att. 4.

Q. IS BELLSOUTH PROVIDING PHYSICAL COLLOCATION IN FLORIDA?

A. Yes. In Florida, as of March 31, 2001, BellSouth had completed 1,498 physical collocation arrangements, with 37 in progress, for over 50 different ALECs, of which 845 are cageless physical collocation arrangements. Physical collocation arrangements were established in 135 different central offices out of a total of 196 central offices in Florida as of March 31, 2001. As of March 31, 2001, there were 5,303 physical collocation arrangements in place for ALECs throughout BellSouth's nine-state region. Of these, 3,353 were cageless physical collocation arrangements. An additional 161 physical collocation arrangements were in progress for over 43 different ALECs as of March 31, 2001. Exhibit WKM-1 is a summary of physical and virtual collocation arrangements currently in place or in progress in Florida and in BellSouth's nine-state region.

Q. DOES BELLSOUTH HAVE PROVISIONING INTERVALS FOR PHYSICAL COLLOCATION?

A. Yes. In Docket Nos. 981834-TP and 990321-TP, the Florida Commission established provisioning intervals for physical collocation. These intervals preempt the intervals established by the FCC. BellSouth will complete physical collocation space in Florida within 90 calendar days of receipt of a complete, accurate and error-free Bona Fide Firm Order, or as agreed to by the parties. *See,* Intermedia Agmnt., Att. 4-FL, § 6.6. For changes to collocation space after initial space completion, BellSouth will complete

construction for collocation arrangements as soon as possible and within a maximum of 45 calendar days from receipt of a complete, accurate and error-free Bona Fide Firm Order ("BFFO"), or as agreed to by the parties. Id. BellSouth has incorporated these intervals into its SGAT, collocation tariff, and applicable interconnection agreements. BellSouth complies with all of the collocation requirements established by the FCC in its Collocation Order and the Collocation Reconsideration Order.

Q. DESCRIBE BELLSOUTH'S VIRTUAL COLLOCATION OFFERING.

A. Upon request of the ALEC, or when space is not available for physical collocation, BellSouth offers virtual collocation in accordance with the existing BellSouth Tariff FCC Number 1, Section 20, "Virtual Expanded Interconnection Service", as contemplated by Paragraph 826 of the *Local Competition Order*, 11 FCC Rcd at 15912. *See* Interconnection Agreement between BellSouth and NPCR, Inc., d/b/a Nextel Partners, effective December 15, 1999 ("NPCR Agmnt."), § V.A. Virtual collocation is a tariffed service offering in section 20 of BellSouth's Florida Dedicated Access Tariff. Virtual collocation provides for the placement of collocator-owned transmission equipment and facilities in BellSouth central offices for the interconnection to the BellSouth network. Such equipment must be necessary for the provision of telecommunications services and may include, but not be limited to, optical terminating equipment and multiplexers, digital subscriber line access multiplexers ("DSLAM"), routers, asynchronous transfer mode ("ATM") multiplexers, and remote switching modules. Virtual collocation arrangements may interconnect to designated BellSouth tariffed services, local interconnection trunks and/or unbundled network elements. BellSouth will provide virtual collocation in a manner that permits ALECs to combine UNEs. With virtual

collocation, BellSouth provides an interconnection point or points, physically accessible by both BellSouth and the requesting ALEC, at which the fiber optic cables carrying the ALEC's circuits enter BellSouth's premises. 47 C.F.R. § 51.323(d)(1). BellSouth will perform all maintenance and repair on virtual collocation equipment once the collocator requests such work. BellSouth will install, maintain and repair collocated equipment in the same manner as BellSouth provides for its own equipment. The terms and conditions pursuant to which BellSouth provides virtual collocation are set forth in detail in the Affidavit of Wayne Gray, Attachment A.

Q. IS BELLSOUTH PROVIDING VIRTUAL COLLOCATION IN FLORIDA?

A. Yes. In Florida, as of March 31, 2001, there were 142 virtual collocation arrangements in service, however there were three (3) virtual collocation arrangements in progress located in 74 different BellSouth central offices. Those central offices are located in 20 cities in Florida. Across BellSouth's nine-state region, over 40 different ALECs have requested and BellSouth had provided 361 virtual collocation with construction of an additional 26 arrangements underway as of March 31, 2001. Exhibit WKM-1 is a summary of physical and virtual collocation arrangements currently in place or in progress in Florida and in BellSouth's nine-state region.

Q. DOES BELLSOUTH HAVE INTERVALS FOR VIRTUAL COLLOCATION?

A. Yes. In Docket Nos. 981834-TP and 990321-TP, the Florida Commission established provisioning intervals for virtual collocation. These intervals preempt the intervals established by the FCC. Virtual collocation space will be completed within 60 calendar

days of BellSouth's receipt of the ALEC's complete, accurate and error-free BFFO. *See* SGAT, § II.B.7.

OTHER INTERCONNECTION METHODS

Q. DOES BELLSOUTH OFFER MEANS OTHER THAN COLLOCATION FOR INTERCONNECTION?

A. Yes. BellSouth also offers assembly point arrangements. Assembly point arrangements allow an ALEC to combine UNEs without physical or virtual collocation. *See* SGAT, § II.D.1. The assembly point is a cross connection device to which BellSouth will deliver UNEs requested by ALECs using the arrangement. In this arrangement, BellSouth will supply all of the equipment required by the ALEC to access UNEs.

1997 ORDER

Q. HAS BELLSOUTH ADEQUATELY MET THE CONCERNS OF THE FLORIDA COMMISSION SET FORTH IN THE 1997 ORDER?

A. Yes. In the *1997 Order*, the Florida Commission concluded that the "primary problem with physical collocation is that no requests have been implemented." As demonstrated above, as of March 31, 2001, BellSouth has provisioned 1,498 physical collocation arrangements in Florida, and has 37 more arrangements in progress. Moreover, BellSouth makes physical collocation available in compliance with its SGAT, applicable interconnection agreements, and this Commission's Order in Docket Nos. 981834-TP and

990321-TP.

Second, the Commission expressed concerns regarding trunk blockage for ALEC traffic. Specifically, the Commission stated that "both parties need to improve communications with respect to potential fluctuations in traffic." *1997 Order*, at 59. As evidenced by my testimony, BellSouth has detailed forecasting procedures in place to ensure that it provisions sufficient trunks to handle ALEC traffic. The Commission also requested from BellSouth "data sufficient to show that blockage levels are comparable between BellSouth and ALEC traffic." *1997 Order*, at 59. BellSouth reports monthly trunk blockage information as part of its Service Quality Measurements. This data will be reviewed as part of the Commission's Commercial Data review.

The Commission also required in the *1997 Order* that BellSouth provide local tandem interconnection without imposing a BFR requirement. As discussed above, BellSouth complies with this requirement. *See* ICG Agmnt., Att. 3, §§ 1.5; 1.10; e.spire Agmnt., Att. 3, § 1.10. An ALEC may select either basic or enhanced local tandem interconnection. Basic local tandem interconnection allows ALECs to terminate traffic to BellSouth's end office switches and wireless service provider switches within the area served by the tandem. Enhanced local tandem interconnection adds the ability to terminate traffic to other ALEC and independent company switches in the area served by the tandem. *See* ICG Agmnt., Att. 3, §§ 1.5; 1.10; SGAT, § I.A.5. As of March 31, 2001, BellSouth has provided 984 local tandem interconnection trunks to a total of three (3) ALECs in Florida.

Finally, the Commission stated in the *1997 Order* that BellSouth was required to provide ALECs with two-way trunking. *See* FDN Agmnt., Att. IV, § 1.1. As discussed above,

BellSouth is in compliance with that requirement, and, as of March 31, 2001, has provided 203,850 two-way trunks (including transit trunks) to a total of 92 ALECs across its nine-state region. In Florida, BellSouth has provided 64,132 two-way trunks (including transit trunks) to 52 ALECs.

CHECKLIST ITEM 2: NONDISCRIMINATORY ACCESS TO NETWORK ELEMENTS

The following issue was approved for consideration in this proceeding by the Florida Commission:

3. Does BellSouth currently provide nondiscriminatory access to all required network elements, with the exception of OSS which will be handled in the third party OSS test, in accordance with Sections 251(c)(3) and 252(d)(1) of the Telecommunications Act of 1996, pursuant to Section 271(c)(2)(B)(ii) and applicable rules promulgated by the FCC?

   (a) Does BellSouth currently provide all required unbundled network elements at TELRIC-based prices?

   (b) Has BellSouth satisfied other associated requirements, if any, for this item?

Q. GENERALLY DESCRIBE BELLSOUTH'S COMPLIANCE WITH CHECKLIST ITEM 2.

A. BellSouth meets the requirements of Checklist Item 2 if it offers access and interconnection that includes "[n]ondiscriminatory access to network elements in accordance with the requirements of Section 251(c)(3) and 252(d)(1)." 47 U.S.C. § 271(c). Section 251(c)(3) requires BellSouth to provide ALECs with nondiscriminatory access to UNEs at any technically feasible point on rates, terms and conditions that are just, reasonable, and nondiscriminatory. This section also requires BellSouth to provide UNEs in a manner that allows ALECs to combine such elements in order to provide a telecommunications service. As detailed below, BellSouth's interconnection agreements and its Florida SGAT satisfy these obligations. BellSouth's provision of access to Operations Support Systems ("OSS") functions will be addressed in the Commission's Third Party Test.

As required by 47 C.F.R. § 51.307, BellSouth provides to a requesting ALEC (for the provision of telecommunications service) nondiscriminatory access to network elements on an unbundled basis at any technically feasible point which is at least equal in quality to the access BellSouth provides to itself. *See* e.spire Agmnt., GTC-A, § 6.0. These network features provide the ALEC access to all features, functions and capabilities of the network elements in a manner that allows the ALEC to provide any telecommunications service that the network element is capable of providing. *See* Intermedia Agmnt., Att. 2, § 1.1. Each network element BellSouth provides to ALECs is at a level of quality and performance that is at least equal to that which BellSouth provides to itself. *See* ICG Agmnt., GTC-A, § 4.0

BellSouth shall provide ordering and provisioning of UNEs to ALECs that are equal in quality to the ordering and provisioning services BellSouth provides to itself or any other ALEC. *See* Intermedia Agmnt., Att. 6, § 1.1. As required by the FCC, and as set forth in

its interconnection agreements and its SGAT, BellSouth makes available nondiscriminatory access to the following unbundled elements at Total Element Long Run Incremental Cost ("TELRIC") rates approved by the Florida Public Service Commission:

Local loop, including sub-loops and the high frequency portion of the loop
Loop concentration in BellSouth central offices
Simple Loop + Port Combinations
Loop + Transport Combinations
Network Interface Device ("NID")
Local switching capability
Tandem switching capability
Interoffice transmission facilities
Digital cross connection capability
Signaling networks and call-related databases
Operations support systems functions
Local channel
Channelization
Dark fiber
Loop conditioning

See FDN Agmnt., Att. III, § 2.7; Intermedia Agmnt., Att. 2, § 1.1; ICG Agmnt., Att. 2. BellSouth also provides access to the facilities or functionality of network elements separately from access to other network elements and for a separate charge. 47 C.F.R. § 51.307(d); *see* e.spire Agmnt., Att. 2, § 1.1. BellSouth will utilize its best efforts to

obtain coextensive third party intellectual property rights for CLECs using UNEs.

Requesting ALECs are entitled to exclusive use of an unbundled network element, and to the use of its features, functions, or capabilities, for a set period of time. 47 C.F.R. § 51.309(c); FDN Agmnt., Att. III, § 2.9. BellSouth, however, retains ownership of the facility and remains obligated to maintain, repair or replace the network element as necessary.

ALECs may provide telecommunications services wholly through BellSouth's UNEs, without using any facilities of its own. The terms and conditions pursuant to which BellSouth provides access to UNEs are offered equally to all requesting ALECs. 47 C.F.R. § 51.313(a). Moreover, as discussed more fully in the testimony of Cynthia Cox, filed concurrently herewith, the "Most Favored Nation" clause in BellSouth's interconnection agreements and the provisions of 47 U.S.C. § 252(i) allow an ALEC to adopt terms, conditions and prices of another ALEC's contract in accordance with the FCC's rules. *See* ICG Agmnt., GTC-A, § 14.1.

With the exception of the NID, the minimum set of network elements are required separately by the checklist and therefore will be discussed in later sections of my testimony. The NID, however, will be discussed in this section, as will UNE combinations.

Q. DESCRIBE THE NID OFFERING.

A. The NID is a cross-connect device used to connect BellSouth's loop facilities to a customer's inside wiring. The NID contains connection points to which the service

provider and the end user customer each make their connections. *See* ICG Agmnt., Att. 2, § 2.3.2.1. When the ALEC provides its own facilities, the ALEC will provide its own NID and thereby interface to the customer's inside wire through the customer chamber of the BellSouth NID. 47 C.F.R. § 51.319(2); Interconnection Agreement between BellSouth and AT&T Communications of the Southern States, Inc., effective June 10, 1997 ("AT&T Agmnt."), Att. 2, § 4.1.1.1.1. This method of access has been referred to as the "NID-to-NID" method, in that the ALEC connects its NID to the BellSouth NID and thereby gains connectivity between the ALEC's loop and the customer's inside wire. As a second method, an ALEC may connect its loop directly to any available spare terminal in the BellSouth NID and thereby gain access to the customer's inside wire. 47 C.F.R. § 51.319(2); *see also* ICG Agmnt., Att. 2, § 2.3; Intermedia Agmnt, Att. 2, § 4.0. Any upgrades or rearrangements to the NID required by the ALEC are performed by BellSouth based on time and materials charges. In situations in which no spare terminals are available in the BellSouth NID, the ALEC may remove BellSouth's loop from BellSouth's NID in order to terminate the ALEC's loop to BellSouth's NID. *See* ICG Agmnt., Att. 2, § 2.3.2.6. As of March 31, 2001, no ALEC had requested an unbundled NID in Florida or anywhere in BellSouth's nine-state region.

Where an ALEC obtains local loops as a UNE from BellSouth, BellSouth also provides the NID. BellSouth connects the drop wire, where present, between the loop distribution facilities and the NID at no additional charge to the ALEC. *See* Covad Agmnt., Att. 2, § 2.2.1.

At multiple dwelling units or multiple-unit business premises, BellSouth will provide, where technically feasible, a Single Point of Interconnection ("SPOI") that is suitable for

use by multiple carriers. *See* Intermedia Agmnt., Att. 2, §§6.2.1.5; 6.7.1.

Q. HAS BELLSOUTH PROVIDED ACCESS TERMINALS TO ALECS IN FLORIDA AND IN ITS NINE-STATE REGION FOR THE PURPOSE OF GAINING ACCESS TO SUB-LOOP ELEMENTS?

A. No. BellSouth has not provisioned any such access terminals to ALECs in Florida because none have been requested; however, BellSouth has provisioned over 80 access terminals across its nine-state region.

Q. MAY AN ALEC TEST THE UNES IT IS OBTAINING FROM BELLSOUTH PRIOR TO TURNING UP A CUSTOMER'S SERVICE?

A. Yes. Each ALEC may perform testing of its UNEs using whatever methods it deems appropriate in light of its network configuration. BellSouth will provide UNEs to each ALEC's collocation arrangement at the specified level of quality. BellSouth has tested and confirmed its ability to provide UNEs to requesting ALECs.

Q. DESCRIBE BELLSOUTH'S CROSS-CONNECT OFFERING.

A. Cross connections are the facility by which BellSouth extends its network to the point of access selected by an ALEC, as described above. The FCC's *Local Competition Order* required incumbent LECs to provide such facilities and stated that the LEC could recover the costs associated with providing cross connections. *See* Intermedia Agmnt., Att. 2, § 2.2.2. Cross connections are wires or fibers or equipment that connect one piece of

equipment to another on a semi-permanent basis. For instance, some cross connections are made by a simple pair of copper wires called a jumper. Different loop options require different types of cross connections. In fact, several cross connections may be required for many of the options. BellSouth offers the following types of loop cross connects:

- Cross connect to Digital Cross-connect System ("DCS")
- Cross connect to Multiplexer/Interoffice transport
- Cross connect to collocation arrangement
- Cross connect to switch port

In addition, BellSouth offers the choice of three types of cross connects with subloop elements. The applicable cross connects are as follows:

- Two wire
- Four wire
- Dark fiber

Cross connections must also be used with Unbundled Dedicated Transport ("UDT"). The dedicated transport cross connects are the equipment needed to connect the interoffice dedicated transport transmission facilities to the point of access.

The following cross connects are available with UDT:

- Voice grade 2-Wire
- Voice grade 4-Wire
- Digital 56/64 Kilobits per second (Kb/s)
- DS1
- DS3
- OC3
- OC12

- OC48 (Only between BellSouth offices)
- Dark fiber

Q. DESCRIBE BELLSOUTH'S DIGITAL CROSS CONNECT OFFERING.

A. A DCS is an electronic device that provides the capability of rearranging circuits on high-speed facilities without the need to de-multiplex the signals. Without DCS, signals cannot be exchanged between high-speed circuits without returning all of the circuits to analog electrical signals. BellSouth offers DCS in conjunction with the unbundled dedicated transport element with the same functionality that is offered to interexchange carriers or with additional functionality as provided in a BellSouth/ALEC interconnection agreement. 47 C.F.R 51.319 (d)(2)(iv); *See* Intermedia Agmnt., Att. 2, § 8.1.1(4).

BellSouth provides ALECs three types of port DCS configurations as follows:

- DS0 channel port termination.
- DS1 channel port termination.
- DS3 channel port termination.

An ALEC may utilize BellSouth's Management Terminal Interface ("MTI") through the use of a computer terminal on the ALEC's premises to access a database maintained by BellSouth to reconfigure the ALEC's Dedicated Transport facilities. An ALEC may use the MTI to directly access and control the ALEC's 45 Megabits per second (Mbps) facilities or 1.544 Mbps facilities or 64 Kbps facilities or unbundled dedicated transport, subtending channels, and internodal facilities (i.e., the facilities that connect a DCS in one central office with a DCS in another central office).

ALECs remotely access the database by using a computer terminal on the ALEC's premises in conjunction with the ALEC's facilities or BellSouth Unbundled Loops or Dedicated Transport elements (Entrance Facility and/or Interoffice Transport), or in conjunction with a local telephone line with a seven-digit or ten-digit telephone number. ALECs may use DCS to perform the following functions:

- Routing/Rerouting - The routing feature allows an ALEC to select the routes that will be used to connect circuits between DCSs. The ALEC may control the route selection process by various parameters according to the ALEC's needs. An ALEC may also reroute circuits from a failed internodal facility to a working one.
- Renaming-An ALEC may rename its circuits and facilities.
- Scheduled Command Definition – An ALEC may specify circuit reconfiguration on special days, e.g., payday, holidays.
- Transaction Log – An ALEC is provided a database log that contains every transaction. These transactions include reconfiguration, scheduling, macro development, alarm surveillance, and attempted transactions.
- Scheduled Command Summary Screen – An ALEC may view the status of its reconfiguration reservations.
- Macro Command/Network Modeling – An ALEC may initiate, with one command, multiple two-point cross connections. The ALEC can build separate network macros, such as daytime macros, nighttime macros, and disaster recovery macros and invoke their activation or switch from one to the other.
- Perform real-time configuration management and alarm surveillance.
- Electronically cross-connect and route traffic in order to:
    - Alleviate congestion
    - Isolate faults

- Change routing logic
- Monitor network performance
- Pre-arrange and automatically switch to backup facilities for disaster recovery

BellSouth provides the cross connects necessary to extend Dedicated Transport facilities to points of access designated by the ALEC. 47 C.F.R. § 51.319(d)(2)(iii). In addition to the standard arrangements, the ALEC may request new or additional unbundled transport elements via the BFR process.

COMBINATIONS OF UNES

Q. GENERALLY DESCRIBE BELLSOUTH'S COMBINATION OFFERINGS.

A. BellSouth provides access to UNEs in a manner that allows requesting carriers to access preexisting combinations of network elements as well as to combine UNEs for themselves. *See* ICG Agmnt., Att. 2, § 1.3. BellSouth provides ALECs access to a variety of means by which ALECs may combine network elements, including caged, cageless and shared collocation, *see* TriVergent Agmnt., Att. 4, § 3, and an Assembly Point arrangement. *See* SGAT, § II.D.1. BellSouth also offers other technically feasible methods of combining UNEs via the BFR process. *See* ICG Agmnt., GTC-A, § 6.0. Each of these options is described more fully in my testimony on checklist item 1, and collocation is described more fully in the Affidavit of Wayne Gray, attached hereto as Attachment A.

Q. DOES BELLSOUTH OFFER PREEXISTING COMBINATIONS OF UNES TO ALECS?

A. Yes. Pursuant to an order of the Florida Commission, except upon request, BellSouth will not separate requested network elements where such elements are physically combined and providing service to a particular customer at a particular location. *See* SGAT, § II.D; ICG Agmnt., Att. 2, § 1.9.1.1; Intermedia Agmnt., Att. 2 §§18.0; 19.0.

The rates for these UNE combinations are addressed in the testimony of Cynthia Cox. Ms. Cox also addresses the conditions pursuant to which BellSouth offers the Enhanced Extended Link ("EEL").

Q. MAY ALECS COMBINE UNES THEMSELVES?

A. Yes. BellSouth provides access to UNEs in a manner that allows requesting carriers to combine those elements. ALECs may use either physical collocation (including caged; shared cage; cageless; and adjacent, where space is not available), virtual collocation arrangements, *see* Intermedia Agmnt., Att. 4, § 3 or assembly point arrangements to combine UNEs. In addition, ALECs may request other technically feasible methods of combining UNEs through the BFR. *See* Intermedia Agmnt., GTC-A, § 5.0.

The UNE combination is effectuated as follows: BellSouth will wire each UNE to the tie cable and pair running between BellSouth's distributing frame and the ALEC's collocation arrangement as designated by the ALEC on its UNE order. For example, both the loop and the switch port are terminated on the Main Distribution Frame ("MDF") within the BellSouth central office. Upon request of the ALEC, BellSouth will

wire the loop to the tie cable and pair facility designated on the unbundled loop order. Likewise, BellSouth will wire the unbundled switch port to the tie cable and pair designated on the unbundled switch port order. In the case of physical collocation, BellSouth's wiring of the UNEs to the tie cable and pair interconnection facilities designated by the ALEC correlates to the pre-designated positions on the interconnection point (that is, BellSouth's distributing frame) serving the collocation arrangement. The ALEC may complete the combination via connections within its collocation arrangement either manually or electronically, at the election of the ALEC. These connections within the ALEC's collocation arrangement may be pre-wired or established on an as-needed basis at the election of the ALEC. To facilitate UNE combinations using virtual collocation, the ALEC may employ any of several options that include, but are not limited to: pre-wired terminations on the ALEC's transmission equipment; use of the ALEC's electronic digital cross-connection facilities or other means of performing cross-connections remotely; or connections on a per request basis.

An example of using pre-wired terminations might include the ALEC's arranging the pre-wiring of connector block "position 100" to "position 200", "position 101" to "position 201" and so forth. Should the ALEC wish to combine two elements, such as the combining of an unbundled loop with an unbundled switch port, the ALEC would specify the BellSouth cable and pair assignment correlating to "position 100" on the unbundled loop order and would specify the BellSouth cable and pair assignment correlating to "position 200" on the unbundled switch port order. With "position 100" and "position 200" having been pre-connected, the UNEs would thus be combined once BellSouth completes its connection of each of the UNEs ordered to the designated interconnection facility cable and pair assignments.

Q. IT APPEARS THAT THE DISTRIBUTION FRAME IS AN ESSENTIAL COMPONENT OF AN ALEC'S ABILITY TO COMBINE UNES. CAN BELLSOUTH ACCOMMODATE THE ALECS' DEMAND FOR DISTRIBUTING FRAME CONNECTOR BLOCKS?

A. Yes. BellSouth can fully accommodate demand for new distributing frame connector blocks for ALECs. While space on distributing frames is a finite resource, this is not a consequence of local competition. Because of increasing retail demand, BellSouth has for many years been faced with the possible exhaustion of space on distributing frames within its central offices. This increasing demand is evidenced by the fact that in 1988 there were roughly one million access lines in the Miami Metropolitan Statistical Area ("MSA"); through December 2000, there were over 1.5 million access lines in the Miami MSA, a 50 percent increase in over eleven years. BellSouth has always effectively met the challenges of increased demand -- a fact no party contests. For example, in the years 1999-2000, BellSouth completed eleven (11) additions to its conventional main distribution frames and COSMIC main distribution frames in Florida. Also, BellSouth has never denied any ALEC's request for a UNE because of a lack of main distribution frame connector blocks. BellSouth likewise will continue to make needed additions to its distributing frames on a nondiscriminatory basis, as with other facilities such as switches and loop facilities, to accommodate ALECs' needs.

Q. HAS BELLSOUTH PROVIDED ALECS WITH PREEXISTING UNE COMBINATIONS?

A. Yes. As of March 31, 2001, BellSouth had 71,588 loop and port combinations in place

for ALECs in Florida and 303,257 such combinations in place for ALECs across BellSouth's nine-state region. In addition, BellSouth had 1,196 loop and transport combinations in place for ALECs in Florida.

Q. DESCRIBE THE MEANS BY WHICH ALECS MAY COMBINE INDIVIDUAL UNES OBTAINED FROM BELLSOUTH WITH THE ALEC'S OWN FACILITIES.

A. An ALEC may also use its physical collocation arrangement to combine UNES that the ALEC acquires from BellSouth with the ALEC's own equipment or facilities. BellSouth will extend UNEs to an ALEC's physical collocation arrangement and will terminate those UNEs in such a way as to allow the ALEC to provide any cross connections or other required wiring within the collocation arrangement in order to effect the combination. In such an arrangement, the ALEC is responsible for making any necessary cross connections within the physical collocation arrangement, for example, by making cross connections at a frame or cross connection block within the physical collocation arrangement. As noted above, the ALEC may choose to "pre-wire" these connections in anticipation of BellSouth's providing the UNEs, thereby eliminating the need to establish these connections during the customer cutover process.

For example, BellSouth will deliver both unbundled loops and unbundled dedicated transport facilities to the ALEC's collocation arrangement. The ALEC is then free to cross-connect the loop and transport facilities in any manner it chooses. Similarly, BellSouth will deliver unbundled loops and unbundled switch ports to any ALEC's collocation arrangement and, again, the ALEC may cross-connect the unbundled loop and unbundled switch port in any manner the ALEC desires.

In order to combine network elements in their collocation arrangements, ALECs will use the same types of cross-connections that BellSouth regularly uses thousands of times every day in its retail operations. When BellSouth connects a new customer to its network, it uses cross-connections to combine facilities, just as ALECs may do. In its retail operations, BellSouth regularly uses multiple cross-connections between loops and switch ports, as well as on Intermediate Distribution Frames ("IDFs"), and provides high quality transmission performance on the resulting service. ALECs' use of cross-connections to combine network elements into an operational network is a routine part of local telephone operations and precisely analogous to the manner in which BellSouth establishes service to a customer premises not previously served by its own network.

Q. HAS BELLSOUTH ADDRESSED THE CONCERNS OF THE FLORIDA COMMISSION REGARDING THIS CHECKLIST ITEM AS EXPRESSED IN THE 1997 ORDER?

A. In the *1997 Order*, the Florida Commission expressed two concerns with respect to Checklist item (2), namely that BellSouth had not demonstrated that it can provide mechanically generated billing statements for all UNEs and that BellSouth has not provided detailed access usage detail for billing purposes. Both of these concerns will be addressed in the Commission's Third Party Test.

As my testimony makes clear, BellSouth provides nondiscriminatory access to UNEs at any technically feasible point. Moreover, as the units of service reflect, ALECs are purchasing UNEs from BellSouth in large numbers to enter the local market in Florida.

CHECKLIST ITEM 3: ACCESS TO POLES, DUCTS, CONDUITS, AND RIGHTS-OF-WAY

The following issue was approved for consideration in this proceeding by the Florida Commission:

4. In Order PSC-97-1459-FOF-TL, issued November 19, 1997, the Commission found that BellSouth met the requirements of Section 224 of the Communications Act of 1934, as amended by the Telecommunications Act of 1996, pursuant to Section 271(c)(2)(B)(iii). Does BellSouth currently provide nondiscriminatory access to the poles, ducts, and conduits, and rights-of-way owned or controlled by BellSouth at just and reasonable rates in accordance with the requirements of Section 224 of the Communications Act of 1934 as amended by the Telecommunications Act of 1996, pursuant to Section 271(c)(2)(B)(iii) and applicable rules promulgated by the FCC?

Q. DESCRIBE BELLSOUTH'S COMPLIANCE WITH CHECKLIST ITEM 3.

A. Section 271(c)(2)(B)(iii) of the Act requires BellSouth to provide nondiscriminatory access to poles, ducts and conduits and rights of way to ALECs when requested. The FCC found that BellSouth had met all requirements for Checklist Item 3 in the *Second Louisiana Order*. BellSouth's procedures and processes described in that application are the same as those that are used in Florida. In the *1997 Order*, the Florida Commission found that "the procedures for providing access to cable companies. . . have been in effect for years" and that there was no "evidence...to indicate that this process will not work for telecommunications companies." *1997 Order,* at 100. From this evidence the

Commission concluded that BellSouth met the requirements of this checklist item. In Section III of the SGAT, and in various negotiated and arbitrated agreements, BellSouth continues to offer nondiscriminatory access to poles, ducts, conduits and rights-of-way in a timely fashion as discussed in the Affidavit of Linda Kinsey, Attachment B. In short, nothing material has changed since 1997 that would cause the Commission to reach a different conclusion than it reached in the *1997 Order*.

Q. ARE ALECS USING BELLSOUTH'S POLES, DUCTS, CONDUITS, AND RIGHTS-OF-WAY?

A. Yes. As of May 17, 2001, ALECs in Florida had executed with BellSouth 51 license agreements and 103 license agreements region-wide, (both state-specific and multi-state) that allow them to attach their facilities to BellSouth's poles and to place their facilities in BellSouth's ducts and conduits. Since July 1997, BellSouth has received 338 requests in Florida for access to poles, ducts, conduits, and rights-of-way from 26 ALECs with no requests being denied. Similarly, ALECs have leased approximately 195,000 feet of conduit space in BellSouth's nine-state region as a result of ALEC requests, of which 31,000 feet are in Florida.

CHECKLIST ITEM 4: LOCAL LOOP

The following issue was approved for consideration in this proceeding by the Florida Commission:

5. In Order PSC-97-1459-FOF-TL, issued November 19, 1997, the Commission found that BellSouth met the requirements of Section 271(c)(2)(B)(iv) of the Telecommunications Act of 1996. Does BellSouth currently provide unbundled local loop transmission between the central office and the customer's premises from local switching or other services, pursuant to Section 271(c)(2)(B)(iv) and applicable rules and orders promulgated by the FCC?

(a) Does BellSouth currently provide all currently required forms of unbundled loops?

(b) Has BellSouth satisfied other associated requirements, if any, for this item?

Q. DESCRIBE BELLSOUTH'S COMPLIANCE WITH CHECKLIST ITEM 4.

A. Checklist Item (4) requires that BellSouth provide local loop transmission from the central office to the customer's premises, unbundled from local switching or other services. 47 U.S.C. § 271(c)(2)(B)(iv). In its *1997 Order*, the Florida Commission found that "since the evidence indicates that BellSouth has provided, and competitors have received, this checklist item, we find that BellSouth has met the requirements of § 271(c)(2)(B)(iv)." *See 1997 Order*, at 104. BellSouth continues to provide nondiscriminatory access to local loop transmission on an unbundled basis and has procedures in place for the ordering, provisioning, and maintenance of unbundled loops.

Q. DESCRIBE THE UNBUNDLED LOOPS BELLSOUTH MAKES AVAILABLE TO ALECS.

A. The local loop network element is defined as a dedicated transmission facility between a distributing frame (or its equivalent) in a BellSouth central office and the loop demarcation point at an end user customer's premises. The local loop network element includes all features, functions and capabilities of the transmission facility, including dark fiber and attached electronics (except those electronics used for the provision of advanced services, such as Digital Subscriber Line Access Multiplexers or "DSLAMs"), and loop conditioning. 47 C.F.R. § 51.319(a). BellSouth allows ALECs to access unbundled loops at any technically feasible point. BellSouth provides ALECs access to unbundled local loops in a manner that allows an efficient competitor a meaningful opportunity to compete.

BellSouth makes the following loop types available to ALECs and has provided the following quantities in Florida as of March 31, 2001:

- SL1 voice grade loops (33,084)
- SL2 voice grade loops (68,270)
- 2-wire ISDN digital grade loops (5,939)
- 2-wire ADSL loops (4,279)
- 2-wire HDSL loops (108)
- 4-wire HDSL loops (2)
- 4-wire DS-1 digital grade loops (2,584)
- 56 or 64 Kbps digital grade loops (0)
- UCL (Long and Short) loops (2,579)

- DS3 Loops (0)
- UCL-ND (0)

ALECs may request additional loop types through the BFR process. BellSouth provides access to loops at any technically feasible point with access to all features, functions, and capabilities unbundled from other UNEs; without any restrictions that impair use by ALECs; for an ALEC's exclusive use; and in a manner that enables ALECs to combine loops with other UNEs. *See* ICG Agmnt., Att. 2. Moreover, BellSouth offers local loop transmission of the same quality and same equipment and technical specifications used by BellSouth to service its own customers.

Q. ARE ALECS PURCHASING UNBUNDLED LOOPS FROM BELLSOUTH?

A. Yes. As of March 31, 2001, BellSouth had provisioned 116,845 unbundled loops to over 40 ALECs in Florida. In BellSouth's nine-state region, BellSouth had provisioned 353,992 unbundled loops as of that same date.

Q. DOES BELLSOUTH OFFER UNBUNDLED LOOPS SERVED BY INTEGRATED DIGITAL LOOP CARRIER ("IDLC") TECHNOLOGY?

A. Yes. IDLC is a special version of DLC that does not require the host terminal in the central office (sometimes referred to as the Central Office Terminal or "COT"), but instead terminates the digital transmission facilities directly into the central office switch. The design of IDLC technology means that it is impossible to separate the loop from the switch because the switch performs the control and functions normally performed by the

host terminal. In the Texas decision, the FCC found that "the BOC must provide competitors with access to unbundled loops regardless of whether the BOC uses integrated digital loop carrier (IDLC) technology or similar remote concentration devices for the particular loops sought by the competitor." *SWBT*, ¶ 248. BellSouth provides access to such IDLC loops via the following methods:

Alternative 1: If sufficient physical copper pairs are available, BellSouth will reassign the loop from the IDLC system to a physical copper pair.

Alternative 2: Where the loops are served by Next Generation Digital Loop Carrier (NGDLC) systems, BellSouth will "groom" the integrated loops to form a virtual Remote Terminal (RT) set-up for universal service (that is, a terminal which can accommodate both switched and private line circuits). "Grooming" is the process of arranging certain loops (in the input stage of the NGDLC) in such a way that discrete groups of multiplexed loops may be assigned to transmission facilities (in the output stage of the NGDLC). Both of the NGDLC systems currently approved for use in BellSouth's network have "grooming" capabilities.

Alternative 3: BellSouth will remove the loop distribution pair from the IDLC and re-terminate the pair to either a spare metallic loop feeder pair (copper pair) or to spare universal digital loop carrier equipment in the loop feeder route or Carrier Serving Area (CSA). For two-wire ISDN loops, the universal digital loop carrier facilities will be made available through the use of Conklin BRITEmux or Fitel-PMX 8uMux equipment.

Alternative 4: BellSouth will remove the loop distribution pair from the IDLC and re-terminate the pair to utilize spare capacity of existing Integrated Network Access (INA) systems or other existing IDLC that terminates on DCS equipment. BellSouth will thereby route the requested unbundled loop channel to a channel bank where it can be de-multiplexed for delivery to the requesting ALEC or for termination in a DLC channel bank in the central office for concentration and subsequent delivery to the requesting ALEC.

Alternative 5: When IDLC terminates at a peripheral capable of serving "side-door/hairpin" capabilities, BellSouth will utilize this switch functionality. The loop will remain terminated directly into the switch while the "side-door/hairpin" capabilities allow the loop to be provided individually to the requesting ALEC.

Alternative 6: If a given IDLC system is not served by a switch peripheral that is capable of side-door/hairpin functionality, BellSouth will move the IDLC system to switch peripheral equipment that is side-door capable.

Alternative 7: BellSouth will install and activate new Universal DLC ("UDLC") facilities or NGDLC facilities and then move the requested loop from the IDLC to these new facilities. In the case of UDLC, if growth will trigger activation of additional capacity within two years, BellSouth will activate new UDLC capacity to the distribution area. In the case of NGDLC, if channel banks are available for growth in the CSA, BellSouth will activate NGDLC unless the DLC enclosure is a cabinet already wired for older vintage DLC systems.

Alternative 8: When it is expected that growth will not create the need for additional capacity within the next two years, BellSouth will convert some existing IDLC capacity to UDLC.

See e.g. Intermedia Agmnt., Att. 2, § 3.0.

Because certain circuits cannot be supported via an IDLC system in those instances where NGDLC is installed, BellSouth normally reserves some NGDLC capacity to support those special service circuits (both its own and those of ALECs) through a universal DLC arrangement based on site-specific forecasts. BellSouth does not reserve loops served by NGDLC for its own purposes, and does not restrict ALEC access to BellSouth loops. BellSouth will construct (via the special construction process) the facilities necessary to provide unbundled loops to requesting ALECs in the small number of cases in which none of these methods is viable. *See* Intermedia Agmnt., Att. 2, § 3.1.1.

Q. DESCRIBE BELLSOUTH'S UNIVERSAL DIGITAL CARRIER LOOP OFFERING.

A. BellSouth provides ALECs the Universal Digital Carrier ("UDC") capable loop. This loop gives ALECs the ability to arrange the individual channels of an ISDN line such that it appears to the end user to be a single channel of 144 Kbps. Some ALECs have referred to such an arrangement as ISDN Digital Subscriber Line (IDSL) service.

Q. DOES BELLSOUTH OFFER LOOP CONDITIONING?

A. Yes. BellSouth offers loop conditioning in accordance with applicable FCC rules and orders. Loop conditioning is defined as the removal from the loop of any devices that

may diminish the capacity of the loop to deliver high-speed switched wireline telecommunications capability, including xDSL service. BellSouth provides loop conditioning for unbundled loops, whether or not BellSouth offers advanced services to the end-user on that loop. *See* Intermedia Agmnt., Att. 2, § 2.4; SGAT, § IV.H. BellSouth's loop conditioning offer is described fully in the testimony of Wiley (Jerry) G. Latham.

Q. ARE ALECS PURCHASING LOOP CONDITIONING?

A. Yes. Through March 2001, ALECs in Florida made 13 requests for loop conditioning; however, across BellSouth's region as of that same date there were a total of 59 requests.

Q. DOES BELLSOUTH OFFER SUB-LOOP ELEMENTS IN COMPLIANCE WITH CHECKLIST ITEM 4?

A. Yes. In addition to the unbundled loops themselves, BellSouth offers ALECs nondiscriminatory access to sub-loop elements. A sub-loop unbundled network element is an existing portion of the loop that can be accessed at accessible points on the loop. An accessible point on the loop is where technicians can access the copper wire or fiber within the cable without removing a splice case to reach the wire or fiber within. This includes any technically feasible point near the customer premises (such as the pole or pedestal, the NID, or minimum point of entry ("MPOE") to the customer's premises), the feeder distribution interface ("FDI"), the MDF, remote terminals, and various other terminals. BellSouth offers loop concentration/multiplexing as a sub-loop element. BellSouth also provides unbundled access to the sub-loop elements loop feeder, loop

distribution, intrabuilding network cable, and network terminating wire. Details about how these sub-loop elements are provided may be found at BellSouth's Interconnection website:

http://www.interconnection.bellsouth.com/products/unes.html

Q. ARE ALECS PURCHASING SUB-LOOP ELEMENTS?

A. Yes. ALECs in Florida have purchased over 500 unbundled sub-loop elements.

Q. DOES BELLSOUTH PROVIDE ACCESS TO DARK FIBER?

A. Yes. BellSouth also provides access to unused transmission media, which in some cases is referred to as "dark fiber". *See* e.spire Agmnt., Att. 2, § 14. BellSouth provides dark fiber in the subscriber loop segment of the network and in the dedicated interoffice transport segment of the network as a UNE when the ALEC has collocation space in a central office housing a BellSouth tandem or end office switch. BellSouth uses standardized forms to allow an ALEC to determine dark fiber availability via a service inquiry and to order dark fiber via a local service request. BellSouth will use its best efforts to confirm the availability of dark fiber within ten (10) business days of receipt of a service inquiry. BellSouth will use its best efforts to provide dark fiber to the ALEC within thirty (30) business days from the receipt of a complete, accurate and error-free local service request. BellSouth will either grant the request and issue an appropriate lease or deny the request. Availability is limited by fibers in use by BellSouth or its customers, maintenance spares, number of defective fibers present, and the number of fibers for which BellSouth has specific documented plans within a two year period.

BellSouth has, where appropriate, executed non-disclosure agreements and agreed to share documents with ALECs in order to demonstrate BellSouth's specific documented plans. To exercise its right of revocation, BellSouth must demonstrate that the subject dark fiber is needed to meet BellSouth's bandwidth requirements or the bandwidth requirements of another local service provider. BellSouth's dark fiber interoffice service terminates on a standard Light Guide Cross-connect ("LGX") termination at both ends. The dark fiber subscriber loop service terminates on a standard LGX in the subscriber's Serving Wire Center. A collocation cross-connect is used to provide connectivity between the dark fiber and the ALEC's collocation space. *See*, Intermedia Agmnt., Att. 2, § 14.

Q. ARE ALECS PURCHASING DARK FIBER?

A. Yes. BellSouth has two (2) dark fiber arrangements in place in Florida. BellSouth has four (4) dark fiber arrangements in place in one (1) other state within BellSouth's nine-state region.

Q. DOES BELLSOUTH OFFER ALECS LINE SHARING?

A. Yes. BellSouth provides ALECs with access to the high frequency portion of the local loop as a UNE in compliance with the FCC's *Line Sharing Order*. The high frequency of the loop is defined as the frequency range above the voice band on a copper loop facility carrying analog circuit-switched voice band transmissions where the incumbent LEC is the voice provider. *See* Covad Agmnt. 4/25/00 Amend. BellSouth will provide requesting carriers access to the high-frequency portion of the loop at the remote terminal

location as well as at the central office. Line Sharing is discussed in the testimony of Tommy G. Williams.

Q. ARE ALECS PURCHASING LINE SHARING?

A. Yes. As of April 1, 2001, BellSouth had provisioned 2,542 line sharing arrangements across BellSouth's nine-state region and 714 line sharing arrangements in Florida.

Q. DOES BELLSOUTH PROVIDE ACCESS TO LOOP MAKEUP INFORMATION?

A. Yes. BellSouth provides ALECs access to information regarding a given loop's characteristics, including loop length, wire gauge, loop medium (copper of fiber), and information regarding any bridged tap, load coil, or repeaters present on the loop. Manual access to LMU information is described in the testimony of Wiley (Jerry) G. Latham. *See* also, Covad Agmnt. Amend., § 2.2.10. BellSouth's electronic pre-ordering and ordering interfaces have been enhanced to provide electronic access to loop makeup information and electronic ordering of ADSL-capable loops, HDSL-capable loops, and UCLs.

Q. ARE ALECS ACCESSING LOOP MAKEUP INFORMATION?

A. Yes. In March 2001, ALECs made 4,841 mechanized LMU inquiries region-wide. In Florida, ALECs made 1,409 mechanized LMU inquiries. From November 2000 through March 2001, ALECs made 683 manual LMU inquiries region-wide, and 234 in Florida.

Q. DOES BELLSOUTH PROVIDE XDSL LOOPS TO ALECS?

A. Yes. As discussed earlier, BellSouth provides ALECs with various types of xDSL loops including the 2-wire Asymmetrical Digital Subscriber Line (ADSL), the 2-wire and 4-wire High-bit-rate Digital Subscriber Line (HDSL), 2-wire ISDN and Unbundled Copper Loops. *See* Intermedia Agmnt. Att. 2, § 2.3; 2.5; Covad Agmnt., Amend., § 2.2.9. Finally, BellSouth offers nondiscriminatory access to loop makeup information so that ALECs can determine whether or not existing loop facilities can support the desired xDSL service. BellSouth's xDSL loops, line conditioning and loop qualification offerings are discussed in detail in the testimony of Wiley (Jerry) G. Latham.

Q. ARE ALECS ORDERING XDSL LOOPS?

A. Yes. As of March 31, 2001, in Florida, BellSouth had provisioned 4,279 two-wire ADSL loops and 108 two-wire HDSL loops to over 40 different ALECs in Florida. As of the same date, BellSouth had provisioned within its region 14,102 two-wire ADSL loops, 451 two-wire HDSL loops, and 46 four-wire HDSL loops to over 90 different ALECs.

Q. DOES BELLSOUTH FACILITATE LINE SPLITTING?

A. Yes. BellSouth will work cooperatively with ALECs to develop rates, methods and procedures to operationalize a process whereby two ALECs, one being a provider of voice services and the other being a provider of data services may provide service over the same loop. *See* SGAT, § II.B.9(2). Line Splitting is discussed in detail in the testimony of Tommy Williams.

Q. ARE ALECS ORDERING LINE SPLITTING?

A. No, not at this time. As stated above, however, BellSouth will facilitate line splitting for any ALEC that requests it.

HOT CUTS

Q. GENERALLY DESCRIBE THE PROCESS KNOWN AS A "HOT CUT."

A. Hot cuts involve the conversion of an existing BellSouth customer to the network of a competitor by transferring the customer's in-service loop over to the ALEC's network. BellSouth has established hot cut procedures that ensure accurate, reliable, and timely cutovers.

Q. DESCRIBE THE LOOP CUTOVER PROCEDURES ESTABLISHED BY BELLSOUTH TO ENSURE ACCURATE AND TIMELY CUTOVERS.

A. BellSouth has implemented three hot cut processes, two involving coordination at the time of the hot cut between BellSouth and the requesting ALEC and one process that does not involve such coordination. The two processes for coordinated loop cutovers are a time-specific cutover, and a non-time-specific cutover. With a time-specific cutover, an ALEC can set a specific date and time for a loop conversion by ordering and paying for time specific order coordination. Under this option, BellSouth commits to use best efforts to complete the conversion as specified by the ALEC at the ordered date and time. *See* Intermedia Agmnt. Att. 2, § 2.2.2. If unforeseen circumstances occur during the

provisioning process which may cause the date or time of the conversion to be in jeopardy, BellSouth notifies ALEC as soon as the jeopardy is identified to allow the ALEC to respond to its customer as appropriate.

Under the second option, the ALEC may request non-time specific coordination from BellSouth. Under this option, BellSouth and an ALEC mutually establish a date for the conversion but do not pick a specific conversion time at the time BellSouth receives the ALEC's local service request. Then, 24 to 48 hours in advance of the date of the conversion, BellSouth and the ALEC mutually set a time for the conversion. Like time-specific coordination, if unforeseen circumstances occur that may jeopardize BellSouth's ability to perform the conversion, BellSouth notifies the ALEC as soon as the jeopardy is identified.

As a third option, the ALEC may prefer no coordination of any kind between BellSouth and the ALEC at the time of the hot cut. The ALEC merely specifies the date upon which it wishes BellSouth to perform its cutover activities and BellSouth notifies the ALEC once the hot cut is complete.

Q. DESCRIBE IN MORE DETAIL THE PROCESS FOR COORDINATED CUTOVERS.

A. Coordinated loop cutovers involve a number of steps. Exhibit WKM-2 shows, pictorially and with a brief narrative, the various work steps involved in a typical coordinated loop cutover. These photographs were taken in BellSouth's Norcross, Georgia, central office; however, the work steps are identical in all nine states in BellSouth's region. Briefly, the work steps involved are as follows:

- The BellSouth central office technician receives a call from the Customer Wholesale Interconnection Network Services (CWINS) Center to begin cutover and asks for the cable pair number of the loop to be cutover. This is shown on page 1 of Exhibit WKM-2.
- The technician types the cable pair number into a database to find the loop cutover work order number. This is shown on page 2 of Exhibit WKM-2.
- The technician retrieves a copy of the work order for the unbundled loop. This is shown on page 3 of Exhibit WKM-2.
- The technician in the BellSouth central office responds to the BellSouth UNE Center's request to initiate coordination of the overall cutover of service from BellSouth to the ALEC. This is shown on page 4 of Exhibit WKM-2.
- The technician then verifies that the correct loop has been identified for cutover. This is done using a capability referred to as Automatic Number Announcement Circuit ("ANAC"). The technician plugs a test set onto the loop and dials a special code. The telephone number associated with that loop is played audibly. This is shown on page 5 of Exhibit WKM-2.
- Next, the technician locates the existing jumper on the BellSouth MDF running between the loop and the BellSouth switch port. This is shown on pages 6-7 of Exhibit WKM-2.
- The technician locates and removes the end of the jumper connected to the BellSouth cable pair. This is shown on page 8 of Exhibit WKM-2.
- The technician then locates and removes the end of the jumper connected to the BellSouth switching equipment. This is shown on page 9 of Exhibit WKM-2.
- The technician then connects the one end of a new jumper between the loop and a connector block on a cable rack with tie cables to the ALEC's collocation

arrangement. This is shown on page 10 of Exhibit WKM-2.

- The technician then weaves the new jumper wire through the cable rack to reach the tie cables to the ALEC's collocation arrangement. This is shown on page 11 of Exhibit WKM-2.
- The technician connects the second end of the new jumper to the connector block and thus the tie cable to the ALEC's collocation equipment. This is shown on page 12 of Exhibit WKM-2.
- The technician next verifies that the loop is connected to the expected switch port and telephone number in the ALEC's switch, again using ANAC capabilities. This is shown on page 13 of Exhibit WKM-2.
- Upon successful completion of the loop cutover, the technician verifies with the ALEC that the order was correctly worked, closes the work order, and notifies the UNE Center. This is shown on page 14 of Exhibit WKM-2.
- Once the cutover is complete, the ALEC sends appropriate messages to effect number porting.

Q. DOES BELLSOUTH DO ANY TESTING IN ADVANCE OF THE CUTOVER DATE?

A. Yes, BellSouth does advance testing for all designed circuits which come with test points. For such circuits, BellSouth will check the circuit 24 to 48 hours prior to the due date. For non-designed circuits, BellSouth performs continuity tests within the central office from the collocation space to the BellSouth switch. For both designed and non-designed circuits, BellSouth tests on the cutover due date for ALEC dialtone.

On the due date, BellSouth tests for ALEC dialtone for all circuits, whether designed or nondesigned. BellSouth also monitors the line for use. If during the test, BellSouth does not receive ALEC dialtone, the cutover will not take place unless the ALEC corrects the problem within 15 minutes or pays for standby time. Otherwise, the ALEC must elect to reschedule the conversion.

Q. DOES BELLSOUTH PERFORM LOOP CUTOVERS SIMULTANEOUSLY WITH NUMBER PORTING?

A. No. BellSouth does not perform loop cutovers simultaneously with number porting for the very important reason that to do so leaves the end user customer at risk of the number porting being completed early and calls bound for the end user customer being misdirected to the ALEC's switch. The loop cutover is much more complicated in terms of the work steps involved (on the part of both BellSouth and the ALEC) than the number porting. BellSouth performs all "up front" work in anticipation of the loop cutover being successfully completed. BellSouth's LNP process is discussed further in the Affidavit of Dennis L. Davis, Attachment E.

The cutover process can be even more unobtrusive to the end user customer if one of several processes is followed. The ALEC might, for example, schedule the cutover late at night or on a weekend or any other time when the end user customer will not be using the service. Other procedures such as pre-wiring cross connections in anticipation of BellSouth's providing the unbundled network elements likewise minimize or eliminate any inconvenience to the end user customer.

Q. DOES BELLSOUTH DOCUMENT ITS CUTOVER PROCESS SUCH THAT THE ALECS CAN REVIEW IT?

A. Yes. BellSouth has developed a detailed flow chart depicting the entire process. This process flow is attached to this testimony as Exhibit WKM-3.

Q. DOES BELLSOUTH HAVE METHODS AND PROCEDURES THAT DOCUMENT THIS PROCESS FLOW?

A. Yes. BellSouth has developed methods and procedures ("M&Ps") for its process flow. BellSouth's M&Ps are attached to this testimony as Exhibit WKM-4 and address the following:

- BellSouth's processes when an ALEC orders a coordinated conversion and whether the ALEC wants to set the conversion time for an offered day or whether the ALEC elects to have the time mutually agreed to prior to conversion.
- BellSouth's requirements to contact the ALEC at any point in the provisioning process where a jeopardy condition might result in a conversion delay.
- BellSouth's commitment to contact the ALEC 24 to 48 hours in advance of the cut depending on the interval for the service ordered, to negotiate a non time specific conversion and/or to verify the ALEC's readiness to convert the customer's service as ordered.
- BellSouth's pre-testing responsibilities prior to conversion as well as on the conversion date to ensure the conversion is completed successfully.
- BellSouth's willingness to notify and cooperatively work with ALECs to correct any wiring defects which BellSouth identifies while performing pre-testing

activities whether the fault appears to be in BellSouth's or an ALEC's equipment.

- An ALEC's ability to accept or reject the completion of a conversion prior to BellSouth completing the service request and BellSouth's obligation to timely notification to the ALEC for the porting of telephone numbers.

In addition, BellSouth has developed training materials with which to instruct its technicians about the loop cutover process. These are Work Instruction UTDIC001, Issue 2f and Work Instruction UTNIC001, Issue 2g. and are attached to this testimony as Exhibit WKM-5.

Q. IS BELLSOUTH'S CONNECTING FACILITY ASSIGNMENT DATABASE AVAILABLE TO ALECS IN CONNECTION WITH LOOP CUTOVERS?

A. Yes. BellSouth makes available its Connecting Facility Assignment database ("CFA") to ALECs via the Internet. BellSouth provides ALECs with the connecting facility assignments (that is, cable and pair assignments for the cable between the ALEC's collocation arrangement and BellSouth's equipment such as distributing frames or cross-connect bays) assigned to the ALEC at the time the ALEC's collocation arrangement is made available. Each ALEC is required to maintain its own connecting facility assignment records and assign each pair that the ALEC wants BellSouth to use in order to connect BellSouth's facilities to the ALEC's facilities.

