BELLSOUTH TELECOMMUNICATIONS, INC.

DIRECT TESTIMONY OF RONALD M. PATE

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

DOCKET NO. TP-001305-TP

JULY 27, 2001

Q. PLEASE STATE YOUR NAME, YOUR POSITION WITH BELLSOUTH TELECOMMUNICATIONS, INC., AND YOUR BUSINESS ADDRESS.

A. My name is Ronald M. Pate. I am employed by BellSouth Telecommunications, Inc. ("BellSouth") as a Director, Interconnection Services. In this position, I handle certain issues related to local interconnection matters, primarily operations support systems ("OSS"). My business address is 675 West Peachtree Street, Atlanta, Georgia 30375.

Q. PLEASE SUMMARIZE YOUR BACKGROUND AND EXPERIENCE.

A. I graduated from Georgia Institute of Technology in Atlanta, Georgia, in 1973, with a Bachelor of Science Degree. In 1984, I received a Masters of Business Administration from Georgia State University. My professional career spans over twenty-five years of general management experience in operations, logistics management, human resources, sales and marketing. I joined BellSouth in 1987, and have held various positions of increasing responsibility since that time.

Q. HAVE YOU TESTIFIED PREVIOUSLY?

A. Yes. I have testified on behalf of BellSouth before the Public Service Commissions ("PSC") in Alabama, Florida, Georgia, Louisiana, South Carolina, and Kentucky, as well as the Tennessee Regulatory Authority and the North Carolina Utilities Commission.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. The purpose of my testimony is to provide BellSouth's position on Issue Nos. 5, 38, 46, 47, 51, 55, 57, 60, 61, and 62 raised by Supra Telecommunications & Information Systems, Inc. ("Supra") in Petition for Arbitration filed with the Florida Public Service Commission ("Commission") on October 16, 2000.

Q. HAVE THE PARTIES DISCUSSED EACH OF THESE ISSUES IN AN INTERCOMPANY REVIEW BOARD MEETING AS ORDERED BY THE FLORIDA PUBLIC SERVICE COMMISSION?

A. No. Although BellSouth attempted to engage Supra on all issues, Supra refused to negotiate the following issues during the Intercompany Review Board Meetings: Issue Nos. 5, 38, 46, 47, 51, 55, 57, 60, 61, and 62.

Issue 5: Should BellSouth be required to provide to Supra a download of

all BellSouth's Customer Service Records ("CSRs")?

Q WHAT IS YOUR UNDERSTANDING OF THE NATURE OF THE DISPUTE CONCERNING ISSUE 5?

A. Because Supra failed to negotiate this issue in the Intercompany Review Meetings, I do not know its position. My assumption is that Supra wants a download of CSRs for those areas in which Supra markets its services. Supra apparently believes that such a download is not a violation of the Customer Proprietary Network Information ("CPNI") requirements of the Act, that a download is necessary to allow Supra to place orders in a timely manner.

Q. WHAT IS BELLSOUTH'S RESPONSE TO SUPRA'S REQUEST FOR A DOWNLOAD OF ALL BELLSOUTH CUSTOMER SERVICE RECORDS?

A. Supra is entitled to view customer service records only for those records where the end-user customer has given specific permission to do so. Thus, BellSouth is unwilling to provide a download of the BellSouth customer service records. Providing Supra with a download of all CSRs, without authorization of each and every BellSouth customer would constitute a breach of confidentiality and privacy for which Supra is not entitled.

Q. DOES BELLSOUTH PROVIDE SUPRA ACCESS TO BELLSOUTH'S CUSTOMER SERVICE RECORDS?

A. Yes. BellSouth provides both electronic and manual access to BellSouth's Customer Service Records as a pre-ordering functionality and thus, a download of the CSRs is not necessary. The electronic pre-ordering functionality, available via the Local Exchange Navigation System ("LENS"), Telecommunications Access Gateway ("TAG"), and RoboTAG™ is real-time access to BellSouth's Customer Service Records. The ability to view Customer Service Record information for the ALEC's own customers and existing BellSouth customers is described for ALEC's in BellSouth's Pre-Ordering and Ordering Overview Guide available at BellSouth's Web-Site:
http://www.interconnection.bellsouth.com/guides/html/bpobr.html

Q. WHAT MUST AN ALEC DO IN ORDER TO GAIN ACCESS TO BELLSOUTH CUSTOMER SERVICE RECORDS?

A. After contract negotiations between BellSouth and an ALEC are completed, an ALEC must go through a series of steps that outlines the requirements for doing business with BellSouth. For the sake of simplicity, I will not review each step that an ALEC must perform, but specifically address the provision for securing customer service records.

First, an ALEC must sign a blanket letter of authorization.

Q. WHAT IS THE PURPOSE OF A BLANKET LETTER OF AUTHORIZATION?

A. The purpose of the blanket letter of authorization is to ensure that an end-user customer's records are protected from unauthorized access. It describes the terms and conditions under which an ALEC can obtain customer service records. Further, it ensures that an ALEC only obtains the customer service records information necessary to provide telecommunications services for that end-user customer.