CHECKLIST ITEM 5: LOCAL TRANSPORT

The following issue was approved for consideration in this proceeding by the Florida Commission:

6. Does BellSouth currently provide unbundled local transport on the trunk side of a wireline local exchange carrier switch from switching or other services, pursuant to Section 271(c)(2)(B)(v) and applicable rules promulgated by the FCC?

(a) Does BellSouth currently provide billing for usage-sensitive UNEs?

(b) Has BellSouth satisfied all other associated requirements, if any, for this item?

Q. DESCRIBE BELLSOUTH'S COMPLIANCE WITH CHECKLIST ITEM 5.

A. Checklist Item 5 requires BellSouth to offer access to the local transport network element on the trunk side of a wireline local exchange carrier switch unbundled from switching or other services. 47 U.S.C. § 271(c)(2)(B)(v). Local transport consists of BellSouth interoffice transmission facilities dedicated to a particular customer or carrier, or shared by more than one customer or carrier, that provide telecommunications between wire centers owned by BellSouth or an ALEC or third parties acting on behalf of an ALEC, or between switches owned by BellSouth or an ALEC or third parties acting on behalf of an ALEC. BellSouth provides both types of local transport, namely dedicated and common (also called "shared."). *See* Intermedia Agmnt., Att. 2, § 8.0. BellSouth complies with the obligations of this checklist item, both through its interconnection agreements and through its SGAT.

Dedicated transport consists of BellSouth transmission facilities dedicated to a particular customer or carrier that provide telecommunications between wire centers owned by BellSouth or ALECs, or between switches owned by BellSouth or ALECs. *See*

Intermedia Agmnt., Att. 2, § 8.1(1).

Common transport is interoffice transmission facilities, shared between BellSouth and one or more ALECs, that connect end office switches, end office switches and tandem switches, or tandem switches, in BellSouth's network. This definition of common transport assumes the interconnection point between the two carriers' networks is at BellSouth's switch. *See* Intermedia Agmnt., Att. 2, § 8.1 (3).

With respect to dedicated transport, BellSouth does the following: (1) provides unbundled access to dedicated transmission facilities between BellSouth's central offices or between such central offices and serving wire centers ("SWCs"); between SWCs and interexchange carriers points of presence ("POPs"); between tandem switches and SWCs, end offices, or tandems of BellSouth and the wire centers of BellSouth and requesting carriers; (2) provides all technically feasible transmission capabilities such as DS1, DS3, and Optical Carrier (OCn) levels that the competing carrier could use to provide telecommunications, including the necessary electronics; (3) does not limit the facilities to which dedicated interoffice transport facilities are connected, provided such interconnections are technically feasible, or restrict the use of unbundled transport facilities; and (d) to the extent technically feasible, provides requesting carriers with access to digital cross-connect functionality in the same manner that the BellSouth offers such capabilities to IXCs that purchase transport services. *See* Intermedia Agmnt., Att. 2, §. 8.0.

In addition, ALECs can use dedicated transport to provide any transmission-specific service to the extent technically feasible.

With respect to common transport, BellSouth does the following: (1) provides common transport in a way that enables the traffic of requesting carriers to be carried on the same transport facilities that BellSouth uses for its own traffic; (2) provides common transport transmission facilities between end office switches, between BellSouth's end office and tandem switches; and between tandem switches in BellSouth's network; (3) permits requesting carriers that purchase unbundled common transport and unbundled switching to use the same routing table that is resident in BellSouth's switch; and (4) permits requesting carriers to use common (or dedicated) transport as an unbundled element to carry originating traffic from, and terminating traffic to, customers to whom the requesting carrier is also providing local exchange service. *See* Intermedia Agmnt., Att. 2, § 8.0.

In the *Second Louisiana Order*, the FCC found that BellSouth complies with the requirements of this checklist item by making available dedicated and common transport between end offices, between tandems, and between tandems and end offices.[3] BellSouth continues to make both dedicated and shared transport available to ALECs on a nondiscriminatory basis and has procedures in place for the ordering, provisioning, and maintenance of both dedicated and shared interoffice transport.

In addition to the types of local transport currently offered by BellSouth, an ALEC may request new or additional unbundled transport elements using the BFR process. *See* e.spire Agmnt., GTC-A, § 15.

[3] Despite its favorable conclusion on BellSouth's provision of local transport, the FCC declined to approve this checklist item on the grounds that BellSouth had failed to make a prima facie showing that it provides nondiscriminatory access to OSS for the ordering and provisioning of dedicated and shared transport facilities. These issues will be addressed in the Commission's Third Party Test.

Q. ARE ALECS ORDERING LOCAL TRANSPORT?

A. Yes. As of March 31, 2001, BellSouth had provided 3,336 dedicated local transport trunks to ALECs in Florida. BellSouth has provided 10,907 dedicated trunks providing interoffice transport to ALECs in its nine-state region as of that same date.

For common transport, specific counts of trunks providing service to ALECs cannot be determined. This is because, as the name (common transport) implies, all trunks in a given trunk group are available for carrying service for any carrier which uses that group, including BellSouth and in some cases multiple ALECs. However, BellSouth can state that as of from July 1999 to March 31, 2001, there were 52 ALECs in Florida and 92 in BellSouth's nine-state region using common transport to some degree.

Q. HAS BELLSOUTH ADDRESSED THE FLORIDA COMMISSION'S CONCERNS REGARDING THIS CHECKLIST ITEM SET FORTH IN THE 1997 ORDER?

A. The only concerns raised by the Florida Commission in the *1997 Order* regarding this checklist item were BellSouth's perceived failure to comply with either the requirement to bill usage sensitive UNEs using the CABS billing system or to provide ALECs CABS-formatted bills. These issues will be addressed in the Commission's Third Party Test and in the testimony of David Scollard, filed concurrently herewith.

CHECKLIST ITEM 6: LOCAL SWITCHING

The following issue was approved for consideration in this proceeding by the Florida Commission:

7. Does BellSouth currently provide unbundled local switching from transport, local loop transmission, or other services, pursuant to Section 271(c)(2)(B)(vi) and applicable rules promulgated by the FCC?

(a) Does BellSouth bill for unbundled local switching on a usage-sensitive basis?

(b) Does BellSouth currently provide unbundled local switching on both the line-side and the trunk-side of the switch?

(c) Has BellSouth satisfied other associated requirements, if any, for this item?

Q. DESCRIBE BELLSOUTH'S COMPLIANCE WITH CHECKLIST ITEM 6.

A. The Act requires BellSouth to offer access to "[l]ocal switching unbundled from transport, local loop transmission, or other services." 47 U.S.C. § 271(c)(2)(B)(vi). Local switching is the network element that provides the functionality required to connect the appropriate originating lines or trunks wired to the main distributing frame ("MDF") or to the digital cross connect panel to a desired terminating line or trunk. Local switching encompasses line-side and trunk-side facilities, plus the features, functions and capabilities of the switch. *See* Intermedia Agmnt., Att. 2, § 7.1.1.1.

BellSouth has procedures in place for the ordering, provisioning, and maintenance of its switching services on a nondiscriminatory basis. *See* Intermedia Agmnt., Att. 2 § 7.0. The line-side facilities include the connection between a loop termination at, for example, a main distributing frame, and a switch line card. 47 C.F.R. § 51.319(c)(1)(i)(A). The trunk-side facilities include the connection between, for example, trunk termination at a trunk-side cross connect panel and a trunk card. 47 C.F.R. § 51.319 (c)(1)(i)(B). The functionality of BellSouth's local circuit switching offerings includes all of the features, functions and capabilities provided for the particular port type, including features inherent to the switch and the switch software. Local circuit switching also provides access to additional capabilities such as common and dedicated transport, out of band signaling, 911, operator services, directory services, repair service, as well as AIN and similar capabilities.

Because BellSouth obligates itself to provide common transport, it, by definition, provides ALECs with shared trunk ports, and the routing table that instructs the call to follow a specified path. *See Second Louisiana Order*, ¶ 228 ("BellSouth is obligated to provide shared trunk ports and the routing tables necessary to get to the shared trunk port as a consequence of its legal obligation to provide shared transport.")

In addition, if ALECs want unbundled switching in conjunction with dedicated transport, ALECs likewise have access to BellSouth's routing tables.

Q. DOES BELLSOUTH PROVIDE ACCESS TO VERTICAL SERVICES AND FEATURES?

A. Yes. BellSouth's local circuit switching offerings include access to the vertical services and features the switch is capable of providing. All vertical features loaded in a circuit switch are available to ALECs, whether or not BellSouth offers such features to its retail customers. Features loaded but not activated and features not loaded in the circuit switch may be requested through the BFR process. *See* Intermedia Agmnt., Att. 2, § 7.1.2; *Second Louisiana Order*, ¶ 220 ("we find that a BOC can require a requesting carrier to submit a request for such a vertical feature through a predetermined process that give the BOC an opportunity to ensure that it is technically feasible and otherwise develop the necessary procedures for ordering those features.")

Q. DOES BELLSOUTH ACTIVATE ALEC NXX CODES IN BELLSOUTH'S SWITCHES?

A. Yes. For successful call completion, each switch must recognize all active NXX codes in order to determine where the call is to be routed. When an ALEC, or any other LEC, obtains a new NXX code, BellSouth activates the code in its switches in accordance with the FCC's *Third Order on Reconsideration*, 12 FCC Rcd 12,460, ¶ 82. BellSouth performs this function at no charge to the ALEC.

BellSouth provides an NXX activation Single Point of Contact ("SPOC") to address ALEC inquiries about NXX codes. Among other functions, the NXX SPOC coordinates the activation of ALEC NXX codes within BellSouth's network and provides a trouble-reporting center for ALEC code activation.

Since its establishment, the NXX SPOC has successfully facilitated the NXX activation process. The NXX SPOC provides ALECs with a positive report on the activation of all

of the ALEC's NXXs that are activated in BellSouth's network. If requested by an ALEC, a written response is provided to the ALEC when BellSouth's Complex Translations Group has provisioned the NPA/NXX in the appropriate BellSouth switches and BellSouth has completed mechanized Automatic Message Accounting ("AMA") testing and validation. Since it began operation, the NXX SPOC has tracked the provisioning and testing of approximately 4,300 NXXs codes for facility-based ALECs and Independent Telephone Companies and has been involved in the resolution of over 400 customer related routing troubles.

Q. DOES BELLSOUTH PROVIDE FEATURE GROUP D SIGNALING IN CONJUNCTION WITH THE PROVISIONING OF UNBUNDLED LOCAL SWITCHING?

A. Yes. BellSouth will provide an ALEC with its choice of signaling format, including Feature Group D signaling, to the extent technically feasible.

Q. DOES BELLSOUTH PROVIDE ACCESS TO PACKET SWITCHING?

A. Pursuant to Rule 51.319, BellSouth will provide ALECs packet switching as a UNE in situations in which each of the following conditions is satisfied:

(1) BellSouth has deployed digital loop carrier systems, including but not limited to, integrated digital loop carrier or universal digital loop carrier systems; or has deployed any other system in which fiber optic facilities replace copper facilities in the distribution section (*e.g.*, end office to remote terminal, pedestal or environmentally controlled vault);

(2) There are no spare copper loops capable of supporting xDSL services the ALEC seeks to offer;

(3) BellSouth has not permitted an ALEC to deploy a Digital Subscriber Line Access Multiplexer in the remote terminal, pedestal or environmentally controlled vault or other interconnection point, nor has the requesting carrier obtained a virtual collocation arrangement at these subloop interconnection points as defined in 47 C.F.R. § 319(b); and

(4) BellSouth has deployed packet switching for its own use.

See Intermedia Agmnt., Att. 2, § 7.3; SGAT, § VI.D.

Q. DOES BELLSOUTH PROVIDE ACCESS TO TANDEM SWITCHING?

A. Yes. BellSouth's unbundled tandem switching element meets all the requirements of the FCC's Rules. Tandem switching is defined as trunk-to-trunk connection facilities, including but not limited to the connection between trunk terminations at a cross connect panel and a switch trunk card; the basic switching function of connecting trunks to trunks; and all technically feasible functions that are centralized in tandem switches (as distinguished from separate end office switches), including but not limited to call recording, the routing of calls to operator services, and signaling conversion features. 47 C.F.R. § 51.319(c)(2); *see* Intermedia Agmnt., Att. 2, § 7.1.1.3. Tandem switching provides trunk to trunk connections for local calls between two end office switches, including two office switches belonging to different ALECs. To the extent that all signaling is SS7, tandem switching preserves Custom Local Area Switched Services (CLASS) features and Caller ID as calls are processed. BellSouth performs testing through the tandem switching element for ALECs in the same manner and frequency that it performs such testing for itself. To the extent that BellSouth manages traffic

congestion for tandem switching for itself, it also manages it for ALECs using unbundled tandem switching, including congestion points such as those caused by radio station call-ins, and network routing abnormalities, using capabilities such as Automatic Call Gapping, Automatic Code Gapping, Automatic Congestion Control, and Network Routing Overflow.

Q. ARE ALECS ORDERING UNBUNDLED LOCAL SWITCHING?

A. Yes. As of March 31, 2001, BellSouth had 30 unbundled switch ports in service in Florida. Region-wide, BellSouth had 388 unbundled switch ports in service as of that same date. Additionally, in connection with its combined loop/port combination offering, BellSouth had 71,588 switch ports in service in Florida and 303,257 in service regionally.

Q. DOES BELLSOUTH OFFER CUSTOMIZED ROUTING IN COMPLIANCE WITH THE FCC'S REQUIREMENTS?

A. Yes. Customized routing (which is also referred to as selective routing) permits requesting carriers to designate the particular outgoing trunks that will carry certain classes of traffic originating from competitors' customers. *See Second Louisiana Order*, ¶ 221. One specific use of customized routing is to allow calls from an ALEC's customers served by a BellSouth switch to reach the ALEC's choice of operator service or directory assistance service platforms which may be BellSouth's operator service and directory assistance service platforms or the ALEC's platforms or the platforms of a third party provider. Customized routing can be provided when an ALEC acquires unbundled local switching from BellSouth or resells BellSouth's local exchange services.

BellSouth offers two methods of customized routing to ALECs: Advanced Intelligent Network ("AIN") and Line Class Codes ("LCCs"). *See* SGAT, § X.A.3(f); Intermedia Agmnt., Att. 2, §§ 7.2.1.15; 7.2.1.16. BellSouth has tested both methods and both currently are available.

Q. DESCRIBE THE AIN METHOD OF CUSTOMIZED ROUTING BELLSOUTH OFFERS.

A. BellSouth's AIN method uses a database of the ALEC's routing choices queried during call set up. The AIN method of customized routing allows the use of the AIN "hub" concept, which yields several advantages. The AIN hubbing arrangement:

- Allows the use of appropriate AIN "triggers" for all call types rather than only a limited set of call types.
- Allows even those end office switches that are not AIN-capable to use the AIN customized routing solution.
- Optimizes the use of trunk groups by allowing the carriage of customized routing traffic over common trunk groups between the end office and the AIN hub.

Thus, the AIN hubbing arrangement allows the use of the AIN method in all switches, even those that are not AIN capable. Also, the AIN hubbing arrangement allows the sharing of trunk groups that some ALECs have stated they prefer.

Q. DID BELLSOUTH RECENTLY COMPLETE AN ENHANCEMENT TO THE AIN METHOD?

A. Yes. BellSouth completed an enhancement to its AIN method that further automates the means by which ALECs' routing information may be updated. End-to-End call-through testing was successfully completed on June 14, 2000. BellSouth then completed all methods and procedures for the service offering during the third quarter 2000, and posted a Market Service Description (MSD) to its interconnection website on October 23, 2000.

Q. ARE ALECS USING THE AIN METHOD OF CUSTOMIZED ROUTING?

A. To date, no ALEC has requested BellSouth's AIN method of customized routing. BellSouth stands ready to provide the AIN method upon request.

Q. DESCRIBE THE LCC METHOD OF CUSTOMIZED ROUTING.

A. In the LCC method, which is the method by which BellSouth routes its own end users' calls, end user calls are routed via the use of a LCC in the switch. For example, an ALEC's end users served by a BellSouth switch are configured such that when the end user dials 0-, a Line Attributes Table points to another table, a Position Table for 0- calls. This table in turn identifies a trunk group to the appropriate operator services platform. For calls requiring a number pretranslation such as 411 or 611, the Line Attributes Table points the call to the appropriate pretranslator table, and this table then points the call to the appropriate destination. A separate line class code is not needed for each end user for each function, but rather the same line class code can be used for multiple subscribers. The same LCC connects each of them to the same destination for the same type of call. *See* e.g. Intermedia Agmnt., Att. 2, §§ 7.2.1.15; 7.2.1.16.

Availability of customized routing capability using LCCs is offered on a first-come, first-served basis. This method permits the passage of intraLATA toll and interLATA operator services traffic to interexchange carriers over Feature Group D trunks at the ALEC's option. While there are finite limits on the number of line class codes in particular central office switches, BellSouth has not denied any request for customized routing based on lack of LCC capacity. Moreover, the AIN method of customized routing eliminates any potential exhaust concerns about the LCC method of customized routing.

Q. ARE ALECS USING THE LCC METHOD OF CUSTOMIZED ROUTING?

A. Yes. BellSouth has provided the LCC method of customized routing to one ALEC in Georgia. No ALEC in Florida has requested this method of customized routing; BellSouth, however, stands ready to provide it.

Q. HOW IS THE AIN METHOD OF CUSTOMIZED ROUTING DIFFERENT THAN THE LCC METHOD?

A. The AIN method allows the use of shared trunk groups (for those ALECs using the AIN method) between the end office switch and the AIN hub switch to accomplish customized routing for customers served by different end offices subtending a particular AIN hub. In contrast, the LCC solution, discussed below, requires a separate trunk group for each end office due to the inherent technical limitations of the switches. This separate trunk group may be shared, however, by those ALECs requesting the same branding or unbranding of their respective end users' OS/DA traffic. BellSouth uses separate trunk groups between its end office switches and BellSouth's operator services and directory assistance

platforms for calls from BellSouth's end users.

Q. DO BELLSOUTH'S CUSTOMIZED ROUTING SOLUTIONS MEET THE FCC'S REQUIREMENTS?

A. Yes. In the *Second Louisiana Order*, the FCC discussed the ALECs' ability to route its customers' calls. Specifically, the FCC held that "BellSouth should not require the competitive LEC to provide the actual line class codes, which may differ from switch to switch, if BellSouth is capable of accepting a single code region-wide." *Second Louisiana Order*, ¶ 224. In compliance with this obligation, BellSouth will implement one routing pattern per region for an ALEC's customers. In addition, although it is not required to do so, BellSouth voluntarily will provide a single routing pattern on a state-wide basis. This single routing pattern (whether region-wide or state-wide) can include routing to a BellSouth platform (branded or unbranded), an ALEC platform, or a third-party platform.

To avail itself of the single routing pattern, the ALEC need not put any LCC on its local service requests ("LSRs"). Such orders will be handled electronically (assuming, of course, that they would not otherwise fall out for manual handling) and therefore will need no manual intervention.

This line class code routing arrangement is identical to that provided to the BellSouth retail units. On its retail side, BellSouth has a single region-wide routing pattern for its customers' calls that is effectuated without the service representative having to populate the LCC on the service order. Likewise, BellSouth will provide a single routing pattern

for ALECs that is effectuated without the ALEC service representative having to populate the LCC on the order.

If, on the other hand, the ALEC chooses to have different routing options available for different customers served out of the same switch, BellSouth will handle such requests on a manual basis. In this scenario, the ALEC will provide information on the LSR designating the appropriate LCCs to direct the call for those of the ALEC's end users for which the single routing plan will not be used. Although submitted electronically, such as order will fall out for manual handling and BellSouth will process it manually. The FCC specifically recognized that ALECs who wish to have multiple routing patterns in the same switch should bear the obligation to populate the requisite LCCs on the LSR. Specifically, the FCC held as follows:

> We agree with BellSouth that a competitive LEC must tell BellSouth how to route its customers' calls. If a competitive LEC wants all of its customers' calls routed in the same way, it should be able to inform BellSouth, and BellSouth should be able to build the corresponding routing instructions into its systems just as BellSouth has done for itself. If, however, a competitive LEC has more than one set of routing instructions for its customers, it seems reasonable and necessary for BellSouth to require the competitive LEC to include in its order an indicator that will inform BellSouth which selective routing pattern to use.

Second Louisiana Order, ¶ 224. As described above, BellSouth is in full compliance with these obligations.

For those LSRs on which the ALECs populate the LCCs for specific routing patterns, BellSouth will process them in a timely manner. Such orders will be counted in the "partially mechanized" category of performance data that will be reviewed in the Commission's Commercial Data Review.

Q. HAS BELLSOUTH MET THE CONCERNS OF THE FLORIDA COMMISSION SET FORTH IN THE 1997 ORDER?

A. The Florida Commission raised two concerns in the *1997 Order*. First, the Commission concluded that BellSouth did not demonstrate that it can bill for unbundled local switching on a usage-sensitive basis. This issue is addressed in the testimony of David Scollard, filed concurrently herewith. Second, the Commission concluded that BellSouth did not demonstrate that its unbundled local switching included both the line side and trunk side capabilities. As I demonstrated above, BellSouth makes both sides of the switch available to ALECs, and therefore the Commission's concerns should be alleviated.

CHECKLIST ITEM 7: 911/E911, DIRECTORY ASSISTANCE AND OPERATOR CALL COMPLETION

The following issue was approved for consideration in this proceeding by the Florida Commission:

8. Does BellSouth currently provide nondiscriminatory access to the following, pursuant to Section 271(c)(2)(B)(vii) and applicable rules promulgated by the FCC:

(i) 911 and E911 services;

(ii) directory assistance services to allow other telecommunications carrier's customers to obtain telephone numbers; and

(iii) operator call completion services?

(a) Does BellSouth currently provide ALECs access to all information contained in BellSouth's directory listing database?

(b) Does BellSouth currently provide selective routing in Florida?

(c) Has BellSouth satisfied other associated requirements, if any, for this item?

Q. PLEASE DESCRIBE BELLSOUTH'S COMPLIANCE WITH CHECKLIST ITEM 7.

A. BellSouth provides to ALECs access to 911/E911 services, directory assistance services, and operator call completion services at a level of quality and performance that is at least equal to that which BellSouth provides to itself. *See* Intermedia Agmnt., Att. 2, § 16.2.4. In the *1997 Order*, the Florida Commission found that BellSouth "is providing nondiscriminatory access to 911 in compliance with checklist item vii." *1997 Order*, at

113. The Commission also concluded that "billing usage for directory assistance is nondiscriminatory," *1997 Order*, at 116, and that BellSouth provides nondiscriminatory access to operator call completion services. Finally, the Commission concluded that BellSouth is providing nondiscriminatory access to white pages listings. *1997 Order*, at 122.

911/E911

Q. DOES BELLSOUTH PROVIDE NONDISCRIMINATORY ACCESS TO 911 AND E911 SERVICES?

A. Yes. Section 271(c)(2)(B)(vii) of the Act requires a Bell Operating Company such as BellSouth to provide "[n]ondiscriminatory access to --- (I) 911 and E911 services. In the *Ameritech Michigan Order*, the FCC held that a BOC "must maintain the 911 database entries for competing LECs with the same accuracy and reliability that it maintains the database entries for its own customers" and that for facilities-based carriers, BellSouth must provide "unbundled access to [its] 911 database and 911 interconnection, including the provision of dedicated trunks from the requesting carrier's switching facilities to the 911 control office at parity with what [BellSouth] provides to itself." *Ameritech Michigan Order*, ¶ 256.

Q. DESCRIBE THE MEANS BY WHICH BELLSOUTH OFFERS ALECS ACCESS TO BELLSOUTH'S E911 DATABASE.

A. The BellSouth E911 database contains end user subscriber information that is useful to emergency service agencies in locating a customer dialing 911 for dispatching

appropriate emergency services. The database contains information such as customer name, service address, class and type of service. BellSouth has had procedures in place since early 1996 by which ALECs can connect their switches to BellSouth's E911 tandems. Because methods and procedures have long been in place to allow other carriers, including independent LECs, access to BellSouth's E911 and 911 updating capabilities, the necessary methods and procedures for obtaining such updating by ALECs have been business as usual for BellSouth. *See* Intermedia Agmnt., Att. 2, § 16.0.

BellSouth's provision of nondiscriminatory access to the E911 database as well as procedures for updating and maintaining the E911 database both for ALEC and BellSouth end users are described in the Affidavit of Ms. Val Sapp, Attachment F.

In the *Second Louisiana Order*, the FCC found that BellSouth satisfied the requirements of Checklist Item (vii)(I). There has been no material change in BellSouth's provision of 911/E911 since that decision and thus the Commission should find BellSouth in compliance.

Q. ARE ALECS ACCESSING BELLSOUTH'S E911 DATABASE?

A. Yes. As of March 31, 2001, ALECs had requested and BellSouth had provided 1,078 such trunks for ALECs in Florida. In its nine-state region, BellSouth had 4,400 trunks in service connecting ALECs' switches with BellSouth's E911 arrangements as of that same date. In Florida, 38 ALECs were sending mechanized updates to BellSouth for inclusion in the 911 database as of March 31, 2001; and in BellSouth's nine-state region, 66

ALECs were doing so as of that same date. These mechanized updates include information about both end user customers to whom ALECs provide service via the resale provisions of the Act as well as those end user customers to whom ALECs provide service from the ALECs' own switches.

DIRECTORY ASSISTANCE/OPERATOR SERVICES

Q. WHAT ARE BELLSOUTH'S OBLIGATIONS WITH RESPECT TO DIRECTORY ASSISTANCE AND OPERATOR SERVICES?

A. Section 271(c)(2)(B)(vii)(II) and (III) of the Act requires BellSouth to provide nondiscriminatory access to "directory assistance services to allow the other carrier's customers to obtain telephone numbers" and "operator call completion services," respectively. Section 251(b)(3) obligates BellSouth to permit ALECs to have nondiscriminatory access to operator services, directory assistance and directory listing with no unreasonable dialing delays. BellSouth, however, is no longer obligated to provide operator and directory assistance services as a UNE because BellSouth provides customized routing as discussed earlier.

Q. DOES BELLSOUTH PROVIDE DIRECTORY ASSISTANCE SERVICE IN A NONDISCRIMINATORY MANNER?

A. Yes. BellSouth provides directory assistance access service to ALECs in the same manner as it does for its own retail subscribers. *See* Intermedia Agmnt., Att. 2, § 10.3; ICG Agmnt., Att. 2, §8.3. Specifically, BellSouth provides ALECs with DAAS. DAAS allows ALECs' end users to obtain telephone listing information from BellSouth.

ALECs also have access to BellSouth's DACC service, which gives the ALEC's end user the option to have a call to BellSouth's DA service completed automatically. Facilities-based ALECs obtain access to these services through trunks connecting the ALEC's point of interface to BellSouth's DA platform.

Q. ARE ALECS USING DAAS AND DACC?

A. Yes. As of March 31, 2001, ALECs in Florida had 1,031 directory assistance trunks in place between those ALECs' switches and BellSouth's DA platform. In BellSouth's nine-state region, there were 2,929 such directory assistance trunks in place serving ALECs. In BellSouth's nine-state region, 30 ALECs were purchasing DAAS and 41 ALECs were purchasing DACC from BellSouth as of March 31, 2001. Because methods and procedures have long been in place to allow other carriers, such as independent LECs, access to BellSouth's DAAS and DAAC services, the necessary methods and procedures for obtaining such access by ALECs are business as usual for BellSouth.

Q. DOES BELLSOUTH PROVIDE ALECS WITH ACCESS TO BELLSOUTH'S SUBSCRIBER LISTING INFORMATION FOR ALECS TO ESTABLISH THEIR OWN DIRECTORY ASSISTANCE SERVICES?

A. BellSouth provides ALECs and other service providers with access to BellSouth's DADS, which allows ALECs to use BellSouth's subscriber listing information to set up their own directory assistance services. *See* ICG Agmnt., Att. 2 §8.4. BellSouth also provides ALECs and other service providers with DADAS, which gives ALECs direct

access to BellSouth's DA database so that ALECs may provide directory assistance services. *See* Intermedia Agmnt., Att. 2, § 10.6. BellSouth currently provides both DADS and DADAS to ALECs themselves and to various third-party service providers which, in turn, furnish the service to ALECs. Database information is available to ALECs in magnetic tape format, cartridge tape format, and where the ALEC has electronic connectivity, in network data mover (NDM) format.

All information contained in BellSouth's listing database for its own end users, ALECs' end users, and independent LECs' end users is available to competitive carriers in the same manner as it is available to BellSouth itself. BellSouth is fully compliant with Section 51.217(c)(3)(i) of the Commission's rules.

Q. ARE ALECS ACCESSING BELLSOUTH'S DIRECTORY DATABASES?

A. Yes. As of March 31, 2001, eight (8) service providers were using BellSouth's Florida subscriber listings, via DADS, to provide DA service and third party listing data to end users. Nine (9) service providers were using DADS across BellSouth's nine-state region as of that same date. As of March 1, 2001, two (2) service providers in the region were using DADAS to provide the service to ALECs.

Q. DESCRIBE BELLSOUTH'S INTERCEPT SERVICE OFFERING.

A. ALECs also have access to BellSouth's intercept service, which refers calls from a disconnected or non-working number to an appropriate announcement. Facilities-based ALECs obtain access to BellSouth's intercept service through a dedicated trunk facility.

As of March 31, 2001, BellSouth had provided ALECs in Florida with 30 intercept trunks. In BellSouth's nine-state region, BellSouth had provided 172 intercept trunks to ALECs as of that same date. Because methods and procedures have long been in place to allow other carriers, such as independent LECs, access to BellSouth's intercept service, the necessary methods and procedures for obtaining such access by ALECs are business as usual for BellSouth.

Q. DESCRIBE BELLSOUTH'S OPERATOR CALL PROCESSING SERVICES OFFERING.

A. Operator call processing, which allows ALECs to obtain both live operator and mechanized functionality, is available from BellSouth. *See* Intermedia Agmnt., Att. 2, § 10.2; DSL.net Agmnt., Att. 2, §8.2. BellSouth call processing includes: Call Assistance and Call Completion services; Alternate Billing Services such as third number billing, calling card billing, and collect call handling; verification and interruption of a busy line; and operator transfer service. Facilities-based ALECs can obtain access to BellSouth's operator call processing by connecting their point of interface via a trunk group to BellSouth's operator services system.

Q. ARE ALECS ACCESSING BELLSOUTH'S OPERATOR SERVICES?

A. Yes. As of March 31, 2001, BellSouth had provided ALECs in Florida with 1,042 operator services trunks. Across its nine-state region, BellSouth had provided ALECs with 2,903 operator services trunks as of that same date. In Florida, BellSouth had provided ALECs with 155 verification trunks as of March 31, 2001. Across its nine-state region, BellSouth had provided ALECs with 503 verification trunks as of that same date.

Because methods and procedures have long been in place to allow other carriers, such as independent LECs, access to BellSouth's operator call processing, such access by ALECs is considered business as usual for BellSouth.

Q. CAN INFORMATION CONCERNING ALECS' END USER CUSTOMERS BE ENTERED INTO OR CORRECTED IN BELLSOUTH'S DIRECTORY ASSISTANCE AND OPERATOR SERVICES DATABASES?

A. Yes. BellSouth will update ALEC end user listings equal to the service it provides to itself and its end users. *See* TriVergent Agmnt., Att. 2, § 11.3.2.2; DSL.net, Att.2 § 8.3.4. BellSouth's procedures for updating and maintaining the DA and OS databases for BellSouth's end user subscribers are described in the Affidavit of Doug Coutee, Attachment C. As described by Mr. Coutee, procedures for both ALEC subscribers and BellSouth subscribers are performed in a similar and nondiscriminatory manner.

DISAGGREGATION OF PERFORMANCE DATA FOR DIRECTORY ASSISTANCE/OPERATOR SERVICES

Q. DO BELLSOUTH'S PERFORMANCE MEASUREMENTS FOR DIRECTORY ASSISTANCE/OPERATOR SERVICES SUFFICIENTLY DEMONSTRATE NONDISCRIMINATION?

A. Yes. In the *Second Louisiana Order*, the FCC stated that in future applications, BellSouth needed either to disaggregate its performance data for directory assistance and operator services between wholesale and retail, or explain why such disaggregation is

unnecessary to show nondiscrimination. *Second Louisiana Order*, ¶ 245. Because BellSouth's provision of directory assistance and operator services to ALECs is parity by design, disaggregation of performance measurements for these services is unnecessary.

To demonstrate this fact, I directed the preparation of exhibits that describe the routing and handling of operator services and directory assistance calls. Exhibit WKM-7 describes the processing of such calls by Traffic Operating Position System ("TOPS") and its associated Queuing Management System ("QMS"). This exhibit was prepared by BellSouth subject matter experts responsible for staff support for BellSouth departmental operations in these two areas. I also obtained an affidavit from one of BellSouth's major suppliers of hardware and associated software systems for these two areas, Nortel, Inc. This affidavit, which is attached to my testimony as Exhibit WKM-8 validates the accuracy of the exhibit as well as my overview of it contained herein.

Q. EXPLAIN WHY DISAGGREGATION OF PERFORMANCE DATA IS UNNECESSARY.

A. Exhibit WKM-6 documents the flow of service orders from various sources (BellSouth Retail Units, ALEC resale, ALEC UNE, and ALEC UNE and resale with customized call routing). As this Exhibit demonstrates, the flow of the service order is precisely the same regardless of the source of the service order. Universal Service Order Codes ("USOCs") on the service orders are used to establish switch translations that provide dial tone and various service features listed on each service request. The exact same list of USOCs, with the exception of four unique provisioning USOCs used for UNEs, is used on both BellSouth and ALEC orders to describe various features and functions. If the service

order being processed is for a ALEC, it contains a special four-digit Field Identifier Code ("FID") that ultimately identifies the ALEC to the billing system. However, the FID is not input to the switch. Thus, the switch is "blind" as to whether a given end user customer is BellSouth's customer or an ALEC's customer. The service orders enter a system called the Line Class Code Assignment Module ("LCCAM"). The LCCAM associates the USOCs assigned on service orders with an appropriate LCC that identifies the routing and screening characteristics of the line to the switch. Nothing in the LCC distinguishes a BellSouth customer from an ALEC customer. The LCC information flows into a computer system named MARCH. MARCH is a memory administration system that translates line-related service order data into switch provisioning messages and automatically transmits the messages to targeted stored program control switches. Routing, screening, and trunking of calls by the switch are identical for lines associated with identical LCCs. Therefore, it is not necessary to perform measurements beyond this point in the process to demonstrate parity in the handling of operator services and directory assistance calls. The diagrams attached to Exhibit WKM-6 clearly show that the LCCAM to MARCH handoff merges traffic from all sources into a single flow determined solely by LCCs.

BRANDING

Q. WHAT BRANDING OPTIONS DOES BELLSOUTH PROVIDE TO ALECS?

A. BellSouth offers four service levels of branding to ALECs when ALECs order Directory Assistance and/or Operator Call Processing. The options are: BellSouth branding; unbranded; custom branding; and self-branding. Unbranded, custom branding and self-

branding are all provided via customized routing. Unbranded and custom branding can also be provided via OLNS. BellSouth will complete its deployment of OLNS in Florida by June 11, 2001. *See* Intermedia Agmnt. Att. 2, § 10.4; Trivergent Agmnt., Att. 2, § 11.4.

Q. HOW DOES BELLSOUTH ROUTE OPERATOR SERVICES AND DIRECTORY ASSISTANCE TRAFFIC FOR ITS OWN END USER CUSTOMERS?

A. BellSouth routes its operator services or directory assistance traffic directly to a BellSouth TOPS platform rather than via a tandem switch. The operator services or directory assistance end office functions offered by BellSouth, as part of its retail services, require dedicated trunk groups from BellSouth end offices to the TOPS platform.

Q. PLEASE DESCRIBE THE OPERATION OF TOPS.

A. Exhibit WKM-7 provides a complete description of TOPS call flow via the QMS. Calls are initially queued based on call origination type. For example, a determination is made whether the call originated from a public telephone or arrived at TOPS via a directory assistance trunk group. Next, calls are ordered based on whether or not they have previously received some form of automated treatment or operator handling. Then the calls are processed through six refinement tables to enable them to be handled by operator groups best equipped to handle specific types of calls. For example, this process routes directory assistance calls to directory assistance equipped TOPS positions while calls requiring fluency in a particular language are routed to operators with skills in that

language. Finally, the calls are routed to queues based on such factors as the age of the call, equipment availability, and force management considerations.

Q. HOW DOES TOPS TREAT CALLS FROM ALEC END USER CUSTOMERS?

A. ALECs' customers' calls to BellSouth's TOPS platform are handled in a nondiscriminatory manner at parity with the treatment of calls from BellSouth's retail customers. TOPS does not distinguish between calls made by BellSouth end users and calls made by ALEC end users. Thus, the system represents parity by design. Exhibit WKM-8 contains affidavits prepared by Mr. Robert Summers, Jr., Mr. William Greytock, and Mr. David C. Thompson, all of Nortel, pertaining to operation of the TOPS and QMS systems. Nortel is the supplier of BellSouth's TOPS platform. Their affidavits confirm that BellSouth's processes for the handling of calls to operator services are nondiscriminatory.

Q. DOES BELLSOUTH PERMIT AN ALEC TO ROUTE ITS OPERATOR SERVICES OR DIRECTORY ASSISTANCE TRAFFIC TO ITS OWN OPERATOR SERVICES OR DIRECTORY ASSISTANCE PLATFORMS?

A. Yes. The ALEC may wish to route calls to its own operator or directory assistance platform for branding purposes. As discussed in Exhibit WKM-6, customized routing is ordered by use of a FID that is then converted by LCCAM, as discussed above, into an LCC for use by the switch. Once this conversion occurs, the switch's processor routes the call based on the assigned LCC rather than on the basis of whether the LCC is a "BellSouth LCC" or an "ALEC LCC". If the LCC denotes that the call is to be routed to

an operator services platform other than BellSouth's operator services platform, then the provisioning of the trunk group to the ALEC's choice of operator services platform is the responsibility of the ALEC. Under this scenario, the ALEC will have the option of treating the calls in any fashion it wants because the calls will be directed to the ALEC's (or third party provider's) platform. The diagram for example 3 of the attachments to Exhibit WKM-6 depicts the call processing flow of calls using customized routing.

Q. DOES BELLSOUTH PROVIDE ALECS WITH THE ABILITY TO APPLY UNIQUE BRANDING IN COMPLIANCE WITH THE FCC'S REBRANDING REQUIREMENTS?

A. Yes. In the *Second Louisiana Order*, the FCC stated that BellSouth must demonstrate that its method of providing branding results in nondiscriminatory access. *Second Louisiana Order*, at ¶ 247. BellSouth provides ALECs the ability to apply unique branding via the customized routing methods discussed in my testimony under Checklist Item 6 and the OLNS method described below.

Under the LCC method of customized routing, calls are directed at the end office switch to the requested OS/DA platform over dedicated trunks. Dedicated trunks are required because of the technical limitations of the switches. To the extent that ALECs choose the same OS/DA platform and the same branding (or unbranding) of calls, ALECs may share transport between the end office switch and the platform. An ALEC's use of line class codes to reach an OS/DA platform is the same as BellSouth's use of line class codes to reach its TOPS platform, and thus BellSouth's provision of customized routing is nondiscriminatory.

Under the AIN method of customized routing, calls are sent to an AIN hub that performs the database query. AIN uses centralized databases to determine routing instructions rather than have the same determination made at the end office switch level. In this arrangement, ALECs may share transport between BellSouth's end office switch to the AIN hub. Moreover, ALECs who opt for the same branding (or unbranding) of their traffic and whose traffic is sent to the same OS/DA platform can likewise share trunk groups between the AIN hub and that OS/DA platform.

Q. DESCRIBE BELLSOUTH'S OFFERING OF ORIGINATING LINE NUMBER SCREENING (OLNS).

A. OLNS is method of providing customized branding in addition to the LCC and AIN methods described earlier in this testimony. OLNS provides a means of making information available to the OS/DA platform about the end user originating a telephone call. This information may be used to determine things such as an end user's local service provider and that local service provider's branding preferences. OLNS functionality makes originating line information available to the OS/DA platform via centralized databases. In other words, OLNS allows end users' calls to proceed from the end office switches to BellSouth's OS/DA platform over common trunk groups (that is, a single trunk group between an end office switch and the OS/DA platform carrying multiple service providers' traffic including calls from BellSouth's retail customers). Once the call arrives at the OS/DA platform, OLNS is used to "look up" the telephone number of the calling party in its database to determine whether and how to brand a call from that particular end user.

BellSouth completed its deployment of OLNS in Georgia on December 31, 2000. BellSouth had earlier informed ALECs of this deployment in a carrier notification letter on BellSouth's interconnection website dated December 22, 2000. The current deployment schedule calls for OLNS availability to ALECs in Florida by June 11, 2001 and in the rest of BellSouth's region by July 13, 2001.

CHECKLIST ITEM 8: WHITE PAGES LISTINGS

The following issue was approved for consideration in this proceeding by the Florida Commission:

9. In Order PSC-97-1459-FOF-TL, issued November 19, 1997, the Commission found that BellSouth met the requirements of Section 271(c)(2)(B)(viii) of the Communications Act of 1934, as amended by the Telecommunications Act of 1996. Does BellSouth currently provide white pages directory listings for customers of other telecommunications carrier's telephone exchange service, pursuant to Section 271(c)(2)(B)(viii) and applicable rules promulgated by the FCC?

Q. DESCRIBE BELLSOUTH'S COMPLIANCE WITH CHECKLIST ITEM 8.

A. Checklist Item 8 requires that BellSouth's interconnection offerings include directory listings in BellSouth's white pages directory for customers served by an ALEC. BellSouth has long made its white pages listing capabilities available to independent LECs and other service providers. Because methods and procedures have been in place

to allow other carriers access to BellSouth's white pages listing capabilities for many years, the necessary methods and procedures pursuant to which ALECs may obtain such listings are business as usual for BellSouth. The white pages listings will include the subscriber's name, address and telephone number. Both the Florida Commission in the *1997 Order* and the FCC in the *Second Louisiana Order* found BellSouth in compliance with checklist item. Nothing has changed since those decisions were reached that impacts BellSouth's compliance with its obligations. Thus, the Commission should reaffirm that BellSouth is in compliance with Checklist item 8.

The Affidavit of Rook Barretto, attached hereto as Attachment D, describes the flow of orders received for the production of white pages directories and how this process is accomplished for both BellSouth's listings and ALECs' listings.

CHECKLIST ITEM 9: NUMBER ADMINISTRATION

The following issue was approved for consideration in this proceeding by the Florida Commission:

10. In Order PSC-97-1459-FOF-TL, issued November 19, 1997, the Commission found that BellSouth met the requirements of Section 271(c)(2)(B)(ix) of the Communications Act of 1934, as amended by the Telecommunications Act of 1996. Does BellSouth currently provide nondiscriminatory access to telephone numbers for assignment to the other telecommunications carrier's telephone exchange service customers, pursuant to Section 271(c)(2)(B)(ix) and applicable rules promulgated by the FCC?

Q. DESCRIBE BELLSOUTH'S COMPLIANCE WITH CHECKLIST ITEM 9.

A. During February 1998, Lockheed-Martin assumed the NANPA functions previously provided by Bell Communications Research, Inc. (Bellcore), now Telcordia Technologies, Inc. This did not include the central office code assignment and NPA relief planning functions that continued to be performed by the dominant ILEC serving the particular geographic territory until a transition plan could be finalized to transfer these functions to Lockheed-Martin. The central office code assignment function was transferred to Lockheed-Martin region-by-region through an industry-accepted transition plan. In BellSouth's region, that transition began July 6, 1998, and concluded August 14, 1998. At this time, BellSouth no longer performs the central office code assignment function. NeuStar assumed all NANPA responsibilities on November 17, 1999 when the FCC approved the transfer of Lockheed-Martin's Communication Industry Service Division to NeuStar.

Q. DOES BELLSOUTH HAVE ANY RESPONSIBILITY FOR NPA RELIEF PLANNING NOW?

A. No. NeuStar also assumed responsibility for NPA relief planning. When BellSouth was responsible for NPA relief planning and as an NPA was found to be in jeopardy of exhausting before a NPA relief plan could be implemented, the BellSouth Central Office Code Administration Center implemented code conservation measures complying with consensus decisions of the local industry as reached in one or more Industry Jeopardy Meetings. NANPA now has the responsibility for jeopardy declaration in a NPA.

Q. PLEASE DESCRIBE BELLSOUTH'S ACTIONS PRIOR TO THE TIME NPA RELIEF PLANNING WAS TRANSFERRED TO NEUSTAR.

A. While serving as the Central Office Code Administrator for its territory, BellSouth maintained neutrality in performing the code administration functions and ensured that ALECs had nondiscriminatory access to telephone numbers for assignment to their customers. BellSouth adhered to the code administration guidelines published by the Industry Numbering Council ("INC"), a national industry body under the Carrier Liaison Committee ("CLC"), sanctioned by the Alliance for Telecommunications Industry Solutions ("ATIS"). INC documents, including final documents, completed guidelines, and issue resolutions in final closure, are readily accessible via the Internet, at ATIS's website (http://www.atis.org). These guidelines provide instructions to all service providers, including ALECs, on how to request and have NPA/NXX codes assigned. BellSouth established procedures to provide nondiscriminatory NXX code assignments to ALECs that conform to the INC standards. Pursuant to these procedures, as of August 19, 1998, BellSouth had assigned 2,141 NPA/NXX codes for ALECs in its nine-state region. Other than when faced with imminent NPA exhaustion, BellSouth did not refuse any ALEC requests for NPA/NXX code assignments, either in Florida or in BellSouth's nine-state region.

Q. DOES BELLSOUTH HAVE ANY RESPONSIBILITY FOR THE ASSIGNMENT OF NPA/NXX CODES NOW?

A. No. Since NeuStar assumed the Central Office Code Administration function, BellSouth no longer has any responsibility for the administration or assignment of NXXs to ALECs

or any other telecommunications service provider. BellSouth follows the Central Office Code (NXX) Assignment Guidelines developed by the INC in submitting NXX code requests to NANPA, entering code information into the appropriate national databases, activating NXX codes assigned to any service provider in BellSouth's territory, making available BellSouth NXX codes that are no longer in use, and all other areas covered by these and other appropriate industry guidelines. It is now NANPA's responsibility to supply competitively neutral number administration services and to ensure that all service providers have equal and non-discriminatory access to telephone numbers.

Q. WHAT RESPONSIBILITIES DOES BELLSOUTH NOW HAVE WITH REGARD TO THE ACTIVATION OF NXX CODES WITHIN ITS NETWORK?

A. BellSouth responded to ALEC concerns about accurate and timely activation of NXX codes by establishing, effective May 15, 1998, its NXX activation Single Point of Contact ("SPOC") to provide assistance to ALECs and Independent LECs. The NXX SPOC processes requests for NXX activity coordination, and provides information concerning BellSouth's architecture arrangements, assistance in trouble resolution for code activation, and assistance in preparing the Code Request. If an ALEC or independent LEC intends to interconnect directly with BellSouth, or if interconnection arrangements with BellSouth are already in place, the ALEC or independent LEC should send to BellSouth a courtesy copy of its Central Office Code Request in conjunction with the submission of its CO Code Request to the NANPA (NeuStar). If the ALEC gives BellSouth a copy of its Central Office Code Request, BellSouth is better able to activate the Central Office Code in BellSouth's network.

Among other functions, the NXX SPOC coordinates the activation of ALEC NXX codes and provides a trouble-reporting center for ALEC code activation. Since its establishment in mid-1998, the NXX SPOC has operated successfully in keeping NXX activation problems to a minimum. The NXX SPOC provides ALECs with a positive report on the activation of all of the ALECs' NXX codes that are activated in BellSouth's network. If requested by the ALEC, a written response is provided to the ALEC when BellSouth's Complex Translations Group has provisioned the NPA/NXX in the appropriate BellSouth switches and BellSouth has completed mechanized AMA testing and validation. Since it began operation, BellSouth's NXX SPOC has tracked the provisioning and testing of approximately 4,300 NXXs for facility-based ALECs and Independent Telephone Companies. BellSouth has never charged ALECs or LECs for NPA/NXX codes.

Q. WHAT INFORMATION DOES BELLSOUTH FURNISH TO NEUSTAR WITH RESPECT TO NUMBER RESOURCES?

A. BellSouth furnishes certain data to NeuStar with respect to number resources. For example, BellSouth provides the following: (1) Number Resource Utilization Forecast ("NRUF") Report – BellSouth prepares a NRUF Report and forwards it to NeuStar pursuant to FCC directives. NeuStar uses the NRUF Reports from all carriers to estimate when all NPAs will exhaust; (2) Part 1 CO Code Request Form and Months-To-Exhaust Worksheet – when BellSouth requests a new CO code assignment for growth from NeuStar CO Code Administration, BellSouth submits a Part 1 CO Code Request Form and Months-To-Exhaust Worksheet that shows when the existing supply of telephone numbers in the CO will exhaust; (3) Part 4 – New CO codes must be put to work within

six months of being assigned or must be returned to NeuStar. BellSouth notifies NeuStar that an NXX code has been put to work by furnishing NeuStar with a Part 4.

CHECKLIST ITEM 10: ACCESS TO DATABASES AND ASSOCIATED SIGNALING

The following issue was approved for consideration in this proceeding by the Florida Commission:

11. In Order PSC-97-1459-FOF-TL, issued November 19, 1997, the Commission found that BellSouth met the requirements of Section 271(c)(2)(B)(x) of the Communications Act of 1934, as amended by the Telecommunications Act of 1996. Does BellSouth currently provide nondiscriminatory access to databases and associated signaling necessary for call routing and completion, pursuant to Section 271(c)(2)(B)(x) and applicable rules promulgated by the FCC?

Q. DESCRIBE BELLSOUTH'S COMPLIANCE WITH CHECKLIST ITEM 10.

A. This checklist item obligates BellSouth to provide:

- Nondiscriminatory access to databases and associated signaling necessary for call routing and completion. 47 U.S.C. § 271(c)(2)(B)(x).
- Nondiscriminatory access to signaling networks and call-related databases. 47 C.F.R. § 51.319(e).

Both the Florida Commission in its *1997 Order*, and the FCC in its *Second Louisiana Order*, found that BellSouth was in compliance with this checklist item. BellSouth continues to provide ALECs with nondiscriminatory access to databases and associated signaling and thus the Commission should continue to find BellSouth in compliance with this checklist item.

Q. GENERALLY DESCRIBE THE ACCESS BELLSOUTH PROVIDES TO ITS DATABASES AND SIGNALING NETWORKS.

A. BellSouth employs the same relevant systems, processes, and procedures in Florida as in Louisiana, which the FCC held were providing nondiscriminatory access to signaling and call-related databases. BellSouth provides nondiscriminatory access to its signaling networks, including Signal Transfer Points ("STPs"), Signaling Links, Service Control Points ("SCPs"), LIDB, Toll Free Number Database, AIN Toolkit, and the AIN method for Customized Routing. In addition, BellSouth also provides access to the LNP database and the CNAM database.

BellSouth provides nondiscriminatory access to its call-related databases and associated signaling as evidenced by the millions of queries that BellSouth's call-related databases have successfully handled for ALECs, IXCs, and other ILECs. BellSouth provides ALECs access to BellSouth's signaling network either directly, or through third party service providers, whichever the ALEC elects. BellSouth's provision of the AIN method for customized routing is described earlier in my testimony.

SIGNALING NETWORKS

Q. DESCRIBE THE ACCESS BELLSOUTH PROVIDES TO ITS SIGNALING LINKS AND SIGNAL TRANSFER POINTS.

A. BellSouth provides nondiscriminatory access to its signaling network, including Signaling Links and STPs on an unbundled basis. 47 C.F.R. § 51.319(e)(1)(i); *See* Intermedia Agmnt., Att. 2, § 11.0; 12.0; TriVergent Agmnt., Att. 2, §§ 12,13. Signaling networks enable ALECs to send signals between its switches (including unbundled switching elements), between its switches and BellSouth's switches, and between its switches and those third party networks with which BellSouth's signaling network is connected. BellSouth provides SS7 network service to ALECs for their use in furnishing SS7-based services to their own end users or to the end users of another ALEC that has subtended its STP to the signaling network of the interconnecting ALEC. *See* SGAT, § X. This arrangement permits ALECs to use BellSouth's SS7 signaling network for signaling between the ALECs' switches, between the ALECs' switches and BellSouth's switches, and between the ALECs' switches and the networks of other parties connected to BellSouth's SS7 network. Because all unbundled switching elements are provided on switches that BellSouth uses to provide service to its own customers, all signaling functions are identical. 47 C.F.R. § 51.319(e)(l)(iii); *see* Intermedia Agmnt., Att. 2, § 11.1.

The Signaling Link between the ALEC's switch and BellSouth's STP is an unbundled network element that ALECs can order by contacting their assigned account team representative at BellSouth. The representative then arranges the set-up for the ALEC. When an ALEC purchases unbundled switching from BellSouth, BellSouth will provide

access to its signaling network in the same manner as it provides such access for itself.

BellSouth's SS7 network provides dedicated two-way signaling links that interconnect BellSouth's STP locations and ALEC's Signaling Points at Signaling-Point-of-Interface (SPOI) locations. SGAT, § X.A. The SS7 network consists of STP Port Termination(s) for ALEC signaling and STP Interconnection Facilities (also called Signaling Links). The port terminations consist of port connections operating at 56 Kilobits per second (56 Kbps) transmission facilities on BellSouth's STP. The STP Interconnection Facility is the transmission facility that lies between the multiplexing hub, which demultiplexes the ALEC's 56 Kbps transmission from DS1 transmission facilities, and the STP port. 47 C.F.R. § 51.319(e)(1)(ii); Intermedia Agmnt., Att. 2, § 11.0.

STPs are signaling message switches that interconnect Signaling Links to route signaling messages between switches and databases. ALECs may use BellSouth's SS7 signaling network for signaling between their switches, between their switches and BellSouth's switches, and between their switches and the networks of other parties connected to the BellSouth SS7 network. STPs also provide access to other network elements connected to the BellSouth SS7 network including: 1) BellSouth-provided local end office switching or tandem switching; 2) BellSouth-provided SCPs or databases; 3) third-party provided local end office switching or tandem switching; and 4) third-party provided SCPs or databases. *See* TriVergent Agmnt., Att.a 2, § 13.0.

Q. DOES BELLSOUTH PROVIDE SS7 NETWORK INTERCONNECTION?

A. Yes. SS7 Network Interconnection is the interconnection of the ALEC's local STPs and ALEC's local end office or tandem switching systems with BellSouth's STPs. This interconnection provides connectivity that enables the exchange of SS7 messages among BellSouth's switching systems and databases, ALEC's local or tandem switching systems, and other third-party switching systems directly connected to the BellSouth SS7 network. SS7 network interconnection provides ALECs with connectivity to all components of the BellSouth SS7 network. *See* Intermedia Agmnt., Att. 3, § 15.0.

Q. IS ACCESS TO BELLSOUTH'S SIGNALING NETWORK AVAILABLE?

A. Yes. BellSouth's signaling service is available as evidenced by the fact that, as of May 17, 2001, there were 16 ALECs that had directly connected to BellSouth's signaling network in Florida. Additional facilities-based ALECs may obtain access to BellSouth's signaling network as described above and in BellSouth's tariff (FCC No. 1). Because neither BellSouth's switch nor STP distinguish between BellSouth's end users and the end users of resellers, BellSouth does not know how many queries have been made to BellSouth's databases from the end users of resellers.

CALL-RELATED DATABASES

Q. DESCRIBE THE CALL-RELATED DATABASES BELLSOUTH OFFERS ON AN UNBUNDLED BASIS.

A. Section 51.319(e)(2)(ii) of the FCC Rules set forth certain call-related databases to which BellSouth must offer access on an unbundled basis. Consistent with that rule, BellSouth

provides access to its LIDB, Toll Free Number database, LNP database, CNAM database, AIN Services Feature database, as well as the 911 and E911 databases. *See* SGAT § X.A.3.d.

Q. DOES BELLSOUTH PROVIDE ACCESS TO ITS SERVICE CONTROL POINTS?

A. Yes. A SCP is a specific type of network element where call related databases can reside. SCPs deployed in a SS7 network execute service application logic in response to SS7 queries sent to them by a switching system also connected to the SS7 network. SCPs also provide operational interfaces to allow for provisioning, administration and maintenance of subscriber data and service application data. ALECs may use either Feature Group D or SS7 signaling for interconnecting with BellSouth's network. *See* Intermedia Agmnt., Att. 2, § 13; DSL.net Agmnt., Att.2, §7.3.2.

Q. DESCRIBE THE ACCESS BELLSOUTH PROVIDES TO ITS LIDB DATABASE.

A. The LIDB is a transaction-oriented database accessible through Common Channel Signaling ("CCS") networks such as BellSouth's SS7 network. It contains records associated with end user line numbers and Special Billing Numbers. BellSouth's region-wide LIDB processed more than 1.5 billion queries from ALECs and others during the period from January 1997 through February 2001. Access to the LIDB is at present through a third party "signaling hub" provider or IXC directly connected to BellSouth's signaling network. LIDB queries are billed to the third party "signaling hub" provider or IXC, not the ALEC. ALECs can access the LIDB database once the ALEC puts required signaling links in place. *See* Intermedia Agmnt. Att. 2, § 13.4; TriVergent Agmnt., Att. 2

§ 14.4. Carriers may update customer information contained in BellSouth's LIDB in substantially the same time and manner as BellSouth's retail operations.

Q. DESCRIBE THE ACCESS BELLSOUTH PROVIDES TO ITS CNAM SERVICE.

A. CNAM service enables the called end user to identify the calling party by a displayed name before the call is answered (often referred to as a "caller ID" service). BellSouth will provide all requesting ALECs nondiscriminatory access to its CNAM Service database. *See* Intermedia Agmnt. Att. 2, § 13.8; ICG Agmnt., Att. 2, § 9.0. When an ALEC purchases unbundled local switching from BellSouth, access to the CNAM database will be identical to that used by BellSouth in the same switch. 47 C.F.R. § 51.319(e)(2)(iii).

The calling party's name, date, and time of the call are retrieved from the SCP database and delivered to the end user's premises between the first and second ring for display on compatible customer premise equipment. CNAM Service Query is BellSouth's service that allows an ALEC to query BellSouth's Calling Name database.

When an ALEC operates its own switching center, access to the CNAM database is obtained through the SS7 network. The ALEC accesses the SCP through the BellSouth STP or by connecting the ALEC's STP to the BellSouth STP and then to the BellSouth SCP. ALECs that deploy their own switching facilities are able to access BellSouth's SS7 network for each of their switches through a signaling link between their switches and BellSouth's STP in the same manner as BellSouth connects its own switches to the STP. The same features, functions, and capabilities are available to the ALEC as are

available to BellSouth. 47 C.F.R. §51.319(e)(2)(iv).

Q. IS CNAM AVAILABLE TO ALECS?

A. Yes. As of April 1, 2001, BellSouth has over 70 CNAM database customers, consisting of both ALECs and independent LECs, across BellSouth's nine-state region.

Q. DESCRIBE THE ACCESS BELLSOUTH PROVIDES TO ITS TOLL FREE NUMBER AND NUMBER PORTABILITY DATABASE.

A. The SGAT and BellSouth's Florida PSC-approved agreements provide the terms and conditions for nondiscriminatory access to BellSouth's Toll Free Number and Number Portability Database. *See* DSL.net Agmnt., Att. 2, §§ 7.4; TriVergent Agmnt., Att. 2, §14.5. Access to the Toll Free Number and Number Portability Databases allows an ALEC to access BellSouth's Toll Free Number and Number Portability databases for the purpose of switch query and database response. The Toll Free Number Database provides the ALEC information required to determine the appropriate routing of an 800 or 888 number.

The Number Portability database comes in two forms. The Routing service, which is a default porting service (if a company does not sign up for a query service, it will automatically use the Routing service to port calls) is available to any company and no registration is necessary. The Query service is available to any company as well, but a three-page form must be completed and returned to BellSouth. The differences between the two services is that the query service is about one-fourth of the cost of the routing

service. No contracts are necessary for either service. Additional information on both LNP database services is available at: http://www.interconnection.bellsouth.com/products/vertical/LNP_Query.html; and http://www.interconnection.bellsouth.com/products/vertical/LNP_Call_Routing.html. When an ALEC purchases unbundled local switching from BellSouth, it has exactly the same access as BellSouth to BellSouth's Toll Free Number and Number Portability database. *See* Intermedia Agmnt., Att. 2, § 13.5.

BellSouth offers three different types of access to the BellSouth call related databases. The first type of access allows an ALEC whose switches are SS7 capable to attach those switches to BellSouth's STPs and then to the BellSouth call related databases. See SGAT, § X.A.

The second option is for an ALEC whose switches are SS7 capable to attach those switches to a third party's STPs. These STPs would be attached to BellSouth's STPs and then to BellSouth's call related databases. See SGAT, § X.A. An ALEC can use Feature Group D for calls using information retrieved from BellSouth's databases.

The third option allows access by an ALEC whose switches are not capable of supporting SS7 protocols. I am not aware of any requests from ALECs for such access, no doubt because the SS7 protocol has been used so extensively for many years that most, if not all, modern switching systems are SS7-capable. However, should an ALEC make such a request, BellSouth would respond using the BFR process.

All of the above features are available to an ALEC and its customers in the same manner as provided by BellSouth to its own customers. When an ALEC operates its own switching system, access to the databases will be obtained by using the SS7 network. 47 C.F.R. § 51.319(e)(2)(iv).

When an ALEC purchases unbundled local switching from BellSouth, the access to the call related databases will be identical to that used by BellSouth in the same switch. 47 C.F.R. § 51.319(e)(2)(iii).

Q. IS BELLSOUTH SUCCESSFULLY PROVIDING ACCESS TO ITS TOLL FREE NUMBER DATABASE?

A. Yes. BellSouth has offered independent LECs and other service providers access to its Toll Free Number database for years. The necessary methods and procedures for obtaining such access by ALECs are business as usual for BellSouth. Moreover, the availability of these services is evidenced by the fact that, from January 1997 through March 31, 2001, ALECs and other service providers across BellSouth's nine-state region completed approximately 8.2 billion queries to BellSouth's Toll Free Number database. Additional facilities-based ALECs may obtain access to the database as described in BellSouth's tariff (FCC No. 1). Assuming the appropriate signaling links are in place, direct access to the database can be provided as determined through negotiations.

Q. DESCRIBE THE ACCESS BELLSOUTH PROVIDES TO THE AUTOMATIC LOCATION IDENTIFICATION/DATA MANAGEMENT SYSTEM ("ALI/DMS").

A. The ALI/DMS database contains end user information (including name, address, telephone information, and sometimes special information from the local service provider or end user) used to determine to which Public Safety Answering Point the call should be sent. BellSouth offers ALECs a data link to the ALI/DMS database or permits ALECs to provide their own datalinks to the database. *See* Intermedia Agmnt., Att. 2, § 13.6; TriVergent Agmnt., Att. 2, §.14.6.

Q. DESCRIBE BELLSOUTH'S AIN NETWORK ARCHITECTURE.

A. AIN is a vendor-independent network architecture deployed by BellSouth that provides capabilities for creation of custom telecommunications services that are invoked by SS7 messages (called "triggers") from a switch through the STP to a SCP database. AIN uses distributed intelligence in databases to control call processing and manage network information, rather than performing those functions at every switch. When an ALEC purchases unbundled local switching from BellSouth, it has exactly the same access as BellSouth to BellSouth's AIN.

AIN access provides ALECs the ability to create service applications utilizing BellSouth's AIN and deploy those applications via the BellSouth Service Management System ("SMS") in conjunction with BellSouth's SCPs. BellSouth provides access to its AIN SCP, or databases, through its AIN Toolkit and AIN SMS Access services. These services permit the ALEC to create and deploy AIN services on a BellSouth SCP using a set of service creation tools provided by BellSouth. BellSouth uses these same tools to create and deploy AIN services in exactly the same manner as is available to ALECs. As set forth in BellSouth's SGAT, SMS access allows ALECs to provide AIN services from

either BellSouth switches or the ALEC's own switch. It also allows ALECs to create service applications using BellSouth's AIN service creation tools and to deploy those services using BellSouth's service management tools. ALECs will have the same access to SMS as does BellSouth. *See* SGAT, § X.3.d.

Using BellSouth's AIN Toolkit, end user customers of the ALEC may also access BellSouth-created AIN applications and/or ALEC-created AIN applications residing in BellSouth's SCP via 1) unbundled local switching purchased from BellSouth, or 2) a ALEC's own switch that is connected to BellSouth's SS7 network via the SS7 network element. 47 C.F.R. § 51.319(e)(2)(iii), (iv) and § 51.319(e)(3)(C).

BellSouth has tested its AIN Toolkit, which provides an ALEC with the ability to create and offer AIN-service applications to the ALEC's end users, as well as its AIN SMS access, which provides an ALEC with access to the BellSouth-provided service creation environment. The completion of test calls and the generation of billing records were part of the testing process that completed March 31,1997. The testing confirmed that service orders flowed through BellSouth's systems properly and that accurate bills were rendered.

BellSouth has made presentations to several ALECs interested in using AIN Toolkit to develop AIN applications that would run via BellSouth's AIN, and thus on BellSouth's switches. An ALEC that wishes to access BellSouth's AIN service creation tools (that is, AIN Toolkit) for the first time could, however, do so in a matter of seven days provided that the ALEC has an ISDN line and a personal computer.

BellSouth provides access to the SMS associated with each of the databases described above in accordance with 47 C.F.R. §51.319(e)(3). This gives ALECs the same access as BellSouth to develop and deploy AIN services using BellSouth's SMS. Requesting ALECs receive the information necessary to format data and enter the data correctly into the various databases using the associated SMS.

Q. DOES BELLSOUTH MAINTAIN ITS DATABASES IN ACCORDANCE WITH SECTION 222 OBLIGATIONS?

A. Yes. All data in the above databases are maintained in accordance with §222 of the Act. 47 C.F.R. § 51.319(e)(2)(vi).

Q. WILL BELLSOUTH CONSIDER OTHER MEANS OF ACCESS TO ITS CALL-RELATED DATABASES?

A. BellSouth will respond to requests for additional arrangements for access to call-related databases and associated signaling facilities through the BFR process.

Q. PLEASE SUMMARIZE YOUR TESTIMONY ON CALL-RELATED DATABASES.

A. In summary, as required by 47 C.F.R. § 51.319(e), BellSouth provides unbundled, nondiscriminatory access to its signaling networks, to its call-related databases used in signaling networks for billing and collection or the transmission, routing or other provision of telecommunications services, and to the associated SMS for each database. Each database is accessed through BellSouth's STPs by a requesting ALEC in the same manner and via the same signaling links to the database that are used by BellSouth itself.

Q. DESCRIBE BELLSOUTH'S PROVISION OF NONDISCRIMINATORY ACCESS TO SERVICE MANAGEMENT SYSTEMS.

A. SMS is defined as a computer database or system not part of the public switched network that, among other things: (1) interconnects to the SCP and sends to that SCP the information and call processing instructions needed for a network switch to process and complete a telephone call; (2) provides telecommunications carriers with the capability of entering and storing data regarding the processing and completing of a telephone call. BellSouth provides access to the SMS associated with each of the databases described above in accordance with 47 C.F.R. § 51.319(e)(3). Requesting carriers are provided with the information necessary to format data and enter it into the various databases using the associated SMS. Carriers have the same access as BellSouth to develop AIN services using SMS. All data in the databases described above is maintained in accordance with § 222 of the Act.

CHECKLIST ITEM 11: SERVICE PROVIDER NUMBER PORTABILITY

The following issue was approved for consideration in this proceeding by the Florida Commission:

12. In Order PSC-97-1459-FOF-TL, issued November 19, 1997, the Commission found that BellSouth met the requirements of Section 271(c)(2)(B)(xi) of the Communications Act of 1934, as amended by the Telecommunications Act of 1996. Does BellSouth currently provide number portability, pursuant to Section 271(c)(2)(B)(xi) and applicable rules promulgated by the FCC?

Q. DESCRIBE BELLSOUTH'S COMPLIANCE WITH CHECKLIST ITEM 11.

A. Section 271(2)(B)(xi) requires that BellSouth generally offer "until the date by which the Commission issues regulations pursuant to section 251 to require number portability, interim telecommunications number portability through remote call forwarding, direct inward dialing trunks, or other comparable arrangements, with as little impairment of functioning, quality, reliability, and convenience as possible. After that date, full compliance with such regulations." BellSouth provides interim number portability in accordance with these requirements. *See* Intermedia Agmnt., Att. 5, § 3.0. In the *1997 Order*, the Commission found that BellSouth provided interim number portability in accordance with these requirements. BellSouth continued to offer interim number portability until March 31, 2000, when BellSouth began offering ALECs Long Term Number Portability (LNP) on 100% of BellSouth's access lines in Florida. However, BellSouth continues to provide interim number portability on a limited number of existing lines. Therefore, BellSouth continues to be in compliance with this checklist item.

Q. DESCRIBE BELLSOUTH'S INTERIM NUMBER PORTABILITY OFFER.

A. BellSouth offered interim number portability under the four methods which the FCC had found to be technically feasible: (1) Remote Call Forwarding (RCF) and Direct Inward Dialing (DID); (2) Route Index-Portability Hub (RI-PH); (3) Directory Number-Route Index (DN-RI); and (4) Local Exchange Routing Guide (LERG) Reassignment. BellSouth provides Route Index-Portability Hub (RI-PH) as a comparable arrangement in provisioning interim number portability.

BellSouth ported 19,971 lines in Florida using INP. However, as of May 22, 2001, BellSouth had converted 19,283 (97%) of those lines to LNP. In its region, BellSouth ported 117,010 numbers, of which 108,934 (93%) have been converted to LNP as of that same date.

Q. DESCRIBE BELLSOUTH'S PERMANENT NUMBER PORTABILITY OFFER.

A. BellSouth has implemented permanent number portability in Florida in accordance with FCC rules and as discussed further in the Affidavit of Dennis Davis, Attachment E. As of March 31, 2000, BellSouth had equipped all its switches in Florida accounting for 100% of its lines with LNP capability. As of March 31, 2001, BellSouth has equipped in its nine-state region switches accounting for over 97% of its access lines with LNP capability. This total includes all major marketing areas. The remaining approximately less than 3% of network access lines in BellSouth's nine-state region generally are located in rural areas not yet subject to competition. These access lines will be equipped for LNP if requested by an ALEC via the BFR process. For the less than 3% of access lines for which LNP is not available, INP will remain available.

Once long term number portability is implemented in a particular end office, BellSouth and ALECs will withdraw interim number portability offers. The transition from interim arrangements to permanent arrangements should be accomplished within 120 days. BellSouth will not charge the ALEC for the conversion from interim to permanent number portability.

As of March 31, 2001, BellSouth had ported 258,227 business directory numbers and 49,523 residence directory numbers in Florida using LNP. In its nine-state region, BellSouth has ported 1,113,649 business and 133,703 residence directory numbers as of March 31, 2001, which confirms the availability of LNP.

Q. DESCRIBE THE MEANS BY WHICH ALECS' END USER CUSTOMERS MAY OBTAIN VERIFICATION OR INTERRUPTION OF A TELEPHONE NUMBER THAT HAS BEEN PORTED TO AN ALEC SWITCH.

A. BellSouth has developed methods and procedures to be followed when customers want verification or interruption of a conversation involving a telephone number that has been ported to an ALEC's switch. There are two arrangements that an ALEC may elect: 1) BellSouth provides operator call processing on behalf of the ALEC; and 2) the ALEC provides its own operator call processing. When BellSouth handles the ALEC's operator call processing, a verification trunk will be provisioned between the BellSouth operator services platform and the ALEC's network. This will allow BellSouth's operator to verify such a line in an ALEC switch at the request of either a BellSouth or ALEC end user. When the ALEC handles its own operator call processing, a two-way inward operator trunk (an operator to operator connection) will be jointly provisioned. This will allow the BellSouth operator to contact the ALEC operator. The ALEC operator will verify and/or interrupt the line, and report the condition to the BellSouth operator who will, in turn, report the condition of the line to the end user. This arrangement will likewise allow the ALEC operator to contact the BellSouth operator. The BellSouth operator will verify and/or interrupt the line and report the condition to the ALEC operator who will report the condition of the line to the ALEC's end user.

CHECKLIST ITEM 12: LOCAL DIALING PARITY

The following issue was approved for consideration in this proceeding by the Florida Commission:

13. In Order PSC-97-1459-FOF-TL, issued November 19, 1997, the Commission found that BellSouth met the requirements of Section 271(c)(2)(B)(xii) of the Communications Act of 1934, as amended by the Telecommunications Act of 1996. Does BellSouth currently provide nondiscriminatory access to such services or information as are necessary to allow the requesting carrier to implement local dialing parity in accordance with the requirements of Section 271(c)(2)(B)(xii) and applicable rules promulgated by the FCC?

Q. DESCRIBE BELLSOUTH'S COMPLIANCE WITH CHECKLIST ITEM 12.

A. Checklist Item 12 obligates BellSouth to provide nondiscriminatory access to such services or information as are necessary to allow the requesting carrier to implement local dialing parity in accordance with the requirements of Section 251(b)(3). Rule 51.207 states that a LEC shall permit telephone exchange service customers within a local calling area to dial the same number of digits to make a local call notwithstanding the identity of the customer's or the called party's telecommunications service provider. Both the Commission in the *1997 Order*, and the FCC, in the *Second Louisiana Order*, found BellSouth in compliance with this Checklist item. BellSouth continues to provide ALECs with dialing parity, and thus BellSouth remains in compliance with Checklist Item 12. The FCC's *Second Report and Order*, ¶ 71 stated that local dialing parity also is

achieved through the implementation of the interconnection, number portability and nondiscriminatory access to telephone number requirements of Section 251 of the Act. As described earlier, BellSouth has implemented each of these items in accordance with the Act.

BellSouth's interconnection arrangements do not require any ALEC to use access codes or additional digits to complete local calls to BellSouth customers. Neither are BellSouth customers required to dial any access codes or additional digits to complete local calls to the customers of any ALEC. Further, end user customers of ALECs that have provisioned those customers utilizing the UNE Platform (UNE-P) will have available to them local dialing plans in the same manner as BellSouth's retail customers. In addition, BellSouth will not cause ALECs' local service customers to experience inferior quality regarding post-dial delay, call completion rate and transmission quality as compared to BellSouth's local service customers. *See* Intermedia Agmnt., Att. 3, § 5.0. The interconnection of the BellSouth network and the network of the ALEC will be seamless from a customer perspective, unless the ALEC chooses otherwise. While BellSouth is unable to determine the full extent of ALEC dialing policies, BellSouth is not aware of any complaints from ALEC customers that they are required to dial any access codes or additional digits to complete local calls.

CHECKLIST ITEM 13: RECIPROCAL COMPENSATION

The following issue was approved for consideration in this proceeding by the Florida Commission:

14. In Order PSC-97-1459-FOF-TL, issued November 19, 1997, the Commission found that BellSouth met the requirements of Section 271(c)(2)(B)(xiii) of the Communications Act of 1934, as amended by the Telecommunications Act of 1996. Does BellSouth currently provide reciprocal compensation arrangements in accordance with the requirements of Section 252(d)(2) of the Telecommunications Act of 1996, pursuant to Section 271(c)(2)(B)(xiii) and applicable rules promulgated by the FCC?

Q. DESCRIBE BELLSOUTH'S COMPLIANCE WITH CHECKLIST ITEM 13.

A. Reciprocal compensation arrangements are provided for in BellSouth's interconnection agreements as well as through its SGAT. Reciprocal compensation is discussed further in the testimony of Cynthia Cox.

CHECKLIST ITEM 14: RESALE OF THE INCUMBENT LEC'S RETAIL TELECOMMUNICATIONS SERVICES AT A DISCOUNT

The following issue was approved for consideration in this proceeding by the Florida Commission:

15. Does BellSouth currently provide telecommunications services available for resale in accordance with the requirements of Sections 251(c)(4) and 252(d)(3) of the Telecommunications Act of 1996, pursuant to Section 271(c)(2)(B)(xiv) and applicable rules promulgated by the FCC?

Q. DESCRIBE BELLSOUTH'S COMPLIANCE WITH CHECKLIST ITEM 14.

A. Checklist Item 14 obligates BellSouth to make telecommunications services available for resale in accordance with the requirements of sections 251(c)(4) and 252(d)(3). Specifically, BellSouth is required to offer for resale at wholesale rates without unreasonable or discriminatory conditions or limitations any telecommunications service that the carrier provides at retail to subscribers who are not telecommunications carriers. In the *Second Louisiana Order*, the FCC found that but for perceived deficiencies in BellSouth's OSS systems, BellSouth makes telecommunications services available for resale in accordance with sections 251(c)(4) and 252(d)(3). With respect to the offering of services for resale, BellSouth continues to meet the requirements of this Checklist Item.

Q. ARE ALECS PURCHASING RESOLD SERVICES?

A. Yes. As of March 31, 2001, there were 850,902 units being resold by ALECs in Florida while 3,002,701 were being resold throughout BellSouth's region. Of those units in service in Florida, there were 75,840 resold business lines and 100,799 resold residence lines. The table shown in Exhibit WKM-9, which is attached to my testimony, identifies the service and the number of units being resold in Florida and across the BellSouth region.

Other retail telecommunications services are likewise available for resale. Further discussion of Checklist Item 14 is found in the testimony of Cynthia Cox. Ms. Cox also addresses pricing of resold services in Florida in her testimony.

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes.

WKM-1

VIRTUAL COLLOCATION DATA FOR FLORIDA AND BELLSOUTH (BST)

VIRTUAL COLLOCATION DATA FOR FLORIDA AND BELLSOUTH (BST)

BST Region	StatusCode					
STATE	AP	AR	FB	SA	SR	Grand Total
AL				8	1	9
FL			3	5	137	145
GA	2	1	13	3	90	109
KY			2		2	4
LA				1	16	17
MS				1	5	6
NC	1		2	1	60	64
SC			1		13	14
TN			1		18	19
Grand Total	3	1	22	19	342	387

In Progress (BST)	26	In Progress (Florida) - 3	
Complete (BST)	361	In Service (Florida) - 142	
TOTAL (BST)	387		

IN SERVICE
SA-SPACE ACCEPTED
SR-SPACE READY

IN PROGRESS
AP-SPACE RESPONSE
AR-APPLICATION RECEIVED
FB-FIRM ORDER BONA FIDE

BST Region	StatusCode					
CITY	AP	AR	FB	SA	SR	Grand Total
	1				1	2
ACWORTH					3	3
ALBANY					2	2
ALPHARETTA			2	1	5	8
ANDERSON					1	1
ASHEVILLE					1	1
ATLANTA	1	1	4	1	31	38
AUGUSTA					6	6
BATON ROUGE					1	1
BATON ROUGE					8	8
Birmingham				1		1
BOCA RATON				2	2	4
BOCO RATON					1	1
BUFORD					1	1
BURLINGTON			1		1	2
CARY				1	1	2
CHAPEL HILL					2	2
CHARLESTON					2	2
CHARLOTTE	1				28	29
CHATTANOOGA					3	3
CLARKSTON					2	2
COCO BEACH					1	1
COCOA					2	2
COLLEGE PARK					1	1
COLUMBIA					5	5
COLUMBUS			1		1	2
CORAL GABLES					2	2
DAYTONA BEACH ORMOND BEAC					1	1
DEEFIELD					1	1
DEERFIELD BEACH					1	1
DULUTH				1		1
DUNWOODY					1	1
EAST POINT					1	1
FAYETTEVILLE					1	1
FORT LAUDERDALE					7	7
Franklin					3	3
FT LAUDERDALE					3	3
FT. LAUDERDALE					1	1
GAINESVILLE					3	3
Gallatin					1	1
Gastonia					1	1
GREENSBORO					7	7
GREENVILLE			1		2	3
Hendersonville					1	1
HIALEAH					2	2
HLWD-PEMBROKE PINES					1	1
HOLLYWOOD					8	8
HOMESTEAD			1			1
HUNSTVILLE				1		1
Huntsville				1	1	2
INDIAN CREEK					1	1
JACKSON					3	3
JACKSONVILLE					25	25
KEY WEST					1	1
LAUDERDALE LAKES					1	1
LAWRENCEVILLE					1	1
Lebanon					1	1
LILBURN					3	3
LITHONIA					1	1

LOUISVILLE			2		2	4				
MADISON				1		1				
MARIETTA					5	5				
MELBOURNE					3	3				
Miami			1		32	33				
MIAMI BEACH					1	1				
MIAMI SPRINGS					2	2				
MONROE					1	1				
MONTGOMERY				2		2				
NASHVILLE			1		2	3				
NORCROSS			2		5	7				
NORTH			1			1				
NORTH DADE					1	1				
NORTH MIAMI					1	1				
NORTH MIAMI BEACH					1	1				
ORLANDO				1	11	12				
PALM BEACH GARDENS					3	3				
PALM BEACH-FEDERAL					1	1				
PEACHTREE CITY					1	1				
PEMBROKE PINES					1	1				
PENSACOLA				1	3	4				
PENSACOLA BELMONT				1		1				
PENSACOLA FERRY PASS					1	1				
PLANTATION					2	2				
POMPANO BEACH					2	2				
POWDER SPRINGS					1	1				
RALEIGH					10	10				
RIVERDALE					1	1				
Roswell			2		2	4				
SANDY SPRINGS					1	1				
SAVANNAH			1		2	3				
Shreveport					5	5				
SMYRNA			1		7	8				
SPARTANBURG					3	3				
ST. AUGUSTINE					1	1				
STOCKBRIDGE					2	2				
SUNRISE					1	1				
TUPELO					1	1				
VALDOSTA					1	1				
VERO BEACH					1	1				
WEST MIAMI					1	1				
West Palm Beach					2	2				
WILMINGTON					2	2				
WINSTON SALEM					2	2				
WINSTON-SALEM			1		5	6				
MACON					1	1				
MOBILE				2		2				
DAYTONA BEACH					1	1				
HEATHROW					1	1				
ATHENS					1	1				
NEW ORLEANS					1	1				
LAFAYETTE				1		1				
JACSON				1		1				
VICKSBURG					1	1				
Memphis					6	6				
Grand Total	3	1	22	19	342	387				

COMPLETED PHYSICAL COLLOCATION					
APPLICATIONS BY CENTRAL OFFICE - FLORIDA					
STATE		StatusCode			
Area Code	CENTRAL OFFICE	SA	SR	Grand Total	
FLORIDA	BCRTFLBT	16	4	20	1
	BCRTFLMA	18	2	20	1
	BCRTFLSA	10	1	11	1
	BGPIFLMA	1		1	1
	BKVLFLJF	2		2	1
	BYBHFLMA	13	2	15	1
	CCBHFLMA	4	1	5	1
	COCOFLMA	9	3	12	1
	COCOFLME	5	1	6	1
	DELDFLMA	4	1	5	1
	DLBHFLKP	7		7	1
	DLBHFLMA	11	3	14	1
	DRBHFLMA	11	2	13	1
	DYBHFLFN	1		1	1
	DYBHFLMA	10	3	13	1
	DYBHFLOB	6	1	7	1
	DYBHFLPO	6	3	9	1
	EGLLFLBG	6	2	8	1
	EGLLFLIH	3	1	4	1
	FRBHFLFP	3	2	5	1
	FTLDFLCR	17	2	19	1
	FTLDFLCY	19	3	22	1
	FTLDFLJA	18	1	19	1
	FTLDFLMR	26	1	27	1
	FTLDFLOA	20	2	22	1
	FTLDFLPL	20	3	23	1
	FTLDFLSG	1		1	1
	FTLDFLSU	10	3	13	1
	FTLDFLWN	7		7	1
	FTPRFLMA	5	2	7	1
	GLBRFLMC	2		2	1
	GSVLFLMA	13	3	16	1
	GSVLFLNW	3		3	1
	HBSDFLMA	1		1	1
	HLNVFLMA	1		1	1
	HLWDFLHA	7	1	8	1
	HLWDFLMA	14	2	16	1
	HLWDFLPE	17	1	18	1
	HLWDFLWH	18	6	24	1
	HMSTFLHM	2	1	3	1
	HTISFLMA	1		1	1
	JCBHFLAB	1		1	1
	JCBHFLMA	15	2	17	1
	JCVLFLAR	15	2	17	1
	JCVLFLBW	15	2	17	1
	JCVLFLCL	25	3	28	1
	JCVLFLFC	7	2	9	1
	JCVLFLIA	1		1	1
	JCVLFLJT	1		1	1
	JCVLFLLF	10	1	11	1
	JCVLFLNO	14	3	17	1
	JCVLFLOW	5		5	1
	JCVLFLRV	17	1	18	1
	JCVLFLSJ	22	1	23	1
	JCVLFLSM	19	3	22	1
	JCVLFLWC	15		15	1

FLORIDA	JPTRFLMA	7	1	8	1
	LKCYFLMA		1	1	1
	LKMRFLMA	5	1	6	1
	LYHNFLOH	1		1	1
	MIAMFLAE	18	4	22	1
	MIAMFLAL	5	2	7	1
	MIAMFLAP	5		5	1
	MIAMFLBA	11	1	12	1
	MIAMFLBC	4	1	5	1
	MIAMFLBR	11	3	14	1
	MIAMFLCA	17	2	19	1
	MIAMFLDB	1		1	1
	MIAMFLFL	10	2	12	1
	MIAMFLGR	27	4	31	1
	MIAMFLHL	18	3	21	1
	MIAMFLIC	6		6	1
	MIAMFLKE	2		2	1
	MIAMFLME	4		4	1
	MIAMFLNM	9	2	11	1
	MIAMFLNS	8	1	9	1
	MIAMFLOL	7	1	8	1
	MIAMFLPB	14	2	16	1
	MIAMFLPL	10	1	11	1
	MIAMFLRR	16	2	18	1
	MIAMFLSH	9	2	11	1
	MIAMFLSO	13	4	17	1
	MIAMFLWD	9	1	10	1
	MIAMFLWM	17	1	18	1
	MLBRFLMA	9	4	13	1
	MLTNFLRA	2	1	3	1
	MNDRFLAV	7	1	8	1
	MNDRFLLO	11	4	15	1
	NDADFLAC	9	4	13	1
	NDADFLBR	8	3	11	1
	NDADFLGG	8		8	1
	NDADFLOL	10	2	12	1
	NSBHFLMA	4		4	1
	ORLDFLAP	18	3	21	1
	ORLDFLCL	21	4	25	1
	ORLDFLMA	27	3	30	1
	ORLDFLPC	22	5	27	1
	ORLDFLPH	19	3	22	1
	ORLDFLSA	21	3	24	1
	ORPKFLMA	12	1	13	1
	ORPKFLRW	3	1	4	1
	OVIDFLCA	5	1	6	1
	PACEFLPV	2		2	1
	PCBHFLNT	3	1	4	1
	PLTKFLMA	1		1	1
	PMBHFLCS	10	2	12	1
	PMBHFLFE	18	2	20	1
	PMBHFLMA	15	1	16	1
	PMBHFLTA	8	2	10	1
	PNCYFLCA	1		1	1
	PNCYFLMA	7	1	8	1
	PNSCFLBL	11	2	13	1
	PNSCFLFP	8	2	10	1
	PNSCFLHC	2		2	1
	PNSCFLWA	9	1	10	1
	PNVDFLMA	5	2	7	1

FLORIDA	PRRNFLMA	13	3	16	1
	PTSLFLMA	2		2	1
	PTSLFLSO	2		2	1
	SBSTFLMA	1		1	1
	SNFRFLMA	16	1	17	1
	STAGFLMA	9	1	10	1
	STAGFLSH	1		1	1
	STAGFLWG	1		1	1
	STRTFLMA	5	2	7	1
	TTVLFLMA	8	1	9	1
	VRBHFLMA	4	2	6	1
	WPBHFLAN	19	2	21	1
	WPBHFLGA	16	2	18	1
	WPBHFLGR	10	2	12	1
	WPBHFLHH	18	2	20	1
	WPBHFLLE	11	2	13	1
	WPBHFLRB	13	3	16	1
	WPBHFLRP	10	1	11	1
	WWSPFLSH		1	1	1
FLORIDA Total		1289	209	1498	135
Grand Total		1289	209	1498	

SA-SPACE ACCEPTED
SR-SPACE READY

CITIES W/PHYSICAL COLLOCATION - FLORIDA	StatusCode				
CITY	SA	SR	Grand Total		
BIG PINE KEY	1		1	1	
BOCA RATON	44	7	51	1	
BOYNTON BEACH	13	2	15	1	
BROOKSVILLE	2		2	1	
COCOA BEACH	18	5	23	1	
DAYTONA BEACH	23	7	30	1	
DEERFIELD BEACH	11	2	13	1	
DELAND	4	1	5	1	
DELRAY BEACH	18	3	21	1	
FERNANDINA BEACH	3	2	5	1	
FORT LAUDERDALE	143	17	160	1	
GAINESVILLE	16	3	19	1	
GULF BREEZE	2		2	1	
HEATHROW	5	1	6	1	
HOBE SOUND	1		1	1	
HOLLYWOOD	56	10	66	1	
HOMESTEAD	2	1	3	1	
JACKSONVILLE	166	18	184	1	
JACKSONVILLE BEACH	16	2	18	1	
JENSEN BEACH	1		1	1	
JUPITER	7	1	8	1	
LAKE CITY		1	1	1	
LYNN HAVEN	1		1	1	
MANDARIN	18	5	23	1	
MELBOURNE	18	7	25	1	
MIAMI	251	39	290	1	
MILTON	2	1	3	1	
NAVARRE	1		1	1	
NEW SMYRNA BEACH	4		4	1	
NORTH DADE	35	9	44	1	
ORLANDO	143	23	166	1	
OVIEDO	5	1	6	1	
PACE	2		2	1	

PALATKA	1		1	1	
PANAMA CITY	8	1	9	1	
PANAMA CITY BEACH	3	1	4	1	
PENSACOLA	30	5	35	1	
PERRINE	13	3	16	1	
POMPANO BEACH	51	7	58	1	
PONTE VEDRA BEACH	5	2	7	1	
PORT SAINT LUCIE	4		4	1	
SANFORD	16	1	17	1	
SEBASTIAN	1		1	1	
SPRING HILL		1	1	1	
ST. AUGUSTINE	11	1	12	1	
STUART	5	2	7	1	
TITUSVILLE	8	1	9	1	
VERO BEACH	4	2	6	1	
WEST PALM BEACH	97	14	111	1	
Grand Total	1289	209	1498	49	

COMPLETED PHYSICAL COLLOCATION APPLICATIONS					
BY CENTRAL OFFICE					
Count of CENTRAL OFFICES		StatusCode			
STATE	CENTRAL OFFICE	SA	SR	Grand Total	
FLORIDA	BCRTFLBT	16	4	20	1
	BCRTFLMA	18	2	20	1
	BCRTFLSA	10	1	11	1
	BGPIFLMA	1		1	1
	BKVLFLJF	2		2	1
	BYBHFLMA	13	2	15	1
	CCBHFLMA	4	1	5	1
	COCOFLMA	9	3	12	1
	COCOFLME	5	1	6	1
	DELDFLMA	4	1	5	1
	DLBHFLKP	7		7	1
	DLBHFLMA	11	3	14	1
	DRBHFLMA	11	2	13	1
	DYBHFLFN	1		1	1
	DYBHFLMA	10	3	13	1
	DYBHFLOB	6	1	7	1
	DYBHFLPO	6	3	9	1
	EGLLFLBG	6	2	8	1
	EGLLFLIH	3	1	4	1
	FRBHFLFP	3	2	5	1
	FTLDFLCR	17	2	19	1
	FTLDFLCY	19	3	22	1
	FTLDFLJA	18	1	19	1
	FTLDFLMR	26	1	27	1
	FTLDFLOA	20	2	22	1
	FTLDFLPL	20	3	23	1
	FTLDFLSG	1		1	1
	FTLDFLSU	10	3	13	1
	FTLDFLWN	7		7	1
	FTPRFLMA	5	2	7	1
	GLBRFLMC	2		2	1
	GSVLFLMA	13	3	16	1
	GSVLFLNW	3		3	1

FLORIDA	HBSDFLMA	1		1	1
	HLNVFLMA	1		1	1
	HLWDFLHA	7	1	8	1
	HLWDFLMA	14	2	16	1
	HLWDFLPE	17	1	18	1
	HLWDFLWH	18	6	24	1
	HMSTFLHM	2	1	3	1
	HTISFLMA	1		1	1
	JCBHFLAB	1		1	1
	JCBHFLMA	15	2	17	1
	JCVLFLAR	15	2	17	1
	JCVLFLBW	15	2	17	1
	JCVLFLCL	25	3	28	1
	JCVLFLFC	7	2	9	1
	JCVLFLIA	1		1	1
	JCVLFLJT	1		1	1
	JCVLFLLF	10	1	11	1
	JCVLFLNO	14	3	17	1
	JCVLFLOW	5		5	1
	JCVLFLRV	17	1	18	1
	JCVLFLSJ	22	1	23	1
	JCVLFLSM	19	3	22	1
	JCVLFLWC	15		15	1
	JPTRFLMA	7	1	8	1
	LKCYFLMA		1	1	1
	LKMRFLMA	5	1	6	1
	LYHNFLOH	1		1	1
	MIAMFLAE	18	4	22	1
	MIAMFLAL	5	2	7	1
	MIAMFLAP	5		5	1
	MIAMFLBA	11	1	12	1
	MIAMFLBC	4	1	5	1
	MIAMFLBR	11	3	14	1
	MIAMFLCA	17	2	19	1
	MIAMFLDB	1		1	1
	MIAMFLFL	10	2	12	1
	MIAMFLGR	27	4	31	1

FLORIDA	MIAMFLHL	18	3	21	1
	MIAMFLIC	6		6	1
	MIAMFLKE	2		2	1
	MIAMFLME	4		4	1
	MIAMFLNM	9	2	11	1
	MIAMFLNS	8	1	9	1
	MIAMFLOL	7	1	8	1
	MIAMFLPB	14	2	16	1
	MIAMFLPL	10	1	11	1
	MIAMFLRR	16	2	18	1
	MIAMFLSH	9	2	11	1
	MIAMFLSO	13	4	17	1
	MIAMFLWD	9	1	10	1
	MIAMFLWM	17	1	18	1
	MLBRFLMA	9	4	13	1
	MLTNFLRA	2	1	3	1
	MNDRFLAV	7	1	8	1
	MNDRFLLO	11	4	15	1
	NDADFLAC	9	4	13	1
	NDADFLBR	8	3	11	1
	NDADFLGG	8		8	1
	NDADFLOL	10	2	12	1
	NSBHFLMA	4		4	1
	ORLDFLAP	18	3	21	1
	ORLDFLCL	21	4	25	1
	ORLDFLMA	27	3	30	1
	ORLDFLPC	22	5	27	1
	ORLDFLPH	19	3	22	1
	ORLDFLSA	21	3	24	1
	ORPKFLMA	12	1	13	1
	ORPKFLRW	3	1	4	1
	OVIDFLCA	5	1	6	1
	PACEFLPV	2		2	1
	PCBHFLNT	3	1	4	1
	PLTKFLMA	1		1	1
	PMBHFLCS	10	2	12	1
	PMBHFLFE	18	2	20	1

FLORIDA	PMBHFLMA	15	1	16	1
	PMBHFLTA	8	2	10	1
	PNCYFLCA	1		1	1
	PNCYFLMA	7	1	8	1
	PNSCFLBL	11	2	13	1
	PNSCFLFP	8	2	10	1
	PNSCFLHC	2		2	1
	PNSCFLWA	9	1	10	1
	PNVDFLMA	5	2	7	1
	PRRNFLMA	13	3	16	1
	PTSLFLMA	2		2	1
	PTSLFLSO	2		2	1
	SBSTFLMA	1		1	1
	SNFRFLMA	16	1	17	1
	STAGFLMA	9	1	10	1
	STAGFLSH	1		1	1
	STAGFLWG	1		1	1
	STRTFLMA	5	2	7	1
	TTVLFLMA	8	1	9	1
	VRBHFLMA	4	2	6	1
	WPBHFLAN	19	2	21	1
	WPBHFLGA	16	2	18	1
	WPBHFLGR	10	2	12	1
	WPBHFLHH	18	2	20	1
	WPBHFLLE	11	2	13	1
	WPBHFLRB	13	3	16	1
	WPBHFLRP	10	1	11	1
	WWSPFLSH		1	1	1
FLORIDA Total		1289	209	1498	135
Grand Total		1289	209	1498	

Count of StatusCode	StatusCode				
CITY	SA	SR	Grand Total		
BIG PINE KEY	1		1	1	
BOCA RATON	44	7	51	1	

BOYNTON BEACH	13	2	15	1	
BROOKSVILLE	2		2	1	
COCOA BEACH	18	5	23	1	
DAYTONA BEACH	23	7	30	1	
DEERFIELD BEACH	11	2	13	1	
DELAND	4	1	5	1	
DELRAY BEACH	18	3	21	1	
FERNANDINA BEACH	3	2	5	1	
FORT LAUDERDALE	143	17	160	1	
GAINESVILLE	16	3	19	1	
GULF BREEZE	2		2	1	
HEATHROW	5	1	6	1	
HOBE SOUND	1		1	1	
HOLLYWOOD	56	10	66	1	
HOMESTEAD	2	1	3	1	
JACKSONVILLE	166	18	184	1	
JACKSONVILLE BEACH	16	2	18	1	
JENSEN BEACH	1		1	1	
JUPITER	7	1	8	1	
LAKE CITY		1	1	1	
LYNN HAVEN	1		1	1	
MANDARIN	18	5	23	1	
MELBOURNE	18	7	25	1	
MIAMI	251	39	290	1	
MILTON	2	1	3	1	
NAVARRE	1		1	1	
NEW SMYRNA BEACH	4		4	1	
NORTH DADE	35	9	44	1	
ORLANDO	143	23	166	1	
OVIEDO	5	1	6	1	
PACE	2		2	1	
PALATKA	1		1	1	
PANAMA CITY	8	1	9	1	
PANAMA CITY BEACH	3	1	4	1	
PENSACOLA	30	5	35	1	
PERRINE	13	3	16	1	
POMPANO BEACH	51	7	58	1	

PONTE VEDRA BEACH	5	2	7	1	
PORT SAINT LUCIE	4		4	1	
SANFORD	16	1	17	1	
SEBASTIAN	1		1	1	
SPRING HILL		1	1	1	
ST. AUGUSTINE	11	1	12	1	
STUART	5	2	7	1	
TITUSVILLE	8	1	9	1	
VERO BEACH	4	2	6	1	
WEST PALM BEACH	97	14	111	1	
Grand Total	1289	209	1498	49	

PHYSICAL COLLOCATION DATA FOR FLORIDA AND BELLSOUTH (BST)										
BST Region	StatusCode									
STATE	AB	AP	AR	AS	EA	FB	FO	SA	SR	Grand Total
AL								331	148	479
FL	1	1	1			34		1289	209	1535
GA		19	2	2		44	1	395	257	720
KY						2		122	76	200
LA		2				6		406	120	534
MS		3	2		6	4		121	42	178
NC		5		2	1	5		638	114	765
SC		2				9		296	39	346
TN		1				6		426	274	707
Grand Total	1	33	5	4	7	110	1	4024	1279	5464
In Progress (BST)	161			In Progress (Florida) - 37			Cageless (BST) - 3,353			
Complete (BST)	5,303			In Service (Florida) - 1,498			Cageless (Florida) - 845			
In Progress = AB+AP+AR+AS+EA+FB+FO										
Complete = SA+SR										

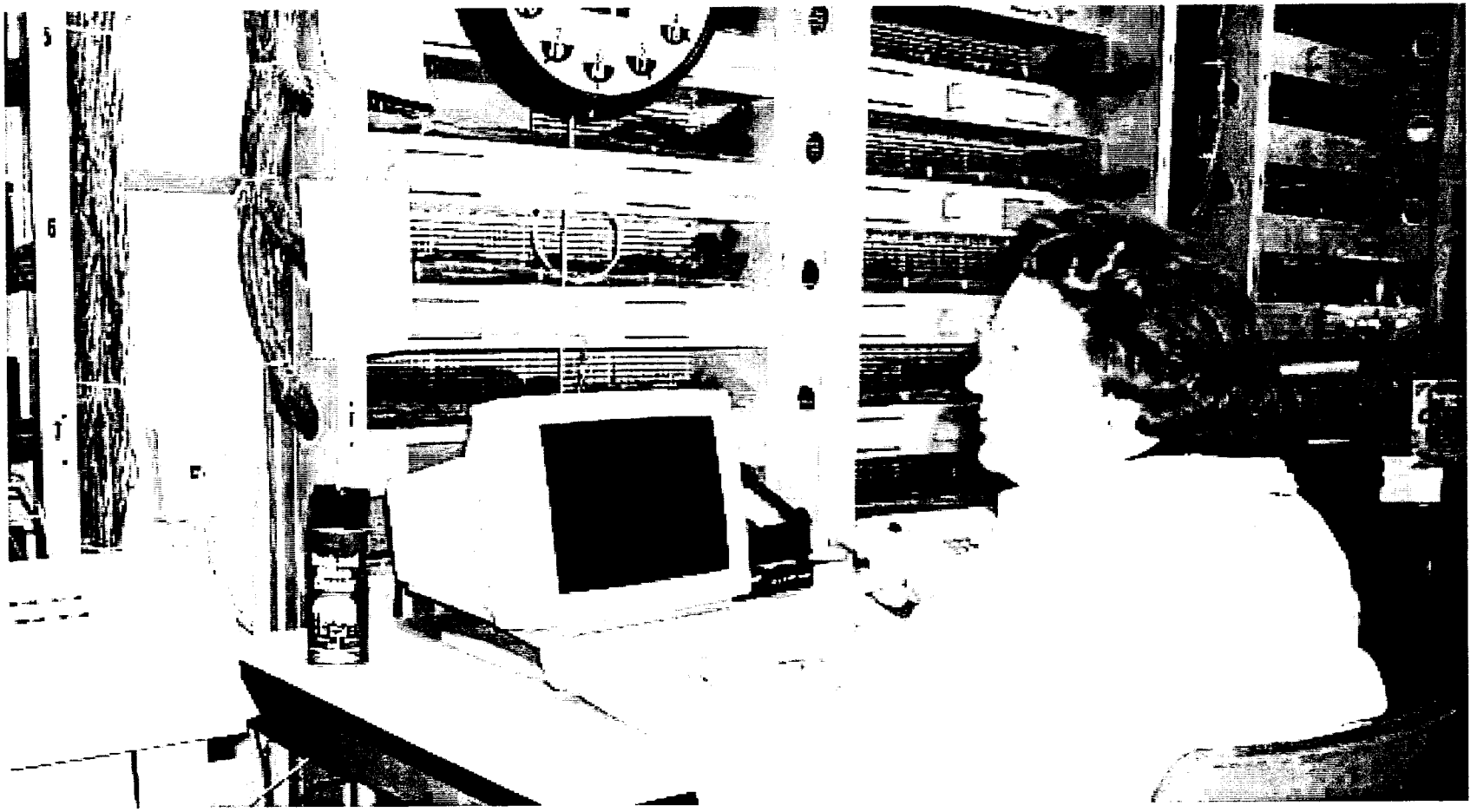
WKM-2
LOOP CUTOVER PROCESS

LOOP CUTOVER PROCESS

Step 1: Technician gets call to begin cutover. Asks for cable pair information.

LOOP CUTOVER PROCESS

Step 2: Technician types in cable pair number to obtain order number.

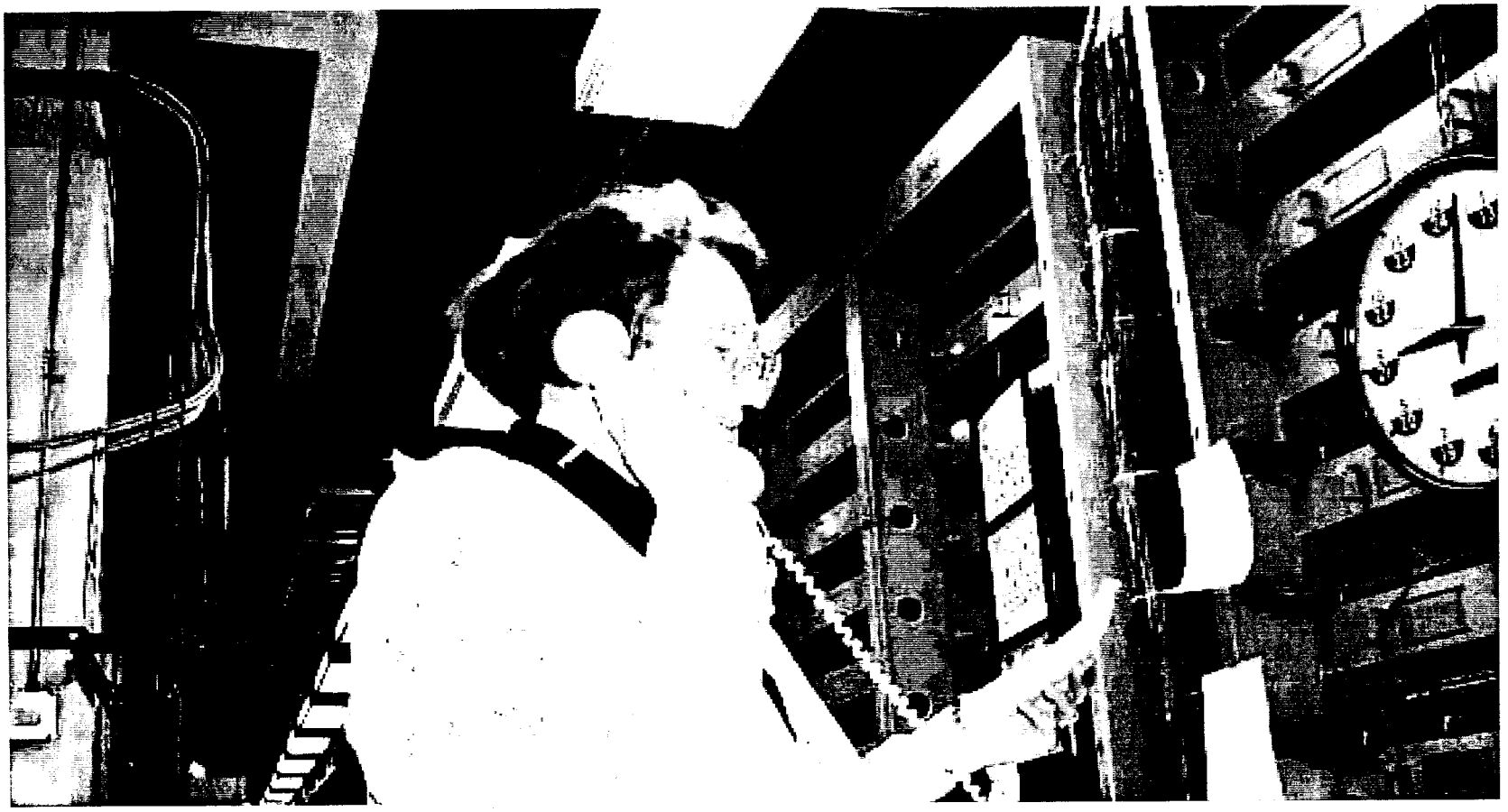


LOOP CUTOVER PROCESS

Step 3: Technician retrieves copy of work order.