An end-user's customer service record information contains confidential and proprietary information and as such must be protected. BellSouth is committed to providing our customers with the necessary safeguards to protect their private and confidential information.

The terms and conditions of the blanket letter of authorization, states that an ALEC will obtain permission from the end-user customer before accessing that end-user customer's service records. Additionally, the ALEC must obtain an individual letter of authorization from the end-user before accessing the end-user's records. This step is normally executed at the time an ALEC gains agreement from the prospective end-user customer for providing that end-user customer's telecommunication service. During this exchange, the end-user customer signs the individual letter of authorization granting permission to an ALEC to view the end user customer service records.

Q. ONCE THE BLANKET LETTER OF AUTHORIZATION HAS BEEN SIGNED, WHAT MUST SUPRA DO TO OBTAIN CUSTOMER SERVICE RECORDS?

A. As I stated earlier, BellSouth provides both electronic and manual access to BellSouth's customer service records. For the sake of simplicity, I will describe the manner in which a Supra customer service representative, utilizing the LENS interface, would obtain access to customer service records.

After successfully logging into LENS, a Supra customer service representative is taken to the main menu screen. The main menu screen provides several options for selection. The selection options include firm orders, bulk orders, supplemental existing request, inquiry, view local service request ("LSR")/order information, and user administration. As mentioned, for the sake of simplicity, I will address just the steps that a Supra customer service representative would use to access a customer service record.

Next, the Supra customer service representative selects "Inquiry Mode". From the "Inquiry Menu", the Supra customer service representative is prompted to select "View Customer Record". The Supra representative must also populate the telephone number of the end-user customer along with the area where the customer resides. Once the telephone number

and associated information has been populated, the Supra representative selects the "Proceed With Inquiry" prompt. This selection takes the Supra representative to the customer service record authorization screen. At this point, the Supra customer service representative will be prompted to answer the following question, "Are you authorized to view this CSR?" "If so, click OK." After affirming that the Supra customer service representative is authorized, BellSouth provides the individual customer service record. Please see an example of the customer service record information provided via LENS in Exhibit RMP - 1 pages 37 and 38 of the LENS User Guide 9.3 issued June 16, 2001. You may review the LENS User Guide in its entirety at BellSouth's Interconnection Web Site at: http://www.interconnection.bellsouth.com/guides/html/lens_tafi.html

Further, if the Supra representative does not affirm they are authorized to obtain the end-user customer's record, BellSouth denies access.

Q. DOES BELLSOUTH REQUIRE ALECS TO SUBMIT AN INDIVIDUAL LETTER OF AUTHORIZATION BEFORE ACCESSING CUSTOMER SERVICE RECORDS?

A. No. While BellSouth does not require an ALEC to submit a written authorization from each end-user customer to BellSouth before the ALEC accesses that end-user's customer service record, BellSouth does require the ALEC to obtain a signed letter of authorization from the end-user granting the ALEC authorization to access their customer information.

Q. HAS BELLSOUTH PROVIDED A DOWNLOAD OF THE CUSTOMER SERVICE RECORDS TO ANY OTHER ALEC?

A. No.

Issue 38: Should BellSouth provide Supra Telecom true electronic access to its pre-ordering and ordering interfaces?

Q. WHAT IS YOUR UNDERSTANDING OF SUPRA'S POSITION ON THIS ISSUE?

A. Although Supra failed to discuss this issue during the Intercompany Review Board Meetings, it is my understanding that Supra is seeking direct access to BellSouth databases, which BellSouth uses for the purposes of provisioning service requests.

Q. WHAT IS BELLSOUTH'S POSITION ON THIS ISSUE?

A. Direct access to BellSouth's databases is unnecessary and more importantly is not required by the Telecommunications Act of 1996. BellSouth is required by the Telecommunications Act to provide non-discriminatory access to its Operations Support Systems ("OSS") for the purposes of providing access to the functionality of pre-ordering, ordering,

provisioning, maintenance and repair, and billing.

Q. DID THE FCC DEFINE NON-DISCRIMINATORY ACCESS TO OPERATIONS SUPPORT SYSTEMS?

A. Yes. An Incumbent Local Exchange Carrier ("ILEC") such as BellSouth must provide access to OSS that allows ALECs to perform the functions of pre-ordering, ordering, provisioning, maintenance and repair, and billing for resale services in substantially the same time and manner as BellSouth does for itself; and, in the case of unbundled network elements, provide a reasonable competitor with a meaningful opportunity to compete.[1]

Q. HAS THE FCC SUBSEQUENTLY REAFFIRMED THIS DEFINITION?

A. Yes. In paragraph 87 of its Order on BellSouth's second 271 application for Louisiana, the FCC reiterated its requirement stated in the Ameritech Michigan Order and in the Local Competition First Report and Order "that a BOC must offer access to competing carriers that is analogous to OSS functions that a BOC provides to itself. Access to OSS functions must be offered in 'substantially the same time and manner' as the BOC. For those OSS functions that have no retail analogue . . . a BOC must offer

[1] Federal Communication Commission First Report and Order in CC Docket No. 96-98 and 95-185 released on April 8, 1996 at 312 and 518, hereinafter "First Report and Order".