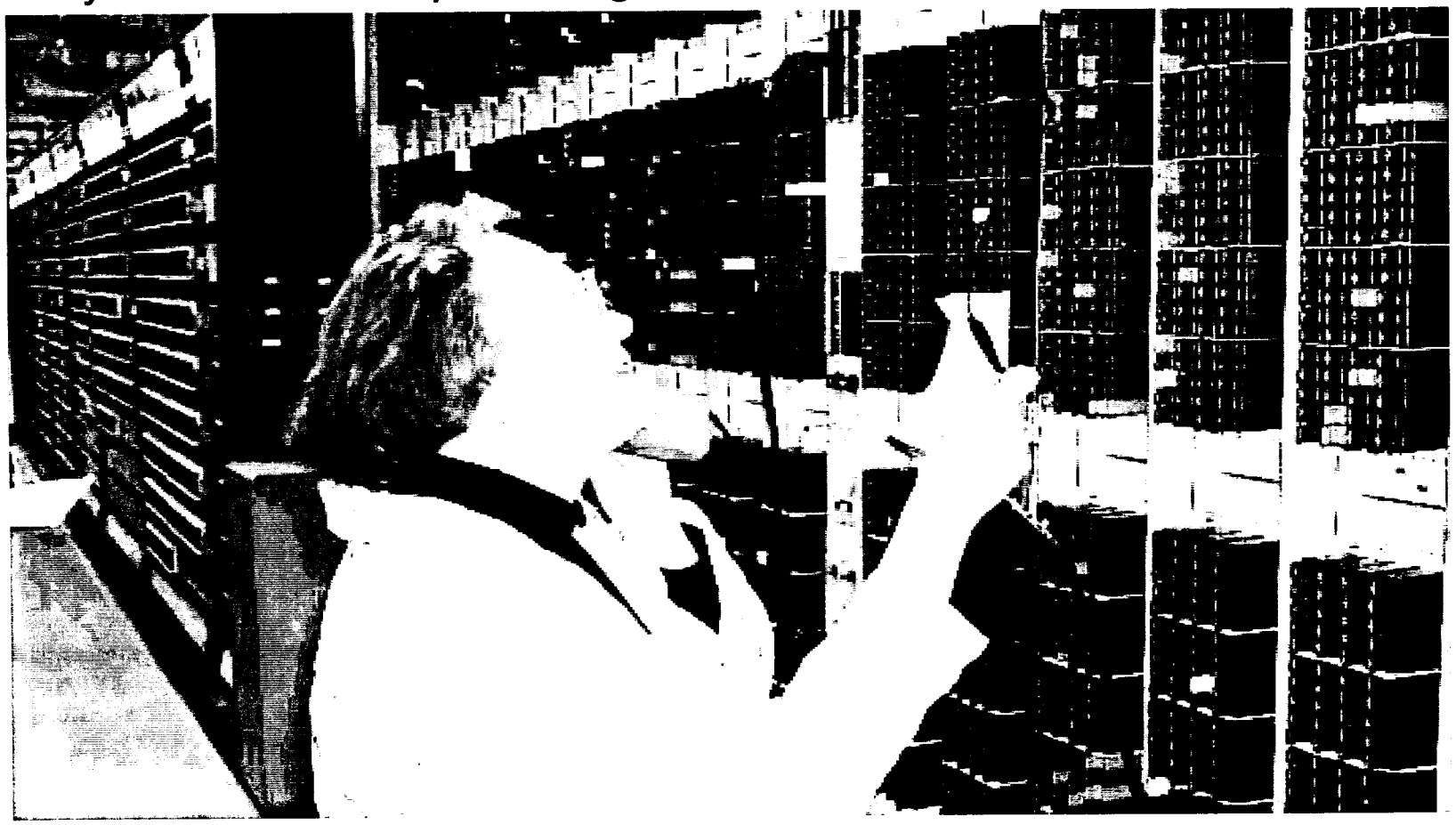
LOOP CUTOVER PROCESS

Step 4: Technician responds to UNE Center request to initiate overall cutover of service from BellSouth to ALEC.



LOOP CUTOVER PROCESS

Step 5: Technician conducts ANAC test to verify that correct loop is being cutover.



LOOP CUTOVER PROCESS

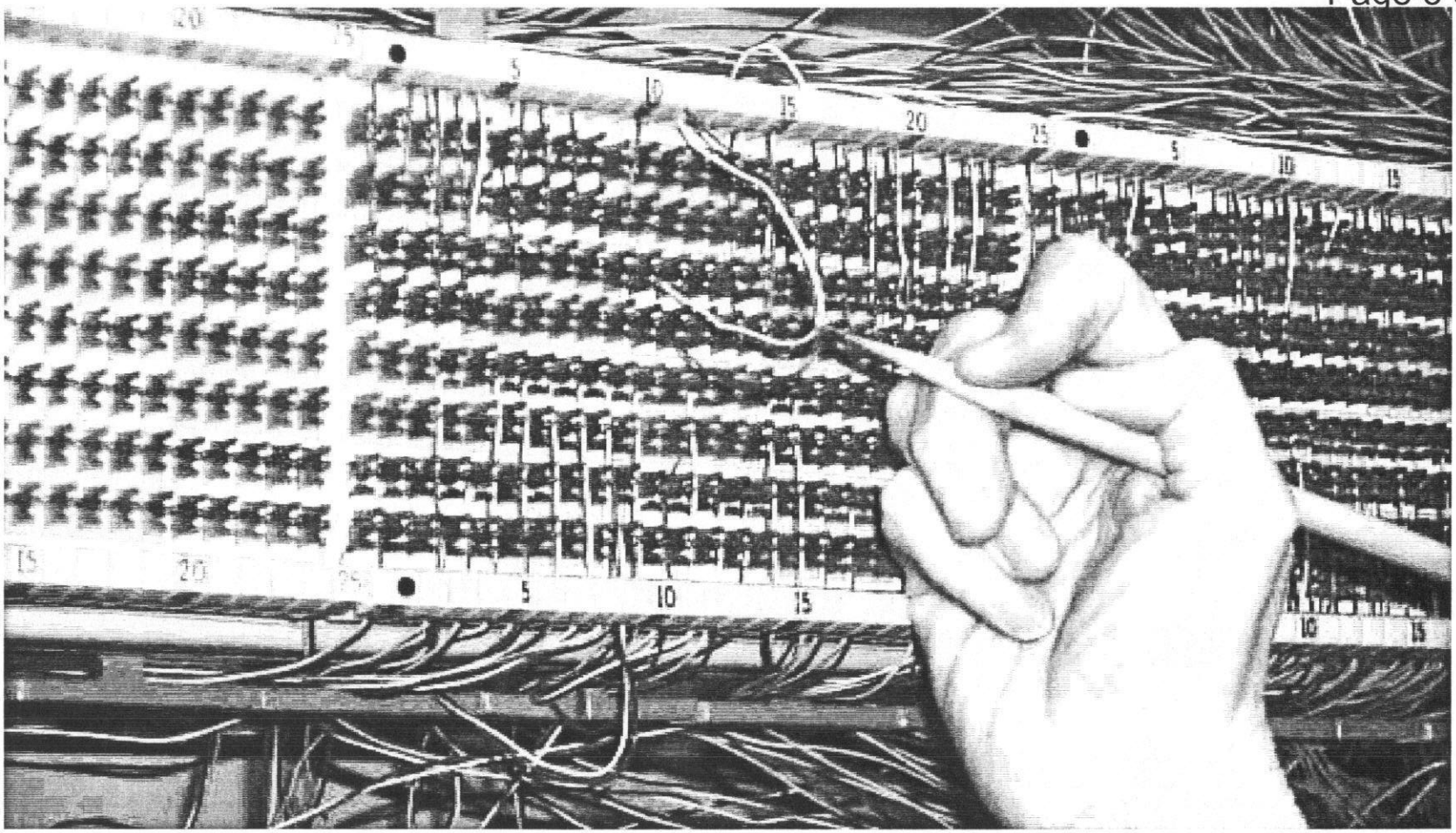
Step 6: Technician walks along Main Distributing Frame to locate both ends of jumper to be cut.

LOOP CUTOVER PROCESS

Step 7: Technician locates precise location of jumper.

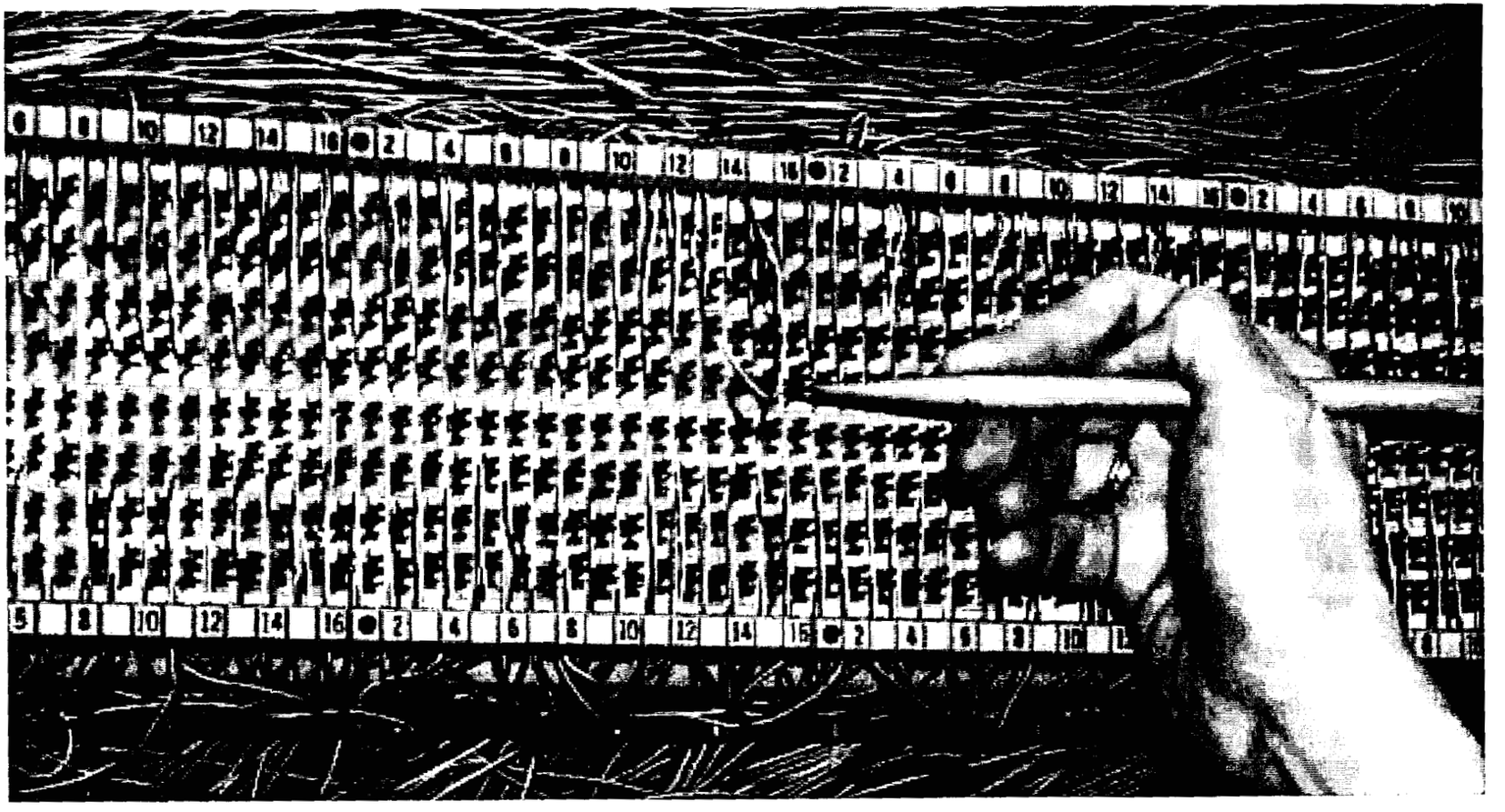
LOOP CUTOVER PROCESS

Step 8: Technician locates and removes end of jumper connected to the BellSouth cable pair.



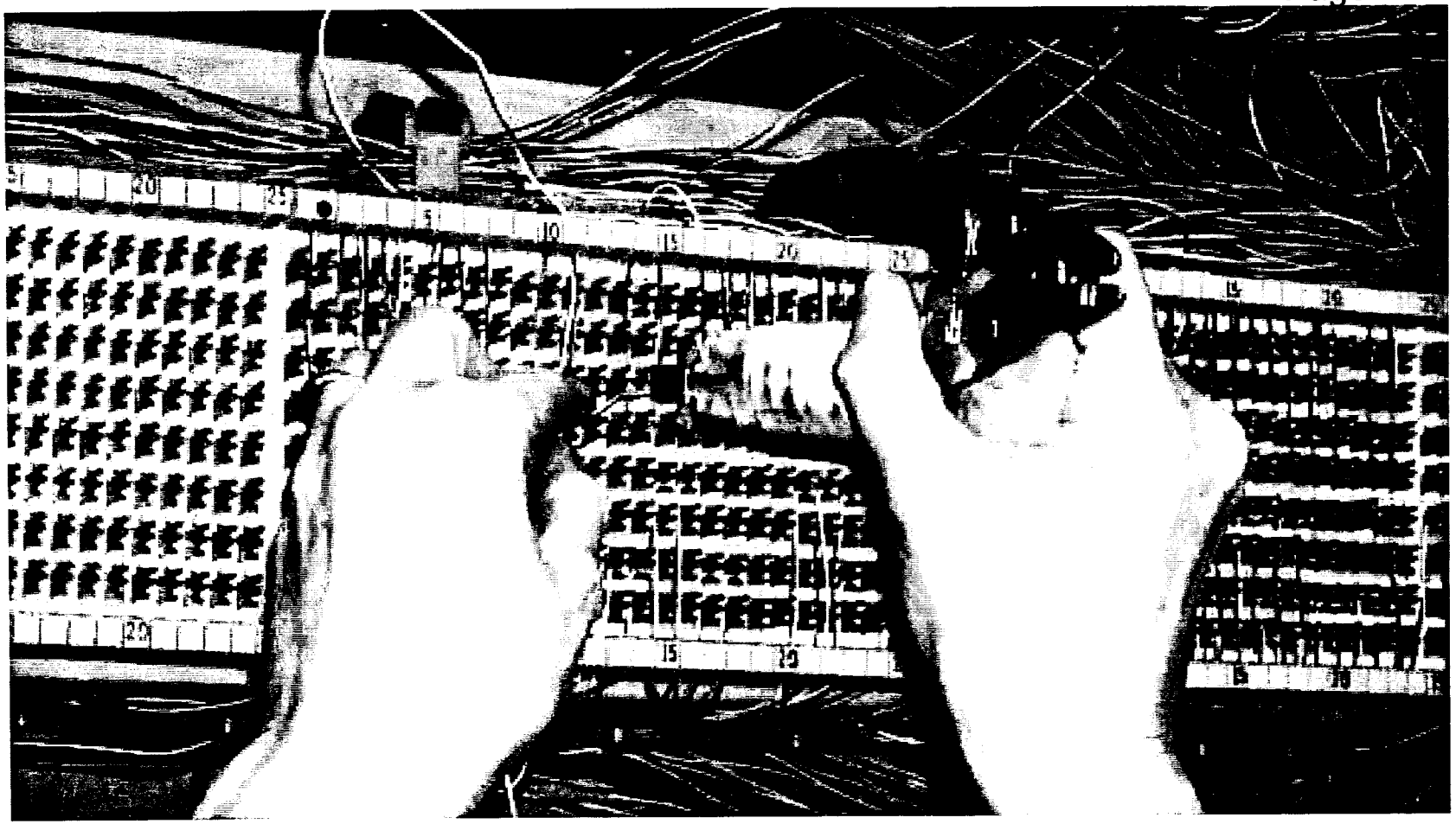
LOOP CUTOVER PROCESS

Step 9: Technician locates and removes end of jumper connected to the switching equipment.



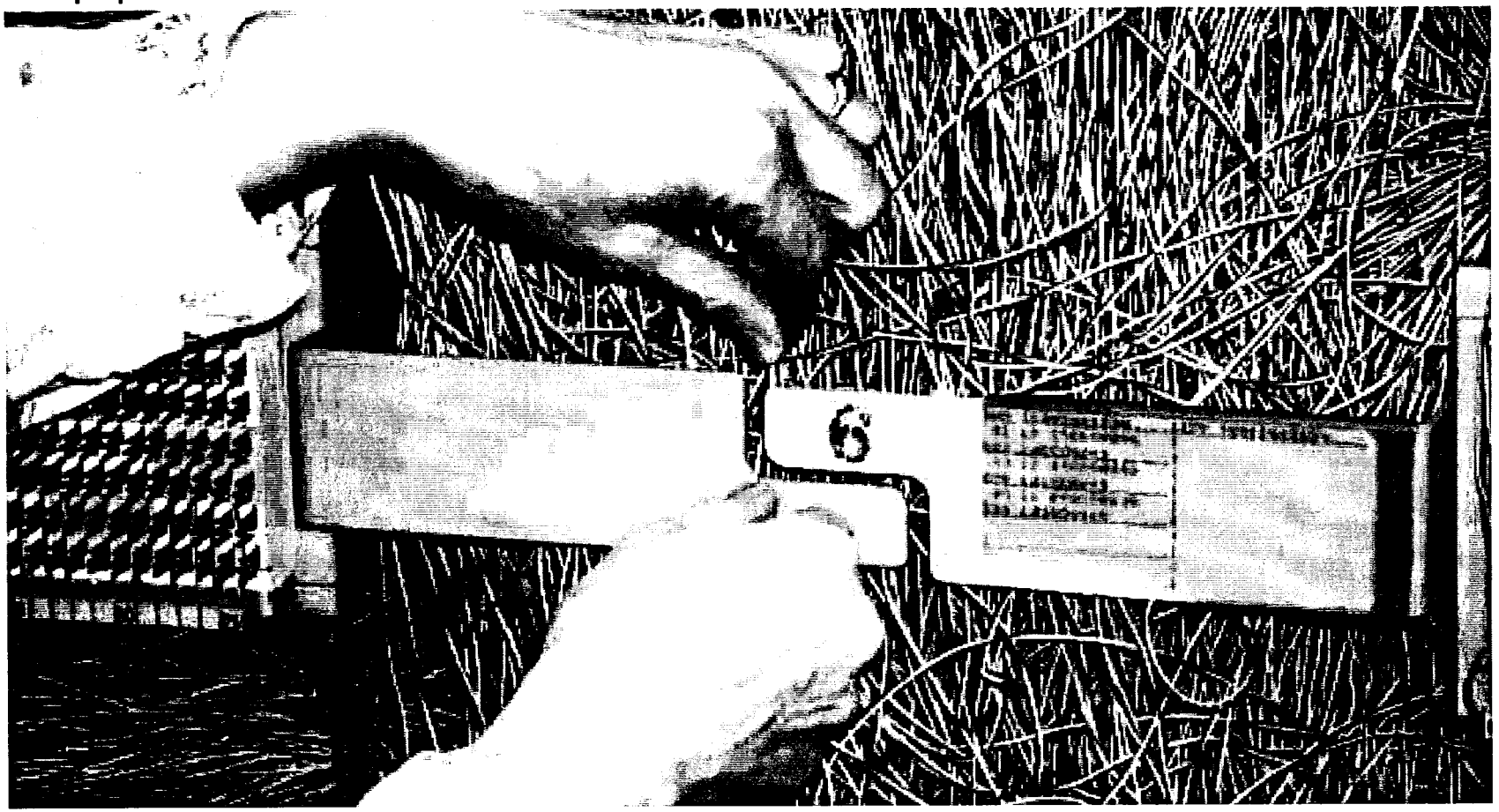
LOOP CUTOVER PROCESS

Step 10: Technician places new jumper on MDF.



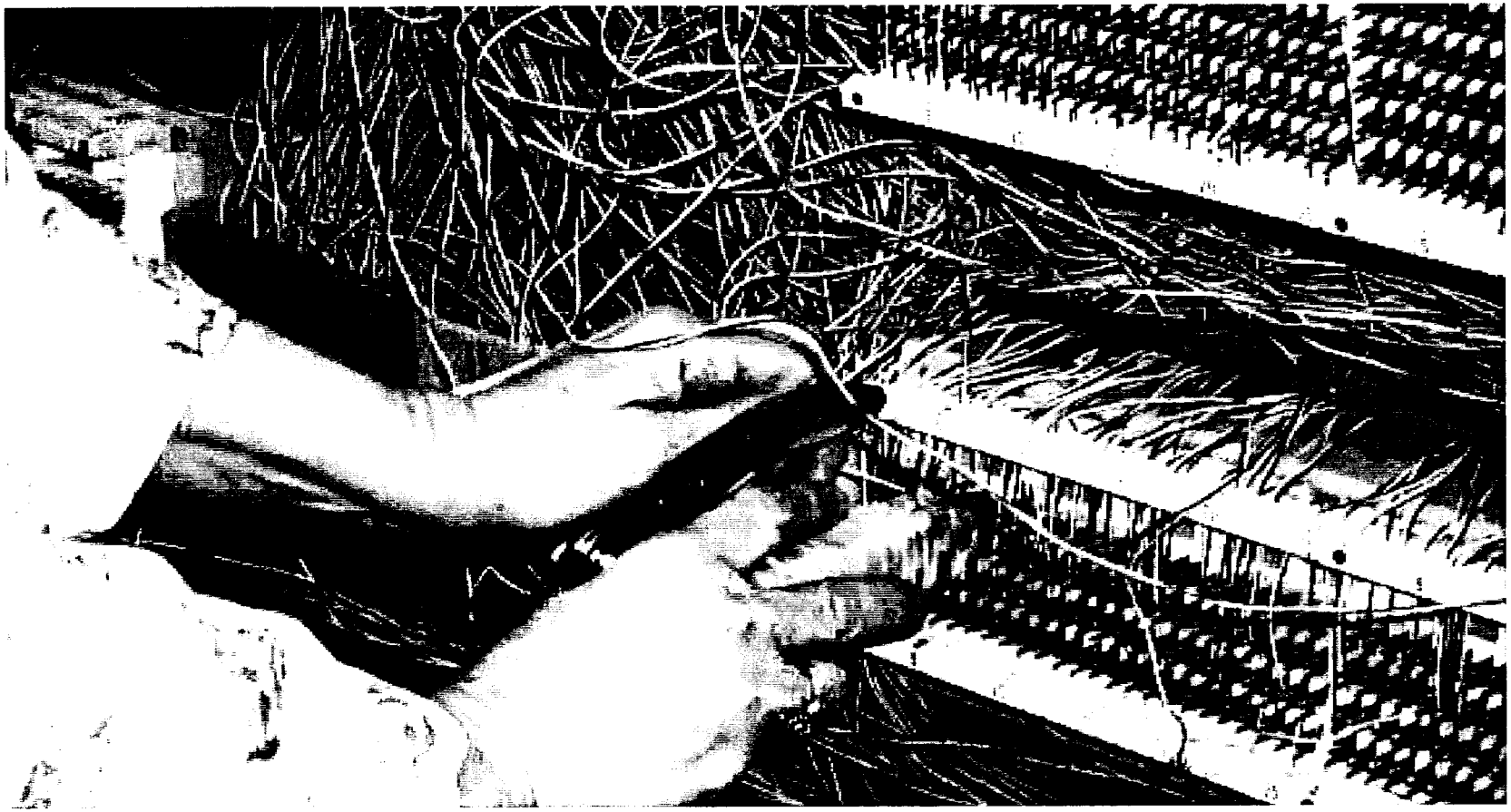
LOOP CUTOVER PROCESS

Step 11: Technician weaves wire through cable rack to reach tie cable to ALEC's collocation equipment.



LOOP CUTOVER PROCESS

Step 12: Technician connects new jumper on frame to tie cables to ALEC equipment.



LOOP CUTOVER PROCESS

Step 13: Technician conducts ANAC test to verify that loop has been cut to correct ALEC switch port.

LOOP CUTOVER PROCESS

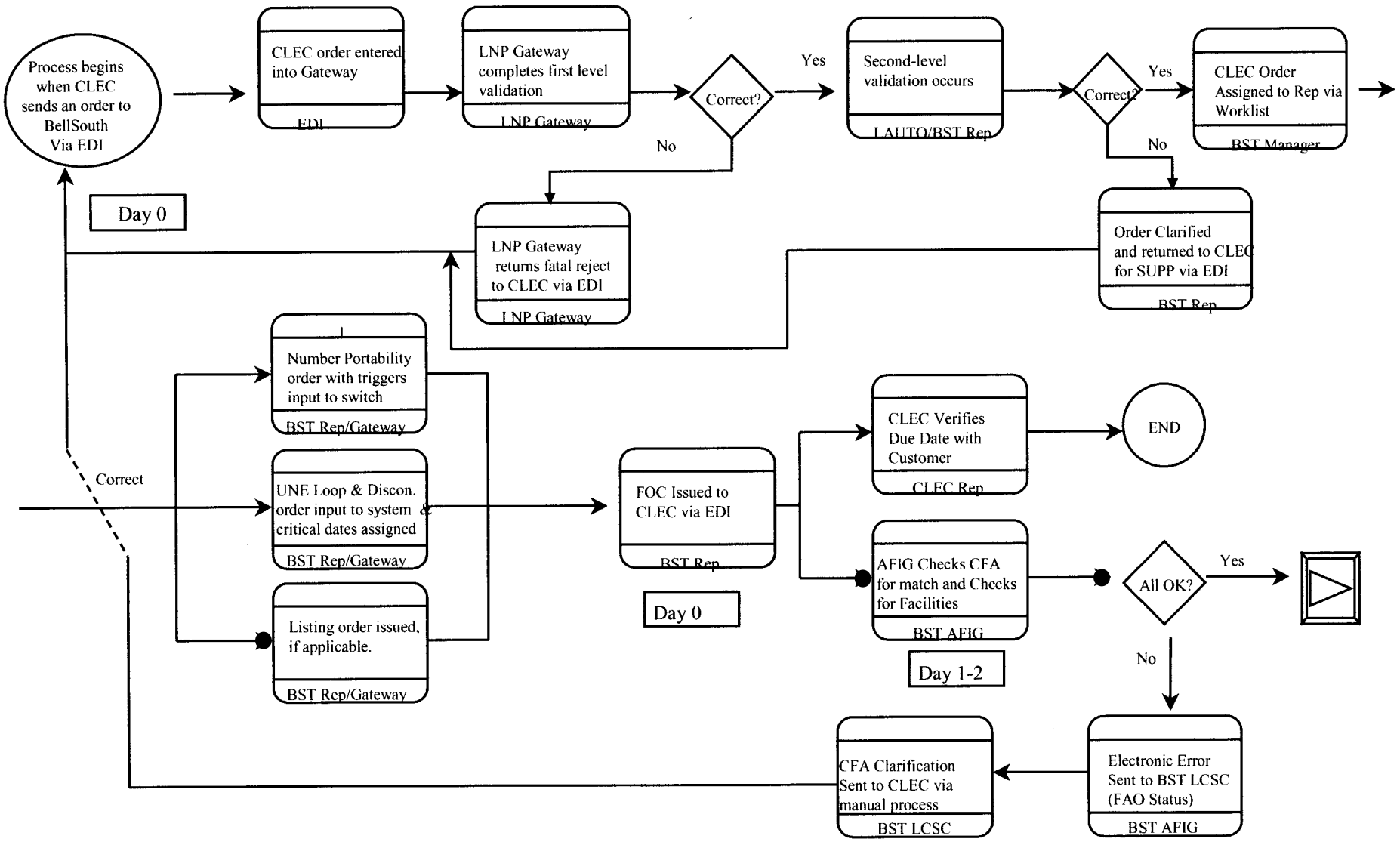
Step 14: Technician verifies cutover with ALEC, closes order, and notifies the UNE Center.

WKM-3
COORDINATED HOT CUT PROCESS

Coordinated Hot Cut Process

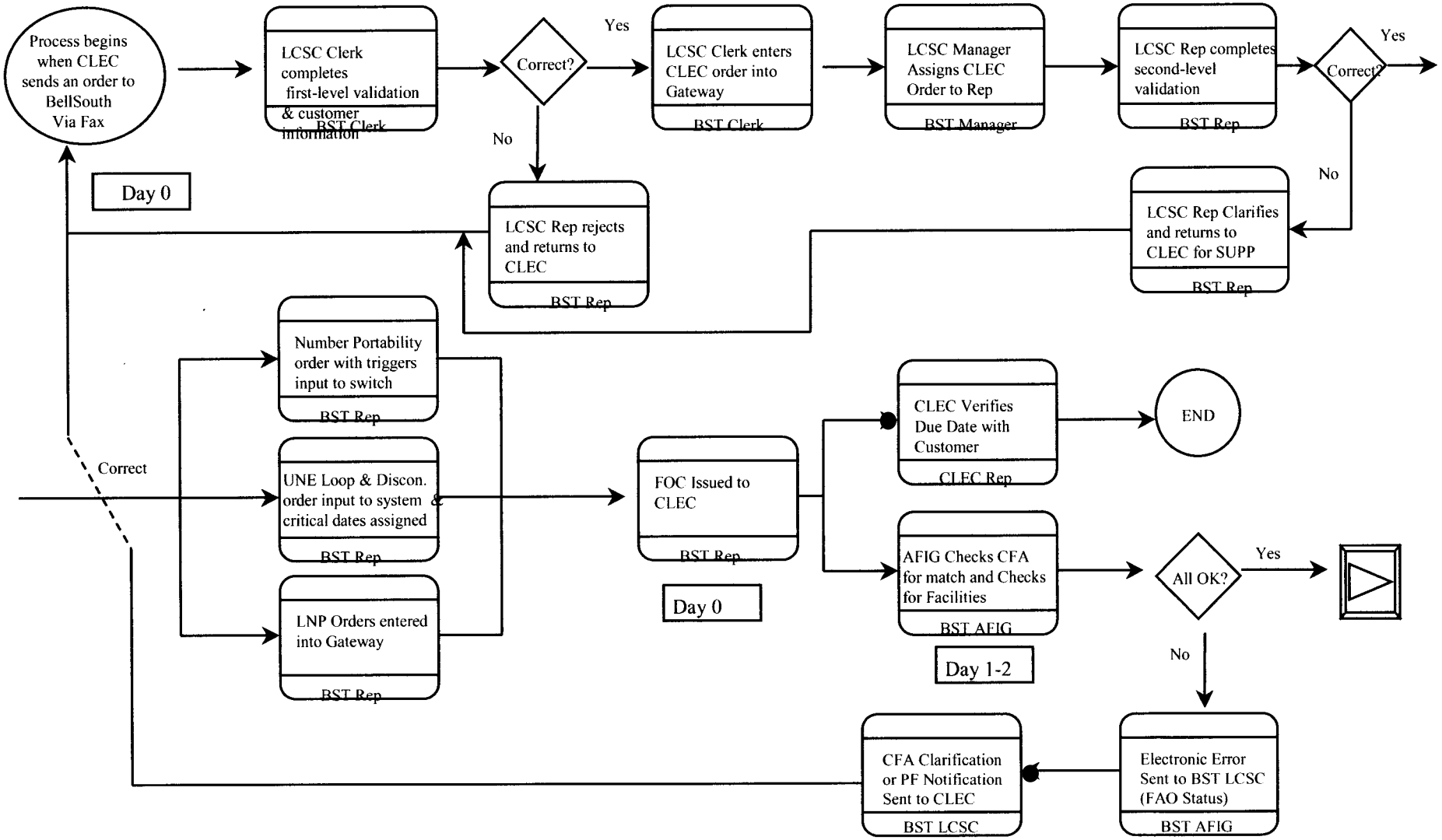
Issue 2
4/18/0

Assumptions: SL2 loop with LNP or XDSL loop with LNP also assumes for XDSL loops that a Loop make up has been processed either manually or electronically prior to submission of the LSR.. LNP Gateway communicates with NPAC.

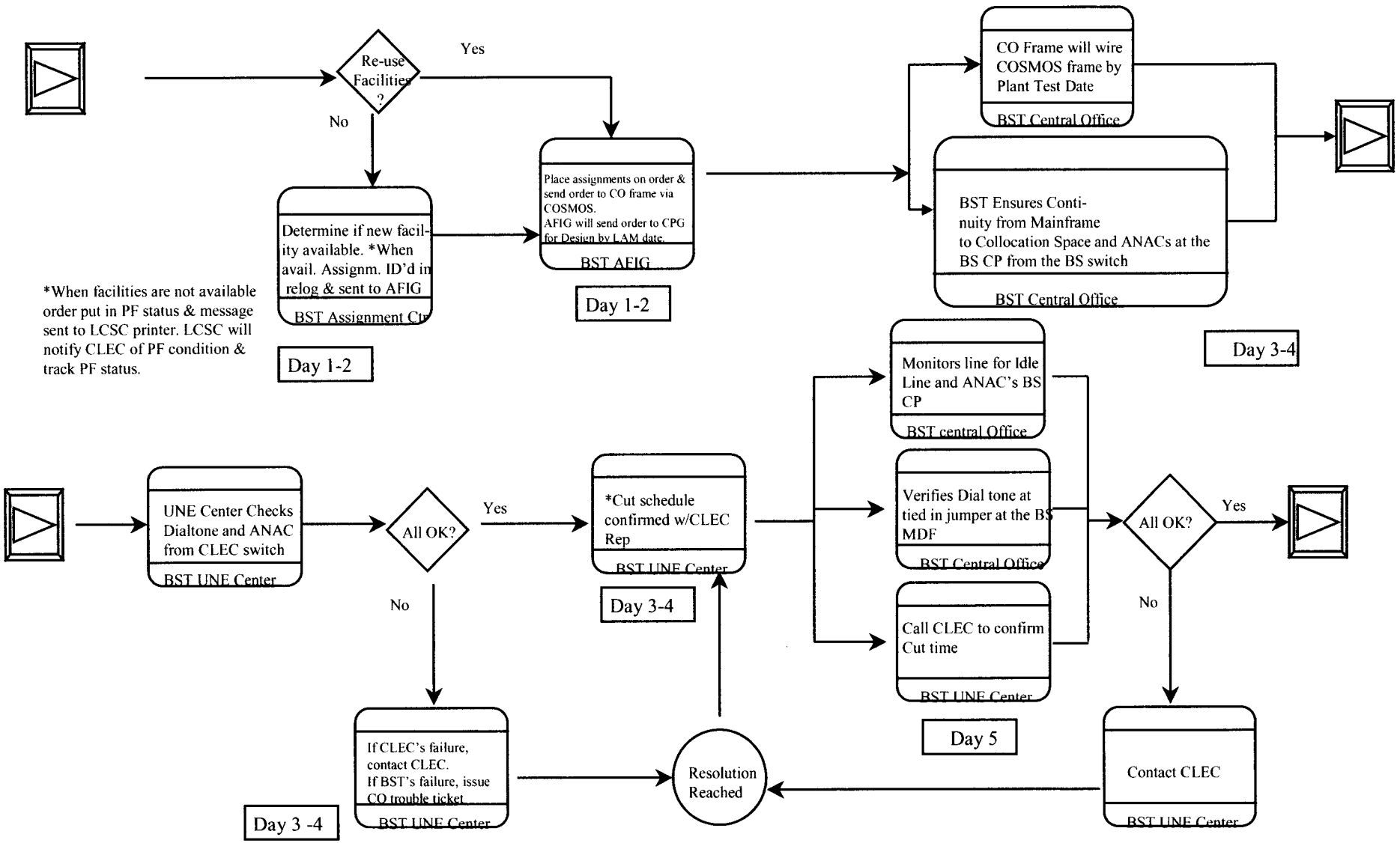


Issue 2,
4/18/00

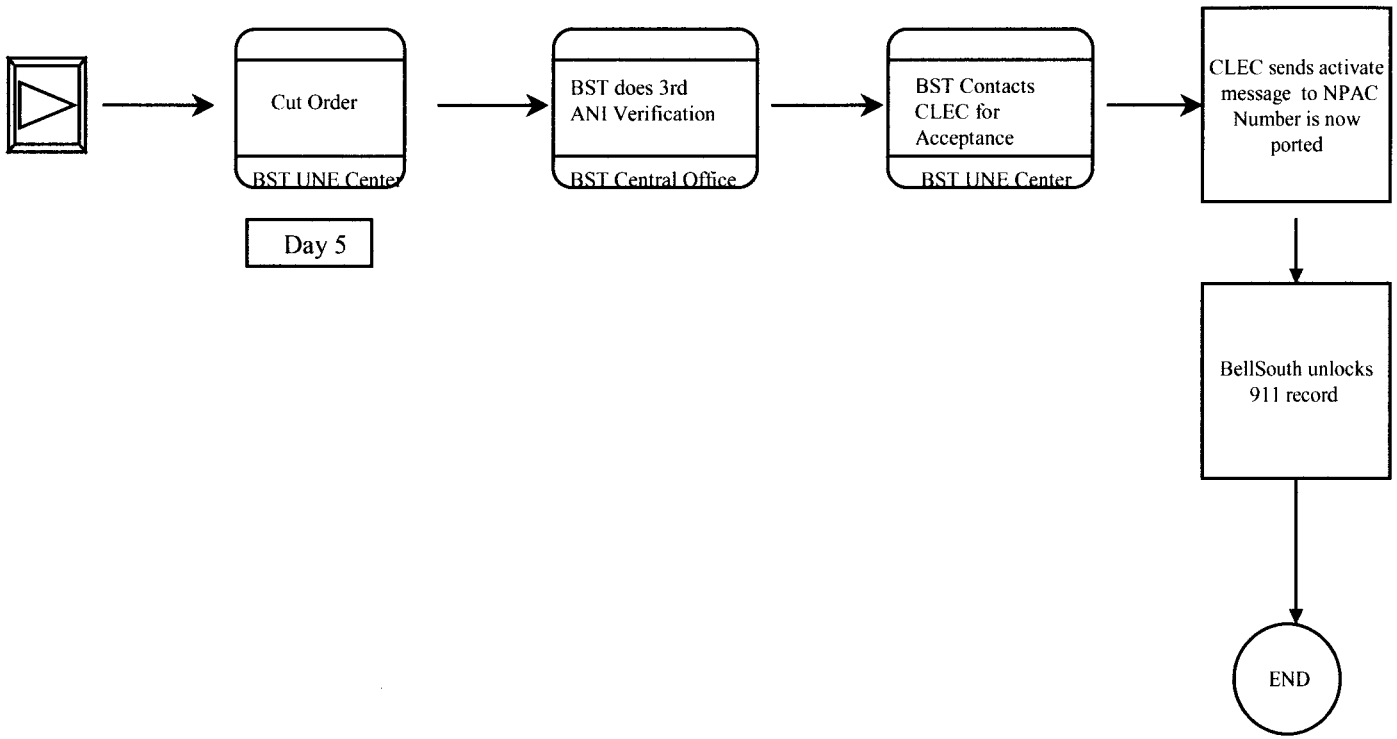
Coordinated Hot Cut Process



Coordinated Hot Cut Process



Coordinated Hot Cut Process



The intervals depicted are business days and assume the order is transmitted and processed mechanically and or manually or electronically and requires manual handling, and received by the LCSC prior to 10 AM location time of the respective LCSC. Manual requests or requests requiring manual handling received after 10 AM, add 1 business day.
The LCSC is located in Bir/Atl
The AFIG is located in Tn
The UNE Center is located in Bir/Atl
The Co is located in Tn
The CPG is located in Tn

WKM-4
UNE CENTER PROCEDURES

Non-design Unbundled Voice Loops and Non-design Unbundled Sub-Loops
UNE Center Procedures

Conversion Coordination

PRESERVICE: For coordinated UVL or USL conversions the UNE Center will contact the CLEC 24/48 hours prior to due date to confirm conversion date and time. Time specific requests by the CLEC is identified on the service order behind the OCOSL USOC. The UNE center will hand off an appointment ticket within 48 hours prior to the Due Date, or as soon as possible upon receipt of the assignments on the order. Coordinated non time specific requests will be scheduled at the discretion of the UNE center and CLEC notified. Non coordinated SL1s will not have pre Due Date notification by the UNEC. Prior to the coordinated conversion the UNEC will check COSMOS for an ID jeopardy to ensure the CO is wired. If COMOS does not show the ID jeopardy, the UNEC will call the CO to determine pre-wiring status.

DUE DATE: .For coordinated SL1 UVL conversions the UNEC will contact the CO. Handoff for a test assist ticket does not apply on SL1's. The UNEC will have the C.O. Tech access the existing BellSouth Cable and Pair at the cut point. The C.O. Tech will ANAC the BellSouth line to ensure the assignments on the order are correct. The UNEC and C.O. Tech will resolve any discrepancies. The UNEC will then have the C.O. Tech check for CLEC dialtone on all circuits at the cut point. CLEC dialtone must be present on all circuits for the conversion to continue. If the CO technician advises the UNEC that the line is in use, the UNEC will contact the CLEC for assistance. At the direction of the CLEC, the conversion will either be initiated or the order will be placed in an MA status per the UNEC SD/MA policy.

- CLEC will be notified on due date of conversion. If contact is unsuccessful, conversion will proceed at appropriate time.
- If CLEC dialtone is present, continue to next paragraph.
- If dialtone is not present at the cut point for any one of the circuits, have the C.O. Tech go the C.O. demarcation point (Collocation Cable and Pair) and test for CLEC dialtone.
  - If dialtone is present at the demarcation point have the C.O. Technician isolate and clear the wiring trouble in the C.O. Redo this work step.
  - If dialtone is not present at the demarcation point, the C.O. Technician will inform the UNEC. The UNEC will inform the CLEC and give the CLEC 15 minutes to correct the problem.
    - If the CLEC can correct the problem in the allotted time, repeat this work step.
    - If the CLEC cannot correct the problem in the allotted time, the UNEC will call off the conversion and place the order into a MA status according the the UNEC SD/MA policy.

When CLEC dialtone has been verified the cutwill begin. The UNEC will start the Coordinated

Cut Scheduling System (CCSS) conversion timer as appropriate. After the C.O. Tech advises the UNEC the cutover has been completed the UNEC will stop the CCSS conversion timer. Have the C.O. Tech go to the end user side of the cut point. Then use the
CLEC ANAC code, to ANAC the UVL. Note the CLEC number and match against the
CLEC telephone number associated with the UVL on the cut sheet.

- If the numbers match, continue on to next work step.
- If the numbers are different, have the C.O. Tech isolate and clear the trouble. After the trouble has been resolved redo this step.
- If the numbers are different, but no BellSouth trouble can be isolated and cleared, inform the CLEC that they may have a potential translations problem in their switch. There are certain types of legitimate end-user services where the telephone number you call to reach that end-user, and the telephone number you hear when you ANAC the circuit will be different. The CLEC will have to determine if this is the cause of the ANAC mismatch. An example of when this will occur is with terminals within a Multiline Hunt Group (MLHG). Usually the terminals in the MLHG will ANAC the Main Telephone Number assigned to terminal one (1) in the group.

Notify the CLEC of the completed conversion.
Upon CLEC acceptance the associated service orders will be completed in WFA and SOCS. For coordinated USL conversions, the UNEC will wait for the outside technician to get to the crossbox or equipment room. The UNEC should have the FWG Tech ANAC the BellSouth pairs prior to conversion to verify assignments. CLEC dialtone will also be verified prior to the conversion. The CLEC will then be advised that the cut will begin. The UNEC will document the conversion time in CCSS as appropriate. Upon CLEC acceptance the associated service orders will be completed in WFA and SOCS.

DUE DATE: SL1 UVL non coordinated conversion due date activities for the UNE Center require only post conversion notification to the CLEC and tracking for network order completion. The UNEC will be notified of order completion by EnDI and the UNEC will place a notification call to the CLEC. The UNEC will follow up on any order pending completion as of 2:30 PM on the due date. The UNE Center will escalate all pending orders to the WMC in order to meet the service due date. The UNE Center will also be the CLEC point of contact for any SL1 non coordinated order provisioning issue. The UNE Center will complete or validate completion of the service order after CLEC notification.

Designed 2 Wire Loop and Ground Start - Unbundled Voice Loop
UNE Center Procedures

Testing

Pre-Service Testing Requirements for Due Date

Once wiring steps have posted complete in WFA/DI, perform all pretesting that is applicable. It is very important that continuity has been verified from the interface facility of the CLEC to the main frame of the Unbundled Loop. The UNEC should validate via dial tone verification test if test points are available. If test points are not available the UNEC will hand off to the CO for a test assist. The UNEC must TEST, TRACK, and ESCALATE until all pre-work has been completed. The CLEC will be contacted 24 to 48 hours prior to DD to confirm conversion schedule. The UNEC will attempt to handoff an appointment ticket (work-type AP) within 48 hours of the DD, or as soon as possible upon receipt of the engineering WORD document.

Check in WFA/C RO field of the OSSOI screen or behind the RRSO FID of the SOCS order for any other related order activity.

Testing Requirements for Due Date

The UNEC tech will handoff an immediate test assist ticket, Work Type IA, to the C.O. The UNEC will then call the C.O. If the handoff goes to the toll group in the C.O. and the toll group does not do these conversions it is the responsibility of the C.O. Toll Tech to get this handoff to the correct person in the C.O. It is not the responsibility of the UNEC to handoff to the frame. The C.O. Tech will show the work time taken to complete the conversion against this test assist ticket.

The CLEC will be notified on the due date of conversion. If contact attempt is unsuccessful, the conversion will proceed at the appropriate time.

For the existing service on the disconnect order, have the C.O. Tech go to BellSouth Cable Pair, pull BellSouth dial tone and ANAC the cable pair and verify that the exiting service on the D order is working to the documented assignments.

- If the existing service is working as documented, continue on to next paragraph.
- If the existing service is not working as assigned, the C.O. Tech will resolve the assignment error. Then redo this workstep.
- If the existing service is in a trouble condition the C.O. Tech will resolve the trouble. Then redo this workstep.

Have the C.O. Tech go to the cut point for Unbundled Loop. Have the C.O. tech check for CLEC dialtone on each of the circuits on the service order. CLEC dialtone must be on all circuits on an order for the conversion to continue. If the CO technician advises the UNEC that the line is in use, the UNEC will contact the CLEC for assistance. At the direction of

the CLEC, the conversion will either be initiated or the order will be placed in an MA status per the UNEC SD/MA policy..

- If dialtone is present at the cut point for each circuit, have C.O. tech begin the conversion. Start the CCSS timer for the conversion, and proceed to the next paragraph.
- If dialtone is not present at the cut point for any one of the circuits, have the C.O. Tech go the the C.O. demarcation point (Collocation Cable and Pair) and test for CLEC dialtone.
    - ♦ If dialtone is present at the demarcation point have the C.O. Technician isolate and clear the wiring trouble in the C.O. Redo this workstep.
    - ♦ If dialtone is not present at the demarcation point, the C.O. Technician will inform the UNEC. The UNEC will inform the CLEC and give the CLEC 15 minutes to correct the problem.
        - ➢ If the CLEC can correct the problem in the allotted time, repeat this workstep.
        - ➢ If the CLEC cannot correct the problem in the allotted time, the UNEC will call off the conversion and place the order into a MA status according the the UNEC SD/MA policy.

On cutovers that use new facilities, the cut point may be at the F2 facility or at the Network Interface. **It is very important on Network Interface Cut points, that the existing Network Interface is reused.**

Have the Field Work Group (FWG) Tech prior to conversion, go to the cut point pull BellSouth dial tone and ANAC the cable pair and verify that the existing service on the D order is working to the documented assignments.

- If the existing service is working as documented continue to next paragraph.
- If the existing service is not working as assigned, the FWG tech will resolve the assignment error. After the assignment error has been resolved, have the FWG redo this workstep.
- If the existing service is in a trouble condition the FWG tech will resolve the trouble. After the trouble condition has been resolved, redo this workstep.

Have the Field Work Group (FWG) Tech check each circuit on the order for CLEC dialtone. CLEC dialtone must be present on all circuits on the service order to proceed with the conversion.

- If CLEC dialtone is present on all circuits, have the FWG Tech begin the conversion. Start the CCSS timer, and proceed to the next paragraph.
- If CLEC dialtone is not present on all circuits, the UNEC will coordinate the FWG Tech and a C.O. Tech in determining if CLEC dialtone is present at the C.O. demarcation point (CLEC Cable and Pair).
    - ♦ If dialtone is present at the demarcation point, have the C.O. and FWG Techs isolate the wiring trouble and repair. Repeat this work step.
    - ♦ If dialtone is not present at the demarcation point, the C.O. Technician will inform the UNEC. The UNEC will inform the CLEC and give the CLEC 15 minutes to correct the problem.
        - ➢ If the CLEC can correct the problem in the alloted time, repeat this work step.
        - ➢ If the CLEC cannot correct the problem in the alloted time, the UNEC will call off the conversion and place the order into a MA status according the

the UNEC SD/MA policy.

Due to contract negotiations the CLECs have the opportunity to specify a time window for the cutover. The negotiated time for conversion must be met. Failure to do so could result in rebating the non-recurring service order charges back to the CLEC based on contract language.

After the cutover is complete have the C.O. Tech/FWG Tech go to the end user side of the cut point. Then use the CLEC ANAC code, to ANAC the UVL. Note the CLEC number and match against the CLEC telephone number associated with the UVL on the cut sheet.

- If the numbers match, continue on to next workstep.
- If the numbers are different, have the C.O. Tech/FWG Tech isolate and clear the trouble. After the trouble has been resolved redo this step.
- If the numbers are different, but no BellSouth trouble can be isolated and cleared, inform the CLEC that they may have a potential translations problem in their switch. There are certain types of legitimate end-user services where the telephone number you call to reach that end-user, and the telephone number you hear when you ANAC the circuit will be different. The CLEC will have to determine if this is the cause of the ANAC mismatch. An example of when this will occur is with terminals within a Multiline Hunt Group (MLHG). Usually the terminals in the MLHG will ANAC the Main Telephone Number assigned to terminal one (1) in the group.

After the CO technician advises the UNEC that the cutover has been completed, the UNEC will stop the CCSS conversion timer and notify the CLEC of the completed conversion

9.0 CENTRAL OFFICE UNBUNDLED LOCAL LOOPS PROVISIONING JOB AID

9.1 **SL2 Unbundled Loop Design Circuits**

9.2 All designed circuits will be manually coordinated by the UNE Center
2 WFA/DI Tickets Issued
PSA Ticket to provision TIRKs Circuits
LNP or UNE Ticket to provision the COSMOS Circuits

9.3 **UNE** tickets will consist of orders with all facilities in a Spare Pending Connect Status. These orders may be wired, tested, and completed prior to the order Due Date. Presence of CLEC Dial Tone or Signaling is not required. A cross office continuity test must be preformed. The WFA/DI tickets must be completed 100%. The 'Start Date & Time' fields must be populated prior to WFA/DI ticket completion.

9.4 **LNP** tickets consist of orders reusing the BellSouth Cable Pairs (CP). These circuits must be wired (made ready at the BellSouth CP) and a cross office continuity test performed from the CLEC demarcation point (POT) to the tied in jumper at the BellSouth CP on or before WOT date. If this is a voice grade circuit, the BellSouth line should be ANAC'd to insure Database integrity. If the TN that is ANAC'd and the TN in COSMOS do not match, the Central Office (CO) will place this order in A1 jeopardy with a remark noting the actual working TN on that Cable Pair.

9.5 PSA ticket with a WOT step should be completed 100%.

9.6 LNP ticket should be completed 100%.

9.7 UNE Center will issue a SPLAP (work code of NT) ticket notifying CO of cut 48 hours prior to due date. For a non-attended office or outside of normal business hour cuts, the CO technician should notify the Network Manager and complete ticket 100%. The TIRKS engineering is not always available 48 hours prior to due date so the UNE Center will issue the appointment ticket as soon as the engineering is available.

9.8 UNE Center will issue a SLPIA ticket and call the CO to cut the circuits.

9.9 CO will advise UNE Center to Hold and proceed to cut location (BellSouth CP).

9.10 If voice grade circuit, CO will test for CLEC Dial Tone (DT) at tied in jumper.

9.11 If No Dial Tone (NDT), CO will go to Demarcation point (POT) and test for CLEC DT. If CLEC DT is not present, CO will remove the bridging clips, wait 2 minutes, and retest on CLEC side. When NDT condition exists from CLEC equipment, CO will advise UNE Center of specific CLEC CP that NDT condition is on. If a multi-line order, no cuts will be made if NDT condition exists on one or more circuits.

9.12 If CLEC DT is present at tied in jumper, CO will monitor the BellSouth line. If the line is idle, CO will ANAC the BellSouth TN. When the line is not idle, CO will notify the UNE Center that the conversion can not continue and the UNE Center will direct further activities. If the BellSouth TN does not match the Service Order, CO will locate the correct CP. When CLEC DT is present on the tied in jumper and the BellSouth TN is ANAC'd, CO will advise UNE Center that they are ready to begin the conversion. CO will remove jumper from BellSouth Cable Pair and terminate tied in jumper. CO will ANAC the line and report the CLEC TN to UNE Center. CO will remain on line with UNE Center until CLEC has accepted circuit.

9.13 If DDS grade circuit, CO will test for proper Signaling at tied in jumper.

9.14 If No Signaling (NS), CO will go to Demarcation point (POT) and test for CLEC Signaling. When NS condition exists from CLEC equipment, CO will advise UNE Center of specific CLEC CP that NS condition is on. If a multi-line order, no cuts will be made if NS condition exists on one or more circuits.

9.15 If Signaling is present at tied in jumper, CO will advise UNE Center that they are ready to begin the conversion. CO will remove jumper from BellSouth Cable Pair and terminate tied in jumper. CO will advice UNE Center when all circuits have been cut. CO will remain on line with UNE Center until CLEC has accepted circuit.

9.16 When UNE Center advises CO that CLEC accepted circuit, the CO will complete the SLPIA ticket 100%.

NOTE 1: If Unbundled DS1 Loops (Hicap), the WFA/DI tickets will be SPAH for provisioning, HISAP for the appointment ticket, and HISPIA for the cut.

NOTE 2: The industry standard ANAC number is 800-223-1104. If this number does not work contact the UNE Center and have them acquire the CLEC's ANAC number.

10.0 CENTRAL OFFICE UNBUNDLED LOCAL LOOPS PROVISIONING JOB AID

10.1 **SL1 Unbundled Loop Non-Designed Circuits with a Frame Due Time (FDT) of 9:00pm**

10.2 Non-designed circuits with a FDT of 9:00pm (Circuit ID of TYNU) will be voice grade circuits and will be manually coordinated by the UNE Center. A single WFA/DI ticket (LNP or UNE) will be issued for the provisioning of each order. The LNP or UNE ticket will contain the COSMOS Work Package Number (WPN).