[2] Application of BellSouth Corporation, et al. for Provision of In-Region, InterLATA Services in Louisiana, 13 FCC Rcd. 20599 (1998) at 87, hereinafter "FCC Louisiana II Order".

access sufficient to allow an efficient competitor a meaningful opportunity to compete." The FCC reaffirmed this requirement in its orders granting long distance relief to Bell Atlantic in New York (New York Order, paragraphs 85-86) and Southwestern Bell in Texas (Texas Order, paragraphs 94-95).[3]

The FCC follows a two-step approach to determine if the BOC has met the non-discrimination standard for each OSS function. First the FCC will determine, "whether the BOC has deployed the necessary systems and personnel to provide sufficient access to each of the necessary OSS functions and whether the BOC is adequately assisting competing carriers to understand how to implement and use all of the OSS functions available to them." Next, the FCC will determine "whether the OSS functions that the BOC has deployed are operationally ready, as a practical matter." This includes an examination of "performance measurements and other evidence of commercial readiness." *See Second Louisiana Order*, ¶ 85.

Q. DOES BELLSOUTH PROVIDE ALECS NON-DISCRIMINATORY ACCESS TO ITS OSS?

[3] *Application by Bell Atlantic New York for authorization under Section 271 of the Communications Act to provide In-Region, InterLATA Service in the State of New York,* Memorandum Opinion and Order and *Application by SBC Communications, Inc., Southwestern Bell Telephone Company, and Southwestern Bell Communications Services, Inc. d/b/a Southwestern Bell Long Distance. Pursuant to Section 271 of the Telecommunications Act of 1996 to Provide In-Region, InterLATA Services in Texas,* Memorandum and Opinion.

A. Yes. BellSouth provides non-discriminatory access to its OSS for ALECs via electronic and manual interfaces. BellSouth provides access to its OSS via the following electronic interfaces: Electronic Data Interchange ("EDI") for ordering and provisioning; Local Exchange Navigation System ("LENS"), Telecommunications Access Gateway ("TAG"), and RoboTAG™ for pre-ordering, ordering and provisioning; Trouble Analysis and Facilities Interface ("TAFI") for maintenance and repair; Electronic Communications Trouble Administration ("ECTA") for maintenance and repair; and for the function of billing, Access Daily Usage File ("ADUF"), Enhanced Optional Daily Usage File ("EODUF") and Optional Daily Usage File ("ODUF"). In conformance with the FCC's requirements, these interfaces allow the ALECs to perform the functions of pre-ordering, ordering, provisioning, maintenance and repair, and billing for services in substantially the same time and manner as BellSouth does for itself; and, in the case of unbundled network elements, provide a reasonable competitor with a meaningful opportunity to compete which is also in conformance with the FCC's requirements. BellSouth is not obligated to provide ALECs with any additional access to its OSS functions.

Q. UPON WHAT TYPES OF EVIDENCE WILL THE FCC RELY TO ASSESS AN RBOC'S PROVISION OF NON-DISCRIMINATORY ACCESS TO OSS?

A. The FCC emphasized that commercial or operational readiness can be evidenced in several ways: actual commercial usage, carrier-to-carrier

testing, independent third-party testing and internal testing. The FCC has repeatedly stated that actual commercial usage is the most probative evidence that OSS functions are operationally ready. Bell Atlantic New York Order, ¶89. BellSouth's interfaces have been used commercially for years. As will be shown more fully in the discussion of each interface, the levels of commercial usage alone clearly demonstrate the operational readiness of these interfaces. However, these interfaces have also been subjected to extensive third-party testing and carrier-to-carrier testing, as will be described below.

Q. WHAT HAS THE FCC SAID ABOUT INDEPENDENT THIRD-PARTY OSS TESTING?

A. In its Bell Atlantic New York Order, the FCC stated that "the persuasiveness of a third-party review is dependent on the conditions and scope of the review." In addition to scope, depth, and surrounding conditions, the following qualities led the FCC " . . . to treat the conclusions in the KPMG Final Report as persuasive evidence of Bell Atlantic's OSS readiness." These qualities are: independence, military-style testing philosophy, efforts to place themselves in the position of an actual market entrant, and efforts to maintain blindness when possible. Bell Atlantic New York Order, ¶ 100. The independent third-party test ordered by the GPSC has all of these qualities.

Q. HAS BELLSOUTH CONDUCTED CARRIER-TO-CARRIER TESTING OF

ITS ACCESS TO OSS?

A. Yes. Six ALECs participated in a carrier-to-carrier Beta test of LENS Release 6.0 from September 13 through September 24, 1999. The ALECs tested pre-ordering, the new "fast-path" ordering, the new screen design and activity flows, the view function for LSR order information, the changes to the main menu, the options for user administration (such as the ability to change the company code and passwords), and the new bulk ordering function. Because LENS Release 6.0 is dependent on TAG Release 3.0 which was still in development in September, not all the functionality of LENS was tested.