10.3 **UNE** tickets will consist of orders with all facilities in a Spare Pending Connect Status. These orders may be wired, tested, and completed prior to the order Due Date. Presence of CLEC Dial Tone is not required. If No Dial Tone (NDT) exists Central Office (CO) will perform a cross office continuity test. The WFA/DI ticket must be completed 100%. The 'Start Date & Time' fields must be populated prior to WFA/DI ticket completion.

10.4 **LNP** tickets consist of orders reusing the BellSouth Cable Pairs (CP). These circuits must be wired (made ready at the BellSouth Cable Pair) and a cross office continuity test performed from the CLEC demarcation point (POT) to the tied in jumper at the BellSouth CP before the due date. CO will ANAC the BellSouth line to insure Database integrity. If the TN that is ANAC'd and the TN in COSMOS do not match, the CO will place this order in A1 jeopardy with a remark noting the actual working TN on that Cable Pair.

10.5 After successfully wiring and testing, the COSMOS WPN will be placed in ID jeopardy (Hold for Call) and the WFA/DI ticket will be completed 100%. The 'Start Date and Time' fields must be completed.

10.6 The Frame Output will be filed in a unique ID Jeopardy folder, bin, file, etc. on the local frame desk.

10.7 UNE Center will issue a NDSAP (work code of ND) ticket notifying CO of cut 48 hours prior to due date. For a non-attended office, outside of normal business hour cuts, or if a Time Specific cut, the CO technician will notify his/her Network Manager and complete ticket 100%. Orders are not always assigned 48 hours prior to Due Date so the UNE Center will input the appointment ticket as soon as the Order is available.

10.8 UNE Center will call the CO to cut the circuits.

10.9 CO will advise UNE Center to hold and proceed by testing for Dial Tone (DT) from the CLEC at the tied in jumper at the BellSouth CP. If multi-line order, DT should be checked on all circuits prior to making any cuts. No circuits are to be cut if No Dial Tone (NDT) condition exists on one or more circuits.

10.10 If NDT, CO should proceed to the CLEC Demarcation point (POT) and test for DT. If CLEC DT is not present, CO will remove the bridging clips, wait 2 minutes and retest on CLEC side. If NDT from CLEC equipment, CO will notify UNE Center of problem with specific CLEC CP having NDT condition.

10.11 If CLEC DT is present at tied in jumper, CO will monitor the BellSouth line. If the line is idle, CO will ANAC the BellSouth TN. When the line is not idle, CO will notify the UNE Center that the conversion can not continue and the UNE Center will direct further activities. If the BellSouth TN does not match the Service Order, CO will locate the correct CP. When CLEC DT is present on the tied in jumper and the BellSouth TN is ANAC'ed, CO will advise UNE Center that they are ready and to start the conversion. CO will remove jumper from BellSouth Cable Pair and terminate tied in jumper. CO will ANAC the line and report the CLEC TN to UNE Center. CO will remain on line with UNE Center until CLEC has accepted circuit.

10.12 CO will remain on the line with the UNE Center until they report acceptance from the CLEC.

10.13 CO will create a SONPK ticket in WFA/DI to report conversion time and complete the order directly in COSMOS.

NOTE 1: The industry standard ANAC number is 800-223-1104. If this number does not work contact the UNE Center and have them acquire the CLEC's ANAC number.

11.0 CENTRAL OFFICE UNBUNDLED LOCAL LOOPS PROVISIONING JOB AID

11.1 **SL1 Unbundled Loop Non-Designed Circuits With A Frame Due Time (FDT) of 3:30pm**

11.2 Non-designed circuits with a FDT of 3:30pm (Circuit ID of TYNU) will be non-coordinated voice grade circuits. Central Office (CO) will cut these circuits anytime on the DUE DATE.

11.3 A single WFA/DI ticket (LNP or UNE) will be issued for the provisioning of each order.

The LNP or UNE ticket will contain the COSMOS Work Package Number (WPN).

11.4 **UNE** tickets will consist of orders with all facilities in a Spare Pending Connect Status. These orders may be wired, tested, and completed prior to the order Due Date. Presence of CLEC Dial Tone is not required. If No Dial Tone (NDT) exists CO will perform a cross office continuity test. The WFA/DI ticket must be completed 100%. The 'Start Date & Time' fields must be populated prior to WFA/DI ticket completion.

11.5 **LNP** tickets consist of orders reusing the BellSouth Cable Pairs (CP). These circuits must be wired (made ready at the BellSouth Cable Pair) and a cross office continuity test performed from the CLEC demarcation point (POT) to the tied in jumper at the BellSouth CP before the Due Date. CO will ANAC the BellSouth line to insure Database integrity. If the TN that is ANAC'd and the TN in COSMOS do not match, the CO will place this order in A1 jeopardy with a remark noting the actual working TN on that Cable Pair.

11.6 After successfully wiring and testing, the WFA/DI ticket will be completed at 10%.

11.7 Frame output should be filed by Due Date at the Frame desk.

11.8 The CO will cut the circuit(s) on the Due Date.

11.9 If No Dial Tone (NDT) on the tied in jumper, CO will proceed to the CLEC Demarcation point (POT) and test for DT. If DT is not present, CO will remove the bridging clips wait 2 minutes, and retest on CLEC side. If NDT from CLEC, CO will place the COSMOS WPN in I4 jeopardy, complete the WFA/DI ticket at 20%. On multi-line orders no circuits are to be cut if NDT condition exists on one or more circuits.

11.10 The Frame Output will be filed in a unique I4 Jeopardy folder, bin, file, etc., on the local frame desk.

11.11 If CLEC DT is present at tied in jumper, CO will monitor the BellSouth line. If the line is idle, CO will ANAC the BellSouth TN. When the line is not idle, CO will monitor the BellSouth line every 5 to 10 minutes until the line is idle. If the BellSouth TN does not match the Service Order, CO will locate the correct CP. When CLEC DT is present on the tied in jumper and the BellSouth TN is ANAC'd, CO will lift off jumper at BellSouth CP and terminate the tied in jumper. CO will complete the WFA/DI ticket 100% as soon as cut is completed. The 'Start Date and Time' fields must be completed prior to WFA/DI ticket completion.

NOTE 1: The industry standard ANAC number is 800-223-1104. If this number does not work contact the UNE Center and have them acquire the CLEC's ANAC number.

WKM-5

TURN-UP DESIGNED INSIDE-CUT-ONLY CONVERSIONS

AND

TURN-UP NON-DESIGNED INSIDE-CUT-ONLY COORDINATED CONVERSIONS

BELLSOUTH

Work Instruction
UTDIC001
Issue 2f, November, 2000

Turn Up – Designed Inside Cut Only, Conversions

Network Services – Carrier Services

Copyright

June, 1999 - December, 2000

James Ennis, Manager
205/714–0191

Contents

Introduction

Purpose

This document presents the purpose, scope, responsibilities and actions associated with the turn-up of CWINS/ UNE Center Designed Inside-Cut-Only Conversion Orders.

Version Information

Table A Revision History

Chapter	Action Request #	Date/Issue	Description
new section	N/A	December 15, 2000 / 2f	Update to add section on time specific negotiation
Step Action Table, Step #26	AR 1875	November 28, 2000 / 2e	Update to change action taken for listing orders in HC status. Update by Jim Ennis.
ALL	N/A	September 18, 2000 / 2d	Update to true documentation rkw
Step Action Table	AR 2449	August 01, 2000 / 2c	Correct link in step action table RKW
Step Table, Step #12 Note	N/A	June 5, 2000 / 2d	Changes per Glen Miller to establish conversion time specific goal.
Flow and Step Tables	N/A	May 08, 2000 / 2c	Changes by Glen Miller to update per latest CO/WINS/UNEC M&P.
Title page and title	N/a	March 9, 2000 / 2b	Added id quik15 to titlepage tag for linking from external documents. Also changed title to be more consistent with other provisioning work instructions.
Para. 1.2 and step 27 of step table	AR1968	March 3, 2000 / 2a	Included references to Job Aid for Provisioning Performance Review.
1.3	1793	January 28, 2000 / 2	Revised step #23 in table so it will link to WINS/UNEC acceptance policy instead of control office practice for TR administration (WBL)
All	N / A	November 10, 1999 / 1c	General Revision

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Table A Revision History (continued)

Chapter	Action Request #	Date/Issue	Description
Order Turn-Up	1478 & 1479 & 1498	08/24/99 / 1b	Revised step action table to step 25 & 26 to
All	n/a	7/5/99 / 1a	Revised step table
All	n/a	6/1/1999 / 1	New document

1. Order Turn-Up

1.1 Purpose/Scope

This document presents the steps and associated actions required to successfully complete turn-up of CWINS/ UNE Center Designed Inside-Cut-Only Conversion Orders.

1.2 Responsibilities

This document describes the responsibilities of the Electronic Technician (ET) and/or Maintenance Administrator (MA) in turning up Center Designed Inside-Cut-Only Conversion Orders. Also refer to JA-PETT-001, Job Aid for Provisioning Performance Review, requirements.

1.3 Requirements

1.3.1 Steps for Turning Up CWINS/ UNE Center Designed Inside-Cut-Only Conversion Orders

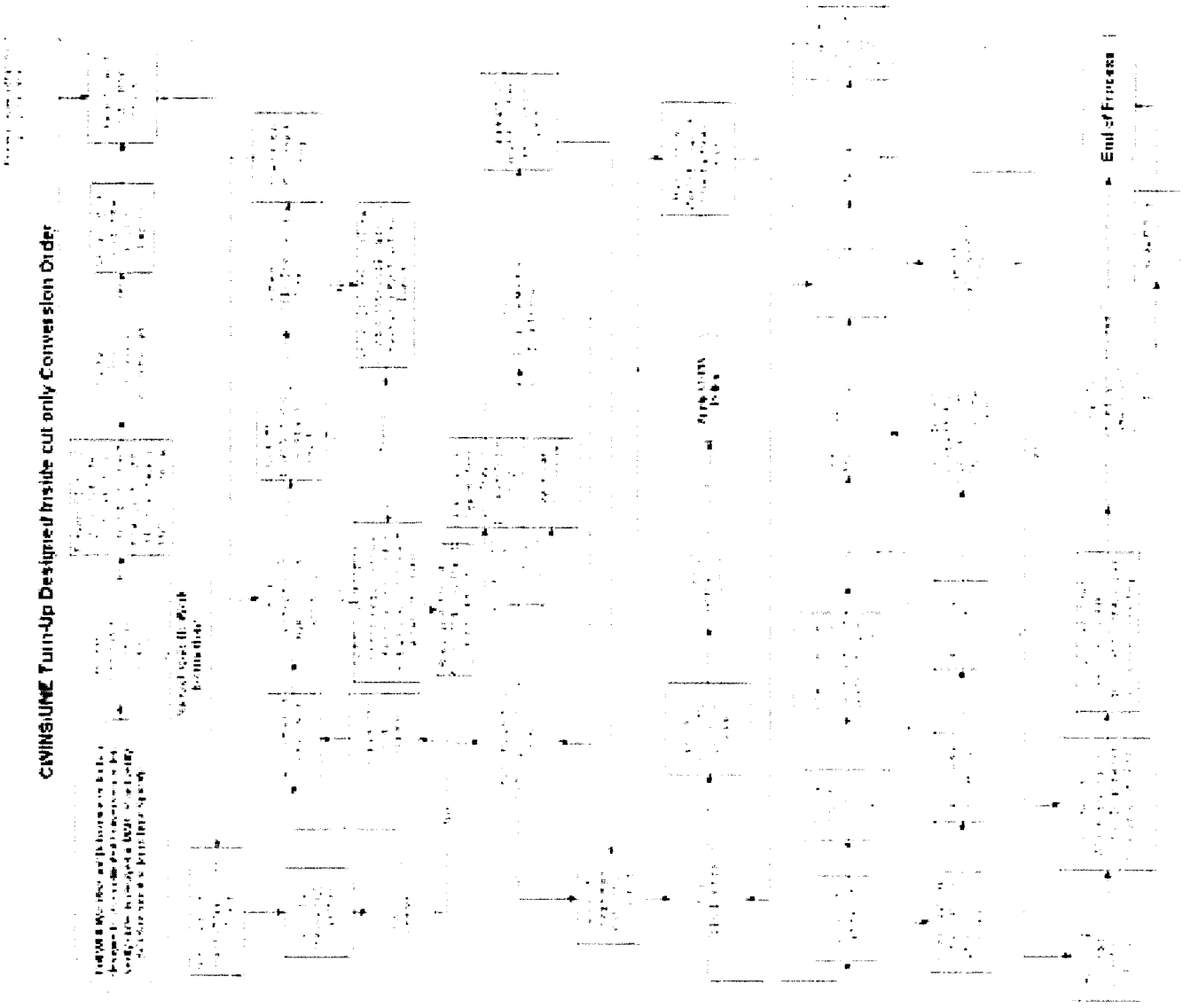

Figure 1 Inside Cut Only Conversion

The ET/MA will complete the following actions:

Step	Action	If / Then
1	Pull WFA worklist and determine if order is a designed CO coordinated conversion order. Verify that the order is delayed in MARCH and verify SOCS to see if order is Time Specific.	If order is a coordinated conversion order Proceed to next step. If order is not a coordinated conversion order refer to task specific work instructions.
2	Between Due Date-1 and Due Date-2, call CLEC to verify order Due Date and content. CLEC may check for LNP Concurrence. Are there Due Date discrepancies?	If no, proceed to next step. If yes, advise CLEC to contact the LCSC to get discrepancy resolved. Once resolved proceed to next step.
3	Check to see if order is Time specific. (see note below for ***Time Specific)	Proceed to next step
4	Between Due Date-1 and Due Date-2 handoff an appointment ticket to the Central Office.	Proceed to next step.
5	On WOT+1, check WFA/DI load steps. Is wiring complete?	If yes, proceed to next step. If no, escalate, according to escalation procedure, until wiring is complete. Then proceed to next step.
6	Access test point and test. Does circuit test okay? Dial Tone and continuity inside CO?	If yes, skip to Step 10. If no, proceed to next step.
7	Handoff to CO to verify order is wired and correct to CO. Is there CLEC dial tone?	If yes, have CO correct the problem and return to step 6. If no, advise CLEC of no-dial-tone condition and when CLEC advises they have gotten Dial Tone, retest circuit, and proceed to next step.
8	Does circuit test OK?	If yes, proceed to next step If no, return to step 7.

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Step	Action	If / Then
9	On DD, contact CLEC to confirm schedule or make scheduling adjustment if mutually agreed, Hand-off a Test Assist Ticket, work type IA, to the CO. Call CO to advise that you are ready to do the cut. Is the CO ready to perform preconversion activity?	If yes, Skip to Step 12. If no, and order is not time specific, proceed to next step. If no, and order is Time Specific, escalate to WMC/CO for coverage, proceed to next step
10	Ask CO for a specific time when they will be ready to do the cut.	Proceed to next step.
11	Does response meet required time frame?	If no, escalate according to Escalation Procedure until CO is ready to perform preconversion activity, proceed to next step. If yes, proceed to next step.
12	Ask CO to begin their ANAC and Dial Tone test.	
13	Is there CLEC dial tone?	If yes, Advise the CO will START the cut. Skip to step 15. If no, advise CLEC of no-dial-tone condition and proceed to next step.
14	Can the CLEC get dial tone on the circuit?	If yes, have the CO retest the circuit and return to step 13. If no, apply SD/MA policy. **END OF PROCESS**
15	Record the START time in the CCSS system. **Note:** Note: For Time Specific Conversions the WINS/UNEC goal is to begin the conversion at the scheduled time; however, we will use best effort to begin the conversion within +/- 15 Min. of the scheduled time.	
16	When CO advises cut is complete, record test results and the END time in the CCSS system.	

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Step	Action	If / Then
17	Is the order ILNP?	If yes, access MARCH system and record start time in the CCSS system. If no, proceed to step 21.
18	Release the MARCH orders	
19	Resolve any rejects.	
20	Once order is accepted by the switch, record the END time in the CCSS system.	Proceed to next step.
21	Inform CLEC that the physical cut is complete	
22	CLEC tests circuit. Does the circuit test okay?	If yes, skip to step 24. If no, proceed to next step.
23	Work with CLEC, CO, and or OST to fix problem.	Return to step 22.
24	Can the CLEC accept the order at this time?	If yes, proceed to next step. If no, apply the UNE center acceptance policy and proceed to next step.
25	Complete order in WFA by placing an "O" by the Due Date and enter a remark and Depress PF11. **Note:** Ensure all entries are complete per additional Responsibilities and Requirements found in JA-PETT-001 , Job Aid for Provisioning Performance review.	

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Step	Action	If / Then
26	Complete all related orders. (Except those orders in an HC status. Like the N orders for listing.) **Note: If the order was for LNP, access the MARCH system and run the disconnect order** .	
27	Was this cut scheduled and completed afterhours?	If yes, create a bill on the OSSCSC screen **END OF PROCESS** If no this is the **END OF PROCESS**

This completes the turn up of CWINS/ UNE Center Designed Inside-Cut-Only Conversion Orders.

1.4 *** Time Specific*** Negotiate The Time for the Conversion of Service

Due to contract negotiations the CLECs have the opportunity to specify a time window for the cutover (Time Specific Conversions). In order to prevent miscommunications, 24/48 hours prior to Due Date, BellSouth will contact the CLECs and confirm agreement to Time Specific schedule or **mutually** renegotiate Time Specific schedule to meet load/force capabilities. **Mutually agreed** Time Specific schedule changes on the due date are not recommended but are acceptable to allow flexibility to meet the service order due date. All Time Specific schedule confirmations and mutually agreed reschedules must be documented in the WFA log and be accurately entered into CCSS to reflect the confirmed or mutually agreed Time Specific scheduled time.

A single CLEC request for multiple Time Specific conversions in a single central office at the same time should be negotiated for a sequential order conversion in order of CLEC preference, if requested. WFA log documentation should reflect this agreement and subsequent orders should have WFA log entries identifying the association with the first order in the conversion sequence. The Time Specific scheduled time in CCSS for the first conversion in the sequence must represent the CLEC requested schedule time or mutually negotiated schedule time. All following sequential order schedule times should be entered into CCSS to match the actual conversion start time.

Note: Individual CLEC contract language may differ slightly from the stated process and should be reviewed if necessary. The contract agreement supersedes any difference in the stated process and will be followed.

BELLSOUTH

Work Instruction
UTNIC001
Issue 2g, December, 2000

Turn Up – Non-Designed Inside-Cut-Only Coordinated Conversion

Network Services – Customer Services

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June, 1999 - December, 2000

James Ennis, Manager
205/714-0191

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Introduction

Purpose

This document presents the purpose, scope, responsibilities and actions associated with the turn-up of CWINS/ UNE Center Non-Designed Inside-Cut-Only Coordinated Conversion Orders.

Version Information

Table A Revision History

Chapter	Action Request #	Date/Issue	Description
All	N/A	December 21, 2000 / 2g	Update to add information on Time Specific
Step action table, step 25	AR 1875	November 28, 2000 / 2f	Update to change action taken on orders in HC status. Update by Jim Ennis.
ALL	N/A	September 17, 2000 / 2e	Update to true flows
Step action table	AR 2449	August 01, 2000 / 2d	Update to correct link
Titles	N/A	July 13, 2000 / 2c	Added "Coordinated" to titles per Glen Miller
Step Table and Flow	N/A	June 2000 / 2b	Changes to step and flow to agree with checklist items.
Responsibilities and step table #25	ar1968	March 17, 2000 /2a	Added reference to Provisioning Performances Review
Title page and Title	N/A	March 9, 2000 / 2	Added id quik10 to title page tag for linking from external documents. Also deleted UNE from title.
All	N / A	November 10, 1999 / 1c	General Revision
All	1478 & 1479 & 1498	August 24, 1999 / 1b	change steps 23 and 24 of step action table
Order Turn-Up	n/a	July 15, 1999 / 1a	Reformat table, update links
All	n/a	June 1, 1999 / 1	New document

1. Order Turn-Up

1.1 Purpose/Scope

This document presents the steps and associated actions required to successfully turn-up CWINS/ UNE Center Non-Designed Inside-Cut-Only Coordinated Conversion Orders.

1.2 Responsibilities

This document describes the responsibilities of the Electronic Technician (ET) and/or Maintenance Administrator (MA) in turning up CWINS/ UNE Center Non-Designed Inside-Cut-Only Conversion Orders. Additional Responsibilities and Requirements are found in JA-PETT-001, Job Aid for Provisioning Performance review.

1.3 Requirements

1.3.1 Steps for Turning Up CWINS/ UNE Center Non-Designed Inside-Cut-Only Coordinated Conversion Orders

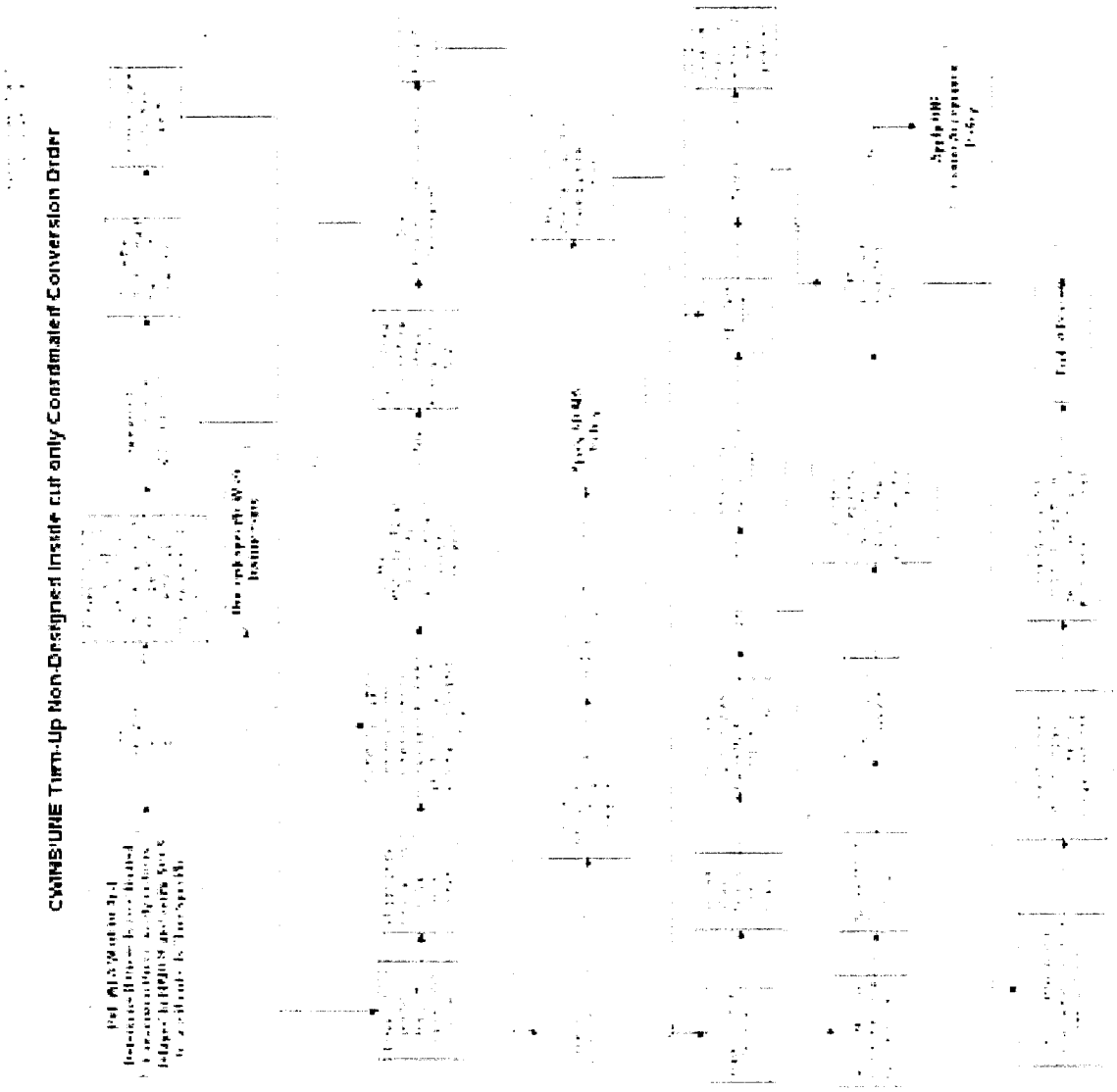

Figure 1 Turn Up — Non-Designed Inside-Cut-Only Coordinated Conversion

The ET/MA will complete the following actions:

Step	Action	If / Then
1	Pull WFA worklist and determine if order is inside coordinated conversion order. Verify the order is delayed in MARCH and verify in SOCS to determine if order is Time Specific.	If yes, (order is coordinated conversion order) proceed to next step If no, (order is not coordinated conversion) refer to Task specific work instructions.
2	Between Due Date -1 and Due Date -2, call CLEC to verify order due date and content. CLEC may check for LNP Concurrence. Are there Due Date or concurrence discrepancies?	If no, proceed to next step If yes, advise the CLEC to contact the LCSC to get discrepancy resolved. Once resolved proceed to next step.
3	Is the order time-specific? (see note below for ***Time Specific)	If yes, proceed to next step. If no, skip to Step 5.
4	Between Due Date -1 and Due Date -2, Handoff an appointment ticket.	
5	On Due Date, call the CLEC to confirm conversion schedule. At appropriate time call the CO to verify that CO is ready has completed preconversion verification and is ready to cut.	
6	Has CO ANAC'd BST Dial Tone (When appropriate) and ready to proceed?	If yes, skip to Step 8 If no, proceed to step 7.
7	Ask CO for a specific time when they will be ready to do the cut. Does response meet time frame?	If yes, return to step 5. If no, escalate, according to escalation procedure and go to step 8
8	Is there CLEC dial tone?	If yes, skip to Step 11. If no, call CLEC to advise them of no-dial-tone condition and proceed to next step.
10	Can the CLEC get dial tone on the circuit within the next 15 Min?	If yes, have the CO retest the circuit after CLEC says they have Dial Tone on circuit and then proceed to next step. If no, apply SD/MA policy. **END OF PROCESS**

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Step	Action	If / Then
11	Have CO start the cut.	
12	Record the START time in the CCSSsystem. Note: Foe Time Specific conversions the WINS/UNEC goal is to begin the conversion at the scheduled time; however, we will use best effort to begin the conversion within +/- 15 Min. of the scheduled time.	
13	When CO advises cut is complete, record test results and END time in the CCSS system.	Proceed to next step.
14	Is the order ILNP or LNP?	If the order is ILNP go to step 18. If the order is LNP go to step 15.
15	Inform the CLEC the physical cut is complete.	
16	CLEC tests circuit. Does the circuit test okay?	If yes, skip to Step 22 If no, proceed to next step.
17	Work with the CLEC, CO and outside technician to fix the problem.	Return to Step 16.
18	Access MARCH and release translation orders.	
19	Record the START time in the CCSSsystem.	
20	Resolve any rejects.	
21	Once the orders are accepted by the switch, record the END time in the CCSS system.	
22	Can the CLEC accept the order at this time?	If yes, proceed to next step. If no, apply the UNE center acceptance policy
23	Access MARCH system and release disconnect orders. (LNP only)	

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Step	Action	If / Then
24	Complete order in WFA: place an "O" by Due Date, and depress PF11. **Note:** Ensure all entries are complete per additional Responsibilities and Requirements found in JA-PETT-001, Job Aid for Provisioning Performance review.	
25	Complete all related orders. (Except those orders in an HC status, like the N orders for listing.)	End of Process

This completes the turn up of CWINS/ UNE Center Non-Designed Inside-Cut-Only Conversion Orders.

1.4 *** Time Specific*** Negotiate The Time for the Conversion of Service

Due to contract negotiations the CLECs have the opportunity to specify a time window for the cutover (Time Specific Conversions). In order to prevent miscommunications, 24/48 hours prior to Due Date, BellSouth will contact the CLECs and confirm agreement to Time Specific schedule or **mutually** renegotiate Time Specific schedule to meet load/force capabilities. **Mutually agreed** Time Specific schedule changes on the due date are not recommended but are acceptable to allow flexibility to meet the service order due date. All Time Specific schedule confirmations and mutually agreed reschedules must be documented in the WFA log and be accurately entered into CCSS to reflect the confirmed or mutually agreed Time Specific scheduled time.

A single CLEC request for multiple Time Specific conversions in a single central office at the same time should be negotiated for a sequential order conversion in order of CLEC preference, if requested. WFA log documentation should reflect this agreement and subsequent orders should have WFA log entries identifying the association with the first order in the conversion sequence. The Time Specific scheduled time in CCSS for the first conversion in the sequence must represent the CLEC requested schedule time or mutually negotiated schedule time. All following sequential order schedule times should be entered into CCSS to match the actual conversion start time.

Note: Individual CLEC contract language may differ slightly from the stated process and should be reviewed if necessary. The contract agreement supersedes any difference in the stated process and will be followed.

WKM-6

END OFFICE HANDLING OF OPERATOR AND DIRECTORY ASSISTANCE CALLS OF BELLSOUTH AND ALEC END-USERS

End Office Handling of Operator and Directory Assistance Calls
Of
BellSouth and ALEC End-Users

1. Introduction

1.1. Scope and Purpose

The purpose of this paper is to show the service parity that exists between BellSouth Telecommunications Inc. (BellSouth) Retail customers and Alternate Local Exchange Carrier (ALEC) customers. It will compare Retail vs. Resale, Retail vs. Unbundled Network Element (UNE) with respect to functions that involve a BellSouth switch and Retail vs. UNE or Resale with the Selective Call Routing option. This includes the dial tone provided to the lines, both BellSouth and ALEC, and the routing of the calls to the various trunk groups. In each case, BellSouth provides parity, subject only to the ALEC's ordering of sufficient facilities to deliver its customized traffic to the BellSouth switch.

1.2. General

Switch translations as defined here are the variable software parameters that allow for individual line identification, vertical services capability, and the applicable Automatic Message Accounting (AMA) recording. The term also applies to the routing schemes based on a defined trunking architecture. In BellSouth, switch translations provisioning is performed by eight geographic software centers supported by a regional staff. This regional staff provides written methods and procedures for new services and features, as well as day-to-day support.

Dial tone, access to subscribed features, and access to all trunk groups in the BellSouth end offices is provided to customers on a first come, first served basis.

2. ALEC Resale Customer vs. BellSouth Retail Customer:

ALEC Request for Service:

An ALEC orders service for its customer by submitting the required forms to the Local Carrier Service Center ("LCSC"). The LCSC serves as BellSouth Telecommunications' point of contact for processing local service requests from ALECs. One of the required forms for Resale the ALEC submits to the LCSC is the Resale Service Form. It is on this form that the ALEC lists appropriate Universal Service Order Codes (USOCs). The USOC identifies specific items of service or equipment. It is also on the Resale Service Form that the ALEC lists any call blocking or calling restrictions, such as 900 and 976 blocking.

The LCSC generates a BellSouth service order once all information is received from the ALEC. The BellSouth service order contains the USOCs required to provide the service. The service order also carries a special Field Identifier Code ("FID"). The FID provides a four-digit code that identifies the ALEC to the billing system. The FID is not input into the switch.

BellSouth Customer Request for Service:

A BellSouth customer orders service from the BellSouth Business Office. The BellSouth business office generates a BellSouth service order. The BellSouth service order contains the USOCs required to provide the service.

Service Order Flow:

BellSouth Retail customer service orders and ALEC Resale customer service orders utilize the exact same USOCs. The service orders enter a system called the Line Class Code Assignment Module ("LCCAM"). The LCCAM takes the USOCs assigned on service orders and converts them to a Line Class Code ("LCC"). The LCC is a three character alphanumeric entry that identifies the routing and screening characteristics of the line to the switch.

The service orders flow into MARCH (not an acronym). MARCH is a memory administration system that translates line-related service order data into switch provisioning messages and automatically transmits the messages to targeted stored program control system switches. Nothing input into the switch identifies a line as an ALEC line. A BellSouth line and an ALEC line with the same LCC look identical to the

switch. They use the exact same routing, screening, and trunking. Therefore, parity between a BellSouth customer Retail line and an ALEC Resale line is guaranteed.

Once the service order is completed by the Service Representative, the entire service order process described above is totally mechanized, unless an error is encountered.

See Diagram 1 for an example of a BellSouth Retail line and an ALEC Resale line. Both lines in the example have requested single party flat rate residential service with 900 and 976 blocking.

3. ALEC UNE Customer vs. BellSouth Retail Customer:

ALEC Request for Service:

An ALEC orders UNE service for its customer, either a Port only, or a Port/Loop Combo, by submitting the required forms to the LCSC. (Note: for the purposes of switch input, Port only orders and Port/Loop Combos are identical.) The LCSC serves as BellSouth's point of contact for processing local service requests from ALECs. One of the required forms for a UNE the CLEC submits to the LCSC is the Port Service Form. It is on this form that the CLEC lists the appropriate USOCs. UNE service uses one of four distinct provisioning USOCs, as well as other USOCs as required to define the service. The USOC identifies specific items of service or equipment. It is also on the Port Service Form that the ALEC lists any call blocking or calling restrictions, such as 900 and 976 blocking.

The LCSC generates a BellSouth Service Order once all information is received from the ALEC. The BellSouth Service Order contains the USOCs required to provide the service. The Service Order also carries a special Field Identifier Code ("FID"). The FID provides a four-digit code that identifies the ALEC to the billing system. The FID is not input into the switch.

BellSouth Customer Request for Service:

A BellSouth customer orders service from the BellSouth Business Office. The BellSouth Business Office generates a BellSouth Service Order. The BellSouth Service Order contains the USOCs required to provide the service.

Service Order Flow:

BellSouth Retail customer service orders and ALEC UNE customer service orders utilize most of the same USOCs. The exception is that one of four distinct provisioning USOCs must be used for the UNE port, along with any other USOCs that may be required to provide the service. The service orders enter a system called the Line Class Code Assignment Module ("LCCAM"). The LCCAM takes the USOCs assigned on service orders and converts them to a Line Class Code ("LCC"). The LCC is a three-character alphanumeric entry that identifies the routing and screening characteristics of the port to the switch.

The service orders flow into MARCH. The MARCH system formats the input messages to the switch. The ports are then translated in the switch. Nothing input into the switch identifies a port as an ALEC port. A BellSouth port and an ALEC port with the same LCC look identical to the switch. They use the exact same routing, screening, and trunking. Therefore, parity between a BellSouth customer Retail port and an ALEC UNE port is guaranteed.

Once the service order is completed by the Service Representative, the entire service order process described above is totally mechanized, unless an error is encountered.

See Diagram 2 for an example of a BellSouth Retail line and an ALEC UNE line. Both lines in the example have requested single party measured rate residential service with 900 and 976 blocking.

4. ALEC UNE/Resale Customer with Selective Call Routing vs. BellSouth Retail Customer:

Overview of Selective Call Routing:

Selective Call Routing is an option that allows an ALEC to select their own Operator Services, Directory Assistance, and Repair Service providers for their customers that are served from a BellSouth switch. Some of the choices available to the ALEC for Operator Services and Directory Assistance are 1) BellSouth operators - BellSouth Brand, 2) BellSouth operators - no Brand, 3) BellSouth operators – ALECs' own Brand, 4) Other Operator Services platform, 5) Announcement, 6) Other arrangement as requested by the ALEC and agreed to by BellSouth. Repair Service would generally be to an ALEC designated location.

Depending on the type of service requested, new trunk groups may by required in each end office where the ALEC is requesting service. If the ALEC requests BellSouth operators with no Brand, a new trunk group is ordered by BellSouth's Operator Services and installed by BellSouth. One would be installed to TOPS for Operator Services and one would be installed to TOPS for Directory Assistance. These trunk groups are not installed in an end office until the first ALEC requests Selective Call Routing for that particular end office. These trunk groups are not dedicated to a particular ALEC but are shared by any ALEC requesting unbranded service.

New trunk groups will be required for an ALEC requesting Customized Branding. These trunk groups will be required to every end office where the ALEC has requested service. The separate trunk groups from each end office are required to provide the same nondiscriminatory branding for the ALECs that is provided for BellSouth. The ALEC branded trunk group identifies to the TOPS equipment that this call is for a specific ALEC and the requested ALEC identification is automatically provided to the customer without operator intervention, just as is provided for a BellSouth customer. These trunk groups will be ordered by the ALEC to TOPS and will be installed by BellSouth. A separate trunk group will be required for Operator Services and for Directory Assistance. These trunk groups are dedicated to the particular ALEC who has ordered them.

ALECs who utilize BellSouth operators for Operator Services and Directory Assistance - BellSouth Brand, use the exact same trunk groups to TOPS as BellSouth Retail customers.

An ALEC has the option of providing its own Operator Services and Directory Assistance functions. The ALEC would be required to provision a trunk group (or trunk groups) from the end office to their Operator Services and/or Directory Assistance location.

ALEC Request for Selective Call Routing:

An ALEC must preorder Selective Call Routing through their BellSouth Account Team. This preordering will cause the required Selective Routing Codes to be assigned and the translations and required trunk groups to be provisioned in the switches.

Once an ALEC has preordered Selective Call Routing and the required translations have been built in the switch, the ALEC orders it by using a FID of ZSRC, followed by the Selective Routing Code assigned to the ALEC for the type of service required. This FID is entered on the Resale Service Form or Port Service Form and sent to the LCSC. The LCSC generates a BellSouth Service Order once all information is received from the ALEC. The BellSouth Service Order contains the USOCs required to provide the service and the special Selective Routing FID and Selective Routing Code.

Service Order Flow:

The service orders enter a system called the Line Class Code Assignment Module ("LCCAM"). The LCCAM takes the Selective Routing Code entered against the ZSRC FID and converts it to a Line Class Code. This Line Class Code represents the type of routing and screening requested for the ALEC customer.

The service orders flow into MARCH. The MARCH system formats the input messages to the switch. The lines are then translated in the switch using the special Line Class Code assigned in just the same manner as for a BellSouth retail line.

Once the service order is completed by the Service Representative, the entire service order process described above is totally mechanized, unless an error is encountered.

Parity:

Parity between BellSouth Retail Customers and ALEC customers with Selective Routing as it relates to Operator Services and Directory Assistance is dependent upon the type of service requested by the ALEC.

When BellSouth Operator Services and Directory Assistance - no Branding is requested, the trunk groups used are not dedicated to a particular ALEC but are shared by any ALEC requesting unbranded service. These trunk groups are monitored by BellSouth and additional trunks are installed when required. This monitoring will assure service parity with BellSouth customers.

When BellSouth Operator Services and Directory Assistance - Custom Branding is requested, the trunk groups used are dedicated to the particular ALEC who has ordered them. The level of service provided to the ALEC customers may be equal to, better than, or worse than, that provided to BellSouth customers, depending on the utilization of the group as determined by the ALEC's trunk ordering decisions. The same is true if an ALEC sends the Operator Services and Directory Assistance traffic to another Operator Services platform of its choosing.

When BellSouth Operator Services and Directory Assistance - BellSouth Branding is requested, the trunk groups used are the exact same trunk groups as BellSouth Retail customers. There is no difference and parity is assured.

The routing of calls to end office trunk groups, InterExchange Carriers, 911 Tandem, and the Access Tandem is the same as is provided to BellSouth Retail Customers. The exact same trunk groups to these locations are used. Parity is thus assured.

See Diagram 3 for an example of a BellSouth Retail line and an ALEC UNE line, with Selective Call Routing. Both lines in the example have requested single party measured rate residential service with 900 and 976 blocking. The Selective Routing requested by the ALEC is for routing to their own Operator Services and Directory Assistance. The Selective Routing code assigned is SAAT4.

Diagram 1: Flat rate residence customer with customized code restriction 4 (Blocks 900/976)

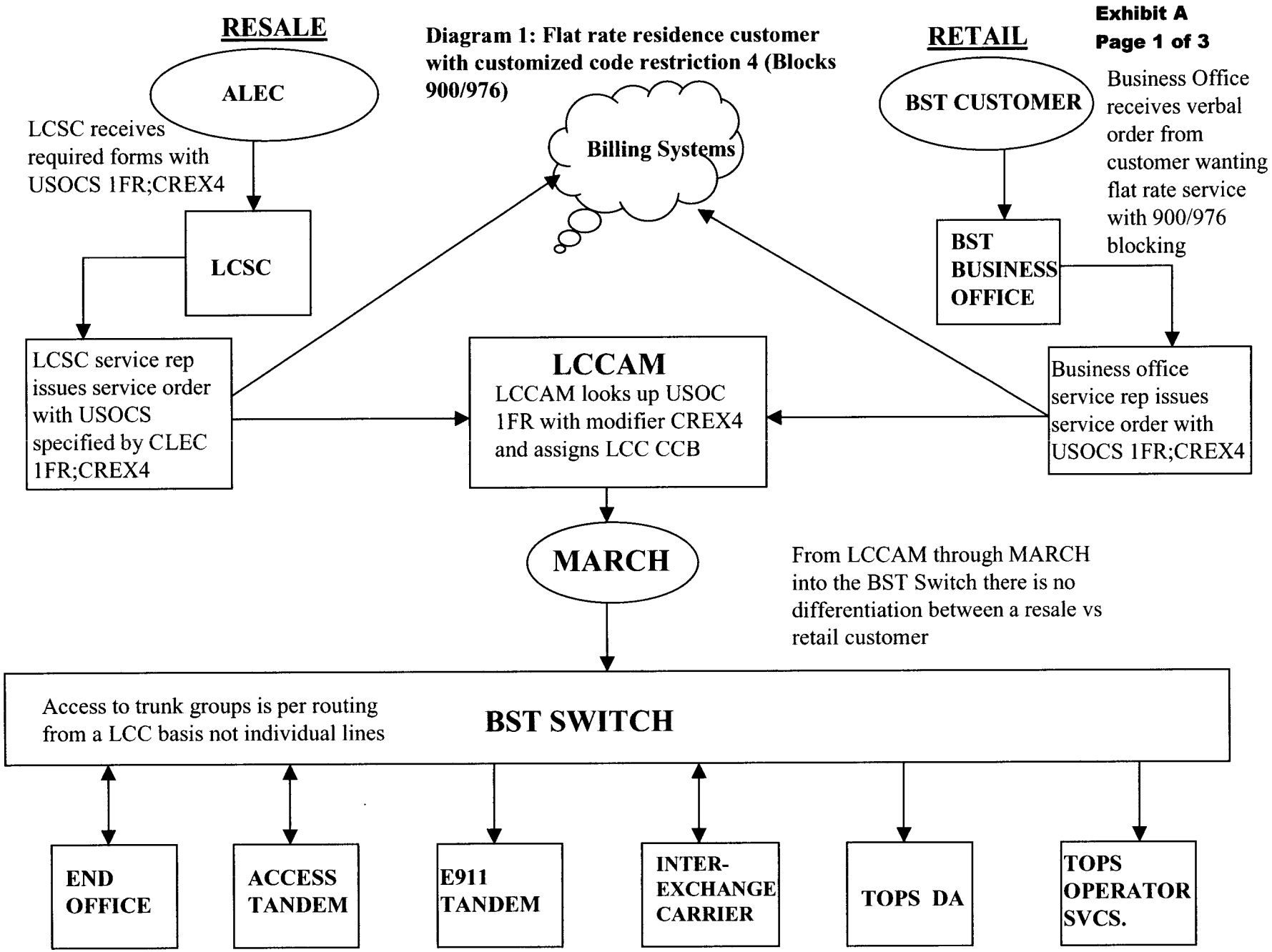


Diagram 2: UNE customer with customized code restriction 4 (Blocks 900/976)

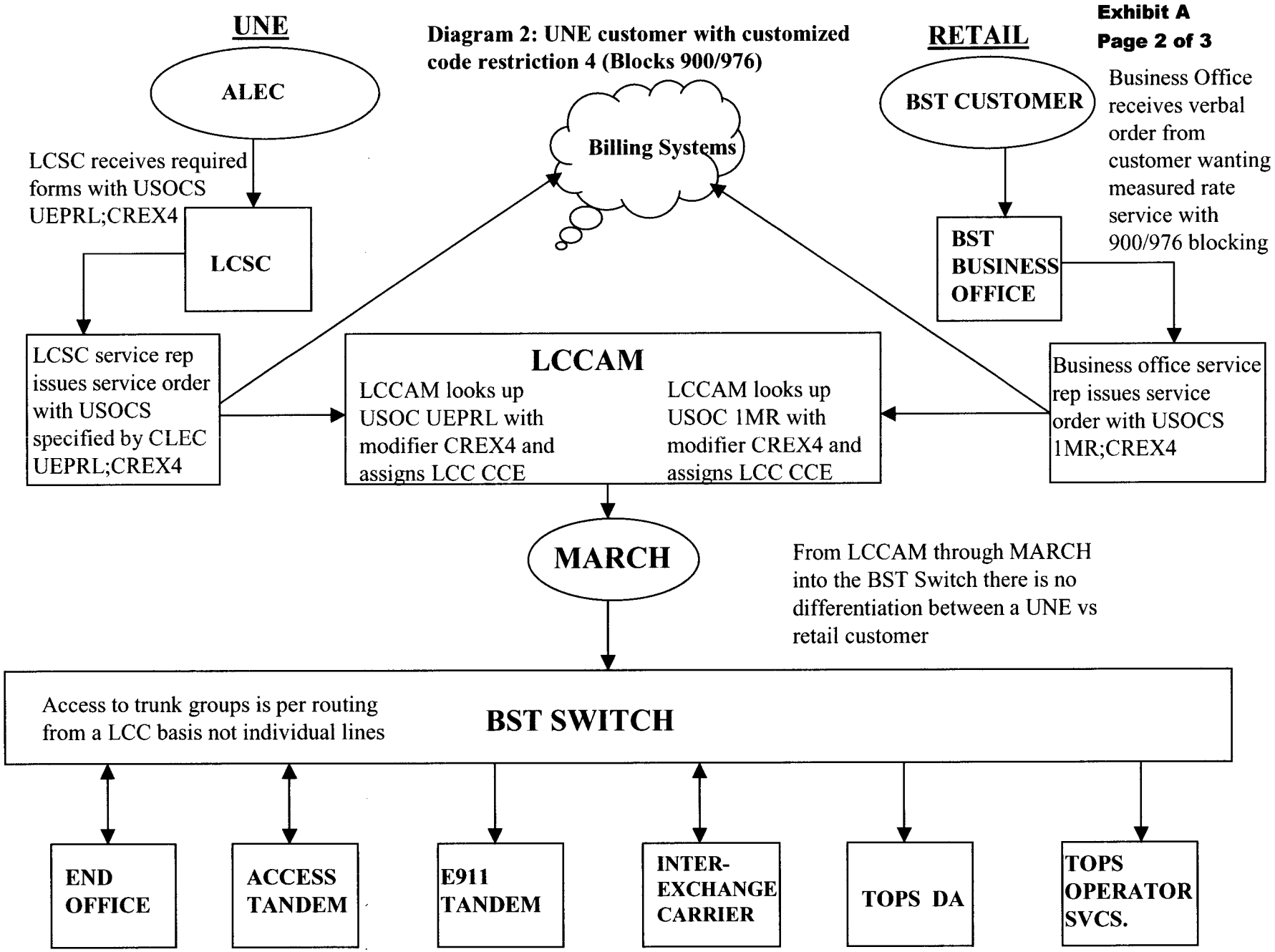
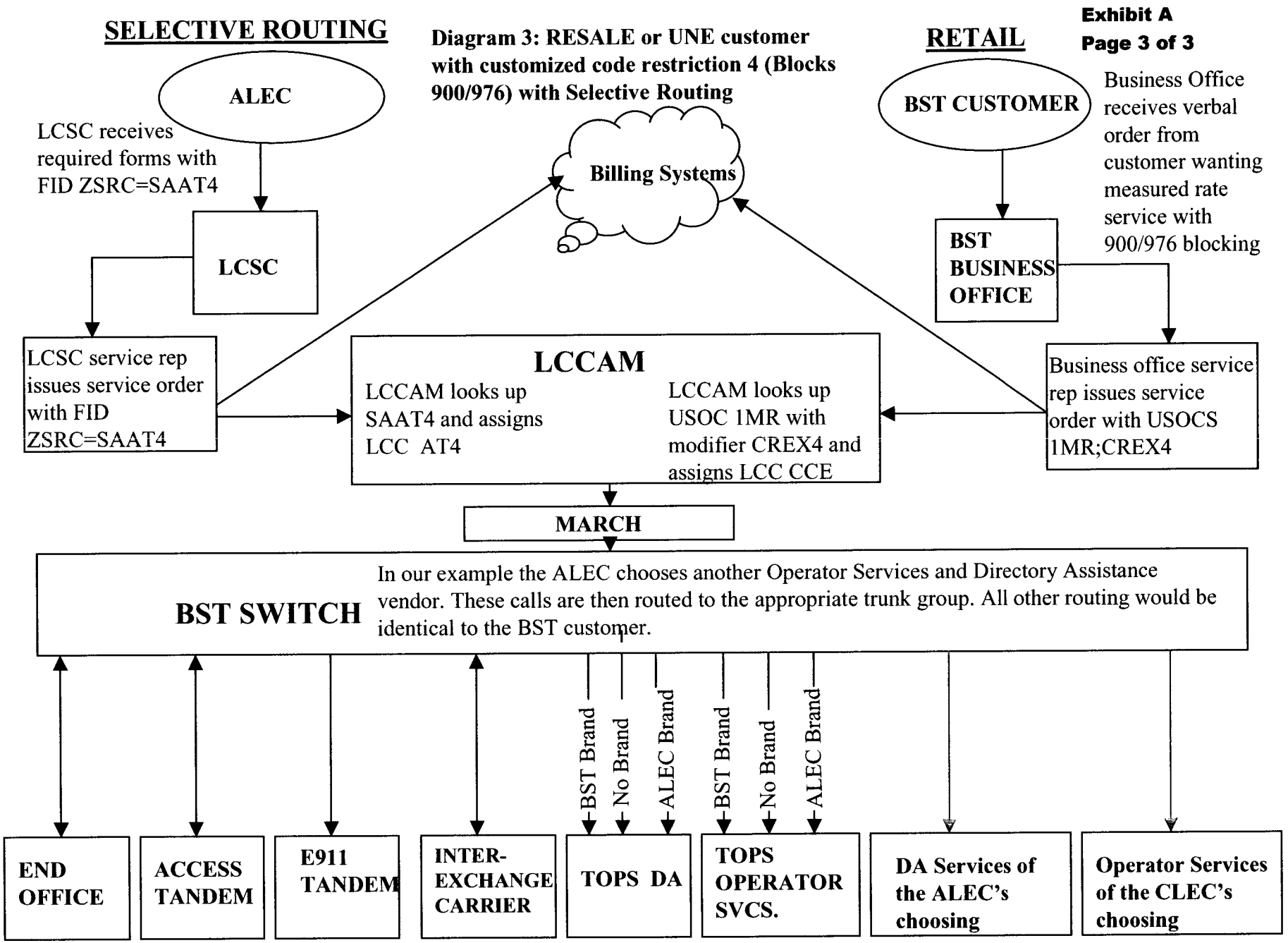


Diagram 3: RESALE or UNE customer with customized code restriction 4 (Blocks 900/976) with Selective Routing



WKM-7

TRAFFIC OPERATING POSITION SYSTEM (TOPS) CALL FLOW VIA QUEUE MANAGEMENT SYSTEM (QMS)

TRAFFIC OPERATING POSITION SYSTEM (TOPS) CALL FLOW VIA QUEUE MANAGEMENT SYSTEM (QMS)

Call origination type is the most frequently used means of call queue assignment in existing TOPS. National translations or a standard pretranslator can be used to assign a call origination type, although most call origination types are hard-coded and determined in the call setup phase through signaling information. The call origination type is used by table QMSTOPS to assign a CT4QNAM to the call. BellSouth marks calls requiring an operator as QMS in table TOPSTOPT.

Traffic Operator Position System Trunk Options Table (TOPSTOPT) is used to specify different options for Traffic Operator Position System (TOPS) trunks. The Automatic Call Distribution (ACD) field is used to specify the processing used on a trunk group basis. The GRPKEY consists of subfield CLLI. The ACDDATA field consists of subfield ACD and refinements LOCATIONS, ORG_AREA, ORIGCRIT_SEL and ORIGCRIT. The DISPCLG field indicates if the calling number is displayed at the TOPS terminal for use by the TOPS operator. The ADASSERV field is for automated directory assistance service (ADAS) availability. Field ADASANS controls when answer supervision is returned to the originating trunk. ANITOCLI enables conversion of ANI on an incoming trunk to CLI for an outgoing ISUP trunk. Originating Line Number Screening Query (OLNSQRY) indicates which calls can launch a query on a given incoming trunk. DCIBIDX is currently non-functional, intended for a later release. Local number portability calling number AMA (LNPCLGAM) specifies whether to append a module 720 to the AMA record for calls that originate on the trunk group. Field XLASCHEM enables this trunk group for use by the new TOPS translations process. Service provider identifier processing (SPIDPRC) field enables SPID processing for this incoming trunk group. Trunk Service Provider Identifier (TRKSPID) indicates whether a default SPID has been assigned for the given trunk group.

SAMPLE ENTRIES FOR TABLE : TOPSTOPT

GRPKEY ACDDATA DISPCLG ADASSERV ADASANS ANITOCLI OLNSQRY DCIBIDX LNPCLGAM XLASCHEM SPIDPRC TRKSPID

UHC5230CM4 QMSCAM CORECAM Y SFLA2_CLEC Y ADASPLUS IMMEDIATE N NONE 0 Y N N N

GGDS0ETCM4 QMSCAM CORECAM Y SFLA2_BS Y ADASPLUS IMMEDIATE N NONE 0 Y N N N

MIAMWD_CM786 QMSCAM CORECAM Y SFLA2_BS Y ADASPLUS IMMEDIATE N NONE 0 Y N N N

UHC5230JCM4 QMSCAM CORECAM Y SFLA2_CLEC Y ADASPLUS IMMEDIATE N NONE 0 Y N N N

INITIAL CALL QUEUE

To manage the segregation of traffic across call queues each call is assigned an initial call queue (CT4Q) in table QMSTOPS. Then, this initial call queue is refined (changed) by refinement tables. The call type for queuing (CT4Q) refinement allows the TOPS office to divide incoming traffic into separately manageable categories based on different call attributes, according to its office-specific criteria. Tables TQORDERA or TQORDERB specifies the relative ordering of the call type for queuing refinement tables

at the three different call states where call queue assignment processing is performed in TOPS QMS. The values in the key fields match the names of the eleven currently available CT4Q refinement tables. Data in a particular CT4Q refinement table has no effect until TQORDERA or TQORDERB has a non-zero ordering added against that CT4Q table. Only one of these tables is active at a time. The active table is shown in table TQMSOPT.

Pre-operator relative ordering defines the relative ordering for calls that have not yet been to either an operator or an automated service. All active preopr refinement tables are used before postauto refinements are utilized. Post-automated service ordering defines the relative ordering for calls that have not yet been to an operator but have been to an automated service. Recall/transfer ordering defines the relative ordering for calls that have already been to an operator and are now recalling for operator service. Assistance relative ordering defines the relative ordering for calls which a QMS operator has requested, and the request maps to the Customer Service Expert (CSE) assistance in table TQMSFCQA.

SAMPLE ENTRIES FOR TABLE: TQORDERA

CT4QTABL	PREOPR	POSTAUTO	RECALL	ASST
CT4QCLAS	2	0	0	0
CT4QREST	4	0	0	0
CT4QPFXT	1	0	0	0
CT4QCAR	0	0	0	0
CT4QCLD	0	1	0	0
CT4QORIG	3	0	0	0
CT4QTIME	5	3	1	0
CT4QLANG	0	2	0	0
CT4QAUTO	0	4	0	0
CT4QSPID	0	0	0	0
CT4QBLST	0	0	0	0

Refer to the sample datafill. Incoming calls PREOPR traverse the call queue refinement phase in the following order: CT4QPFXT, CT4QCLAS, CT4QORIG, CT4QREST and CT4QTIME. Note that table CT4QCLD is not traversed in the preoperator stage, as it contains a 0 in the PREOPR data field.

FIRST REFINEMENT TABLE

CT4QPFXT is the first refinement table checked for changes. Since this is the first refinement table, the oldct4q (call type for queuing) will be the CT4Q entry in table QMSTOPS. Sample entries for QMSTOPS and CT4QPFXT are listed below:

SAMPLE ENTRIES FOR TABLE: QMSTOPS

CO	CT4Q
UNSPEC	UNSPEC
OH	0_MINUS
OA	0_PLUS
DD	1_PLUS
CAMA	CAMA

555	DA_555
411	DA_411
HOM555	DA_555
FOR555	DA_555

A decision was made to isolate operator assisted (OA) directory assistance calls. Therefore, the datafill in this table has entries changing the CT4Q's assigned to 411, 555 and FOR555. The dialed prefix value is either operator assisted (OA) or direct dialed (DD).

SAMPLE ENTRIES FOR TABLE: CT4QPFXT

OLDCT4Q	PFXTCRIT	NEWCT4Q
DA_411	OA	OA_DA_411
DA_411	DD	DD_DA_411
DA_555	OA	OA_DA_555
DA_555	DD	DD_DA_555

SECOND REFINEMENT TABLE

The second refinement table used is CT4QCLAS. The OLDCT4Q for this table will come from table CT4QPFXTor QMSTOPS for entries not refined in CT4QPFXT. Table CT4QCLAS provides call type for queuing (CT4Q) refinement on the basis of clascrit, which is the class of service associated with the calling number. The class of service associated with the calling number can be UNKNOWN, STATION, HOTEL, COIN, or RESTRICTED. Entries are required for calls that need to be separated for queuing purposes.

SAMPLE ENTRIES FOR TABLE: CT4QCLAS

OLDCT4Q	CLASCRIT	NEWCT4Q
0_MINUS	COIN	0_MINUS_COIN
0_MINUS	STATION	0_MINUS_STATION
0_MINUS	HOTEL	0_MINUS_HOTEL
0_MINUS	RESTRICTED	0_MIN_REST
0_PLUS	COIN	0_PLUS_COIN
0_PLUS	STATION	0_PLUS_STATION
0_PLUS	HOTEL	0_PLUS_HOTEL
0_PLUS	RESTRICTED	0_PLUS_REST
1_PLUS	COIN	1_PLUS_COIN
1_PLUS	STATION	1_PLUS_STATION
1_PLUS	HOTEL	1_PLUS_HOTEL
1_PLUS	RESTRICTED	1_PLUS_REST
OA_DA_411	COIN	OA_411_COIN
DD_DA_411	COIN	DD_411_COIN
DD_DA_411	RESTRICTED	DA_REST

THIRD REFINEMENT TABLE

The third refinement table used is Call Type for Queuing by Originating Location Table (CT4QORIG). Table CT4QORIG provides call type for queuing refinement on the basis of ORIGCRIT, which is an originating location associated with the call. This table is used to route calls to special groups of operators who have knowledge of geographical area or have fluency in a particular language so that these operators can effectively handle calls from special groups of subscribers. The OLDCT4Q for this table will come from table CT4QCLAS, CT4QPFXT, or QMSTOPS respectively if not refined in CT4QCLAS or CT4QPFXT. The name to be used in field ORGCRIT must first be defined in table TQORGNAM. If calls are to be CT4Q refined by the originating criteria, they must be marked as yes (Y) in ORIGCRIT_SEL in table TOPSTOPT. If originating criteria is marked no (N) on a trunk group in table TOPSTOPT, this table will not be used for refinement on that trunk group

SAMPLE ENTRIES FOR TABLE: CT4QORIG

OLDCT4Q	ORGCRIT	NEWCT4Q
1_PLUS_STATION	SFLA1_BS	1_PLUS_STA_BS
1_PLUS_STATION	SFLA2_BS	1_PLUS_STA_BS
1_PLUS_STATION	SFLA1_CLEC	1_PLUS_STA_CLEC
1_PLUS_STATION	SFLA2_CLEC	1_PLUS_STA_CLEC
1_PLUS_COIN	SFLA1_BS	1_PLUS_CN_BS
1_PLUS_COIN	SFLA2_BS	1_PLUS_CN_BS
1_PLUS_COIN	SFLA1_CLEC	1_PLUS_CN_CLEC
1_PLUS_COIN	SFLA2_CLEC	1_PLUS_CN_CLEC
1_PLUS_HOTEL	SFLA1_BS	1_PLUS_HOT_BS
1_PLUS_HOTEL	SFLA2_BS	1_PLUS_HOT_BS
1_PLUS_HOTEL	SFLA1_CLEC	1_PLUS_HOT_CLEC
1_PLUS_HOTEL	SFLA2_CLEC	1_PLUS_HOT_CLEC
0_MINUS_STATION	SOUTHFLA2_AREA	DD_DA_411_SFLA2
0_MINUS_STATION	SFLA1_BS	0_MIN_STA_BS
0_MINUS_STATION	SFLA2_BS	0_MIN_STA_BS
0_MINUS_STATION	SFLA1_CLEC	0_MIN_STA_CLEC
0_MINUS_STATION	SFLA2_CLEC	0_MIN_STA_CLEC
0_MINUS_STATION	TEST	0_MIN_STA_TEST
0_MINUS_COIN	SFLA1_BS	0_MIN_CN_BS
0_MINUS_COIN	SFLA2_BS	0_MIN_CN_BS
0_MINUS_COIN	SFLA1_CLEC	0_MIN_CN_CLEC
0_MINUS_COIN	SFLA2_CLEC	0_MIN_CN_CLEC
0_MINUS_COIN	TEST	0_MIN_CN_TEST
0_MINUS_HOTEL	SFLA1_BS	0_MIN_HOT_BS
0_MINUS_HOTEL	SFLA2_BS	0_MIN_HOT_BS
0_MINUS_HOTEL	SFLA1_CLEC	0_MIN_HOT_CLEC
0_MINUS_HOTEL	SFLA2_CLEC	0_MIN_HOT_CLEC
0_MINUS_HOTEL	TEST	0_MIN_HOT_TEST
0_PLUS_STATION	SFLA1_BS	0_PLUS_STA_BS
0_PLUS_STATION	SFLA2_BS	0_PLUS_STA_BS
0_PLUS_STATION	SFLA1_CLEC	0_PLUS_STA_CLEC
0_PLUS_STATION	SFLA2_CLEC	0_PLUS_STA_CLEC
0_PLUS_STATION	TEST	0_PLUS_STA_TEST

0_PLUS_COIN SFLA1_BS 0_PLUS_CN_BS
0_PLUS_COIN SFLA2_BS 0_PLUS_CN_BS
0_PLUS_COIN SFLA1_CLEC 0_PLUS_CN_CLEC
0_PLUS_COIN SFLA2_CLEC 0_PLUS_CN_CLEC
0_PLUS_COIN TEST 0_PLUS_CN_TEST
0_PLUS_HOTEL SFLA1_BS 0_PLUS_HOT_BS
0_PLUS_HOTEL SFLA2_BS 0_PLUS_HOT_BS
0_PLUS_HOTEL SFLA1_CLEC 0_PLUS_HOT_CLEC
0_PLUS_HOTEL SFLA2_CLEC 0_PLUS_HOT_CLEC
0_PLUS_HOTEL TEST 0_PLUS_HOT_TEST
DD_DA_411 SOUTHFLA1_AREA DD_DA_411_SFLA1
DD_DA_411 SOUTHFLA2_AREA DD_DA_411_SFLA2
DD_DA_411 DACC_CELL 411_DACC_CELL
DD_DA_411 SFLA1_D1 D1_DD_411_SFLA1
DD_DA_411 SFLA2_D1 D1_DD_411_SFLA2
DD_DA_411 NDA NDA_ONLY
DD_DA_411 SFLA1_BS D1_DD_411_SFLA1
DD_DA_411 SFLA2_BS D1_DD_411_SFLA2
DD_DA_411 SFLA1_CLEC D1_DD_411_SFLA1
DD_DA_411 SFLA2_CLEC D1_DD_411_SFLA2
DD_DA_411 BSM_NDA BSM_NDA
DD_411_COIN SFLA1_BS D1_DD_411_SFLA1
DD_411_COIN SFLA2_BS D1_DD_411_SFLA2
DD_411_COIN SFLA1_CLEC D1_DD_411_SFLA1
DD_411_COIN SFLA2_CLEC D1_DD_411_SFLA2
0_MIN_REST SFLA1_BS 0_MIN_REST_BS
0_MIN_REST SFLA2_BS 0_MIN_REST_BS
0_MIN_REST SFLA1_CLEC 0_MIN_REST_CLEC
0_MIN_REST SFLA2_CLEC 0_MIN_REST_CLEC
0_PLUS_REST SFLA1_BS 0_PLUS_REST_BS
0_PLUS_REST SFLA2_BS 0_PLUS_REST_BS
0_PLUS_REST SFLA1_CLEC 0_PLUS_REST_CLECS
0_PLUS_REST SFLA2_CLEC 0_PLUS_REST_CLECS
0_PLUS_REST TEST 0_PLUS_REST_TEST
1_PLUS_REST SFLA1_BS 1_PLUS_REST_BS
1_PLUS_REST SFLA2_BS 1_PLUS_REST_BS
1_PLUS_REST SFLA1_CLEC 1_PLUS_REST_CLECS
1_PLUS_REST SFLA2_CLEC 1_PLUS_REST_CLECS
DA_REST NDA NDA_ONLY
DA_REST SFLA1_BS REST_DA
DA_REST SFLA2_BS REST_DA
DA_REST SFLA1_CLEC REST_DA
DA_REST SFLA2_CLEC REST_DA

Table TQORGNAM defines a list of the names that can be used to assign different originating criteria that will be associated with incoming trunk groups. These are the orig names that are used in table TOPSTOPT. This is the first of three (3) tables that are required when originating digits is an active refinement table the orgcrit name is arbitrary.

SAMPLE ENTRIES FOR TABLE : TQORGNAM

ORGCODE	ORGCRIT
0	UNKNOWN_ORGCRIT
1	SOUTHFLA1_AREA
2	SOUTHFLA2_AREA
3	DACC_CELL
4	SFLA1_D1
5	SFLA2_D1
6	D1_DACC_CELL
7	NDA
10	SFLA1_BS
11	SFLA2_BS
12	SFLA1_ICO
13	SFLA2_ICO
14	SFLA1_CLEC
15	SFLA2_CLEC
16	TEST
17	BSM_NDA
18	MARY
19	CELL

FOURTH REFINEMENT TABLE

Call Type for Queuing by Restricted Billing Index Table (CT4QREST) is the fourth refinement table used. Table CT4QREST provides call type for queuing (CT4Q) refinement on the basis for RESTCRIT, which is a restricted billing index. The OLDCT4Q for this table will come from CT4QORIG, CT4QCLAS, CT4QPFXT or QMSTOPS. A restricted billing index is defined only for calls with COIN or RESTRICTED class of service. Normally, restricted billing types that do not require their own queues are not datafilled in this table.

SAMPLE ENTRIES FOR TABLE : CT4QREST

OLDCT4Q	RESTXRIT	NEWCT4Q

DA_REST	4	CN_DACC
REST_DA	2	FLA_NDA
REST_DA	3	FLA_NDA
REST_DA	4	CN_DACC
REST_DA	50	FLA_NDA
REST_DA	55	FLA_NDA
REST_DA	85	FLA_NDA
REST_DA	88	FLA_NDA
0_PLUS_CN_BS	17	0_PLUS_CA
0_PLUS_CN_BS	21	0_PLUS_CA
0_MIN_REST_CLEC	2	0_MIN_CLEC_IPP_3VR
0_MIN_REST_CLEC	3	0_MIN_CLEC_BSP_3VR
0_MIN_REST_CLEC	6	0_MIN_CA
0_MIN_REST_CLEC	7	0_MIN_CA
0_MIN_REST_CLEC	8	0_MIN_CA
0_MIN_REST_CLEC	9	0_MIN_CA
0_MIN_REST_CLEC	16	0_MIN_CLEC_IPP_3VR
0_MIN_REST_CLEC	17	0_MIN_CLEC_BSP_3VR
0_MIN_REST_CLEC	21	0_MIN_CLEC_IPP_3VR
0_MIN_REST_CLEC	22	0_MIN_CLEC_IPP_3VR
0_MIN_REST_CLEC	23	0_MIN_CLEC_IPP_3VR
0_MIN_REST_CLEC	25	0_MIN_CLEC_BSP_3VR
0_MIN_REST_CLEC	26	0_MIN_CLEC_BSP_3VR
0_MIN_REST_CLEC	27	0_MIN_CLEC_BSP_3VR
0_MIN_REST_CLEC	30	0_MIN_CA
0_MIN_REST_CLEC	31	0_MIN_CA
0_MIN_REST_CLEC	34	0_MIN_CA
0_MIN_REST_CLEC	35	0_MIN_CA
0_MIN_REST_CLEC	50	0_MIN_CLEC_BSP_3VR
0_MIN_REST_CLEC	52	0_MIN_REST_CLECS_NVR
0_MIN_REST_CLEC	55	0_MIN_CLEC_BSP_3VR
0_MIN_REST_CLEC	62	0_MIN_CA
0_MIN_REST_CLEC	63	0_MIN_CA
0_MIN_REST_CLEC	65	0_MIN_CA
0_MIN_REST_CLEC	66	0_MIN_CA
0_MIN_REST_CLEC	68	0_MIN_REST_CLECS_NVR
0_MIN_REST_CLEC	74	0_MIN_CA
0_MIN_REST_CLEC	76	0_MIN_CA
0_MIN_REST_CLEC	78	0_MIN_CA
0_MIN_REST_CLEC	79	0_MIN_REST_CEL_3VR
0_MIN_REST_CLEC	85	0_MIN_CLEC_BSP_3VR
0_MIN_REST_CLEC	86	0_MIN_CLEC_IPP_3VR
0_MIN_REST_CLEC	88	0_MIN_CLEC_IPP_3VR
0_MIN_REST_CLEC	89	0_MIN_CLEC_3VR
0_MIN_REST_CLEC	93	0_MIN_REST_CLECS_NVR
0_MIN_REST_CLEC	94	0_MIN_REST_CLECS_NVR
0_MIN_REST_CLEC	96	0_MIN_REST_CLECS_NVR
0_MIN_REST_CLEC	98	0_MIN_CLEC_3VR

0_MIN_REST_CLEC	99	0_MIN_CLEC_IPP_3VR
0_MIN_REST_TEST	3	0_PLUS_CA
D1_DD_411_SFLA1	2	FLA_NDA
D1_DD_411_SFLA1	3	FLA_NDA
D1_DD_411_SFLA1	17	DA_COIN
D1_DD_411_SFLA1	21	DA_COIN
D1_DD_411_SFLA1	22	DA_COIN
D1_DD_411_SFLA1	23	DA_COIN
D1_DD_411_SFLA1	25	DA_COIN
D1_DD_411_SFLA1	26	DA_COIN
D1_DD_411_SFLA1	27	DA_COIN
D1_DD_411_SFLA1	50	FLA_NDA
D1_DD_411_SFLA1	55	FLA_NDA
D1_DD_411_SFLA1	85	FLA_NDA
D1_DD_411_SFLA1	88	FLA_NDA
D1_DD_411_SFLA2	2	FLA_NDA
D1_DD_411_SFLA2	3	FLA_NDA
D1_DD_411_SFLA2	17	DA_COIN
D1_DD_411_SFLA2	21	DA_COIN
D1_DD_411_SFLA2	22	DA_COIN
D1_DD_411_SFLA2	23	DA_COIN
D1_DD_411_SFLA2	25	DA_COIN
D1_DD_411_SFLA2	26	DA_COIN
D1_DD_411_SFLA2	27	DA_COIN
D1_DD_411_SFLA2	50	FLA_NDA
D1_DD_411_SFLA2	55	FLA_NDA
D1_DD_411_SFLA2	85	FLA_NDA
D1_DD_411_SFLA2	88	FLA_NDA
DD_411_COIN	21	DA_COIN
DD_411_COIN	22	DA_COIN
DD_411_COIN	23	DA_COIN
DD_411_COIN	25	DA_COIN
DD_411_COIN	26	DA_COIN
DD_411_COIN	27	DA_COIN
0_MIN_CN_BS	21	0_MIN_REST_IPP_3VR
0_MIN_CN_BS	22	0_MIN_REST_IPP_3VR
0_MIN_CN_BS	23	0_MIN_REST_IPP_3VR
0_MIN_CN_CLEC	21	0_MIN_CLEC_IPP_3VR
0_MIN_CN_CLEC	22	0_MIN_CLEC_IPP_3VR
0_MIN_CN_CLEC	23	0_MIN_CLEC_IPP_3VR

FIFTH REFINEMENT TABLE

The fifth refinement table used is CT4QTIME. Table CT4QTIME provides call type for queuing (CT4Q) refinement on the basis of TIMECRIT, which is a time criterion associated with the call. A set of tables is provided to allow the specification of differently treated times of day for each of the week and for holidays. Table CT4QTIME diverts traffic to a new CT4Q based on the

TIMECRIT value determined upon call arrival. This allows for the consolidation of different types of traffic into a smaller number of call types for queuing at known low-traffic periods providing savings in operator requirements. The OLDCT4Q for this table will come from one of the previously used refinement tables or Table QMSTOPS. The switch will look at one or more of the five other tables related to time of day of week criterion before table CT4QTIME is used. First, the switch must determine the daytype. Is today a HOLIDAY? Check Table TQHOLIDAY. If yes, use the DAYTYPE value for index into table TQDAYDEF. Otherwise, use DAYTYPE value from table TQWKDAY for index into table TQDAYDEF. Next, determine TIMECRIT. Index table TQDAYDEF with DAYTYPE. In field TIMESLOT, obtain TIMECRIT for index into table CT4QTIME. The daytype must be datafilled in table TQDAYNAM before it can be used in the other tables. Table TQTIMENM defines the TIMECRIT values used in tables TQDAYDEF and CT4QTIME.

SAMPLE ENTRIES FOR TABLE: CT4QTIME

DD_DA_411_SFLA2 SF_DA_CLOSED NDA_TEST
DD_DA_411 SF_DA_CLOSED 411_NIGHT_SF
SPANISH_DA SF_DA_CLOSED D1_DD_411_SFLA2
SFL2_ADAS SF_DA_CLOSED 411_NIGHT_SF
D1_DD_411_SFLA1 SF_DA_CLOSED 411_NIGHT_SF
D1_DD_411_SFLA2 SF_DA_CLOSED 411_NIGHT_SF
D1_SFL1_ADAS SF_DA_CLOSED 411_NIGHT_SF
D1_SFL2_ADAS SF_DA_CLOSED 411_NIGHT_SF
EMP_LO_F SF_DA_CLOSED 411_NIGHT_SF
954_411 SF_DA_CLOSED 411_NIGHT_SF
305_411 SF_DA_CLOSED 411_NIGHT_SF
FL_NDA SF_DA_CLOSED NDA_NIGHT
SPA_NDA SF_DA_CLOSED SPA_NIGHT
DA_TO_NDA SF_DA_CLOSED NDA_NIGHT
NDA_ONLY SF_DA_CLOSED NDA_NIGHT
ONLY_NDA SF_DA_CLOSED NDA_NIGHT
DA_REST SF_DA_CLOSED 411_NIGHT_SF
FLA_NDA SF_DA_CLOSED NDA_NIGHT
REST_DA SF_DA_CLOSED 411_NIGHT_SF
NDA_AABS SF_DA_CLOSED NDA_NIGHT

SAMPLE ENTRIES FOR TABLE: TQWKDAY

TQWKKEY DAYTYPE

MON WORKDAY
TUE WORKDAY
WED WORKDAY
THU WORKDAY
FRI WORKDAY
SAT WORKDAY
SUN WORKDAY

SAMPLE ENTRIES FOR TABLE: TQDAYDEF

TQDEFKEY TIMESLOT

WORKDAY (0 0 SF_DA_CLOSED) (6 0 SF_DA_OPEN) (23 59 SF_DA_CLOSED) $

SAMPLE ENTRIES FOR TABLE: TQDAYNAM

DAYCODE	DAYTYPE
0	WORKDAY

SAMPLE ENTRIES FOR TABLE: TQTIMENM

TIMECODE	TIMECRIT
0	UNKNOWN_TIMECRIT
1	OPEN
2	CLOSED
3	NF_DA_CLOSED
4	NF_DA_OPEN
5	SF_DA_CLOSED
6	SF_DA_OPEN
7	NDA_CLOSED
8	NDA_OPEN

SIXTH REFINEMENT TABLE

The sixth refinement table used in our sample is listed in the post automated service ordering (POSTAUTO) column. Only calls that have been to an automated service can be further refined in the POSTAUTO ordering. This refinement table is used after all active PREOPR refinements are utilized. Table CT4QCLD provides call type for queuing refinement on the basis of CLDCRIT, which is a called number criterion associated with the call. The CLDCRIT to be used must first be defined in table TQCLDNAM. Table TQCLDNAM defines a group of names to describe types of called numbers associated with calls. The values in field CLDCRIT in this table are used in table CT4QCLD to segregate incoming traffic in the basis of groups of called digits or called criterion. The OLDCT4Q will come from one of the preopr tables. In our example, the calls will be further refined by the ADASPLUS system. The ADASPLUS system sends the switch a CLDCODE for National Directory Assistance (NDA). The switch will look in table CT4QCLD to see if the OLDCT4Q is listed with a CLDCRIT of NDA_FLA or NDA_FL. If the OLDCT4Q is not listed, the switch will ignore the CLDCODE criterion

SAMPLE ENTRIES FOR TABLE: TQCLDNAM

CLDCODE	CLDCRIT
0	UNKNOWN_CLDCRIT
23	NDA_FL
37	NDA_FLA

SAMPLE ENTRIES FOR TABLE: CT4QCLD

OLDCT4Q	CLDCRIT	NEWCT4Q

OLDCT4Q CLDCRIT NEWCT4Q

DA_411 NDA_FL FL_NDA
DA_411 NDA_FLA FLA_NDA
DA_555 NDA_FL FL_NDA
DA_555 NDA_FLA FLA_NDA
DD_DA_411_SFLA2 NDA_FL FL_NDA
DD_DA_411_SFLA2 NDA_FLA FLA_NDA
DD_DA_411 NDA_FL FL_NDA
DD_DA_411 NDA_FLA FLA_NDA
411_DACC_CELL NDA_FL FL_NDA
411_DACC_CELL NDA_FLA FLA_NDA
SFL1_ADAS NDA_FL FL_NDA
SFL1_ADAS NDA_FLA FLA_NDA
SFL2_ADAS NDA_FL FL_NDA
SFL2_ADAS NDA_FLA FLA_NDA
D1_DD_411_SFLA1 NDA_FL FL_NDA
D1_DD_411_SFLA1 NDA_FLA FLA_NDA
D1_DD_411_SFLA2 NDA_FL FL_NDA
D1_DD_411_SFLA2 NDA_FLA FLA_NDA
D1_SFL1_ADAS NDA_FL FL_NDA
D1_SFL1_ADAS NDA_FLA FLA_NDA
D1_SFL2_ADAS NDA_FL FL_NDA
D1_SFL2_ADAS NDA_FLA FLA_NDA
954_411 NDA_FL FL_NDA
954_411 NDA_FLA FLA_NDA
305_411 NDA_FL FL_NDA
305_411 NDA_FLA FLA_NDA
555_NIGHT_SF NDA_FL FL_NDA
555_NIGHT_SF NDA_FLA FLA_NDA
411_CLOSED_SF NDA_FL FL_NDA
411_CLOSED_SF NDA_FLA FLA_NDA
411_NIGHT_SF NDA_FL FL_NDA
411_NIGHT_SF NDA_FLA FLA_NDA
555_CLOSED_SF NDA_FL FL_NDA
555_CLOSED_SF NDA_FLA FLA_NDA
NDA_TEST NDA_FL FL_NDA
NDA_TEST NDA_FLA FLA_NDA
TEST_NDA NDA_FL FL_NDA
TEST_NDA NDA_FLA FLA_NDA
NDA_ONLY NDA_FL ONLY_NDA
NDA_ONLY NDA_FLA ONLY_NDA
BSM_NDA NDA_FL NDA_BSM
BSM_NDA NDA_FLA NDA_BSM
DA_REST NDA_FL FL_NDA
DA_REST NDA_FLA FLA_NDA
REST_DA NDA_FL FL_NDA
REST_DA NDA_FLA FLA_NDA
DACC_TEST NDA_FL FLA_NDA

DACC_TEST NDA_FLA FLA_NDA
CN_DACC NDA_FLA DACC_TEST

SEVENTH REFINEMENT TABLE

The seventh refinement table used is CT4QLANG. The CT4QLANG (call type for queueing language) table allows companies to specify the language refinement to calls. Table TOPSLANG defines the valid languages for the system. The LANGCRIT is a language criterion and is from existing table TOPSLANG. The NEWCT4Q field is the new CT4Q name assigned to a call that meets the criterion.

SAMPLE ENTRIES FOR TABLE: TOPSLANG

LANGDIGT	LANGNAME	AUTOLANG	ISUPLANG
17	ENG	Y 1	N
18	SPA	Y 2	N

SAMPLE ENTRIES FOR TABLE: CT4QLANG

OLDCT4Q	LANGCRIT	NEWCT4Q
DA_411	SPA	SPA_NDA
DD_DA_411_SFLA2	SPA	SPA_NDA
DD_DA_411	SPA	SPA_NDA
411_DACC_CELL	SPA	SPA_NDA
SFL1_ADAS	SPA	SPA_NDA
SFL2_ADAS	SPA	SPA_NDA
D1_DD_411_SFLA1	SPA	SPA_NDA
D1_DD_411_SFLA2	SPA	SPA_NDA
D1_SFL1_ADAS	SPA	SPA_NDA
D1_SFL2_ADAS	SPA	SPA_NDA
954_411	SPA	SPA_NDA
305_411	SPA	SPA_NDA
411_CLOSED_SF	SPA	SPA_NDA
411_NIGHT_SF	SPA	SPA_NDA
FL_NDA	SPA	SPA_NDA
NDA_TEST	SPA	SPA_NDA
TEST_NDA	SPA	SPA_NDA
NDA_ONLY	SPA	SPA_NDA
ONLY_NDA	SPA	SPA_NDA
BSM_NDA	SPA	SPA_NDA
DA_REST	SPA	SPA_NDA
FLA_NDA	SPA	SPA_NDA
REST_DA	SPA	SPA_NDA
NDA_NIGHT	SPA	SPA_NDA

FINAL CALL QUEUING

After passing through all the criteria of call type for queuing (CT4Q) refinements, a given call may have had its CT4Q changed several times, or it may still have its initial call type for queuing (CT4Q). After refinement, the final CT4Q is used to determine the call queue, and service to be assigned to the call. Table TQMSFCQA specifies the final call queue (CALLQ) for initial calls and recalls assigned to a call after call type for queuing (CT4Q) refinement is complete. The final CT4Q is used as an index to table TQMSFCQA, which returns a numeric value for the CALLQ that is known by the call agent manager (CAM) component of the TOPS QMS. The call queue must be defined in table TQCQINFO and QMSCQDEF before being assigned in this table.

SAMPLE ENTRIES FOR TABLE: TQMSFCQA

CT4Q	CALLQ	RECALLQ	ASSTAREA
UNSPEC	CQ5	CQ5	SA
CAMA	CQ5	CQ15	SA
1_PLUS_STATION	CQ5	CQ15	SA
1_PLUS_COIN	CQ17	CQ17	SA
1_PLUS_HOTEL	CQ5	CQ15	SA
0_MINUS_STATION	CQ4	CQ14	SA
0_MINUS_COIN	CQ17	CQ17	SA
0_MINUS_HOTEL	CQ4	CQ14	SA
0_PLUS_STATION	CQ5	CQ15	SA
0_PLUS_COIN	CQ17	CQ17	SA
0_PLUS_HOTEL	CQ5	CQ15	SA
0_MINUS	CQ4	CQ14	SA
0_PLUS	CQ5	CQ15	SA
1_PLUS	CQ5	CQ15	SA
DA_411	CQ3	CQ33	SA
DA_555	CQ3	CQ33	SA
INTERCEPT	CQ10	CQ10	SA
REPAIR	CQ5	CQ15	SA
OA_DA_411	CQ5	CQ15	SA
DD_DA_411_SFLA1	CQ3	CQ3	SA
DD_DA_411_SFLA2	CQ34	CQ34	SA
INWARD	CQ5	CQ15	SA
INWARD_121	CQ5	CQ15	SA
DELAYCQ	CQ5	CQ15	SA
OA_DA_555	CQ5	CQ15	SA
DD_DA_411	CQ3	CQ33	SA
DD_DA_555	CQ3	CQ33	SA
OA_DA_411_POSTAUTO	CQ5	CQ15	SA
SPANISH_DA	CQ18	CQ18	SA
DD_DA_411_SFLA1_HOTEL	CQ5	CQ15	SA
DD_DA_411_SFLA2_HOTEL	CQ5	CQ15	SA
SFLA_DA_XFR_TO_TA	CQ5	CQ15	SA
411_DACC_CELL	CQ3	CQ33	SA
MEM_CALL	CQ4	CQ14	SA
SFL2_ADAS	CQ34	CQ34	SA
XFR_CREDIT_CARD	CQ15	CQ15	SA

D1_DD_411_SFLA1 CQ20 CQ33 SA
D1_DD_411_SFLA2 CQ3 CQ33 SA
D1_SFL1_ADAS CQ20 CQ33 SA
D1_SFL2_ADAS CQ3 CQ33 SA
EMP_LO_F CQ3 CQ33 SA
954_411 CQ20 CQ33 SA
305_411 CQ3 CQ33 SA
555_NIGHT_SF CQ0 CQ2 SA
411_CLOSED_SF CQ0 CQ2 SA
411_NIGHT_SF CQ0 CQ2 SA
555_CLOSED_SF CQ0 CQ2 SA
OA_555 CQ5 CQ15 SA
OA_411_COIN CQ1 CQ1 SA
DD_411_COIN CQ3 CQ33 SA
FL_NDA CQ37 CQ37 SA
SPA_NDA CQ18 CQ18 SA
DA_TO_NDA CQ16 CQ16 SA
NDA_DA_NITE CQ0 CQ0 SA
NDA_TEST CQ37 CQ37 SA
TEST_NDA CQ37 CQ37 SA
0_MIN_REST CQ4 CQ14 SA
0_MIN_STA_BS CQ4 CQ14 SA
0_MIN_STA_ICO CQ17 CQ17 SA
0_MIN_STA_CLEC CQ4 CQ14 SA
0_MIN_STA_TEST CQ4 CQ14 SA
0_MIN_CN_BS CQ17 CQ17 SA
0_MIN_CN_ICO CQ17 CQ17 SA
0_MIN_CN_CLEC CQ17 CQ17 SA
0_MIN_CN_TEST CQ17 CQ17 SA
0_MIN_HOT_BS CQ4 CQ14 SA
0_MIN_HOT_ICO CQ17 CQ17 SA
0_MIN_HOT_CLEC CQ4 CQ14 SA
0_MIN_HOT_TEST CQ4 CQ14 SA
0_MIN_REST_BS CQ4 CQ14 SA
0_MIN_REST_ICO CQ17 CQ17 SA
0_MIN_REST_CLEC CQ4 CQ14 SA
0_MIN_REST_TEST CQ4 CQ14 SA
0_MIN_REST_BSS_NVR CQ4 CQ14 SA
0_MIN_REST_ICOS_NVR CQ17 CQ17 SA
0_MIN_REST_CLECS_NVR CQ4 CQ14 SA
0_MIN_REST_BSP_3VR CQ17 CQ17 SA
0_MIN_REST_IPP_3VR CQ17 CQ17 SA
0_MIN_REST_CEL_3VR CQ4 CQ14 SA
0_MIN_AUTO CQ4 CQ14 SA
BSP_AUTO CQ17 CQ17 SA
0_PLUS_REST CQ5 CQ15 SA
1_PLUS_REST CQ5 CQ15 SA
1_PLUS_NDAC CQ17 CQ17 SA

0_PLUS_NDAC CQ17 CQ17 SA
1_PLUS_REST_BS CQ5 CQ15 SA
0_PLUS_REST_BS CQ5 CQ15 SA
NDA_ONLY CQ37 CQ37 SA
ONLY_NDA CQ37 CQ37 SA
BSM_NDA CQ37 CQ37 SA
NDA_BSM CQ37 CQ37 SA
0_MIN_NDAC CQ17 CQ17 SA
0_MIN_RNBK CQ17 CQ17 SA
0_MIN_RNBK_TEST CQ17 CQ17 SA
0_MIN_CA CQ17 CQ17 SA
1_PLUS_CA CQ17 CQ17 SA
0_PLUS_CA CQ17 CQ17 SA
0_MIN_BSP_3VR_NOCA CQ4 CQ14 SA
0_MIN_BSS_NVR_NOCA CQ4 CQ14 SA
0_MIN_CEL_3VR_NOCA CQ17 CQ17 SA
0_MIN_ICOS_NVR_NOCA CQ17 CQ17 SA
0_MIN_CLECS_NVR_NOCA CQ4 CQ14 SA
1_PLUS_REST_CLECS CQ5 CQ15 SA
1_PLUS_REST_ICOS CQ17 CQ17 SA
0_PLUS_REST_CLECS CQ5 CQ15 SA
0_PLUS_REST_ICOS CQ17 CQ17 SA
0_MIN_CLEC_BSP_3VR CQ17 CQ17 SA
0_MIN_ICO_BSP_3VR CQ17 CQ17 SA
0_MIN_ICO_IPP_3VR CQ17 CQ17 SA
0_MIN_CLEC_IPP_3VR CQ17 CQ17 SA
NO_NDA_DA CQ3 CQ33 SA
DA_REST CQ3 CQ33 SA
DA_COIN CQ1 CQ1 SA
FLA_NDA CQ37 CQ37 SA
REST_DA CQ3 CQ33 SA
0_PLUS_STA_ICO CQ17 CQ17 SA
0_PLUS_HOT_ICO CQ17 CQ17 SA
1_PLUS_STA_ICO CQ17 CQ17 SA
1_PLUS_HOT_ICO CQ17 CQ17 SA
DACC_TEST CQ37 CQ37 SA
CN_DACC CQ37 CQ37 SA
DACC_TOLL CQ5 CQ15 SA
0_PLUS_AABS CQ5 CQ15 SA
0_PLUS_AABS_CA CQ17 CQ17 SA
DA_AABS CQ3 CQ33 SA
NDA_AABS CQ37 CQ37 SA
0_PLUS_CN_BS CQ17 CQ17 SA
0_PLUS_CN_ICO CQ17 CQ17 SA
0_PLUS_CN_CLEC CQ17 CQ17 SA
0_PLUS_CN_TEST CQ17 CQ17 SA
0_PLUS_STA_BS CQ5 CQ15 SA
0_PLUS_STA_CLEC CQ5 CQ15 SA

0_PLUS_STA_TEST	CQ5	CQ15	SA
0_PLUS_HOT_CLEC	CQ5	CQ15	SA
0_PLUS_HOT_BS	CQ5	CQ15	SA
0_PLUS_REST_CLEC	CQ5	CQ15	SA
0_PLUS_REST_ICO	CQ17	CQ17	SA
0_PLUS_REST_TEST	CQ5	CQ15	SA
0_PLUS_HOT_TEST	CQ5	CQ15	SA
0_PLUS_CA_TEST	CQ17	CQ17	SA
1_PLUS_CN_ICO	CQ17	CQ17	SA
0_PLUS_BSP_AUTO	CQ17	CQ17	SA
1_PLUS_CN_BS	CQ17	CQ17	SA
1_PLUS_STA_BS	CQ5	CQ15	SA
1_PLUS_HOT_BS	CQ5	CQ15	SA
1_PLUS_STA_CLEC	CQ5	CQ15	SA
1_PLUS_CN_CLEC	CQ17	CQ17	SA
1_PLUS_HOT_CLEC	CQ5	CQ15	SA
0_MIN_ICO_3VR	CQ17	CQ17	SA
0_MIN_CLEC_3VR	CQ17	CQ17	SA
0_MIN_BSP_ICO_3VR	CQ17	CQ17	SA
0_MIN_ICO_IPP	CQ17	CQ17	SA
0_MIN_CLEC_IPP	CQ17	CQ17	SA
0_MIN_BS_35	CQ17	CQ17	SA
OPR_AABS_HO	CQ17	CQ17	SA
NDA_NIGHT	CQ36	CQ36	SA
TEST_DACC	CQ17	CQ17	SA
SPA_NIGHT	CQ35	CQ35	SA

CHARACTERISTICS OF CALL QUEUES (TABLE QMSCQDEF)

Table QMSCQDEF defines the characteristics of the call queues required by each application. The table is indexed by a two-part key containing the application name and a call queue number. Call queue priority (CQPRIO) indicates the priority of the call queue (0 = lowest priority, 126 = highest priority). Calls in queue s with the same priority are then chosen according to call age. Call queue assignable grade of service aging (CQAGS) allows artificial aging of a call. A value between 10 and 80 may be selected, representing aging factors from 1.0X to 8.0X. The age of the oldest call in a queue is multiplied by the queue's aging factor, and the resulting age is used for comparison with the oldest calls in other served queues. A 10 indicates no aging. Call queue maximum size defines the maximum number of calls allowed in the queue, above which all calls are deflected due to queue overflow, including calls with a deflect status of NO DEFLECT. The call is deflected and sent to CQOV treatment. The CQMAXSIZ value should be set so that it is not exceeded during anticipated peak traffic conditions. The CQCDTIME field should be utilized to control the input of calls to the call queues so that the CQMAXSIZ thresholds are not reached. The deflect area (DEFLAREA) consists of subfield ALLOWDEF and refinements. Allowed deflection (ALLOWDEF) indicates whether a deflection threshold should be considered before queuing a call. If this field is set to N, then calls are queued regardless of the predicted wait time. If calls

marked for a call queue are to be deflected when the predicted wait for a call exceeds the threshold specified in field CQCDTIME, enter Y. A Y entry requires refinements CQCDTIME and MINODEFL. Call queue call deflection time (CQCDTIME) is the predicted call wait time in tenths of seconds before the call is deflected from the queue. Minimum no deflection (MINODEFL) is the minimum number of calls in queue below which calls are not deflected, even if the value in CQCDTIME is exceeded. This prevents calls from being prematurely deflected from call queues with very low or erratic throughput. If the number of calls in queue would be equal to or greater than MINODEFL, then CQCDTIME is applied. Priority (PRAQAREA) consists of subfield PRIOAQ and refinements. Priority agent queue (PRIOAQ) indicates whether a priority agent (operator) queue should be associated with the given call queue. If this field is set to Y, then the agent queue specified in field AQNUM is searched first for an agent to serve incoming calls, even if agents in other queues able to serve the call have been idle longer. If this field is set to Y, datafill refinements AQNUM and PRTHTIME are required. Otherwise, if set to N, no further refinements require datafill.

SAMPLE ENTRIES FOR TABLE: QMSCQDEF

APPLNCQ	CQPRIO	CQAGS	CQMAXSIZ	DEFLAREA	PRAQAREA
TOPS 0	20	10	500 Y 300	16	N
TOPS 1	20	10	500	N	N
TOPS 2	20	10	500 Y 300	16	N
TOPS 3	20	10	500 Y 300	16 Y 3	3
TOPS 4	20	10	500 Y 300	16	N
TOPS 5	20	10	500 Y 300	16	N
TOPS 6	20	10	500 Y 300	16 Y 5	3
TOPS 7	20	10	500 Y 300	16 Y 5	3
TOPS 8	20	10	500 Y 300	16	N
TOPS 9	20	10	500 Y 300	16	N
TOPS 10	20	10	0 Y 0	0	N
TOPS 11	20	10	500 Y 300	16	N
TOPS 12	20	10	500 Y 300	16	N
TOPS 13	20	10	500 Y 300	16	N
TOPS 14	40	10	50 Y 300	16	N
TOPS 15	20	10	200 Y 300	16	N
TOPS 16	20	10	250 Y 300	16	N
TOPS 17	20	10	500 Y 300	16	N
TOPS 18	20	10	500	N	N
TOPS 19	20	10	300	N	N
TOPS 20	20	10	500 Y 300	16 Y 4	3
TOPS 21	20	10	500 Y 300	16	N
TOPS 22	20	10	500 Y 300	16	N
TOPS 23	20	10	500 Y 300	16	N
TOPS 24	40	10	500 Y 300	16	N
TOPS 25	20	10	500 Y 300	16 Y 5	3
TOPS 26	20	10	500 Y 300	16 Y 5	3
TOPS 27	20	10	500 Y 300	16 Y 5	3
TOPS 28	20	10	500 Y 300	16	N
TOPS 29	20	10	500 Y 300	16 Y 3	3
TOPS 30	20	10	500 Y 300	16	N
TOPS 31	20	10	500 Y 300	16	N

TOPS	32	40	10	500	Y	300	16	N
TOPS	33	40	10	500	Y	300	16	N
TOPS	34	20	10	500	Y	300	16	N
TOPS	35	20	10	500	Y	300	16	N
TOPS	36	20	10	500	Y	300	16	N
TOPS	37	20	10	500	Y	300	16	N
TOPS	38	20	10	500	Y	300	16	N
TOPS	39	20	10	500	Y	300	16	N
TOPS	40	20	10	500	Y	300	16	N
TOPS	41	20	10	500	Y	300	16	N
TOPS	42	20	10	500	Y	300	16	N
TOPS	43	20	10	500	Y	300	16	N

CALL SERVICES QUEUE
(TABLE TQCQINFO)

Table TQCQINFO marks the service of each call based on the call queue (CALLQ) assigned in table TQMSFCQA. The value in field QMSSERV corresponds to a value in Table TQMSSERV. Fields CWOFF and CWON allow the operator's Call Waiting (CW) displays to function. The call waiting on and off time is entered in tenths of seconds. The emergency treatment that will be used when call deflection is activated is also defined in the table. The treatment used must first be defined in Table TMTCNTL.TREAT.

Sample entries for table: TQCQINFO

CALLQ	QMSSERV	CWOFF	CWON	TREAT
CQ0	TOPS_DA	62	100	EMR5
CQ1	TOPS_DA	62	100	EMR5
CQ2	TOPS_DA	62	100	EMR5
CQ3	TOPS_DA	62	100	EMR5
CQ4	TOPS_TA	31	50	EMR4
CQ5	TOPS_TA	31	50	EMR3
CQ6	TOPS_DA	62	100	EMR5
CQ7	TOPS_DA	62	100	EMR5
CQ8	TOPS_DA	62	100	EMR5
CQ9	TOPS_DA	62	100	EMR5
CQ10	TOPS_INTC	62	100	EMR6
CQ11	TOPS_DA	62	100	EMR5
CQ12	TOPS_DA	62	100	EMR5
CQ13	TOPS_DA	62	100	EMR5
CQ14	TOPS_TA	31	50	EMR4
CQ15	TOPS_TA	31	50	EMR3
CQ16	TOPS_DA	62	100	EMR5
CQ17	TOPS_TA	31	50	EMR4
CQ18	TOPS_DA	62	100	EMR5
CQ19	TOPS_DA	62	100	EMR5

CQ20	TOPS_DA	62	100	EMR5
CQ21	TOPS_DA	62	100	EMR5
CQ22	TOPS_DA	62	100	EMR5
CQ23	TOPS_DA	62	100	EMR5
CQ24	TOPS_DA	62	100	EMR5
CQ25	TOPS_DA	62	100	EMR5
CQ26	TOPS_DA	62	100	EMR5
CQ27	TOPS_DA	62	100	EMR5
CQ28	TOPS_DA	62	100	EMR5
CQ29	TOPS_DA	62	100	EMR5
CQ30	TOPS_DA	62	100	EMR5
CQ31	TOPS_DA	62	100	EMR5
CQ32	TOPS_DA	62	100	EMR5
CQ33	TOPS_DA	62	100	EMR5
CQ34	TOPS_DA	62	100	EMR5
CQ35	TOPS_DA	62	100	EMR5
CQ36	TOPS_DA	62	100	EMR5
CQ37	TOPS_DA	62	100	EMR5
CQ38	TOPS_DA	62	100	EMR5
CQ39	TOPS_DA	62	100	EMR5
CQ40	TOPS_DA	62	100	EMR5
CQ41	TOPS_DA	62	100	EMR5
CQ42	TOPS_DA	62	100	EMR5
CQ43	TOPS_DA	62	100	EMR5
CQ44	TOPS_DA	62	100	EMR5

INDIVIDUAL OPERATOR SERVICES PROFILE (TABLE TQMSSERV)

Table TQMSSERV defines a list of services that each operator can provide in the Queue Management System (QMS). Every TOPS QMS call is assigned one of the service names datafilled in this table. The service index number is any number from 0 to 62. The QMS service name (QMSSERV) is an alphanumeric character of up to 32 characters. This is the name that will be used in Table TQCQINFO. Basic service name (BASESERV) consists of subfield basic service name selector (BASESERV_SEL). Services are defined as TASERV, DASERV, or INTCSERV. DASERV and INTCSERV service requires the use of a subset for APPLICATION and SETNO. APPLICATION and SETNO refer to the database link set number previously defined in table SERVICES. Implicit CT4Q (IMPLCT4Q) assigns a CT4Q implicitly to the call when the service changed through operator keying actions. QMS service type (SERVTYPE) consists of selector SERVTYPE_SEL and refinements. The values are defined as BASE or CUSTOM. Base mimics non QMS services, Custom requires datafill refinements. The AUTOAMA subfield automatically produce AMA record when changing from this service to any other service. Enter No (N) if an automatic message accounting (AMA) record is not to be produced when the operator changes the call from this service to any other service.

SAMPLE ENTRIES FOR TABLE: TQMSSERV

SERVNUM QMSSERV BASESERV IMPLCT4Q SERVTYPE

---

0 TOPS_TA TASERV 0_MINUS BASE N

1 NFL_DA DASERV TOPSVR1 0 NFL_411 BASE Y
2 TOPS_DA DASERV TOPSVR1 0 DA_411 BASE Y
3 TOPS_INTC INTCSERV TOPSVR1 0 INTERCEPT BASE N
4 CNA DASERV TOPSVR1 0 DA_411 CUSTOM 920 CNA SERVBILL N

TOPS QMS INDIVIDUAL POSITION PROFILES (TABLE TQSVPROF)

Table TQSVPROF creates service profiles by associating lists of TOPS QMS service names with a QMS service profile number. The service profiles defined are then available for inclusion in Tables TOPSPOS and TQOPROF. These profiles then indicate the TOPS QMS services that a TOPS QMS position is configured to provide, and the TOPS QMS services that a TOPS QMS operator is designated to provide. In table TOPSPOS all operator positions have been assigned PROFNUM 4 which includes the 3 basic services. Operators are assigned a PROFNUM that reflects the services they handle.

SAMPLE ENTRIES FOR TABLE: TQSVPROF

PROFNUM SVCLIST

---

0 (TOPS_TA) $
1 (NFL_DA) $
2 (TOPS_DA) (CNA) $
3 (TOPS_INTC) $
4 (TOPS_TA) (TOPS_DA) (TOPS_INTC) $
5 (TOPS_TA) (TOPS_DA) (TOPS_INTC) (CNA) $
6 (TOPS_DA) (TOPS_INTC) $
7 (TOPS_DA) $

TOPS SYSTEM FUNCTIONS AND CHARACTERISTICS (TABLE TOPSPOS)

Table TOPSPOS specifies the functions and characteristics of all Traffic Operator Position System (TOPS) positions. This table contains information describing the location of the trunk circuits associated with the positions. The QMSCAM selector is only used if the TOPS office has the Queue Management System (QMS) software package. Corecam is entered to specify that the location of the call and agent manager (CAM) is the core. The service profile number (SERVPROF) is selected from one of the profiles datafilled in Table TQSRVPROF.

SAMPLE ENTRIES FOR TABLE: TOPSPOS

POSNO VCCKT VCPDGRP CARDCODE DATAPATH POSAREA

---

204 TMS 0 5 7 TLD DS1SIG TMS MP OPP 141 0 OPR 2 QMSCAM CORECAM 0
205 TMS 0 5 8 TLD DS1SIG TMS MP OPP 141 1 OPR 2 QMSCAM CORECAM 0
1118 TMS 3 1 8 TLD DS1SIG TMS MP OPP 29 1 OPR 11 QMSCAM CORECAM 4
1429 TMS 3 2 3 TLD DS1SIG TMS MP OPP 44 0 OPR 14 QMSCAM CORECAM 4
2177 TMS 10 1 3 TLD DS1SIG TMS MP OPP 180 2 OPR 22 QMSCAM CORECAM 4

2272 TMS 7 2 22 TLD DS1SIG TMS MP OPP 197 3 ASST 22 ALL
2575 TMS 6 3 22 TLD DS1SIG TMS MP OPP 209 3 ASST 25 ALL
2731 TMS 8 5 15 TLD DS1SIG TMS MP OPP 248 2 OPR 17 QMSCAM CORECAM 4
4910 TMS 6 0 14 TLD DS1SIG TMS MP OPP 155 1 OPR 20 QMSCAM CORECAM 4
5010 TMS 11 4 3 TLD DS1SIG TMS MP OPP 118 2 OPR 20 QMSCAM CORECAM 4
6033 TMS 9 3 20 TLD DS1SIG TMS MP OPP 222 1 OPR 3 QMSCAM CORECAM 0
6053 TMS 11 5 20 TLD DS1SIG TMS MP OPP 63 1 OPR 3 QMSCAM CORECAM 0
6144 TMS 4 2 15 TLD DS1SIG TMS MP OPP 131 2 OPR 15 QMSCAM CORECAM 4

CALL QUEUE PROFILES (TABLE TQCQPROF)

Table TOPS QMS Call Queue Profile Table (TQOPROF) defines call queue profiles by associating lists of call queues with a call queue profile number. Individual operator numbers are then associated with one of these profile numbers. Datafill for profiles common to several operators is centralized for easier maintenance and reduced data storage. Call queue profiles datafilled using office-wide priorities contain a list of call queues. The priority and assignable grade of service aging (AGS) associated with each of the call queues specified are the office-wide values defined for the call queue in table QMSCQDEF. Office-wide priority call queue profiles result in consistent office-wide priorities and AGS values being applied to all operators. To override the system priority and AGS associated with each call queue, the particular profile is datafilled using priority and AGS values specific to that profile. To use this override, set PRIOTYPE to PROF. PROF gives you the ability to use each of up to four priority levels labeled PRIO3, PRIO2, PRIO1, and PRIO0, with PRIO3 being the highest priority level. Each priority level can list up to 32 call queues along with the desired AGS for each call queue listed.