During the test, the six CLECs successfully submitted 8,184 LSRs through LENS Release 6.0. During the first nine days, BellSouth limited each ALEC to 50 LSRs per day (a total of 300 per day). On the final day, BellSouth lifted the limit, and the ALECs submitted 2,591 LSRs.

Based on the success of the LENS Release 6.0 Beta test, the ALECs asked BellSouth to put the Beta version of Release 6.0 into production before the scheduled implementation on January 14, 2000. BellSouth complied with that request, and on October 25, 1999, the Beta version of LENS Release 6.0 went into production.

Q. DID BELLSOUTH CONDUCT BETA TESTING OF ITS OSS99 EDI INTERFACE?

A. Yes. BellSouth and AT&T successfully conducted a Non-LNP Beta Test of OSS99. Connectivity testing was conducted from October 25, 1999 to October 26, 1999. Syntax testing was conducted from October 27, 1999 to October 29, 1999. Carrier testing was conducted from November 1, 1999 to December 1, 1999. Approximately 25 LSRs were tested. BellSouth and AT&T also successfully conducted a LNP Beta Test of OSS99. Syntax testing was conducted from December 13, 1999 to December 15, 1999. Carrier testing was conducted from December 20, 1999 to January 14, 2000. Approximately 10 LSRs were tested. A variety of test case scenarios were used during both the Non-LNP and LNP beta testing. Further, BellSouth provides an open and stable testing environment for the ALECs.

A. BellSouth has designed and implemented a variety of electronic interfaces to suit the varied business plans and entry methods of the ALECs in BellSouth's region. An ALEC's selection of an interface depends on its business plan and entry strategy. ALECs can select from among the interfaces described below to match their particular mix of services, volume of orders, technical expertise, resources, and future plans. The following chart depicts the entry methods and the non-discriminatory interfaces from which a CLEC may choose. Each interface will be described in detail later in my testimony.

	Resale	UNEs	Facility-Based	Data
Pre-Ordering	TAG	TAG	TAG	TAG
	LENS	LENS	LENS	LENS
	RoboTAG™	RoboTAG™	RoboTAG™	RoboTAG™
Ordering & Provisioning	EDI	EDI	EDI	EDI
	TAG	TAG	TAG	TAG
	LENS	LENS	LENS	LENS
	RoboTAG™	RoboTAG™	RoboTAG™	RoboTAG™
Maintenance & Repair	TAFI	TAFI (TN-based)	TAFI	TAFI
	ECTA	ECTA	ECTA	ECTA
Billing	EODUF	ADUF	ODUF	N/A
	ODUF	EODUF		
		ODUF		

Q. DOES BELLSOUTH ALLOW ALECS TO SUBMIT LSRS MANUALLY AS WELL AS ELECTRONICALLY?

A. Yes. BellSouth does not require ALECs to transmit requests for resale and UNE POTS-type services only by electronic interfaces, but instead

allows transmittal through manual interfaces for those ALECs that have made the business decision to use only manual entry methods.

Q. HOW DOES BELLSOUTH PROVIDE ALECS WITH ACCESS TO ITS PRE-ORDERING AND ORDERING OSS?

A. BellSouth provides ALECs with access to the same pre-ordering, ordering, and provisioning OSS accessed by BellSouth's retail units through the machine-to-machine Telecommunications Access Gateway ("TAG") interface. TAG, which was developed in response to specific requests from mid-sized and large CLECs, provides a standard Application Programming Interface ("API") to BellSouth's pre-ordering, ordering, and provisioning OSS. TAG is based on Common Object Request Broker Architecture ("CORBA"), which is one of the industry protocols for pre-ordering. TAG follows the Ordering and Billing Forum ("OBF") guidelines for LSRs. TAG pre-ordering has been available since August 31, 1998; TAG ordering has been available since November 1, 1998. There are two ways for ALECs to connect to TAG: LAN-to-LAN and the Internet.

For its retail basic exchange service customers, BellSouth uses two retail marketing and sales support systems to access pre-ordering, ordering, and provisioning information from BellSouth's downstream OSS. BellSouth uses the Regional Negotiation System ("RNS") for most types of residential service requests. For business customers, BellSouth uses the Regional Ordering System ("ROS").

In addition to TAG, BellSouth provides ALECs with access to the same ordering and provisioning OSS accessed by the BellSouth retail units through the machine-to- machine Electronic Data Interchange ("EDI") interface for ALECs. EDI is not used to access pre-ordering OSS. EDI follows the protocol (EDI) that was established for ordering and the OBF guidelines for LSRs. EDI has been available to any interested ALEC since December 1996. There are several EDI connectivity options available: dedicated point-to-point connections; dial-up connections; and Value-Added Network ("VAN") connections. BellSouth is targeted to add Internet access as a method of connectivity for EDI during 2002. The diagram attached as Exhibit RMP - 2 depicts how BellSouth's and ALECs' systems interact with the pre-ordering and ordering OSS.

Q. PLEASE DISCUSS INTEGRATION WITH RESPECT TO TAG AND EDI.

A. In accordance with the FCC's requirements, BellSouth provides ALECs with all the specifications necessary for integrating the BellSouth interfaces. An ALEC may integrate ordering and pre-ordering functions by integrating the TAG pre-ordering interface with the EDI ordering interface, or by integrating TAG pre-ordering with TAG ordering.