SAMPLE ENTRIES FOR TABLE: TQCQPROF

CQPROFNM DLAYCT4Q AGENTQ PRIOAREA
0 DELAYCQ AQ0 OFC (CQ4) (CQ5) (CQ14) (CQ15) $
1 D1_NFL_411 AQ2 OFC (CQ3) (CQ9) (CQ20) (CQ21) (CQ28) (CQ25) (CQ26) (CQ27) (CQ30) (CQ31) (CQ18) (CQ32) (CQ22) (CQ33) (CQ24) (CQ29) (CQ0) $

2 D1_DD_411_SFLA1 AQ1 PROF (CQ19 30) (CQ3 20) (CQ33 20) (CQ9 10) (CQ20 10) $ $ $ $

3 D1_DD_411_SFLA1 AQ1 PROF (CQ19 50) (CQ3 40) (CQ20 30) (CQ9 25) (CQ33 50) $ $ $ $

4 D1_DD_411_SFLA1 AQ1 PROF (CQ19 20) (CQ0 10) (CQ3 10) (CQ33 10) (CQ9 10) (CQ20 10) $ $ $ $

5 FL_NDA AQ8 PROF (CQ18 80) (CQ35 10) (CQ36 10) $ $ $ $
6 D1_DD_411_SFLA1 AQ4 PROF (CQ19 45) (CQ22 45) (CQ24 45) (CQ33 45) (CQ20 40) (CQ3 40) (CQ9 35) (CQ31 30) (CQ29 25) (CQ21 20) (CQ0 10) (CQ1 10) (CQ2 15) $ $ $ $

7 D1_DD_411_SFLA2 AQ1 OFC (CQ34) $
8 D1_DD_411_SFLA1 AQ3 PROF (CQ22 45) (CQ24 45) (CQ33 45) (CQ3 40) (CQ29 35) (CQ20 25) (CQ31 20) (CQ9 15) (CQ21 10) (CQ0 10) (CQ2 15) $ $ $ $

9 D1_DD_411_SFLA1 AQ4 PROF (CQ22 45) (CQ24 45) (CQ33 45) (CQ20 40) (CQ3 40) (CQ9 35) (CQ31 30) (CQ29 25) (CQ21 20) (CQ0 10) (CQ2 15) $ $ $ $

10 FL_NDA AQ7 OFC (CQ23) (CQ16) $
11 FL_NDA AQ7 PROF (CQ18 20) (CQ23 10) (CQ16 10) $ $ $ $
12 D1_DD_411_SFLA1 AQ3 PROF (CQ19 45) (CQ22 45) (CQ24 45) (CQ33 45) (CQ3 40) (CQ29 35) (CQ20 25) (CQ31 20) (CQ9 15) (CQ21 10) (CQ0 10) (CQ1 10) (CQ2 15) $ $ $ $

13 D1_NFL_411 AQ6 PROF (CQ8 45) (CQ22 45) (CQ24 45) (CQ32 45) (CQ33 45) (CQ3 20) (CQ29 30) (CQ31 25) (CQ9 30) (CQ20 25) (CQ28 20) (CQ21 15) (CQ7 15) (CQ27 15) (CQ30 15) (CQ6 10) (CQ25 10) (CQ26 10) (CQ0 10) (CQ1 45) (CQ2 15) (CQ11 10) (CQ13 15) $ $ $ $

14 D1_NFL_411 AQ5 PROF (CQ8 45) (CQ18 45) (CQ32 45) (CQ6 40) (CQ7 40) (CQ25 40) (CQ26 40) (CQ27 40) (CQ30 40) (CQ28 25) (CQ13 15) (CQ11 10) (CQ12 10) $ $ $ $

15 D1_NFL_411 AQ6 PROF (CQ8 45) (CQ22 45) (CQ24 45) (CQ18 45) (CQ32 45) (CQ33 45) (CQ3 30) (CQ29 30) (CQ31 25) (CQ9 25) (CQ20 20) (CQ28 20) (CQ21 15) (CQ7 15) (CQ27 15) (CQ30 15) (CQ6 10) (CQ25 10) (CQ26 10) (CQ0 10) (CQ1 10) (CQ2 15) (CQ11 10) (CQ12 10) (CQ13 15) $ $ $ $

16 D1_DD_411_SFLA1 AQ4 PROF (CQ19 45) (CQ22 45) (CQ24 45) (CQ33 45) (CQ20 40) (CQ3 40) (CQ9 35) (CQ31 30) (CQ29 25) (CQ21 20) (CQ0 10) (CQ2 15) $ $ $ $

17 DELAYCQ AQ0 OFC (CQ4) (CQ5) (CQ14) (CQ15) (CQ17) $
18 D1_DD_411_SFLA1 AQ3 PROF (CQ22 45) (CQ24 45) (CQ33 45) (CQ3 40) (CQ29 35) (CQ20 25) (CQ31 20) (CQ9 15) (CQ21 10) (CQ0 10) (CQ1 10) (CQ2 15) $ $ $ $

19 D1_DD_411_SFLA1 AQ4 PROF (CQ22 45) (CQ24 45) (CQ33 45) (CQ20 40) (CQ3 40) (CQ9 35) (CQ31 30) (CQ29 25) (CQ21 20) (CQ0 10) (CQ1 10) (CQ2 15) $ $ $ $

20 1_PLUS_NDAC AQ7 OFC (CQ17) $
21 FL_NDA AQ8 PROF (CQ18 80) (CQ37 10) (CQ23 10) (CQ16 10) (CQ36 10) (CQ35 10) $ $ $ $

22 D1_DD_411_SFLA1 AQ3 PROF (CQ19 45) (CQ22 45) (CQ24 45) (CQ33 45) (CQ3 40) (CQ29 35) (CQ20 25) (CQ31 20) (CQ9 15) (CQ21 10) (CQ0 10) (CQ2 15) $ $ $ $

23 D1_NFL_411 AQ6 OFC (CQ8) (CQ22) (CQ24) (CQ32) (CQ33) (CQ3) (CQ29) (CQ31) (CQ9) (CQ20) (CQ28) (CQ21) (CQ7) (CQ27) (CQ30) (CQ6) (CQ25) (CQ26) (CQ0) (CQ2) (CQ11) (CQ13) (CQ23) (CQ37) (CQ16) (CQ1) (CQ36) $

24 D1_NFL_411 AQ6 PROF (CQ8 45) (CQ32 45) (CQ6 40) (CQ7 40) (CQ25 40) (CQ26 40) (CQ27 40) (CQ30 40) (CQ28 25) (CQ13 15) (CQ11 10) $ $ $ $

25 D1_NFL_411 AQ6 PROF (CQ19 45) (CQ8 45) (CQ22 45) (CQ24 45) (CQ32 45) (CQ33 45) (CQ3 20) (CQ29 30) (CQ31 25) (CQ9 30) (CQ20 25) (CQ28 20) (CQ21 15) (CQ7 15) (CQ27 15) (CQ30 15) (CQ6 10) (CQ25 10) (CQ26 10) (CQ0 10) (CQ1 45) (CQ2 15) (CQ11 10) (CQ13 15) $ $ $ $

26 D1_NFL_411 AQ5 PROF (CQ8 45) (CQ32 45) (CQ6 40) (CQ7 40) (CQ25 40) (CQ26 40) (CQ27 40) (CQ30 30) (CQ28 40) (CQ13 15) (CQ11 10) $ $ $ $

27 D1_DD_411_SFLA1 AQ1 OFC (CQ3) (CQ9) (CQ20) (CQ33) $
28 D1_DD_411_SFLA1 AQ1 PROF (CQ3 20) (CQ33 20) (CQ20 10) (CQ9 10) $ $ $ $
29 D1_DD_411_SFLA1 AQ1 PROF (CQ20 20) (CQ9 20) (CQ33 20) (CQ3 10) $ $ $ $
30 D1_DD_411_SFLA1 AQ1 PROF (CQ20 40) (CQ9 35) (CQ3 20) (CQ33 45) $ $ $ $
31 D1_DD_411_SFLA1 AQ1 PROF (CQ9 25) (CQ20 30) (CQ3 40) (CQ33 45) $ $ $ $
32 FL_NDA AQ8 OFC (CQ23) (CQ37) (CQ16) $
33 D1_NFL_411 AQ9 OFC (CQ0) (CQ2) (CQ3) (CQ6) (CQ7) (CQ8) (CQ9) (CQ11) (CQ13) (CQ20) (CQ21) (CQ22) (CQ24) (CQ25) (CQ26) (CQ27) (CQ28) (CQ29) (CQ30) (CQ31) (CQ32) (CQ33) $

34 D1_DD_411_SFLA1 AQ9 OFC (CQ0) (CQ2) (CQ3) (CQ6) (CQ7) (CQ8) (CQ9) (CQ11) (CQ13) (CQ20) (CQ21) (CQ22) (CQ24) (CQ25) (CQ26) (CQ27) (CQ28) (CQ29) (CQ30) (CQ31) (CQ32) (CQ33) $

35 D1_NFL_411 AQ6 PROF (CQ8 45) (CQ22 45) (CQ24 45) (CQ32 45) (CQ33 45) (CQ3 20) (CQ29 30) (CQ31 25) (CQ9 30) (CQ20 25) (CQ28 20) (CQ21 15) (CQ7 15) (CQ27 15) (CQ30 15) (CQ6 10) (CQ25 10) (CQ26 10) (CQ0 10) (CQ2 15) (CQ11 10) (CQ13 15) $ $ $ $

36 DELAYCQ AQ0 OFC (CQ4) (CQ5) (CQ14) (CQ15) (CQ17) $
37 FL_NDA AQ8 OFC (CQ23) (CQ37) (CQ16) (CQ36) $
38 FL_NDA AQ8 PROF (CQ18 60) (CQ37 10) (CQ23 10) (CQ16 10) (CQ36 10) (CQ35 10) $ $ $ $

40 FL_NDA AQ8 PROF (CQ18 45) (CQ37 25) (CQ23 10) (CQ16 10) (CQ36 10) $ $ $ $
41 D1_NFL_411 AQ2 OFC (CQ28) $
42 FL_NDA AQ8 PROF (CQ18 20) (CQ37 10) (CQ23 10) (CQ16 10) $ $ $ $
43 D1_NFL_411 AQ2 OFC (CQ25) (CQ26) (CQ27) (CQ28) (CQ29) (CQ30) (CQ31) (CQ32) (CQ18) (CQ22) (CQ21) (CQ24) (CQ6) (CQ7) (CQ8) $

44 D1_NFL_411 AQ2 PROF (CQ25 20) (CQ26 20) (CQ27 20) (CQ18 20) (CQ6 20) (CQ7 20) (CQ8 20) (CQ28 10) (CQ29 10) (CQ30 10) (CQ31 10) (CQ24 10) (CQ22 10) (CQ21 10) (CQ32 10) $ $ $ $

45 D1_NFL_411 AQ2 PROF (CQ28 20) (CQ29 20) (CQ30 20) (CQ31 20) (CQ32 20) (CQ21 20) (CQ22 20) (CQ24 20) (CQ25 10) (CQ26 10) (CQ27 10) (CQ18 10) (CQ0 10) (CQ1 10) (CQ2 20) (CQ11 10) (CQ12 10) (CQ13 20) (CQ6 10) (CQ7 10) (CQ8 10) $ $ $ $

46 D1_DD_411_SFLA1 AQ1 OFC (CQ3) (CQ9) (CQ0) (CQ20) (CQ33) (CQ31) $
47 D1_NFL_411 AQ2 OFC (CQ25) (CQ26) (CQ27) (CQ28) (CQ29) (CQ30) (CQ31) (CQ32) (CQ33) (CQ3) (CQ9) (CQ20) (CQ21) (CQ22) (CQ18) (CQ24) $

48 D1_NFL_411 AQ2 OFC (CQ28) (CQ29) (CQ30) (CQ31) (CQ32) (CQ21) (CQ22) (CQ24) (CQ25) (CQ26) (CQ27) (CQ18) (CQ0) (CQ1) (CQ2) (CQ11) (CQ12) (CQ13) (CQ6) (CQ7) (CQ8) $

49 D1_NFL_411 AQ2 OFC (CQ25) (CQ26) (CQ27) (CQ28) (CQ29) (CQ30) (CQ31) (CQ32) (CQ33) (CQ3) (CQ9) (CQ20) (CQ21) (CQ22) (CQ18) (CQ24) (CQ0) (CQ1) (CQ2) (CQ11) (CQ12) (CQ13) $

50 FL_NDA AQ8 PROF (CQ18 80) $ $ $ $
51 D1_NFL_411 AQ2 PROF (CQ9 30) (CQ28 20) (CQ29 20) (CQ30 20) (CQ31 20) (CQ32 20) (CQ21 20) (CQ22 20) (CQ24 20) (CQ25 10) (CQ26 10) (CQ27 10) (CQ18 10) (CQ0 10) (CQ1 10) (CQ2 20) (CQ11 10) (CQ12 10) (CQ13 20) (CQ6 10) (CQ7 10) (CQ8 10) $ $ $ $

52 D1_NFL_411 AQ6 PROF (CQ19 45) (CQ8 45) (CQ22 45) (CQ24 45) (CQ18 45) (CQ32 45) (CQ33 45) (CQ3 20) (CQ29 30) (CQ31 25) (CQ9 30) (CQ20 25) (CQ28 20) (CQ21 15) (CQ7 15) (CQ27 15) (CQ30 15) (CQ6 10) (CQ25 10) (CQ26 10) (CQ0 10) (CQ1 10) (CQ2 15) (CQ11 10) (CQ12 10) (CQ13 15) $ $ $ $

53 FL_NDA AQ7 OFC (CQ34) $
54 1_PLUS_NDAC AQ7 OFC (CQ4) (CQ5) (CQ14) (CQ15) (CQ17) $
55 D1_NFL_411 AQ1 OFC (CQ0) (CQ1) (CQ2) (CQ3) (CQ6) (CQ7) (CQ8) (CQ9) (CQ11) (CQ12) (CQ13) (CQ20) (CQ21) (CQ22) (CQ24) (CQ25) (CQ26) (CQ27) (CQ28) (CQ29) (CQ30) (CQ31) (CQ32) (CQ33) $

56 DELAYCQ AQ0 OFC (CQ4) (CQ5) (CQ14) (CQ15) $
57 DELAYCQ AQ0 OFC (CQ34) $
58 D1_NFL_411 AQ6 PROF (CQ8 45) (CQ22 45) (CQ24 45) (CQ32 45) (CQ33 45) (CQ3 20) (CQ29 30) (CQ31 25) (CQ9 30) (CQ20 25) (CQ28 20) (CQ21 15) (CQ7 45) (CQ27 45) (CQ30 15) (CQ6 45) (CQ25 45) (CQ26 45) (CQ0 10) (CQ2 15) (CQ11 10) (CQ13 15) $ $ $ $

59 D1_NFL_411 AQ6 PROF (CQ8 45) (CQ22 45) (CQ24 45) (CQ32 45) (CQ33 45) (CQ3 20) (CQ29 30) (CQ31 25) (CQ9 30) (CQ20 25) (CQ28 20) (CQ21 20) (CQ7 45) (CQ27 45) (CQ30 20) (CQ6 45) (CQ25 45) (CQ26 45) (CQ0 10) (CQ2 15) (CQ11 10) (CQ13 15) $ $ $ $

60 D1_NFL_411 AQ6 PROF (CQ8 45) (CQ22 45) (CQ24 45) (CQ32 45) (CQ33 45) (CQ3 20) (CQ29 30) (CQ31 25) (CQ9 30) (CQ20 25) (CQ28 40) (CQ21 15) (CQ7 40) (CQ30 40) (CQ6 40) (CQ25 40) (CQ26 40) (CQ0 10) (CQ2 15) (CQ11 10) (CQ13 15) (CQ27 40) $ $ $ $

OPERATOR NUMBER SPECIFICATION MATCH (TABLE TQOPROF)

Table TOPS QMS Operator Profile (TQOPROF) allows specification of which Traffic Operator Position System (TOPS) QMS calls selection and service profiles apply to a particular operator number. The table also allows specification of the team of which the operator is a member, for the purposes of force management (FM). When an operator logs on to a suitably configured position, calls are presented according to the operator's call selection profile. Once a call arrives at a position, the operator can provide for the call any service defined in the operator's TOPS QMS service profile.

SAMPLE ENTRIES FOR TABLE: TQOPROF

OPRNUM		DFLT	TEAM	SVCPRNUM	CAPPRNUM	SELAREA
6	1	0	0	CALLQ	0	
106	12	0	0	CALLQ	0	
156	12	0	0	CALLQ	0	
256	12	0	0	CALLQ	36	
465	2	0	0	CALLQ	0	
565	2	0	0	CALLQ	0	
716	17	3	0	CALLQ	28	
920	4	0	0	CALLQ	0	
1170	4	0	0	CALLQ	0	
1528	11	6	0	CALLQ	9	
1578	11	6	0	CALLQ	9	
1778	12	6	0	CALLQ	9	
1978	12	6	0	CALLQ	9	
2229	13	6	0	CALLQ	9	
2596	16	1	0	CALLQ	8	
2896	16	6	0	CALLQ	8	
3359	22	6	0	CALLQ	35	
3659	24	6	0	CALLQ	37	
3959	25	6	0	CALLQ	26	
4513	27	6	0	CALLQ	44	
4877	18	6	0	CALLQ	37	
5226	20	6	0	CALLQ	37	
6175	15	6	0	CALLQ	21	
7273	24	6	0	CALLQ	34	

SAMPLE DATA EXAMPLES

Listed below is sample data captured from a TOPS switch. Bell and CLEC DA and Toll & Assist trunk groups are shown starting with table TRKGRP. QVIEW was used to show the refinement tables used and the final call queue assignment for the 3 DA originating call types and an OA call originating type.

TABLE: TRKGRP
ATLNBU3MDDACC
TOPS 11 TPOS NCRT IC MIDL 770 DA77 NLCA NSCR Y SP COMBINED N Y
31 0031 NONE OSS 999 4 4 Y OFFHK N N $
CNYRMA48FDACC

TOPS 13 TPOS NCRT IC MIDL 770 DA77 CNYR NSCR Y SP COMBINED N Y
0 0000 NONE OSS 999 4 4 Y OFFHK N N $

TABLE: STDPRTCT
DA77 (1) (65021)
411 411
T DD 0 TOPS 411 3 3 NONE

5551212 555
T DD 0 TOPS 555 7 10 NONE

7705551212 770555
T DD 0 TOPS HOM555 7 10 NONE

TABLE: TOPSTOPT
ATLNBU3MDDACC QMSCAM CORECAM Y CLEC N ADASPLUS IMMEDIATE N NONE 0 Y N
Y N
CNYRMA48FDACC QMSCAM CORECAM Y BS N ADASPLUS IMMEDIATE N NONE 0 Y N Y N

TRACECO = 411

** QVIEW REPORT on ACTIVE table for PREOPR Ordering

CO: 411 --->>> CT4Q: DA_411_GA

OLDCT4Q	TABLE	CRITERION	NEWCT4Q	ASSIGNMENT INFO
DA_411_GA	PFXT	OA	OA_DA_411_GA	CQ15 TA_TOPS
OA_DA_411_GA	CLAS	COIN	CN_DA_411_GA	CQ0 TOPS_DA
CN_DA_411_GA	ORIG	D1	D1_NON_ADAS	CQ0 TOPS_DA
CN_DA_411_GA	ORIG	NDA	NDA_ONLY	CQ20 DA_TOPS
CN_DA_411_GA	ORIG	CELL	NDA_ONLY	CQ20 DA_TOPS
OA_DA_411_GA	CLAS	HOTEL	OA_DA_411_HO	CQ15 TA_TOPS
OA_DA_411_HO	ORIG	D1	OA_DA_411_HO	CQ15 TA_TOPS
DA_411_GA	PFXT	DD	DD_DA_411_GA	CQ0 TOPS_DA
DD_DA_411_GA	CLAS	COIN	CN_DA_411_GA	CQ0 TOPS_DA
CN_DA_411_GA	ORIG	D1	D1_NON_ADAS	CQ0 TOPS_DA
CN_DA_411_GA	ORIG	NDA	NDA_ONLY	CQ20 DA_TOPS
CN_DA_411_GA	ORIG	CELL	NDA_ONLY	CQ20 DA_TOPS
DD_DA_411_GA	CLAS	RESTRICTED	DA_REST	CQ0 TOPS_DA
DA_REST	ORIG	BS	REST_DA	CQ0 TOPS_DA
REST_DA	REST	2	GA_NDA	CQ20 DA_TOPS
REST_DA	REST	3	GA_NDA	CQ20 DA_TOPS

REST_DA	REST	40 GA_NDA	CQ20	DA_TOPS
REST_DA	REST	41 GA_NDA	CQ20	DA_TOPS
REST_DA	REST	43 GA_NDA	CQ20	DA_TOPS
REST_DA	REST	50 GA_NDA	CQ20	DA_TOPS
REST_DA	REST	55 GA_NDA	CQ20	DA_TOPS
REST_DA	REST	85 GA_NDA	CQ20	DA_TOPS
REST_DA	REST	88 GA_NDA	CQ20	DA_TOPS
DA_REST	ORIG ICO	REST_DA	CQ0	TOPS_DA
REST_DA	REST	2 GA_NDA	CQ20	DA_TOPS
REST_DA	REST	3 GA_NDA	CQ20	DA_TOPS
REST_DA	REST	40 GA_NDA	CQ20	DA_TOPS
REST_DA	REST	41 GA_NDA	CQ20	DA_TOPS
REST_DA	REST	43 GA_NDA	CQ20	DA_TOPS
REST_DA	REST	50 GA_NDA	CQ20	DA_TOPS
REST_DA	REST	55 GA_NDA	CQ20	DA_TOPS
REST_DA	REST	85 GA_NDA	CQ20	DA_TOPS
REST_DA	REST	88 GA_NDA	CQ20	DA_TOPS
DA_REST	ORIG CLEC	REST_DA	CQ0	TOPS_DA
REST_DA	REST	2 GA_NDA	CQ20	DA_TOPS
REST_DA	REST	3 GA_NDA	CQ20	DA_TOPS
REST_DA	REST	40 GA_NDA	CQ20	DA_TOPS
REST_DA	REST	41 GA_NDA	CQ20	DA_TOPS
REST_DA	REST	43 GA_NDA	CQ20	DA_TOPS
REST_DA	REST	50 GA_NDA	CQ20	DA_TOPS
REST_DA	REST	55 GA_NDA	CQ20	DA_TOPS
REST_DA	REST	85 GA_NDA	CQ20	DA_TOPS
REST_DA	REST	88 GA_NDA	CQ20	DA_TOPS
DA_REST	ORIG NDA	GA_NDA	CQ20	DA_TOPS
DA_REST	ORIG CELL	GA_NDA	CQ20	DA_TOPS
DA_REST	REST	2 GA_NDA	CQ20	DA_TOPS
DA_REST	REST	3 GA_NDA	CQ20	DA_TOPS
DA_REST	REST	40 GA_NDA	CQ20	DA_TOPS
DA_REST	REST	41 GA_NDA	CQ20	DA_TOPS
DA_REST	REST	43 GA_NDA	CQ20	DA_TOPS
DA_REST	REST	50 GA_NDA	CQ20	DA_TOPS
DA_REST	REST	55 GA_NDA	CQ20	DA_TOPS
DA_REST	REST	85 GA_NDA	CQ20	DA_TOPS
DA_REST	REST	88 GA_NDA	CQ20	DA_TOPS
DD_DA_411_GA	ORIG ICO	NDA	CQ20	DA_TOPS
DD_DA_411_GA	ORIG TEST	D1_TEST	CQ16	TA_TOPS
DD_DA_411_GA	ORIG NDA	NDA	CQ20	DA_TOPS
DD_DA_411_GA	ORIG CELL	NDA	CQ20	DA_TOPS
DA_411_GA	ORIG NDA	NDA	CQ20	DA_TOPS
DA_411_GA	ORIG CELL	NDA	CQ20	DA_TOPS
DA_411_GA	TQMSFCQA		CQ0	TOPS_DA

** SUMMARY REPORT on ACTIVE table for PREOPR Ordering

CT4Q TABLE	NUMBER OF REFINEMENTS
CT4QPFXT	2
CT4QCLAS	4
CT4QORIG	18
CT4QREST	36

The current values of the QVIEW variables are:
ORDER = PREOPR
USE = ACTIVE
TRACECO = 555
TRACECT4Q = Unassigned
FROMTABLE = Unassigned
TOTABLE = Unassigned
SUMMARY = Unassigned

** QVIEW REPORT on ACTIVE table for PREOPR Ordering

CO: 555 --->>> CT4Q: DA_555_GA

OLDCT4Q	TABLE	CRITERION	NEWCT4Q	ASSIGNMENT INFO
DA_555_GA	PFXT	OA	OA_DA_555_GA	CQ15 TA_TOPS
OA_DA_555_GA	CLAS	COIN	CN_DA_555_GA	CQ15 TA_TOPS
CN_DA_555_GA	ORIG	D1	CN_DA_555_GA	CQ0 TOPS_DA
OA_DA_555_GA	CLAS	HOTEL	OA_DA_555_HO	CQ15 TA_TOPS
OA_DA_555_HO	ORIG	D1	OA_DA_555_HO	CQ15 TA_TOPS
OA_DA_555_GA	ORIG	D1	OA_DA_555_GA	CQ15 TA_TOPS
DA_555_GA	PFXT	DD	DD_DA_555_GA	CQ0 TOPS_DA
DD_DA_555_GA	CLAS	COIN	CN_DA_555_GA	CQ15 TA_TOPS
CN_DA_555_GA	ORIG	D1	CN_DA_555_GA	CQ0 TOPS_DA
DD_DA_555_GA	CLAS	HOTEL	DD_DA_555_HO	CQ15 TA_TOPS
DD_DA_555_HO	ORIG	D1	DD_DA_555_HO	CQ15 TA_TOPS
DD_DA_555_GA	CLAS	RESTRICTED	DA_REST	CQ0 TOPS_DA
DA_REST	ORIG	BS	REST_DA	CQ0 TOPS_DA
REST_DA	REST	2	GA_NDA	CQ20 DA_TOPS
REST_DA	REST	3	GA_NDA	CQ20 DA_TOPS
REST_DA	REST	40	GA_NDA	CQ20 DA_TOPS
REST_DA	REST	41	GA_NDA	CQ20 DA_TOPS

REST_DA	REST	43 GA_NDA	CQ20	DA_TOPS
REST_DA	REST	50 GA_NDA	CQ20	DA_TOPS
REST_DA	REST	55 GA_NDA	CQ20	DA_TOPS
REST_DA	REST	85 GA_NDA	CQ20	DA_TOPS
REST_DA	REST	88 GA_NDA	CQ20	DA_TOPS
DA_REST	ORIG ICO	REST_DA	CQ0	TOPS_DA
REST_DA	REST	2 GA_NDA	CQ20	DA_TOPS
REST_DA	REST	3 GA_NDA	CQ20	DA_TOPS
REST_DA	REST	40 GA_NDA	CQ20	DA_TOPS
REST_DA	REST	41 GA_NDA	CQ20	DA_TOPS
REST_DA	REST	43 GA_NDA	CQ20	DA_TOPS
REST_DA	REST	50 GA_NDA	CQ20	DA_TOPS
REST_DA	REST	55 GA_NDA	CQ20	DA_TOPS
REST_DA	REST	85 GA_NDA	CQ20	DA_TOPS
REST_DA	REST	88 GA_NDA	CQ20	DA_TOPS
DA_REST	ORIG CLEC	REST_DA	CQ0	TOPS_DA
REST_DA	REST	2 GA_NDA	CQ20	DA_TOPS
REST_DA	REST	3 GA_NDA	CQ20	DA_TOPS
REST_DA	REST	40 GA_NDA	CQ20	DA_TOPS
REST_DA	REST	41 GA_NDA	CQ20	DA_TOPS
REST_DA	REST	43 GA_NDA	CQ20	DA_TOPS
REST_DA	REST	50 GA_NDA	CQ20	DA_TOPS
REST_DA	REST	55 GA_NDA	CQ20	DA_TOPS
REST_DA	REST	85 GA_NDA	CQ20	DA_TOPS
REST_DA	REST	88 GA_NDA	CQ20	DA_TOPS
DA_REST	ORIG NDA	GA_NDA	CQ20	DA_TOPS
DA_REST	ORIG CELL	GA_NDA	CQ20	DA_TOPS
DA_REST	REST	2 GA_NDA	CQ20	DA_TOPS
DA_REST	REST	3 GA_NDA	CQ20	DA_TOPS
DA_REST	REST	40 GA_NDA	CQ20	DA_TOPS
DA_REST	REST	41 GA_NDA	CQ20	DA_TOPS
DA_REST	REST	43 GA_NDA	CQ20	DA_TOPS
DA_REST	REST	50 GA_NDA	CQ20	DA_TOPS
DA_REST	REST	55 GA_NDA	CQ20	DA_TOPS
DA_REST	REST	85 GA_NDA	CQ20	DA_TOPS
DA_REST	REST	88 GA_NDA	CQ20	DA_TOPS
DD_DA_555_GA	ORIG D1	DD_DA_555_GA	CQ0	TOPS_DA
DD_DA_555_GA	ORIG NDA	NDA	CQ20	DA_TOPS
DD_DA_555_GA	ORIG CELL	NDA	CQ20	DA_TOPS

DA_555_GA	TQMSFCQA	CQ0	TOPS_DA

** SUMMARY REPORT on ACTIVE table for PREOPR Ordering

CT4Q TABLE	NUMBER OF REFINEMENTS
CT4QPFXT	2
CT4QCLAS	5
CT4QORIG	13
CT4QREST	36

The current values of the QVIEW variables are:
ORDER = PREOPR
USE = ACTIVE
TRACECO = HOM555
TRACECT4Q = Unassigned
FROMTABLE = Unassigned
TOTABLE = Unassigned
SUMMARY = Unassigned
>start

** QVIEW REPORT on ACTIVE table for PREOPR Ordering

CO: HOM555 --->>> CT4Q: DA_555_GA

OLDCT4Q	TABLE	CRITERION	NEWCT4Q	ASSIGNMENT INFO
DA_555_GA	PFXT	OA	OA_DA_555_GA	CQ15 TA_TOPS
OA_DA_555_GA	CLAS	COIN	CN_DA_555_GA	CQ15 TA_TOPS
CN_DA_555_GA	ORIG	D1	CN_DA_555_GA	CQ0 TOPS_DA
OA_DA_555_GA	CLAS	HOTEL	OA_DA_555_HO	CQ15 TA_TOPS
OA_DA_555_HO	ORIG	D1	OA_DA_555_HO	CQ15 TA_TOPS
OA_DA_555_GA	ORIG	D1	OA_DA_555_GA	CQ15 TA_TOPS
DA_555_GA	PFXT	DD	DD_DA_555_GA	CQ0 TOPS_DA
DD_DA_555_GA	CLAS	COIN	CN_DA_555_GA	CQ15 TA_TOPS
CN_DA_555_GA	ORIG	D1	CN_DA_555_GA	CQ0 TOPS_DA
DD_DA_555_GA	CLAS	HOTEL	DD_DA_555_HO	CQ15 TA_TOPS
DD_DA_555_HO	ORIG	D1	DD_DA_555_HO	CQ15 TA_TOPS
DD_DA_555_GA	CLAS	RESTRICTED	DA_REST	CQ0 TOPS_DA
DA_REST	ORIG	BS	REST_DA	CQ0 TOPS_DA
REST_DA	REST	2	GA_NDA	CQ20 DA_TOPS
REST_DA	REST	3	GA_NDA	CQ20 DA_TOPS
REST_DA	REST	40	GA_NDA	CQ20 DA_TOPS
REST_DA	REST	41	GA_NDA	CQ20 DA_TOPS
REST_DA	REST	43	GA_NDA	CQ20 DA_TOPS
REST_DA	REST	50	GA_NDA	CQ20 DA_TOPS
REST_DA	REST	55	GA_NDA	CQ20 DA_TOPS

REST_DA	REST	85 GA_NDA	CQ20	DA_TOPS
REST_DA	REST	88 GA_NDA	CQ20	DA_TOPS
DA_REST	ORIG ICO	REST_DA	CQ0	TOPS_DA
REST_DA	REST	2 GA_NDA	CQ20	DA_TOPS
REST_DA	REST	3 GA_NDA	CQ20	DA_TOPS
REST_DA	REST	40 GA_NDA	CQ20	DA_TOPS
REST_DA	REST	41 GA_NDA	CQ20	DA_TOPS
REST_DA	REST	43 GA_NDA	CQ20	DA_TOPS
REST_DA	REST	50 GA_NDA	CQ20	DA_TOPS
REST_DA	REST	55 GA_NDA	CQ20	DA_TOPS
REST_DA	REST	85 GA_NDA	CQ20	DA_TOPS
REST_DA	REST	88 GA_NDA	CQ20	DA_TOPS
DA_REST	ORIG CLEC	REST_DA	CQ0	TOPS_DA
REST_DA	REST	2 GA_NDA	CQ20	DA_TOPS
REST_DA	REST	3 GA_NDA	CQ20	DA_TOPS
REST_DA	REST	40 GA_NDA	CQ20	DA_TOPS
REST_DA	REST	41 GA_NDA	CQ20	DA_TOPS
REST_DA	REST	43 GA_NDA	CQ20	DA_TOPS
REST_DA	REST	50 GA_NDA	CQ20	DA_TOPS
REST_DA	REST	55 GA_NDA	CQ20	DA_TOPS
REST_DA	REST	85 GA_NDA	CQ20	DA_TOPS
REST_DA	REST	88 GA_NDA	CQ20	DA_TOPS
DA_REST	ORIG NDA	GA_NDA	CQ20	DA_TOPS
DA_REST	ORIG CELL	GA_NDA	CQ20	DA_TOPS
DA_REST	REST	2 GA_NDA	CQ20	DA_TOPS
DA_REST	REST	3 GA_NDA	CQ20	DA_TOPS
DA_REST	REST	40 GA_NDA	CQ20	DA_TOPS
DA_REST	REST	41 GA_NDA	CQ20	DA_TOPS
DA_REST	REST	43 GA_NDA	CQ20	DA_TOPS
DA_REST	REST	50 GA_NDA	CQ20	DA_TOPS
DA_REST	REST	55 GA_NDA	CQ20	DA_TOPS
DA_REST	REST	85 GA_NDA	CQ20	DA_TOPS
DA_REST	REST	88 GA_NDA	CQ20	DA_TOPS
DD_DA_555_GA	ORIG D1	DD_DA_555_GA	CQ0	TOPS_DA
DD_DA_555_GA	ORIG NDA	NDA	CQ20	DA_TOPS
DD_DA_555_GA	ORIG CELL	NDA	CQ20	DA_TOPS
DA_555_GA	TQMSFCQA		CQ0	TOPS_DA

** SUMMARY REPORT on ACTIVE table for PREOPR Ordering

CT4Q TABLE	NUMBER OF REFINEMENTS
---	---

```
CT4QPFXT        2
CT4QCLAS        5
CT4QORIG        13
CT4QREST        36


TABLE: TRKGRP
SMYRPF95CCM4
        TOPS 13 TPOS NCRT IC MIDL 770 NW2 NLCA NSCR Y SP COMBINED N Y 0
        0000 NONE OSS 999 5 5 N OFFHK N N $

ATLNBUHMDCM4770
        TOPS 14 EML3 NCRT IC MIDL 770 TOP1 MTRO NSCR Y SP COMBINED N Y
        31 0031 NONE OSS 999 4 4 N OFFHK N N $


TABLE: STDPRTCT
>pos nw2
   NW2 (   1) (65021)
>sub2;pos 0
  00          0410
   T OA 0    OFRT  126  1  1    NONE

>pos top1
  TOP1 (   1) (   1)
>sub 2;pos 0
   0            0
   T OA 0    OFRT  126  1  1    NONE

TABLE: TOPSTOPT
SMYRPF95CCM4 QMSCAM CORECAM Y BS N ADASPLUS IMMEDIATE N NONE 0 Y N Y N
ATLNBUHMDCM4770 QMSCAM CORECAM Y CLEC N ADASPLUS IMMEDIATE N NONE 0 Y
N Y N

The current values of the QVIEW variables are:
ORDER    = PREOPR
USE      = ACTIVE
TRACECO  = OA
TRACECT4Q = Unassigned
FROMTABLE = Unassigned
TOTABLE  = Unassigned
SUMMARY  = Unassigned
>start


** QVIEW REPORT on ACTIVE table for PREOPR Ordering
```

CO: OA --->>> CT4Q: 0_PLUS_GA

OLDCT4Q	TABLE	CRITERION	NEWCT4Q	ASSIGNMENT INFO
0_PLUS_GA	CLAS	COIN	0_PLUS_CN_GA	CTRL: 0PLCA_C
0_PLUS_CN_GA	ORIG	BS	0_PLUS_CN_BS	CTRL: 0PLCA_C
0_PLUS_CN_GA	ORIG	ICO	0_PLUS_CN_IC	CTRL: 0PLCA_C
0_PLUS_CN_GA	ORIG	CLEC	0_PLUS_CN_CL	CTRL: 0PLCA_C
0_PLUS_CN_GA	ORIG	TEST	0_PLUS_CN_TE	CTRL: 0PLCA_C
0_PLUS_CN_GA	ORIG	ICO_STANDARD	0_PLUS_CN_IC	CTRL: 0PLCA_C
0_PLUS_GA	CLAS	STATION	0_PLUS_STA_G	CTRL: 0PLTA_C
0_PLUS_STA_G	ORIG	BS	0_PLUS_STA_B	CTRL: 0PLTA_C
0_PLUS_STA_G	ORIG	ICO	0_PLUS_STA_I	CTRL: 0PLCA_C
0_PLUS_STA_G	ORIG	CLEC	0_PLUS_STA_C	CTRL: 0PLTA_C
0_PLUS_STA_G	ORIG	TEST	0_PLUS_STA_T	CTRL: 0PLTA_C
0_PLUS_STA_G	ORIG	ICO_STANDARD	0_PLUS_STA_I	CTRL: 0PLCA_C
0_PLUS_GA	CLAS	HOTEL	0_PLUS_HOT_G	CTRL: 0PLTA_C
0_PLUS_HOT_G	ORIG	BS	0_PLUS_HOT_B	CTRL: 0PLTA_C
0_PLUS_HOT_G	ORIG	ICO	0_PLUS_HOT_I	CTRL: 0PLCA_C
0_PLUS_HOT_G	ORIG	CLEC	0_PLUS_HOT_C	CTRL: 0PLTA_C
0_PLUS_HOT_G	ORIG	TEST	0_PLUS_HOT_T	CTRL: 0PLTA_C
0_PLUS_HOT_G	ORIG	ICO_STANDARD	0_PLUS_HOT_I	CTRL: 0PLCA_C
0_PLUS_GA	CLAS	RESTRICTED	0_PLUS_REST	CTRL: 0PLTA_C
0_PLUS_REST	ORIG	BS	0_PLUS_REST_	CTRL: 0PLTA_C
0_PLUS_REST_	REST	1	0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_	REST	2	0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_	REST	3	0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_	REST	6	0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_	REST	7	0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_	REST	8	0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_	REST	9	0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_	REST	15	0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_	REST	16	0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_	REST	17	0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_	REST	21	0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_	REST	22	0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_	REST	23	0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_	REST	25	0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_	REST	26	0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_	REST	27	0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_	REST	30	0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_	REST	31	0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_	REST	32	0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_	REST	33	0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_	REST	34	0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_	REST	35	0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_	REST	36	0_PLUS_CA	CTRL: 0PLCA_C

0_PLUS_REST_ REST	37 0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_ REST	38 0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_ REST	39 0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_ REST	40 0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_ REST	41 0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_ REST	42 0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_ REST	43 0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_ REST	50 0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_ REST	55 0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_ REST	62 0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_ REST	63 0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_ REST	65 0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_ REST	66 0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_ REST	74 0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_ REST	76 0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_ REST	78 0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_ REST	79 0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_ REST	85 0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_ REST	86 0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_ REST	88 0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_ REST	89 0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_ REST	98 0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_ REST	99 0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST ORIG ICO	0_PLUS_REST_	CTRL: 0PLCA_C
0_PLUS_REST_ REST	1 0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_ REST	2 0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_ REST	3 0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_ REST	6 0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_ REST	7 0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_ REST	8 0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_ REST	9 0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_ REST	15 0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_ REST	16 0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_ REST	17 0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_ REST	21 0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_ REST	22 0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_ REST	23 0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_ REST	25 0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_ REST	26 0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_ REST	27 0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_ REST	30 0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_ REST	31 0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_ REST	32 0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_ REST	33 0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_ REST	34 0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_ REST	35 0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_ REST	36 0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_ REST	37 0_PLUS_CA	CTRL: 0PLCA_C

0_PLUS_REST_ REST	38	0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_ REST	39	0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_ REST	40	0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_ REST	41	0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_ REST	42	0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_ REST	43	0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_ REST	50	0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_ REST	55	0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_ REST	62	0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_ REST	63	0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_ REST	65	0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_ REST	66	0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_ REST	74	0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_ REST	76	0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_ REST	78	0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_ REST	79	0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_ REST	85	0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_ REST	86	0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_ REST	88	0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_ REST	89	0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_ REST	98	0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST ORIG CLEC		0_PLUS_REST_	CTRL: 0PLTA_C
0_PLUS_REST_ REST	1	0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_ REST	2	0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_ REST	3	0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_ REST	6	0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_ REST	7	0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_ REST	8	0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_ REST	9	0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_ REST	15	0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_ REST	16	0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_ REST	17	0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_ REST	21	0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_ REST	22	0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_ REST	23	0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_ REST	25	0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_ REST	26	0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_ REST	27	0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_ REST	30	0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_ REST	31	0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_ REST	32	0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_ REST	33	0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_ REST	34	0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_ REST	35	0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_ REST	36	0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_ REST	37	0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_ REST	38	0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_ REST	39	0_PLUS_CA	CTRL: 0PLCA_C

0_PLUS_REST_	REST	40 0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_	REST	41 0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_	REST	42 0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_	REST	43 0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_	REST	50 0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_	REST	55 0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_	REST	62 0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_	REST	63 0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_	REST	65 0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_	REST	66 0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_	REST	74 0_PLUS_CA	CTRL: 0PLCA_C
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0_PLUS_REST_	REST	78 0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_	REST	79 0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_	REST	85 0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_	REST	86 0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_	REST	88 0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_	REST	89 0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_	REST	98 0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_	REST	99 0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST	ORIG TEST	0_PLUS_REST_	CTRL: 0PLTA_C
0_PLUS_REST	ORIG ICO_STANDARD	0_PLUS_REST_	CTRL: 0PLCA_C
0_PLUS_REST_	REST	1 0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_	REST	2 0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_	REST	3 0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_	REST	6 0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_	REST	7 0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_	REST	8 0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_	REST	9 0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_	REST	15 0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_	REST	16 0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_	REST	17 0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_	REST	21 0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_	REST	22 0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_	REST	23 0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_	REST	25 0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_	REST	26 0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_	REST	27 0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_	REST	30 0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_	REST	31 0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_	REST	32 0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_	REST	33 0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_	REST	34 0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_	REST	35 0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_	REST	36 0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_	REST	37 0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_	REST	38 0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_	REST	39 0_PLUS_CA	CTRL: 0PLCA_C

0_PLUS_REST_	REST	40 0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_	REST	41 0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_	REST	42 0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_	REST	43 0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_	REST	50 0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_	REST	55 0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_	REST	62 0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_	REST	63 0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_	REST	65 0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_	REST	66 0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_	REST	74 0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_	REST	76 0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_	REST	78 0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_	REST	79 0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_	REST	85 0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_	REST	86 0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_	REST	88 0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_	REST	89 0_PLUS_CA	CTRL: 0PLCA_C
0_PLUS_REST_	REST	98 0_PLUS_CA	CTRL: 0PLCA_C

0_PLUS_GA TQMSFCQA CQ15 TA_TOPS

** SUMMARY REPORT on ACTIVE table for PREOPR Ordering

CT4Q TABLE	NUMBER OF REFINEMENTS
CT4QPFXT	0
CT4QCLAS	4
CT4QORIG	20
CT4QREST	182

WKM-8

LETTER FROM ROBERT SUMMERS
OF NORTEL NETWORKS
DATED – MAY 4, 2000

AND

LETTER FROM MR. DAVID C. THOMPSON
OF NORTEL NETWORKS
DATED – MAY 5, 2000

NORTEL NETWORKS™

How the world shares ideas.

Date: 4 May 2000

To: Whom It May Concern

From: Robert Summers, Program Manager – TOPS Professional Services
William Greytock, Senior Manager - TOPS Global Support

As the TOPS Professional Services Program Manager, I have performed in a number of assignments involving the design and functioning of the Traffic Operating Position System (TOPS) utilizing the Queuing Management System (QMS) for use by local telephone companies.

I have read the attached document concerning the processing of operator assistance and directory assistance calls via TOPS and QMS. To the best of my knowledge and belief, the attached document (*Traffic Operating Position System (TOPS) Call Flow via Queuing Management System (QMS)*) accurately describes the methods, procedures, and processes involved in the processing of operator assistance and directory assistance calls by TOPS equipment purchased from Nortel, Inc. by BellSouth

This arrangement allows for non-discriminatory access to the operator services and directory assistance functions for BST and CLECs within all areas being provided TOPS Operator Service utilizing QMS.

Signed,

Robert Summers

William Greytock

NORTEL NETWORKS

How the world shares ideas.

Date: May 5, 2000

To: Whom It May Concern

From: Mr. David C. Thompson,
Product Marketing, Line Provisioning and OSS Interface

My current duties at Nortel Networks Inc. ("Nortel") include Product Management of the Line Provisioning interface to Nortel's DMS-100 Family switching systems as well as primary OSS Interface support, including interface to Telcordia Technologies, Inc. Previously, my duties at Nortel have included a number of assignments involving the product management and functioning of DMS-100 Family end-office switches for use by local telephone companies.

I have read the attached document (*End Office Handling of Operator and Directory Assistance Calls of BellSouth and CLEC End-Users*) concerning the operation of end-offices and the processing of operator assistance and directory assistance calls, which provides a detailed description of the inter-relationship between service order USOC codes, the LCCAM system and March.

To the best of my knowledge and belief, the attached document (*End Office Handling of Operator and Directory Assistance Calls of BellSouth and CLEC End-Users*) accurately describes the methods, procedures, and processes involved in the processing of operator assistance and directory assistance calls by DMS-100 Family end-offices switches purchased from Nortel by BellSouth Telecommunications, Inc.

SWORN TO AND
SUBSCRIBED BEFORE ME
This is the 5th day
Of May, 2000.

Tonya J. Pope
NOTARY PUBLIC

My Commission expires:

11-15-00

D C Thompson

David C. Thompson
Nortel Networks Inc.
4008 E. Chapel Hill Road
D15/01/0E2
Research Triangle Park, NC 27709

WKM-9
SERVICE RESALE
UNITS IN SERVICE

SERVICE RESALE - UNITS IN SERVICE
MARCH 31, 2001

BellSouth Telecommunications, Inc.
FPSC Docket No. 960786-TL
Exhibit WKM-9

SERVICE (VOLUME NUMBER)	AL	FLA	GA	KY	LA	MS	NC	SC	TN	TOTAL
ACCUPULSE #1	0	0	5	0	0	0	3	0	0	8
AREA PLUS #2	3,238	24,407	6,397	1,508	9,054	3,169	754	2,318	5,020	55,865
BASIC RATE ISDN #3	174	620	694	169	445	130	350	261	303	3,146
PRIMARY RATE ISDN #4	79	271	153	16	125	47	36	122	29	878
CALL WAITING #5	20,921	38,404	53,676	10,212	35,925	25,799	21,054	18,904	19,196	244,091
CALL WAITING DELUXE #6	7,808	35,743	37,749	3,188	8,096	3,599	7,978	2,289	7,768	114,218
CALLER ID DELUXE #7	18,793	62,337	65,728	10,549	25,956	20,558	17,921	11,591	18,893	252,326
CALLER ID ENHANCED #8	477	2,231	860	192	243	139	98	131	329	4,700
CENTREX/ ESSX # 9	1,765	1,641	5,970	1,134	805	951	2,094	3,752	274	18,386
CUSTOM CALLING - 3 WAY CALLING #10	8,503	46,410	44,141	3,108	9,446	5,176	7,859	3,426	10,309	138,378
CUSTOM CALLING - CALL FORWARDING VARIABLE #11	9,145	35,329	24,727	4,120	9,075	5,227	10,138	3,418	8,696	109,875
CUSTOM CALLING - REMOTE ACCESS TO CF #12	595	5,631	1,940	319	420	185	486	395	564	10,535
CUSTOM CALLING - SPEED CALLING 8 & 30 #13	7,735	36,082	39,543	3,231	5,339	2,796	9,473	1,928	10,902	117,029
DID #14	548	1,229	1,050	369	650	312	403	338	240	5,139
E911/SALI #15	0	0	0	0	0	0	0	0	0	-
ENH CID/MULTILINE CID DELUXE/ENH CID ACR #16	7	39	188	46	10	0	52	75	73	490
FLAT RATE PBX TRUNKS #17	848	5,042	3,103	845	821	323	227	1,272	208	12,689
FLAT RATE RESIDENCE #18	34,284	76,111	82,713	20,972	59,917	44,958	41	40,405	33,454	392,855
FLAT RATE/BASIC LOCAL EXCHANGE # 19	8,862	74,322	22,783	9,556	16,646	3,424	3	10,925	7,838	154,359
FLEXSERV #20	1	47	40	0	61	0	16	1	0	166
FRAME RELAY AND CDS #21	476	369	1,587	44	162	229	256	173	98	3,394
GEORGIA COMMUNITY CALLING #22	0	0	1,916	0	0	0	0	0	0	1,916
HUNTING #23	6,379	40,966	10,829	5,837	9,558	2,661	12,641	7,844	3,900	100,615
INDEPENDENT PAYPHONE PROVIDER #24	640	9,263	4,230	777	927	458	1,006	240	997	18,538
INTEGRATED PACKAGES #25	1,590	0	1,338	376	8,295	11,472	60,989	842	2,463	87,365
LIGHTGATE #26	0	0	2	0	0	0	0	0	0	2
MEASURED RATE BUSINESS # 27	146	1,518	276	115	999	149	213	293	421	4,130
MEASURED RATE RESIDENCE #28	1	281	528	7	25	85	0	45	78	1,050
MEGALINK #29	383	358	554	19	556	148	342	68	67	2,495
MEGALINK ISDN # 30	12	7	1	1	17	0	0	2	19	59
MEMORYCALL # 31	4,604	29,474	15,807	1,590	3,072	996	7,389	3,428	4,012	70,372
MESSAGE TELEPHONE SERVICE (MTS) #32	60	104	86	59	56	51	39	49	64	568
MEASURED RATE PBX TRUNKS #33	348	4,181	808	118	797	479	1,316	133	495	8,675
MULTISERV #34	205	2,323	2,280	96	666	161	353	152	47	6,283
NATIVE MODE LAN INTERCONNECTION #35	0	0	0	0	0	0	0	0	0	-
OFF PREMISE EXTENSIONS (OPX) # 36	85	220	147	54	282	32	259	46	89	1,214
OPTIONAL CALLING PLAN # 37	102	540	280	300	378	589	2,292	1,103	141	5,725
REMOTE CALL FORWARDING (RCF) #38	340	3,440	1,686	157	509	221	813	453	379	7,998
RINGMASTER #39	1,433	6,247	4,759	747	857	719	1,566	770	3,127	20,225

SERVICE (VOLUME NUMBER)	AL	FLA	GA	KY	LA	MS	NC	SC	TN	TOTAL

SMARTPATH #40	0	0	0	0	0	0	0	0	0	-
SMARTRING #41	2	0	0	0	1	1	0	0	2	6
SYNCHRONET #42	29	142	246	18	137	18	108	72	35	805
TOUCHSTAR -CALL BLOCK #43	6,492	31,281	19,769	3,242	4,482	2,461	8,177	1,980	8,275	86,159
TOUCHSTAR -CALL RETURN #44	11,154	45,378	37,894	4,682	9,130	6,773	14,924	5,105	12,058	147,098
TOUCHSTAR -CALL SELECTOR #45	1,427	17,019	12,023	504	898	507	1,218	523	1,949	36,068
TOUCHSTAR -CALL TRACING #46	2,620	25,417	13,927	1,084	3,366	1,931	2,647	1,364	4,764	57,120
TOUCHSTAR -PREFERRED CALL FORWARDING #47	449	810	2,685	158	344	153	364	100	429	5,492
TOUCHSTAR -REPEAT DIALING #48	6,620	29,715	19,687	3,107	6,075	4,016	6,474	2,159	8,745	86,598
TOUCHTONE #49	42,405	155,953	101,787	28,405	82,020	53,654	54,299	46,822	42,250	607,595
VISUAL DIRECTOR # 50	0	0	2	0	0	1	0	0	0	3
TOTAL	211,785	850,902	646,594	121,031	316,643	204,758	256,671	175,317	219,000	3,002,701

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Consideration of BellSouth Telecommunications, Inc.'s, entry into interLATA Services pursuant to Section 271 Of the Federal Telecommunications Act of 1996.	))))))	DOCKET NO. 960786-TL

AFFIDAVIT OF WAYNE GRAY
ON BEHALF OF BELLSOUTH

STATE OF GEORGIA
COUNTY OF FULTON

I, A. Wayne Gray, being first duly sworn upon oath, hereby depose and state as follows:

1. My name is A. Wayne Gray. I am a Director-Collocation in the Network Planning and Support organization located at 675 W. Peachtree Street, Atlanta, GA 30375.

I. PROFESSIONAL EDUCATION AND EXPERIENCE

2. I graduated from Georgia Tech in 1979 with a Bachelor of Electrical Engineering degree. In 1992, I graduated from Emory University with a Master of Business Administration degree. I began working for Southern Bell in 1979 in the Equipment Engineering organization in Miami, Florida. Throughout my 22-year career with BellSouth, I have held various line and staff positions in Equipment Engineering, Traffic Engineering (Capacity Management), Infrastructure Planning and Project Management. Since November 1999, I have held the position of Director-Collocation in the Network Planning and Support organization. In this position, I am responsible for ensuring that BellSouth provisions collocation space in the timeframes established by contractual agreements and governmental mandates.

II. PURPOSE OF AFFIDAVIT

3. The purpose of my affidavit is to demonstrate that BellSouth's Collocation processes comply with Section 251(c)(6) and Section 271(c)(2)(B)(i) of the Telecommunications Act ("the Act") and with applicable Federal Communications Commission ("FCC") and Florida Public Service Commission ("FPSC") rules regarding collocation. BellSouth is providing collocation at rates, terms, and conditions that are just, reasonable, and nondiscriminatory, and is therefore offering Alternative Local Exchange Companies ("ALECs") a meaningful opportunity to compete in Florida.

III. GENERAL DISCUSSION

4. In Florida, BellSouth provides physical collocation through either BellSouth's Florida Access Services Tariff, Section E20, Expanded Interconnection Service ("Florida Access Tariff") (Exhibit AWG-1) or negotiated Interconnection Agreements. Virtual collocation is offered to the ALECs in accordance with the FPSC's Final Order on Arbitration in regard to Metropolitan Fiber Systems of Florida, Inc., AT&T Communications of the Southern States, Inc. and MCI Telecommunications Corporation and MCI Metro Access Transmission Services, Inc. in Docket Nos. 960757-TP, 960833-TP, and 960846-TP, Order No. PSC-98-0604-FOF-TP ("MFS/AT&T/MCI Arbitration Order") (Exhibit AWG-2) or through the Florida Access Tariff, Section E20, Expanded Interconnection Service (Exhibit AWG-1). As part of obtaining collocation via Interconnection Agreement, the tariff, or an FPSC Arbitration Order, the parties agree to comply with all applicable federal, state and/or local laws, ordinances, rules and/or regulations. Over the years, BellSouth has developed a Standard Interconnection Agreement that is updated, as necessary, to comply with all applicable provisions of state and federal law and the requirements of the FCC and state commissions such as Florida. The Standard Interconnection Agreement that BellSouth offers to all parties seeking interconnection is used

in negotiations with the ALECs. Its use ensures that the signed Interconnection Agreement, although negotiated, is compliant with the afore-mentioned provisions and requirements. The Interconnection Agreement contains the cost-based rates, terms and conditions by which BellSouth provides Central Office Physical Collocation.