ALECs have taken the specifications provided by BellSouth, and have successfully integrated the TAG pre-ordering interface with the EDI and TAG ordering interfaces. Because integration takes place on the CLECs'

side, BellSouth cannot specify exactly how many ALECs have integrated the interfaces. However, BellSouth believes that at least 6 ALECs have integrated the TAG pre-ordering interface with the EDI interface and at least 43 ALECs have integrated TAG pre-ordering with TAG ordering. Four ALECS, Cox Communications, Network Telephone Corporation, CenturyTel, and NewSouth Communications have purchased and integrated TAG pre-ordering and EDI ordering gateways built by DSET. (Please see DSET's Web site, www.dset.com for the press releases naming these ALECs.) Exhibit RMP - 3 shows the usage of the pre-ordering and ordering interfaces by ALECs, and indicating those ALECs that BellSouth believes have successfully integrated pre-ordering and ordering interfaces.

Q. DOES BELLSOUTH OFFER ALECS INTERFACES OTHER THAN TAG AND EDI?

A. Yes. BellSouth recognizes that some ALECs have decided not to make the investment necessary to develop the integrateable machine-to-machine TAG and EDI interfaces. BellSouth, therefore, offers the ALECs other interfaces to suit their needs and business plans.

Some ALECs may wish to use TAG for pre-ordering and ordering, so that they have the ability to use their own databases, without the necessity of making the investment in programmers to develop and maintain their own TAG interface. For these ALECs, BellSouth sells a software package

called "RoboTAG™." This software was developed by Science Applications International Corporation (SAIC), under contract with BellSouth. RoboTAG™ provides a standardized, browser-based interface to the TAG gateway that resides on an ALEC's LAN server, and integrates pre-ordering and ordering with up-front editing. RoboTAG™ became available in November 1999. The first ALEC that purchased RoboTAG™ completed testing and was ready for production on November 24, 1999. Five ALECs are using RoboTAG™. A sixth ALEC (Cox Communications) is in the process of establishing RoboTAG™.

BellSouth provides substantial support to ALECs using RoboTAG™. This support includes: performing a site survey before installation of RoboTAG™; developing a detailed project plan for installation; performing installation of RoboTAG™ (including training the ALEC's system administrator); providing the initial training for end users; providing a help desk; and providing fixes. BellSouth also is responsible for providing ALECs with updated versions of RoboTAG™. In other words, as TAG evolves with new releases, ALECs using RoboTAG™ will automatically receive upgrades of TAG.

ALECs using RoboTAG™ need a separate server or one with adequate space to store all of its TAG transactions. This server allows the ALEC to integrate the information obtained through TAG with its own internal OSS, and eliminates the need for ALECs to perform any dual entry of information. The ALEC must maintain licenses for certain third-party

software (NT Server, Cold Fusion, Sequel Server, and Orbix). The ALEC is also responsible for participating in the RoboTAG™ User Group.

Q. CAN ALECS USE A THIRD-PARTY VENDOR TO ACCESS BELLSOUTH'S OSS?

A. Yes. As yet another option available, ALECs may choose to use solutions developed by third-party vendors. Albion International, Inc., Telcordia Technologies, Exceleron Software, Inc., DSET Corporation, Mantiss, Nightfire Software, Quintessent, and Eftia, for example, have developed electronic interfaces to connect and integrate ALECs' systems with BellSouth's OSS. In addition to the ALECs (mentioned earlier) that have purchased DSET's gateway solution, various press releases note CLECs such as Sprint, Now Communications, Teleconex, Rhythms, Covad, DSLNet, and Adelphia Business Solutions as using third-party solutions.

Q. DOES BELLSOUTH OFFER ALECS A HUMAN-TO-MACHINE INTERFACE?

A. Yes. For ALECs that have made the business decision not to integrate pre-ordering, ordering and provisioning interfaces with their own internal OSS, and do not want to expend the resources necessary to use RoboTAG™, BellSouth makes available the human-to-machine Local Exchange Navigation System ("LENS") interface. LENS is a Web-based graphical user interface ("GUI"). LENS requires software development

only on BellSouth's side of the interface. BellSouth therefore is responsible for implementing any changes or new version of the interface. With the implementations of Release 6.0 of LENS on January 14, 2000, LENS became a GUI to the TAG gateway. LENS uses TAG's architecture and gateway, and therefore has TAG's pre-ordering functionality for resale services and UNEs, and TAG's ordering functionality for resale services. With Release 6.2 on April 15, 2000, LENS began using TAG's ordering functionality for designed and non-designed unbundled analog loops, unbundled digital loops, and for ALECs with contracts, unbundled two-wire analog port plus two-wire analog loop combinations (the "UNE Platform"). LENS provides integrated pre-ordering and ordering in its firm order mode. In order to use LENS, an ALEC must have, at a minimum, a personal computer, Web browser software, and an Internet connection (of course, the ALEC must also test with BellSouth, attend training, and obtain a password). LENS has been available since April 1997.

Q. DESCRIBE FOR THE COMMISSION SOME OF THE BENEFITS OF LENS.

A. Certainly. LENS reduces the input requirements for ALEC service representatives by providing ALECs with shortcuts for commonly used functions, such as disconnects, suspends, and restores. ALECs need only to complete one input screen and one verification screen to process these types of LSRs.

Another shortcut function specially tailored to ALECs' practices is the addition on January 14, 2000, of a new feature in LENS called "bulk ordering". This feature allows ALECs to send up to 500 LSRs for conversions/switch as is, disconnects, suspends, restores, and cancellations to BellSouth in a single order. There are also two methods for bulk ordering in LENS. One method allows the ALEC user to type up to 100 LSRs directly on a single LENS screen. Using the other method, a ALEC user types up to 500 LSRs using any program that allows a file to be saved as "*.txt" (tab delimited), such as Microsoft's Excel®. That file can be uploaded into LENS and then sent to BellSouth. CLECs can check the status of each LSR sent in a bulk order, just as they can for LSRs sent individually.

Q. DO ALECS HAVE A MEANS TO TRACK THEIR SERVICE ORDERS?

A. Yes. In December 1999, the CLEC Service Order Tracking System ("CSOTS") became available to ALECs. This region-wide Web-based electronic interface allows ALECs to view service orders on-line, track service orders, and determine the status of their service orders. Region-wide, 320 ALECs are using CSOTS.

Q. WHAT ARE THE INDUSTRY STANDARD PRE-ORDERING PROTOCOLS?

A. In September 1997, the industry voted to approve two standard protocols

for pre-ordering interfaces: CORBA and EDI TCP/IP/SSL3. The industry anticipated that CORBA "would emerge as the preferred long-term solution." (Memorandum from Melson to Sirles of 10/31/1997, at 1.) BellSouth, therefore, began building the TAG pre-ordering interface to the CORBA standard. However, BellSouth is now working with the CLECs via the Change Control Process (discussed below) to add an EDI pre-ordering interface.

Q. DOES BELLSOUTH PROVIDE SUPRA TRUE ELECTRONIC ACCESS TO ITS PRE-ORDERING AND ORDERING INTERFACES?

A. Yes. Bellsouth provides Supra true electronic access to its pre-ordering and ordering interfaces in the manner the Telecommunications Act of 1996 and FCC requires.

Q. WHAT DOES BELLSOUTH RECOMMEND THE COMMISSION DO REGARDING THIS ISSUE?

A. BellSouth recommends this Commission base its decision on what the FCC requires and the third party testing this Commission has ordered. The Commission should not require direct access to BellSouth's OSS. Providing Supra direct access would essentially mean providing access that (a) is different from other ALECs and (b) is not in accordance with the guidelines established by the Ordering and Billing Forum ("OBF").

Issue 46: Should Supra Telecom be allowed the ability to submit orders electronically for all services and elements?

Q. WHAT IS BELLSOUTH'S UNDERSTANDING OF SUPRA'S POSITION ON THIS ISSUE?

A. Again, since Supra failed to negotiate this issue during the Intercompany Review Board Meetings, BellSouth is unable to speak with specificity on what Supra is requesting; however, Bellsouth believes Supra is asking that BellSouth provide it the ability to submit "all" LSRs electronically.

Q. WHAT IS BELLSOUTH'S POSITION ON THIS ISSUE?

A. BellSouth's position is that non-discriminatory access does not require that all LSRs be submitted electronically and involve no manual processes. BellSouth's own retail operations often involve manual processes, as I will describe below, and therefore there is no requirement that every LSR be submitted electronically in order to provide non-discriminatory access.

Q. CAN YOU ELABORATE ON YOUR EARLIER REMARK THAT NON-DISCRIMINATORY ACCESS DOES NOT REQUIRE THAT ALL LSRS BE SUBMITTED ELECTRONICALLY?

A. Yes. As I stated, non-discriminatory access does not require that all LSRs

be submitted electronically. Many of BellSouth's retail services, primarily complex services, involve substantial manual handling by BellSouth account teams for BellSouth's own retail customers. Non-discriminatory access to certain functions for ALECs legitimately may involve manual processes for these same functions. Therefore, these processes are in compliance with the Act and the FCC's rules.

Q. PLEASE DESCRIBE HOW BELLSOUTH'S COMPLEX SERVICE REQUESTS ARE MANUALLY HANDLED FOR BELLSOUTH AND ALECS.

A. There are two types of complex services: "Non-designed" and "Designed." A "Non-designed" service is a class of service with a Universal Service Order Code ("USOC") that does not require special provisioning and is served by one central office or wire center. A "Designed" service involves special engineering and provisioning.

An example of a "Designed" complex service for which retail handling is not fully mechanized is Multiserv® service. This is a complex service available to both BellSouth's retail customers and to resellers. In the case of MultiServ®, the pre-ordering processes are largely manual. These manual pre-ordering processes are substantially the same for both retail and ALEC orders. Orders for retail services are handled primarily by the appropriate business unit for retail services -- BellSouth Business Systems ("BBS") account teams. Orders for ALEC services are handled by the

appropriate business unit for ALEC services – ALEC account teams that are part of Interconnection Services ("ICS"). The ICS account team's handling of complex services for ALECs is substantially the same as BBS's account team handling of complex services for BellSouth's retail customers; they both use substantially the same processes as described below.