5. In the FPSC's Proposed Agency Action ("PAA") Order in Docket Nos. 981834-TP and 990321-TP, Order No. PSC-99-1744-PAA-TP ("FPSC September 7, 1999 Collocation Order") (Exhibit AWG-3), dated September 7, 1999, the FPSC ruled that the Incumbent Local Exchange Carriers ("ILECs") should provision physical collocation within 90 calendar days and virtual collocation within 60 calendar days. If the ILEC believes that it will be unable to meet the applicable provisioning intervals established by the FPSC and the parties are unable to agree to an extension, then an extension of time must be sought from the FPSC within 45 calendar days of receipt of the firm order. The FPSC also noted in its Order that these provisioning intervals superseded any time frames contained in the collocation agreements in Florida, which were in existence on the effective date of this Order; however, the FPSC did permit the renegotiation or adoption of new collocation agreements to incorporate time frames different from those set forth in its FPSC September 7, 1999 Collocation Order (Exhibit AWG-3). The Final Consummating Order, which made the above PAA Order effective, was issued by the FPSC on December 7, 1999. Also in Docket Nos. 981834-TP and 990321-TP, Order No. PSC-00-0941-FOF-TP ("FPSC May 11, 2000 Collocation Order") (Exhibit AWG-4), the FPSC issued a Final Order on May 11, 2000, establishing the application response interval (which includes information regarding space availability and price quotes) and the provisioning interval for cageless collocation. These FPSC ordered intervals are different from the national default intervals established by the FCC in its Collocation Order and

Collocation Reconsideration Order for Incumbent Local Exchange Carriers ("ILECs").[1] In Paragraph 22 of the Collocation Reconsideration Order, the FCC stated that, "we should adopt national standards for physical collocation provisioning that will apply when the state does not set its own standards or if the requesting carrier and incumbent LEC have not mutually agreed to alternative standards. A state could set its own standards by statute, through an existing or future rulemaking order, by enforcing a state tariff, or by applying the precedent of a state to extend the application processing and provisioning interval deadlines in specific circumstances."

6. As noted above, the FPSC has set specific state standards for the application response and the provisioning intervals for various collocation arrangements through its FPSC September 7, 1999 Collocation Order and FPSC May 11, 2000 Collocation Order. BellSouth specifies both the physical and virtual collocation intervals in Section E20 of the Florida Access Tariff, (Exhibit AWG-1) or in ALEC-negotiated Interconnection Agreements.

7. The attached Interconnection Agreement between BellSouth and YipesTransmission, Inc., Attachment 4 (Physical Collocation) ("Yipes Agreement") (Exhibit AWG-5), as well as other Florida Interconnection Agreements, and the rates, terms and conditions specified in Section E20 of the Florida Access Tariff (Exhibit AWG-1) establish BellSouth's legally binding obligation to provide physical collocation in accordance with Section 251(c)(6) and Section 271(c)(2)(B)(i) of the Act, as well as applicable FCC and FPSC provisions and requirements.

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[1]See First Report and Order and Future Notice of Proposed Rulemaking, *Deployment of Wireline Services Offering Advanced Telecommunications Capability*, 14 FCC Rcd 4761 (1999) (" *FCC Collocation Order*"), *vacated in part, GTE Servs. Corp. v. FCC*, 205 F.3d 416 (D.C. Cir. 2000); Order on Reconsideration and Second Further Notice of Proposed Rulemaking in CC Docket No. 98-147, and Fifth Further Notice of Proposed Rulemaking in CC Docket No. 96-98, *Deployment of Wireline Services Offering Advanced Telecommunications Capability*, 15 FCC Rcd 17806 (2000) ("*FCC Collocation Reconsideration Order*"), *recon. pending*.

8. In regard to the provision of virtual collocation, the Florida Access Tariff (Exhibit AWG-1) contains a description of the Virtual Expanded Interconnection Service ("VEIS") tariff offering and sets forth rates, terms, and conditions for the provision of virtual collocation. An ALEC may submit an Application for virtual collocation pursuant to Section E20 of the Florida Access Tariff to obtain the rates contained in the tariff. In the alternative, an ALEC may request the cost-based rates approved by the FPSC in the MFS/AT&T/MCI Arbitration Order. No matter which rates the ALEC chooses to govern its collocation arrangement, the terms and conditions of the arrangement are provided pursuant to the Florida Access Tariff.

9. Both virtual and physical collocation are made available on a first come, first served basis to all ALECs (depending on space availability) for interconnection to unbundled network elements ("UNEs"), local interconnection trunking, access services and local exchange services as requested by ALECs. Examples of ways an ALEC may use its collocated facilities include, but are not limited to, interoffice trunking to originate and terminate calls between an ALEC's switch and a BellSouth switch; for intermediary traffic to or from a third party via a BellSouth tandem switch; for dedicated point-to-point service; and for combining UNEs.

10. BellSouth first provided collocation to carriers pursuant to the FCC's Expanded Interconnection Order released in 1992 and 1993. BellSouth subsequently adapted its Interconnection Agreements to meet the requirements of the FCC's Local Competition Order, issued shortly after Congress passed the Act.[2] Most recently, the FCC Memorandum Opinion

[2]See First Report and Order, *Implementation of the Local Competition Provisions in the Telecommunications Act of 1996*, 11 FCC Rcd 15499 ("Local Competition Order"), modified on recon., 11 FCC Rcd 13042 (1996), *vacated in part, Iowa Utils. Bd. v. FCC*, 120 F.3d 753 (8th Cir. 1997), *aff'd in part, rev'd in part sub nom. AT&T Corp. v. Iowa Utils. Bd.*, 525 U.S. 366 (1999), *decision on remand, Iowa Utils. Bd. v. FCC*, 219 F.3d 744 (8th Cir. 2000), *petitions for cert. pending*, Nos. 00-511 & 00-587.

and Order, CC Docket No. 98-147, released February 20, 2001, In Matter of Deployment of Wireline Services Offering Advanced Telecommunications Capability, ("FCC MO&O")(Exhibit AWG-6) outlined additional collocation obligations for ILECs. BellSouth meets these additional collocation obligations by offering both physical and virtual collocation arrangements and complying with the additional requirements established by the FCC in its MO&O.

11. As noted below, BellSouth will continue to operate in accordance with the rules promulgated in the FCC Collocation Order that the D.C. Circuit Court vacated and remanded to the FCC for further consideration in *GTE Services Corporation v. FCC*, 205 F.3d 416 (D.C. Cir. 2000). BellSouth will not change any existing collocation arrangements or procedures for processing requests under any existing collocation contracts during the life of such contracts unless the FCC, or a state commission, issues new rules regarding collocation in response to the D.C. Circuit Court's remand or unless the FCC determines that BellSouth's adherence to these prior agreements is discriminatory. A copy of correspondence from BellSouth to Mr. Lawrence Strickling, Chief Common Carrier Bureau, confirming this position is attached to this affidavit as Exhibit AWG-7.

12. BellSouth's affiliate companies obtain collocation in the same manner and under the same rates, terms, and conditions as ALECs. For example, BellSouth Long Distance ("BSLD") obtained collocation rights by signing BellSouth's Standard Physical Collocation Agreement. Any ALEC may request and receive physical collocation arrangements pursuant to the rates, terms, and conditions contained in the BSLD agreement. BSLD has not received any preferential treatment including, but not limited to, treatment related to the amount of space, prices charged, reservation policies, or installation intervals. Moreover, BSLD has not had

discriminatory access to information regarding collocation space. All ALECs have the same access to this information.

13. BellSouth offers the ALECs a choice of various types of collocation arrangements in Florida. The physical collocation arrangements that are available to ALECs include caged, shared caged, cageless, adjacent, remote site, and microwave. Virtual collocation arrangements can also be requested by ALECs. Consistent with 47 C.F.R. §51.321(c), a requesting ALEC seeking a particular collocation arrangement, either physical or virtual, is entitled to a presumption that such arrangement is technically feasible, if any ILEC has deployed such collocation arrangement on any ILEC premises. Each process, procedure, requirement or service discussed below applies to BSLD or any other BellSouth affiliate in exactly the same way as it applies to the ALECs.

IV. PHYSICAL COLLOCATION

14. Physical collocation is an arrangement for the placement of ALEC-owned facilities and equipment in BellSouth central offices and may include any type of equipment that is necessary for interconnection to BellSouth's network or access to UNEs in the provision of telecommunications services. See Yipes Agreement, Section 5.1 (Exhibit AWG-5) and Florida Access Tariff, Section E20.2.2 (Exhibit AWG-1). Equipment used for interconnection and access to UNEs includes, but is not limited to: (1) transmission equipment including, but not limited to, optical terminating equipment and multiplexers, (2) equipment being collocated to terminate basic transmission of facilities pursuant to §§ 64.1401 and 64.1402 of Title 47 of the Code of Federal Regulations as of August 1, 1996, and (3) digital subscriber line access multiplexers ("DSLAMs"), routers, and asynchronous transfer mode ("ATM") multiplexers, and

remote switching modules. Equipment ownership, maintenance and insurance are the responsibility of the ALEC or its approved agent.

V. CAGED COLLOCATION

15. Caged collocation is the enclosure of an ALEC's equipment and facilities in compliance with the ALEC's collocation request. As specified in the Yipes Agreement, Attachment 4, Sections 3.2, 3.3 and 3.3.1, (Exhibit AWG-5) and the Florida Access Tariff, Section E20.2.3.B, (Exhibit AWG-1), BellSouth will permit the ALEC, at its sole expense, to arrange with a BellSouth Certified Contractor ("BCC") to construct a collocation arrangement enclosure in accordance with BellSouth's guidelines and specifications prior to starting equipment installation. BellSouth will provide guidelines and specifications to the ALEC or its BCC upon request. Where local building codes require enclosure specifications more stringent than BellSouth's standard enclosure specifications, the ALEC and its BCC must comply with such applicable and enforceable building code requirements to the same extent BellSouth complies with such building code requirements. BellSouth makes caged collocation available in increments small enough to collocate a single rack, or bay, of equipment.

VI. SHARED CAGED COLLOCATION

16. In a shared caged collocation arrangement, an ALEC may allow other ALECs to share its caged collocation arrangement pursuant to terms and conditions agreed to by the ALEC ("Host") and the other ALEC(s) ("Guests"), except where the BellSouth central office is located within a leased space and BellSouth is prohibited by the lease from offering such an option. The Host must also indemnify and hold harmless BellSouth from any and all claims, actions, causes of actions, of whatever kind or nature arising out of the presence of the Guest(s) in the Collocation Space. Furthermore, the ALECs' sharing agreement must contain

a certification that incorporates by reference the terms and conditions of the Interconnection Agreement between BellSouth and the Host. BellSouth offers shared caged collocation in increments small enough to collocate a single rack, or bay, of equipment. See Yipes Agreement, Attachment 4, Sections 3.4 and 3.4.2 (Exhibit AWG-5) and Florida Access Tariff, Sections E20.2.3.C.1 and E20.2.3.C.3, (Exhibit AWG-1).

17. As specified in the Yipes Agreement, Attachment 4, Section 3.4.1 (Exhibit AWG-5) and Florida Access Tariff, Section E20.2.3.C.2 (Exhibit AWG-1), in a shared caged collocation arrangement, the Host or the Guest(s) may be the contact and responsible party to BellSouth for the purpose of submitting Applications to BellSouth for initial and additional equipment placements of the Guest(s). However, the Host is the sole interface and responsible party to BellSouth for the payment of rates and charges contained in the Interconnection Agreement with BellSouth and for ensuring that the safety and security requirements of its Interconnection Agreement with BellSouth are fully complied with by the Guest(s), its employees and agents. In the event the Host and Guest(s) jointly submit an initial Application, only one Application fee will be assessed. A Guest may arrange directly with BellSouth for the provision of the interconnecting facilities between itself and BellSouth and for the provision of the services and access to UNEs.

18. BellSouth does not increase the price of site preparation or the non-recurring charges for a shared collocation arrangement above the cost for provisioning a cage of similar dimensions and material to a single collocating party. The charge for site conditioning and preparation undertaken by BellSouth to construct the shared collocation cage or condition the space for collocation use is prorated based on the number of ALECs and the space used by each. See

the Yipes Agreement, Attachment 4, Section 3.4.1 (Exhibit AWG-5) and the Florida Access Tariff, Section E20.2.3.C.2 (Exhibit AWG-1).

VII. CAGELESS COLLOCATION

19. Cageless collocation allows the ALEC to place its equipment and facilities within the BellSouth central office without requiring the construction of a cage or similar structure. As specified in the Yipes Agreement, Attachment 4, Section 3.1 (Exhibit AWG-5) and Florida Access Tariff, Section E20.2.3.A, (Exhibit AWG-1), the ALEC is allowed to have direct access to its equipment and facilities. BellSouth makes cageless collocation available in single bay increments. Except where the ALEC's equipment requires special technical considerations (e.g., special cable racking, isolated ground plane), BellSouth will locate cageless arrangements in conventional equipment rack lineups where technically feasible on a space-available basis.

20. Pursuant to the Yipes Agreement, Attachment 4, Sections 3.2 and 3.3 (Exhibit AWG-5), and Florida Access Tariff, Section E20.2.3.A (Exhibit AWG-1), where the ALEC's equipment requires special technical considerations (as described above), the ALEC must provide the equipment layout, including spatial dimensions, and will be responsible for constructing all special technical requirements associated with such equipment. The ALEC must utilize a vendor that has been approved as a BCC to perform all engineering and installation work required in the collocation space. The process for becoming a BCC is described in more detail later in this affidavit.

VIII. ADJACENT COLLOCATION

21. Where physical collocation space is legitimately exhausted in a particular BellSouth central office, an ALEC will be permitted to locate its equipment in an adjacent controlled environmental vault or similar structure located on BellSouth's premises (e.g., land owned, controlled or leased where the lessor does not prohibit such activity) subject to technical feasibility. The adjacent arrangement cannot interfere with access to existing or planned structures or facilities on the BellSouth premises and must be permitted by zoning and other applicable state and local regulations. See Yipes Agreement, Attachment 4, Section 3.5 (Exhibit AWG-5), and Florida Access Tariff, Section E20.2.3.D, (Exhibit AWG-1).

22. As specified in the Yipes Agreement, Attachment 4, Section 3.5.1 (Exhibit AWG-5), and in the Florida Access Tariff, Section E20.2.3.D, (Exhibit AWG-1), the ALEC must arrange with a BCC to construct an adjacent arrangement structure in accordance with BellSouth's guidelines and specifications. BellSouth will provide these guidelines and specifications to the ALEC or its BCC upon request. Where local building codes require enclosure specifications more stringent than BellSouth's standard specifications, the ALEC and its BCC must comply with the more stringent local building code requirements.

23. The ALEC's BCC is also responsible for filing and receiving any and all necessary zoning, permits and/or licenses for construction of the adjacent arrangement. The ALEC must provide a concrete pad, the structure housing the arrangement, heating/ventilation/air conditioning ("HVAC"), lighting, and all facilities that connect the structure (e.g., racking and conduits) to the BellSouth point of demarcation. At the ALEC's option, and where the local authority having jurisdiction permits, BellSouth will provide an AC power source in accordance with the requirements of the National Electrical Code and access to physical collocation

services and facilities subject to the same nondiscriminatory requirements as applicable to any other physical collocation arrangement.

24. Only in the case of an emergency will BellSouth access the ALEC's locked enclosure prior to notifying the ALEC.

25. BellSouth may elect to review the ALEC's plans and specifications prior to construction of an adjacent collocation arrangement(s). BellSouth may also inspect the adjacent arrangement(s) after construction, whether or not BellSouth elected to review the ALEC's plans and specifications prior to construction, to ensure the design and construction comply with BellSouth's guidelines and specifications. (These guidelines and specifications apply to BellSouth's own construction projects as well.)

26. BellSouth may require the ALEC, at the ALEC's sole expense, to remove or correct within seven (7) calendar days any structure that does not meet the ALEC's plans and specifications or, where applicable, BellSouth's guidelines and specifications found during such inspection, unless the parties mutually agree to an alternative time frame.

27. As with caged collocation, and under similar terms and conditions, an ALEC may allow other ALECs to share its adjacent collocation arrangement(s).

28. The ALEC may place equipment necessary for interconnection and/or access to UNEs for the provision of telecommunications services in the adjacent collocation facility including, but not limited to, copper cables, coaxial cables, fiber cables and telecommunications equipment.

29. If physical collocation space becomes available in a previously exhausted BellSouth structure, BellSouth will not require an ALEC that has collocated adjacently to move or prohibit an ALEC from moving a collocation arrangement into that structure. Instead, BellSouth will continue to allow the ALEC to collocate in any adjacent structure that the ALEC has constructed or otherwise procured.

IX. REMOTE SITE COLLOCATION

30. In accordance with the attached Interconnection Agreement between BellSouth and Yipes Transmission, Inc., Attachment 4-RS (Remote Site Physical Collocation) ("Remote Site Agreement")(Exhibit AWG-8), BellSouth will grant an ALEC the right to occupy that certain area designated by BellSouth within a BellSouth Remote Site Location, of a size which is specified by the ALEC and agreed to by BellSouth. BellSouth Remote Site Locations include cabinets, huts, and controlled environmental vaults owned or leased by BellSouth that house BellSouth network facilities. BellSouth complies with the FCC's rules regarding remote site collocation.

X. MICROWAVE COLLOCATION

31. The January 23, 2001 Amendment to the Interconnection Agreement between BellSouth and Winstar Wireless, Inc., dated July 28, 2000, contains Exhibit L, Physical Collocation. Attached to Exhibit L is Attachment A, Microwave Collocation. As stated on Page 1 of Attachment A, Microwave Collocation ("Winstar Agreement") (Exhibit AWG-9), where technically feasible and where space is available, BellSouth will provide for physical collocation of microwave equipment on the roofs of BellSouth's central office buildings. Microwave collocation includes placements of supporting masts, non-penetrating roof mounts, penetrating pipe stands, parapet mounts and microwave antenna(e) on the rooftop or other

suitable exterior spaces of BellSouth's central offices, excluding towers. The microwave equipment may include any equipment that is directly related to, and thus necessary for, interconnection or access to UNEs in the provision of telecommunications services.

XI. EQUIPMENT OWNERSHIP, OPERATION, MAINTENANCE AND INSURANCE

32. Equipment ownership, operation, maintenance and insurance are the responsibility of the ALEC or its approved agent. BellSouth places no restrictions on the type of telecommunications equipment that may be physically collocated (in enclosed or non-enclosed space) within a BellSouth central office provided such equipment is necessary for interconnection to BellSouth's network or access to UNEs in the provision of telecommunications services (*see GTE Services Corporation v. FCC*, 205 F.3d 416 (D.C. Cir. 2000)). Equipment that may be used for interconnection and access to UNEs in an ALEC's collocation space was described earlier in this affidavit. As previously stated, BellSouth will continue to operate in accordance with the rules vacated by the *GTE Services* decision for the life of current agreements or until the FCC or a state commission issues new rules regarding collocation. In addition, although not required to do so under the Act, FCC Rules, or state commission orders, BellSouth will allow the placement of switching equipment (including remote switching modules) in physical collocation space. Under certain conditions, ALECs may be permitted to place power plant and battery equipment within code-specified, fire-rated enclosures as part of their collocation arrangement.

XII. VIRTUAL COLLOCATION

33. Virtual collocation is a type of collocation arrangement that provides for the placement of ALEC-owned equipment (leased to BellSouth) in BellSouth's central offices that is necessary for interconnection to the BellSouth network or accessing UNEs. Virtual collocation

arrangements may connect to designated BellSouth tariffed services, local interconnection trunks and/or UNEs. Virtual collocation is available through the Florida Access Tariff, Section E20.1 (Exhibit AWG-1). An ALEC, regardless of the availability of physical collocation, can request virtual collocation.

34. As stated in the Florida Access Tariff, Sections E20.1.1 and E20.1.2 (Exhibit AWG-1), the ALEC may place fiber optic entrance cable from outside the central office to an interconnection point designated by BellSouth (e.g., a serving manhole). The ALEC must leave a sufficient length of cable to be pulled from the interconnection point into the cable vault. BellSouth pulls the fiber cable through entrance conduit into the central office cable vault and splices it into a pre-terminated, fire-retardant riser cable, which connects the entrance facility to the collocated equipment. Multiple facility entrance points are made available to the ALEC where multiple cable entrances exist and capacity is available. Microwave facilities, in lieu of fiber facilities, may be used for interconnection where they may reasonably be provided. See Winstar Agreement (Exhibit AWG-9). The ALEC may directly contract with its selected BCC for engineering and installation of the collocation equipment arrangement.

35. The ALEC provides the collocation equipment and cabling facilities in a virtual collocation arrangement. The equipment that can be placed for virtual collocation must conform to the same equipment requirements as those specified earlier in this affidavit for physical collocation.

36. BellSouth leases the ALEC's entrance fiber, cabling, equipment and provisioning/maintenance tools for the nominal fee of one dollar. For this reason, virtual collocation equipment

arrangements are most commonly located in the BellSouth equipment area. Performance monitoring, alarm monitoring, and software cross-connect control of all ALEC-owned equipment and facilities (leased to BellSouth) are the responsibility of the ALEC and must be performed remotely. At the ALEC's request, BellSouth will perform installation, maintenance and repair of the facilities, from the point of interconnection up to the demarcation point. Upon notification from the ALEC that work is necessary, BellSouth will, at a minimum, install, maintain and repair collocated equipment in the same manner as BellSouth does for its own equipment.

XIII. SPACE AVAILABILITY REPORT

37. In accordance with the Yipes Agreement, Attachment 4, Section 2.2 (Exhibit AWG-5), the Remote Site Agreement, Attachment 4-RS, Section 2.3 (Exhibit AWG-8), and Florida Access Tariff, Section E20.2.4, (Exhibit AWG-1), BellSouth will provide a written report ("Space Availability Report") specifying the amount of collocation space available at the premises requested, the number of ALECs present at the premises, any modifications in the use of the space since the last report on the premises requested and the measures BellSouth is taking to make additional space available for collocation arrangements. The request for a Space Availability Report from an ALEC must be written and must include the central office premises address and Common Language Location Identification ("CLLI") code. Central office premises addresses and CLLI codes are located in the National Exchange Carrier Association ("NECA") Tariff FCC No. 4.

38. BellSouth will respond to a request for a Space Availability Report for a particular central office location within ten (10) calendar days of receipt of such a request when the request includes from two (2) to five (5) BellSouth premises within the same state. The response time for

requests of more than five (5) premises will be negotiated between BellSouth and the ALEC. The request for a Space Availability Report does not require the ALEC to submit an Application for collocation.

XIV. APPLICATION PROCESS

39. BellSouth will negotiate a collocation agreement (e.g. Yipes Agreement, Attachment 4, Exhibit AWG-5) as part of the Interconnection Agreement or as a separate, stand-alone document. The collocation agreement defines the rates, terms and conditions for collocation as well as the process by which BellSouth offers collocation. The agreement includes detailed BellSouth commitments on the use of space, the duty to perform preparatory activities, the Application review and response process with associated interval(s), and the provisioning process with associated interval(s). Using this agreement as a starting point, an ALEC may negotiate a regional or state-specific agreement with BellSouth. Once a collocation agreement is negotiated by an ALEC, it is not necessary to renegotiate another collocation agreement each time a collocation arrangement is requested.

40. In the alternative, an ALEC may submit, at its own discretion, an Application for collocation pursuant to the rates, terms and conditions of the Florida Access Tariff, Section E20, (Exhibit AWG-1). The rates, terms and conditions of the Florida Access Tariff will govern that particular Application, even if the ALEC also has an Interconnection Agreement with BellSouth.

41. The Application process for both physical and virtual collocation is a two-phase process consisting of (1) the Application Inquiry phase and (2) the Bona Fide Firm Order ("BFFO") phase. For both phases, the ALEC can use the paper or electronic BellSouth Expanded

Interconnection ("BSTEI") forms. The order document is called BSTEI-1-P for physical collocation requests and BSTEI-1-V for virtual collocation requests. Applications and BFFOs may be placed electronically through BellSouth's new electronic application ("e-app") system. Within each Customer Account Team[3], BellSouth has designated a Regional Collocation Coordinator to process collocation requests.

42. To initiate the Application Inquiry phase, an ALEC must submit a completed BSTEI-1 Application Inquiry document to its designated Regional Collocation Coordinator either in paper form or electronically utilizing the e-app system. A proposed equipment layout drawing for the type of collocation arrangement requested (virtual or physical) must accompany each Application Inquiry. The Regional Collocation Coordinator reviews the Application for completeness and accuracy.

43. If the Regional Collocation Coordinator identifies deficiencies, omissions, or errors in the Application Inquiry document, the Regional Collocation Coordinator will work closely with the ALEC and various BellSouth departmental representatives, as necessary, to resolve the open issues. This might include, for example, convening a conference between the ALEC's engineering staff and BellSouth's power engineers to resolve issues concerning power specifications.

44. If the Application is complete and correct, the Regional Collocation Coordinator distributes the BSTEI-1 to the following BellSouth departmental representatives for review, planning, cost

[3] Each ALEC is assigned to a BellSouth Customer Account Team, which is responsible for working with the ALEC to address any questions, concerns, problems or issues that might arise between the ALEC and BellSouth in regard to its existing or potential future services. Within the Customer Account Team, a Regional Collocation Coordinator is assigned to handle specific ALEC collocation requests and issues in regard to collocation services ordered or contemplated by a particular ALEC.

development, and response: (1) the Interconnection Network Access Coordinator, who acts as the state-specific implementation manager; (2) Capacity Management for determination of the equipment floor space, terminal equipment, tie cable, cable support structure, demarcation point equipment and power requirements, and estimated construction intervals; (3) Corporate Real Estate & Services for review of the building floor space availability, design and construction cost estimates, and interval projections; (4) Outside Plant Engineering for the determination of the entrance facility capacity and placement; and (5) Central Office Operations for general planning and review. Based on the space and infrastructure analysis from the departmental review team, BellSouth provides a written response to the Application Inquiry ("Application Response"). This response describes space availability, technical parameters, interval and cost estimates, technical contacts and next step procedures.

45. BellSouth does not require an Application fee at the time an Application is submitted. The Application fee is billed after BellSouth determines that space is available. BellSouth will bill the ALEC an Application Fee via a service order, which is issued at the time BellSouth responds that space is available. Space Preparation Fees will be billed upon receipt of a BFFO. BellSouth will bill for construction of the collocation space in accordance with the price quote provided to the ALEC in the Application Response. The price quote will be developed using standard pricing pursuant to the FPSC May 11, 2000 Collocation Order (Exhibit AWG-4). An ALEC may choose to have its collocation arrangement billed in accordance with the rates, terms and conditions of the tariff, which has been updated to include standard pricing. In the alternative, an ALEC may choose to have its Interconnection Agreement govern the rates, terms, and conditions of the collocation arrangement. The only exception in this case would be that BellSouth will bill the standard space preparation rates for Firm Order Processing and Power, as ordered in the FPSC May 11, 2000 Collocation Order(Exhibit

AWG-4). The remaining costs, based on standard pricing or the negotiated Interconnection Agreement, are then billed when construction is completed.

XV. SPACE NOTIFICATION / TOUR OF PREMISES

46. Pursuant to the FPSC September 7, 1999 Collocation Order (Exhibit AWG-3) and the FPSC May 11, 2000 Collocation Order (Exhibit AWG-4), BellSouth will respond to inquiries regarding physical collocation space availability in a particular premises within fifteen (15) calendar days of receipt of a Bona Fide Application (when the Application is complete and correct). See Yipes Agreement, Attachment 4, Section 6.3.2 (Exhibit AWG-5), Remote Site Agreement, Attachment 4-RS, Section 6.5.2 (Exhibit AWG-8), and Florida Access Tariff, Section E20.2.7.B (Exhibit AWG-1).

47. As specified in the Florida Access Tariff, Section E20.2.7.B (Exhibit AWG-1), when space has been determined to be available, BellSouth will provide a written response ("Application Response") within fifteen (15) calendar days of the receipt of a Bona Fide Application. The Application Response will include the configuration of the space and information sufficient to enable the ALEC to place a firm order, including information on space availability and a complete price quote. BellSouth does not place any limits on the number of collocation Applications that it will accept per month; however, when an ALEC submits ten (10) or more Bona Fide Applications within ten (10) calendar days, the initial fifteen (15) calendar day response period will increase by ten (10) calendar days for every additional ten (10) Applications or fraction thereof. See FPSC May 11, 2000 Collocation Order (Exhibit AWG-4).

48. If the amount of space requested by an ALEC is not available, BellSouth will notify the applicant of the amount of space that is available. Should BellSouth determine that there is

no space available for physical collocation in the requested central office, BellSouth will provide a written letter ("Denial of Application") to the ALEC denying the collocation request. Furthermore, pursuant to the FPSC September 7, 1999 Collocation Order, if BellSouth intends to deny collocation, BellSouth will submit a Notice of Intent to Seek Waiver of Physical Collocation Requirements to the FPSC on the same date of its initial response to the applicant ALEC. The notice will include a basic statement of the reason for its denial (i.e., technical infeasibility or lack of space). If the denial is based upon lack of space, BellSouth will also file detailed floor plans or diagrams of the premises with the notice. BellSouth will also provide a copy of these floor plans or diagrams to the applicant ALEC. BellSouth will schedule a tour of the entire premises, upon request, for the applicant ALEC(s), without charge, within ten (10) calendar days of the ALEC's receipt of BellSouth's Denial of Application. (See Yipes Agreement, Attachment 4, Section 2.3, Exhibit AWG-5, and Florida Access Tariff, Section E20.2.4.C, Exhibit AWG-1). These requirements are consistent with the FPSC September 7, 1999 Collocation Order, the FPSC May 11, 2000 Collocation Order, the FCC's Collocation Order and the FCC's Reconsideration Order.

XVI. PUBLIC NOTIFICATION

49. BellSouth maintains on its Interconnection Website (www.interconnection.bellsouth.com) a notification document listing all central offices where physical collocation space has been exhausted. BellSouth updates this document within ten (10) calendar days of the date of the first Denial of Application when space has become exhausted in a central office. At BellSouth's Interconnection Website, ALECs may subscribe to an automatic email notification process, which includes, among other notifications, a notice that the central office space exhaust list has been updated. BellSouth also posts a general notice indicating when space has become available in a central office that was previously on the space exhaust list.

BellSouth will allocate the available space pursuant to the waiting list maintained for that central office.

XVII. WAITING LIST

50. Pursuant to the FPSC May 11, 2000 Collocation Order (Exhibit AWG-4), BellSouth maintains a waiting list on a first come, first served basis (governed by the date of receipt of an Application or Letter of Intent) of requesting ALECs who have either received a Denial of Application or, where it is publicly known that the central office is out of space, have submitted a Letter of Intent to collocate. Sixty (60) days prior to space becoming available, if known, BellSouth will notify the FPSC and the ALECs on the waiting list by mail when space becomes available in a particular central office based upon the amount of space that becomes available and the position of ALEC on the waiting list. If not known sixty (60) days in advance, BellSouth will notify the FPSC and the ALECs on the waiting list within two business days of the determination that space is available. Upon request, BellSouth will notify an ALEC of its position on the list. See Yipes Agreement, Attachment 4, Section 2.5.1 (Exhibit AWG-5) and Florida Access Tariff, Section E20.2.4.E (Exhibit AWG-1).

XVIII. SPACE AVAILABILITY

51. Of the one hundred ninety-six (196) BellSouth central office buildings in Florida (as of April 30, 2001), there are only eight (8) central offices with inadequate space to immediately provide physical collocation. For these eight (8) offices, the appropriate waivers have been filed with the FPSC and BellSouth continues to offer virtual collocation arrangements. The status of the eight (8) central offices with inadequate space to immediately provide physical collocation, as of April 30, 2001, is as follows: (a) four central offices (Milton-Ravine, Miami West Dade, Jacksonville – Atlantic, and North Dade Golden Glades) have building additions in progress;

(b) one central office (Miami-Palmetto) has a building addition planned; (c) two central offices (Lake Mary-Main and Pensacola-Perdido Bay) have feasibility studies for building additions under way; and (d) one central office (Jacksonville-Jay Turner) is on a leased facility and BellSouth is prohibited by the conditions of its lease to offer physical collocation. In accordance with the FCC's Collocation Order, BellSouth will, upon request, remove obsolete unused equipment, if any, from its premises to increase the amount of space available for collocation.

XIX. APPLICATION MODIFICATION PROCESS

52. As specified in the Yipes Agreement, Attachment 4, Section 6.4.2 (Exhibit AWG-5), Remote Site Agreement, Attachment 4-RS, Section 6.6.2 (Exhibit AWG-8), and Florida Access Tariff, Section E20.2.7.C (Exhibit AWG-1), if a modification or revision is made to any information in the Bona Fide Application for Physical Collocation or the Bona Fide Application for Adjacent Collocation, with the exception of modifications to Customer Information, Contact Information or Billing Contact Information, either at the request of the ALEC or necessitated by technical considerations, the Application will be considered a new Application and shall be handled as a new Application for purposes of the response and provisioning intervals. BellSouth will respond to the Bona Fide Application within fifteen (15) calendar days after BellSouth receives such revised Application or at such other date as agreed by the Parties. If, at any time, BellSouth needs to reevaluate the Bona Fide Application as a result of changes requested by the ALEC to its original Application, then BellSouth will charge the ALEC a Subsequent Application Fee. Major changes may require the ALEC to resubmit the Application with an Application Fee. Such modifications or revisions include, but are not limited to, changes in the air conditioning requirements, power requirements, and/or network infrastructure.

53. Since BellSouth must reevaluate the Application, the provisioning clock must be reset. Where the Application Modification does not require assessment for provisioning or construction work by BellSouth, no Application Fee will be required. The fee for an Application Modification where the modification requested has limited effect (e.g., requires limited assessment and no capital expenditure by BellSouth) will be the Subsequent Application Fee. Major changes such as requesting additional space or adding equipment may require the ALEC to resubmit the Application, along with an Application Fee.

XX. BFFO INTERVAL

54. Pursuant to the Florida Access Tariff, Section E20.2.7.D (Exhibit AWG-1), Yipes Agreement, Attachment 4, Section 6.5.1 (Exhibit AWG-5), and Remote Site Agreement, Attachment 4-RS, Section 6.7.1 (Exhibit AWG-8), requesting ALECs have thirty (30) calendar days after the date of BellSouth's written Application Response to submit a complete and accurate BFFO document for each location for which the ALEC wishes to proceed. A BFFO requires the ALEC to complete the Application process and submit a BellSouth Expanded Interconnection BFFO document ("BSTEI-1P-F") indicating acceptance of the Application Response provided by BellSouth. As noted above, the BFFO document may be submitted via paper or electronically utilizing the e-app system.

XXI. FIRM ORDER DATE

55. For each individual BFFO Request received, BellSouth will establish a Firm Order Date based upon the date BellSouth receives the complete and accurate BFFO document and detailed equipment drawing. If the BFFO Request is not received within thirty (30) calendar days of the Application Response date, the ALEC forfeits its requested space (and the Application expires).

56. In accordance with the Yipes Agreement, Attachment 4, Section 6.5.3 (Exhibit AWG-5), Remote Site Agreement, Attachment 4-RS, Section 6.7.3 (Exhibit AWG-8), and Florida Access Tariff, Section E20.2.7.D.1 (Exhibit AWG-1), BellSouth will acknowledge receipt of the BFFO within seven (7) calendar days of receipt by providing a Firm Order Confirmation, which indicates the Firm Order Date. If the BFFO is not accurate and complete, BellSouth will acknowledge receipt of the BSTEI-1 form with a letter that details the information necessary to make the order accurate and complete within the same time period. Because BellSouth cannot finalize its collocation design specifications until it has obtained the ALEC's complete technical and spatial requirements, ALEC-specified building construction and infrastructure provisioning can only begin after an accurate and complete firm order has been received in writing from the requesting ALEC. BellSouth subject matter experts will consult with requesting ALECs to expeditiously resolve any outstanding ALEC technical issues. Requesting ALECs may begin the Application Inquiry process prior to the execution of a physical collocation agreement with BellSouth; however, the agreement must be executed prior to proceeding with the BFFO phase.

XXII. ASSIGNMENT OF SPACE

57. Pursuant to the FCC MO&O (Exhibit AWG-6) and the FPSC May 11, 2000 Collocation Order (Exhibit AWG-4), BellSouth offers and assigns space for collocation based on space availability on a first come, first served basis. Physical collocation space is assigned based on the ALEC's request, where space permits. BellSouth will consider any unused space within BellSouth's central office for cageless collocation. The size specified by the ALEC may contemplate a request for space sufficient to accommodate the ALEC's growth within an 18-month period. Neither BellSouth nor any BellSouth affiliate, reserves space for future use on

preferential terms. For virtual collocation, space is assigned within the BellSouth equipment line-up based on the rack requirements for the equipment installation. See Florida Access Tariff, Section E20.2.5.A (Exhibit AWG-1), Yipes Agreement, Attachment 4, Section 1.2.2 (Exhibit AWG-5), and Remote Site Agreement, Attachment 4-RS, Section 1.2.2 (Exhibit AWG-8).

XXIII. SPACE DESIGN AND EQUIPMENT CONFIGURATION

58. In accordance with the Florida Access Tariff, Section E20.2.7.F (Exhibit AWG-1), Yipes Agreement, Attachment 4, Section 6.7 (Exhibit AWG-5), and the Remote Site Agreement, Attachment 4-RS, (Exhibit AWG-8), unless otherwise agreed to by BellSouth and the ALEC, a joint planning meeting or other method of joint planning will be held within a maximum of twenty (20) calendar days from BellSouth's receipt of a BFFO. At this meeting, the parties will agree to the preliminary design of the collocation space and the equipment configuration requirements as reflected in the Application and affirmed in the BFFO. The collocation space completion time period will be provided to the ALEC during the joint planning meeting or as soon as possible thereafter. Immediately following the planning meeting, BellSouth, the ALEC and the ALEC's contractors will complete architectural and infrastructure designs, file building permits as required, and begin construction and/or other necessary work. Building construction may not begin until building permits are received.

XXIV. SITE VISITS

59. After receipt of the BFFO and prior to completion of the Security Training and Space Acceptance, an ALEC or its approved agent will be permitted one accompanied site visit to its designated collocation arrangement location or access to the entrance manhole, free of charge. See Yipes Agreement, Attachment 4, Sections 6.5.4 and 7.9 (Exhibit AWG-5),

Remote Site Agreement, Attachment 4-RS, Sections 6.8 and 7.4 (Exhibit AWG-8), and Florida Access Tariff, Section E20.2.7.D.2 (Exhibit AWG-1). Further visits under the above circumstances are allowed, but a Security Escort fee may apply.

60. In a physical collocation arrangement, an ALEC may also request access keys/cards at any time after BFFO, once the security and training requirements have been completed. Further information regarding these security and training requirements will be discussed later in this affidavit.

XXV. CONSTRUCTION OF PHYSICAL COLLOCATION SPACE

61. Pursuant to the standards set forth in the FPSC September 7, 1999 Collocation Order (Exhibit AWG-3), BellSouth will complete construction, in accordance with the requesting ALEC's application, of physical collocation space in Florida within a maximum of ninety (90) calendar days from receipt of a BFFO or as agreed to by the Parties. For changes to collocation space after initial space completion, BellSouth will complete construction within a maximum of forty-five (45) calendar days from receipt of the BFFO or as agreed to by the Parties. If BellSouth does not believe that construction will be completed within the relevant time frame and BellSouth and the requesting ALEC cannot agree upon a completion date, within forty-five (45) calendar days of receipt of the BFFO for an initial request, and within 30 calendar days for augmentations (i.e., modifications), BellSouth may seek an extension from the FPSC. See Yipes Agreement, Attachment 4, Section 6.6.1 (Exhibit AWG-5), Remote Site Agreement, Attachment 4-RS, Sections 6.10.1 (Exhibit AWG-8), and Florida Access Tariff, Section E20.2.7.E (Exhibit AWG-1).

XXVI. EQUIPMENT PLACEMENT

62. As soon as construction has been completed ("Space Ready Date"), BellSouth will turn the functional space over to the requesting ALEC. The Space Ready Date for physical collocation is the date that BellSouth finishes construction in accordance with the requesting ALEC's Application and turns functional space over to the requesting ALEC. On the Space Ready Date, the ALEC may begin placing its equipment in its physical collocation space. At this point, BellSouth has completed its provisioning requirements as mandated by the FPSC or FCC.

XXVII. EARLY SPACE ACCEPTANCE

63. Depending on the particular conditions at a given central office and provided the space is adequately secured, BellSouth may, at its discretion, permit the collocation equipment installation to begin prior to the Space Ready Date. In such cases, the ALEC must sign a liability waiver before equipment installation work may begin. This waiver addresses liability issues associated with potential damage to equipment or injury to ALEC personnel as a result of ongoing construction related activities, debris or obstructions.

XXVIII. VIRTUAL COLLOCATION PROVISIONING INTERVALS

64. Pursuant to the FPSC September 7, 1999 Collocation Order (Exhibit AWG-3), virtual collocation arrangements are to be completed within a maximum of sixty (60) calendar days from receipt of the BFFO or as agreed to by the parties. BellSouth fully complies with this requirement. If BellSouth does not believe that construction will be completed within the required time frame, and BellSouth and the requesting ALEC cannot agree upon a completion date, within forty-five (45) calendar days of receipt of the BFFO for an initial request, and

within 30 calendar days for augmentations (i.e., modifications), BellSouth may seek an extension from the FPSC.

XXIX. MODIFICATIONS TO EXISTING COLLOCATION SPACE

65. Additions or modifications are treated under the same terms and conditions that apply for any other type of collocation request. An Application is the appropriate method for requesting an addition or modifications to collocation space. The Application provides all of the equipment, facilities, and service modifications that will enable BellSouth to provision or augment the collocation space. The amount of work performed by BellSouth in response to the ALEC's Application is dependent on the nature and scope of the request and the particular premises involved.

XXX. INTERCONNECTION FACILITIES

66. With either physical collocation or virtual collocation, an ALEC may opt to place a private fiber optic entrance cable to serve its collocation space. If an ALEC has no cable facilities of its own available for interconnection, it can lease the necessary facilities from BellSouth. See 47 C.F.R. § 51.323(g). BellSouth will provide an interconnection point or points at which the fiber transmission cables carrying the ALEC's circuits enter(s) BellSouth's premises. For BellSouth's premises where there are at least two existing entry points and where capacity exists for the placement of new facilities in those entry points, BellSouth will provide the ALEC use of at least two such interconnection points. Where multiple entry points are not available or do not exist, BellSouth will provide access to the existing entry point. (Pursuant to 47 C.F.R. § 51.323(d)(1) and 47 C.F.R. § 51.323(d)(2)).

XXXI. ENGINEERING AND INSTALLATION

67. In order to protect BellSouth facilities, equipment and personnel, and the equipment and personnel of other ALECs, an ALEC must select a BCC to perform all engineering and installation work associated with the collocation arrangement. Installed equipment must also meet Bellcore (now known as Telcordia) Network Equipment and Building Specifications ("NEBS") Criteria Level 1 standards (FCC Collocation Order and FCC Collocation Reconsideration Order FCC 99-48 ¶35 and FCC 00-297 ¶56). Use of a BCC for engineering and installation activities is necessary to ensure compliance with technical, safety and quality standards as set forth in BellSouth Technical Requirements 73503 Engineering and Installation Standards for Central Office Equipment, dated February 1995. BellSouth adheres to this requirement itself and expects any other entity installing equipment and facilities within a BellSouth central office to do likewise.

68. Any ALEC interested in becoming a BCC may contact BellSouth to obtain the certification process information. To become a BCC, an applicant must have a working knowledge of the required standards and appropriate references and demonstrate this through a trial installation. The applicant must also be proficient at operating within these technical, safety and quality engineering and installation guidelines and specifications. Guidelines for obtaining BCC status are available upon request from the BellSouth Account Team. BellSouth provides updated copies of its BCC lists on a frequent basis upon request.

69. After an ALEC becomes a BCC, BellSouth will allow it to perform engineering and installation activities for the ALEC's own equipment installations, as well as those for other ALECs.

XXXII. ALEC RESPONSIBILITIES

70. For a physical collocation arrangement, the ALEC and its BCC are responsible for:

a) installation of the collocated equipment and components;

b) installation and connection of power feed(s) from the Battery Distribution Fused Board ("BDFB") to the collocated equipment or the installation and connection of the power feed(s) from the BellSouth power board interconnection cables to an ALEC-provided BDFB;

c) installation and connection of interconnection cables to the point of demarcation (e.g., BellSouth Conventional Distributing Frame, Digital System Cross-connect ("DSX") panel, or Light Guide Cross-connect ("LGX") panel);

d) in caged collocation, construction of low level frame and aisle lighting, as required within the caged space;

e) performance of operational tests as requested by the ALEC; and

f) notification to the local BellSouth Central Office foremen (and the ALEC) upon successful completion of the installation and testing.

71. For a virtual collocation arrangement, the ALEC and its BCC are responsible for providing the transmission equipment (e.g., fiber optic terminals, DS3/DS1 channelization equipment, fiber terminating device) pursuant to FPSC Access Tariff, Section E20.1 (Exhibit AWG-1). The ALEC must also specify all software options for the transmission equipment and associated plug-ins. In addition, the ALEC must provide the following:

A) all necessary plug-ins/circuit packs (both working and spare) including any required options that must be physically set on the plug-ins;

B) all unique tools and test equipment;

C) initial and subsequently added equipment sized and equipped to handle a minimum of 12

months forecasted growth;

D) lockable rack mounted storage unit to house spare plug-ins, tools, and test equipment;

E) any desired equipment for remote monitoring and control;

F) fuse panel(s) with sufficient capacity for all BellSouth Virtual Collocation equipment;

G) network facility rack(s) (i.e., relay racks) to mount all of the above referenced equipment; and

H) notification to the local BellSouth Central Office Foreman (and the ALEC) upon successful completion of the installation and testing.

XXXIII. EQUIPMENT INSTALLATION STANDARDS

72. BellSouth specifies a minimum standard for equipment to be installed by an ALEC in its physical collocation space. In compliance with 47 C.F.R. § 51.323(b), as revised by the FCC Collocation Reconsideration Order, BellSouth does not object to the collocation of equipment by an ALEC on the grounds the equipment does not comply with safety and engineering standards that are more stringent than the safety and engineering standards that BellSouth applies to its own equipment.

73. BellSouth can deny the collocation of an ALEC's equipment on the grounds that the equipment does not meet the minimum safety standards. If BellSouth denies the collocation of an ALEC's equipment due to safety concerns, BellSouth will provide to the ALEC within five (5) business days of the denial, a list of all BellSouth equipment that BellSouth has located at the premises in question. Included with this list, BellSouth will attach an affidavit attesting that all of BellSouth's equipment meets or exceeds the safety standards that BellSouth contends the ALEC's equipment fails to meet. The affidavit will set forth in detail the exact safety requirement(s) that the ALEC's equipment fails to satisfy; BellSouth's basis for determining

that the ALEC's equipment fails to comply with this safety requirement; and BellSouth's basis for concluding why collocation of the ALEC's equipment would compromise network safety.

XXXIV. POST-INSTALLATION RESPONSIBILITIES

74. The ALEC must notify BellSouth in writing that the collocated equipment is installed, tested and ready for service provisioning. At this time, BellSouth will establish the arrangement Installation Complete Date based upon the written notification received. For physically collocated equipment, the ALEC must notify BellSouth. For virtually collocated equipment, either the ALEC or the ALEC's equipment vendor may provide this notification.

XXXV. COMMENCEMENT DATE

75. BellSouth establishes a Commencement Date for each collocation arrangement. The Commencement Date is the date that the ALEC's equipment becomes operational (cross-connected to BellSouth's network for the purpose of service provision).

76. For physical collocation, the Commencement Date is the Installation Complete Date.

77. For virtual collocation, the BCC must (for insurance purposes) provide BellSouth with a complete and accurate inventory list of all equipment and facilities installed as part of the arrangement. This inventory list is used to verify receipt of all equipment, circuit packs, spare parts, and test equipment and is a critical part of the "Acceptance Process". Until central office personnel receive this inventory list, the installation cannot be accepted and BellSouth assumes no responsibility for the equipment (or any spare parts). This list becomes an attachment to the Equipment Lease. For a virtual collocation arrangement, BellSouth prepares the Equipment Lease agreement upon receipt of notification of the Installation

Complete Date, which includes the "as installed" equipment and facilities list. The Virtual Collocation Commencement Date then becomes the date the Equipment Lease is executed.

XXXVI. SERVICE INTERCONNECTION

78. An ALEC may interconnect to BellSouth's network at 2-wire, 4-wire, DS1, DS3 and 2-fiber/4-fiber optical levels from either a physical or virtual collocation arrangement. BellSouth assigns and pre-wires interconnection facilities from within its network to the collocation demarcation point. BellSouth does not require ALECs to use an intermediate interconnection arrangement in lieu of direct connection to its network unless technically necessary.

XXXVII. DEMARCATION POINT

79. Pursuant to the FPSC May 11, 2000 Collocation Order (Exhibit AWG-4), BellSouth will designate the location of the demarcation point at the perimeter of the ALEC's collocation space, unless a different demarcation point is negotiated by the parties. BellSouth is not obligated to offer access to its Main Distributing Frame ("MDF") or Conventional Distributing Frame ("CDF"). Furthermore, BellSouth is not required to terminate cabling onto any ALEC device or equipment. An ALEC may negotiate with BellSouth for the designation of other demarcation points up to the CDF; however, if terms cannot be reached between the parties, the ALEC's collocation site will be the default demarcation point. Each party will be responsible for maintenance and operation of all equipment/facilities on its side of the demarcation point.

80. For physical collocation, the demarcation point between the ALEC's arrangement and BellSouth's network is the Conventional Distributing Frame, DSX panel or LGX panel. In a DSX panel, electrical digital connections are made and jumpers are used to tie connections

together. In a LGX panel, optical fiber connections are made and jumpers are used to tie connections together.

81. The ALEC is also responsible for providing the common block and necessary cabling in a physical collocation arrangement. For all other terminations, BellSouth will designate a demarcation point on a per arrangement basis. The ALEC may opt, at its own expense, to place a Point of Termination ("POT") bay or frame within its collocation space, but this POT bay or frame will not serve as the demarcation point between the ALEC's equipment and BellSouth's network.

82. For a virtual collocation arrangement, the demarcation point is either the BellSouth Distribution Frame, DSX or LGX. The ALEC's facilities will run directly between the BellSouth Distribution Frame, DSX or LGX and the ALEC's equipment.

XXXVIII. SECURITY ACCESS

83. After BFFO, BellSouth will allow an ALEC to have direct access to its equipment and facilities twenty-four (24) hours a day, seven (7) days a week as required by the FCC Collocation Order and FCC Collocation Reconsideration Order. BellSouth will allow an ALEC to have direct access without the need for a security escort, provided that the ALEC complies with BellSouth's security and safety requirements set forth in its Interconnection Agreement. BellSouth does not require ALEC employees to receive security training from BellSouth, but provides information to the ALEC on the specific type of training required. See Yipes Agreement, Attachment 4, Sections 5.6 and 11, (Exhibit AWG-5), Remote Site Agreement, Attachment 4-RS, Sections 5.6 and 11 (Exhibit AWG-8), and Florida Access Tariff, Section E20.2.10, (Exhibit AWG-1).

84. Prior to ALEC completion of the security and safety requirements, BellSouth offers one free escorted site visit to the ALEC's designated collocation arrangement location or access to the entrance manhole and unlimited paid escorted visits until the ALEC complies with the BellSouth Security and Safety requirements. See Yipes Agreement, Attachment 4, Sections 6.5.4 and 11, (Exhibit AWG-5), Remote Site Agreement, Attachment 4-RS, Sections 6.8 and 11 (Exhibit AWG-8), and Florida Access Tariff, Sections E20.2.7.D.2 and E20.2.10 (Exhibit AWG-1).

85. To gain access to BellSouth's premises, the ALEC's agent or employee is required to carry a picture identification at all times. The ALEC is required to certify that each agent or employee seeking access has had security training, that a background check has been performed, and that no felony convictions were found. These requirements are reasonable and necessary to ensure the safety of BellSouth's and other ALEC's facilities and employees working in and around BellSouth premises and to maintain the efficient operation of the network. These same measures are required for all BellSouth and BellSouth affiliate personnel. Additionally, BellSouth will provide restroom facilities and reasonable parking on a first come, first served basis.

86. BellSouth is installing security access systems in its central offices to effectively monitor compliance with BellSouth's security and safety requirements, reasonably protect the central office and ALEC equipment and facilities, and ensure network reliability. These systems will allow entry to central offices with an appropriate card key, while tracking and recording the time of entry by each cardholder. Where security systems are not yet installed, access keys are provided to the collocated ALECs.

87. BellSouth recovers the costs of implementing the security access systems per central office from all collocating parties, including itself, through an allocation of these costs based on the amount of square feet used by each collocator and BellSouth, relative to the total useable square footage in the central office. This fee is assessed on a monthly basis for each central office in which the ALEC has obtained collocation space. BellSouth's security requirements are addressed in the Florida Access Tariff, Subsection E20.2.10 (Exhibit AWG-1), Yipes Agreement, Attachment 4, Section 11 (Exhibit AWG-5) and the Remote Site Agreement, Attachment 4-RS, Section 11 (Exhibit AWG-8).

88. BellSouth does not and will not use the information that it obtains as a result of the implementation of its security requirements for marketing or other competitive purposes.

89. This concludes my affidavit.

The information contained in this affidavit and its Exhibits is true and correct to the best of my knowledge and belief.

Executed on May 29, 2001.

A. Wayne Gray

STATE OF Georgia
COUNTY OF Fulton
Subscribed and sworn to before me
this 29th day of May, 2001.

Linda M. Hobbs

Notary

Notary Public, Gwinnett County, Georgia
My Commission Expires March 17, 2003