Attached to my testimony is Exhibit RMP - 4, which depicts the flow of the process for ordering MultiServ® service by ALECs and Exhibit RMP- 5, which depicts the flow of the process for ordering MultiServ® by BellSouth's retail unit. To perform the pre-ordering activity for complex services, which is known as a "service inquiry", a systems designer on the appropriate BellSouth Business Services or Interconnection Services account team fills out an extensive paper form and then provides that form to a project manager for further manual activities. On approval of either the retail customer or the ALEC, as appropriate, the paper service inquiry is re-initiated as a firm order, which also is an extensive paper form with subsequent manual distribution. In both the retail and the resale cases, the Firm Order Package is manually handed off to the service center, where paper service order worksheets are created to assist in initiating service orders in the ordering system. At that point, orders are typed into the appropriate order systems, the Regional Ordering System ("ROS") for the BellSouth Retail order and Direct Order Entry ("DOE") for the ALEC order. The order entry is handled in substantially the same manner for both the retail and the resale situations, and thus, does not result in a

different customer "experience" in either case. The person who enters the complex order in BellSouth's systems never has any contact with the end-user customer, whether the customer belongs to an ALEC or BellSouth. After the service order is input, the account team and project manager are notified by e-mail of the service order numbers and due dates. The account team manually reviews the service order for accuracy and follows up as necessary. These processes, with their substantial reliance on manual handling and paper forms, are common to both retail and ALEC orders. Thus, BellSouth provides to ALECs the ability to order complex services in substantially the same time and manner as it provides to its retail customers.

Q. DOES BELLSOUTH PROVIDE ELECTRONIC ORDERING CAPABILITY TO ALECS FOR LOCAL SERVICE REQUESTS?

A. Yes. BellSouth provides the LENS, TAG, RoboTAG™, and EDI electronic ordering interfaces to ALECs. These electronic interfaces are used by ALECs to submit approximately 90% of all LSRs to BellSouth.

Q. DOES BELLSOUTH PROVIDE A PROCESS FOR THE MANUAL SUBMISSION OF LSRS BY ALECS?

A. Yes. BellSouth has established the Local Carrier Service Center ("LCSC") to serve, as BellSouth's point-of-contact for manually processing LSR's from ALECs. Manually submitted LSRs are submitted to the LCSC in

accordance with the ordering business rules defined in the BellSouth Business Rules for Local Ordering TCIF 9/LSOG 4 found on BellSouth's Web Site:
http://www.interconnection.bellsouth.com/guides/html/leo.html

Q. CAN BELLSOUTH ELECTRONICALLY PROCESS ALL LSRS?

A. No. Because the same manual processes are in place for both ALEC and BellSouth retail orders, the processes are non-discriminatory and competitively neutral.

Some Unbundled Network Elements ("UNEs") and complex resold services require manual handling. The manual processes used by BellSouth are accomplished in substantially the same time and manner as the processes used for BellSouth's complex retail services. The specialized and complicated nature of complex services, together with the relatively low volume of orders for them relative to basic exchange services, renders them less suitable for mechanization, whether for resale or retail applications. Complex, variable processes are difficult to mechanize, and BellSouth has concluded that mechanizing many low volume complex retail services for its own retail operations would be an imprudent business decision, in that the benefits of mechanization would not justify the cost.

Q. HAS THE FLORIDA PUBLIC SERVICE COMMISSION SUBSEQUENTLY

RULED ON THIS ISSUE?

A. Yes. In its decision in the AT&T Arbitration Docket 000731-TP issued June 28, 2001, the Florida Public Service Commission ruled, "We agree with AT&T that BellSouth currently does have the technical ability to input its own complex residential and business orders when AT&T does not. Furthermore, we agree with BellSouth when witness Pate suggests that a mechanism is in place to address this issue which is the CCP. It appears no such change control request has been submitted to the CCP. This issue should first be addressed through the CCP."

Q. HAS BELLSOUTH DEVELOPED A PROCESS TO MANAGE CHANGES TO THE INTERFACES PROVIDED TO THE ALECS?

A. Yes. Working closely with the ALEC community, BellSouth has developed the Change Control Process ("CCP").

Q. PLEASE DESCRIBE THE CCP.

A. The CCP is the process by which BellSouth and the ALECs manage requested changes to the ALEC interfaces, handle the introduction of new interfaces, and provide for the identification and resolution of issues related to change requests. This process covers change requests that affect external users of BellSouth's electronic interfaces, associated manual process improvements, performance or the ability to provide

service including defect notification, whether discovered by the ALECs or BellSouth.

Q. WHO CAN PARTICIPATE IN BELLSOUTH'S CHANGE CONTROL PROCESS?

A. A company wishing to participate in the CCP must be certified as an ALEC by one of the state-level utilities commissions in the BellSouth nine-state region in order to be a participating ALEC in the CCP. Once this basic criteria is met, gaining a free membership is simply a matter of registering with the Change Control group at BellSouth via the group's web site: http://www.interconnection.bellsouth.com/markets/lec/ccp_live/ccp_forms.html

Additionally, vendors representing certified ALECs are also entitled to be members, and, of course, BellSouth is a member as administrator of the CCP.

Q. HOW MANY ALECS AND VENDORS PARTICIPATE IN BELLSOUTH'S CHANGE CONTROL PROCESS?

A. Approximately 300 ALECs are actively doing business in the BellSouth region. Of these, approximately 100 (as of November 30, 2000) are registered members of the CCP. There are approximately 10 qualified vendors.

In addition to the ALECs and vendors, there are observers (non-voting members) in regular attendance at the meetings and/or on the conference calls, including the Public Service Commissions from Florida and Georgia, the Department of Justice, and KPMG Consulting, LLC, which has oversight of Third Party Testing[4] in Florida and Georgia.

Q. HOW DOES BELLSOUTH PROMOTE THE CCP AND ENCOURAGE ALECS TO PARTICIPATE?

A. The account team assigned during the initial start-up period for an ALEC informs the ALEC of the CCP. All of the benefits of membership are outlined for the ALEC, along with the location of the CCP's web site. ALECs are strongly encouraged to actively participate as the CCP is the primary forum for ALECs to be involved with the decision-making process regarding interface change requests, as well as a way to be kept informed of issues related to those change requests.

Q. IS SUPRA AN ACTIVE PARTICIPANT IN THE CCP?

A. No. While Supra is a registered member of the CCP, according to the minutes of the various meetings held by the CCP – whether it has been a

[4] Third Party Testing is the process ordered by the Florida and Georgia PSCs to determine whether BellSouth's provision of access to OSS functionality enables and supports CLEC entry into the local market.

full-team or sub-team meeting – a representative of Supra has never attended in person or participated via the telephone conference bridge.

Q. HAS SUPRA TAKEN ADVANTAGE OF ITS MEMBERSHIP IN THE CCP BY SUBMITTING CHANGE REQUESTS AS A MEANS OF NOTIFYING BELLSOUTH OF SITUATIONS THAT SUPRA BELIEVES TO BE DETRIMENTAL TO ITS ABILITY TO OPERATE AS AN EFFICIENT ALEC?

A. No. A check of the CCP Change Request log indicates no such requests by Supra on any issue, much less the issues contained in this arbitration. The CCP would have been the appropriate forum for virtually all of Supra's OSS issues to be addressed.

Q. INASMUCH AS SUPRA IS NOT ACTIVELY ENGAGED IN THE CCP, IS SUPRA PREVENTED FROM SUBMITTING A CHANGE REQUEST?

A. No. Since Supra is a member of CCP, Supra may submit a change request to BellSouth's CCP at any time.

Issue 47: Should BellSouth be required to allow Supra Telecom the ability to continue processing orders electronically after the electronic ordering, without subsequent manual processing by BellSouth personnel?

Q. WHAT IS BELLSOUTH'S UNDERSTANDING OF SUPRA'S POSITION

ON THIS ISSUE?

A. As I stated previously, Supra failed to negotiate this issue during the Intercompany Review Board meetings; therefore, BellSouth is not certain of Supra's specific issue. BellSouth assumes Supra is referring to two possible scenarios. (A) Supra is requesting that all complete and correct LSRs submitted electronically flow through BellSouth systems without manual intervention. (B) Supra is asking that BellSouth relieve Supra of its responsibility to submit a complete and accurate LSR. And, not clarify Supra for Supra's inability to submit a complete and accurate LSR – I will address both scenarios.

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Q. WHAT IS BELLSOUTH'S POSITION ON PART A OF THIS ISSUE?

A. BellSouth's position on part A is that non-discriminatory access does not require that all LSRs be submitted electronically and involves no manual processes. BellSouth's own retail processes often involve manual processes, as I will describe below, and therefore there is no requirement that every LSR has to be submitted electronically in order to provide non-discriminatory access.

However, before I discuss this issue any further, I want to state again that all change requests for BellSouth's electronic and manual interfaces

should be submitted via the CCP. OSS issues subject to the CCP are not appropriate for this arbitration. These issues must be dealt with by BellSouth and all of the ALECs participating in the CCP, not just by Supra and BellSouth in an arbitration such as this one.

Q. CAN YOU ELABORATE ON YOUR EARLIER REMARK THAT NON-DISCRIMINATORY ACCESS DOES NOT REQUIRE THAT ALL LSRS BE SUBMITTED ELECTRONICALLY?

A. Yes. As I stated in my position, non-discriminatory access does not require that all LSRs be submitted electronically. Many of BellSouth's retail services, primarily complex services, involve substantial manual handling by BellSouth account teams for BellSouth's own retail customers. Non-discriminatory access to certain functions for ALECs legitimately may involve manual processes for these same functions. Therefore, these processes are in compliance with the Act and the FCC's rules.

Q. WHAT IS FLOW-THROUGH?

A. Flow-through for an ALEC LSR occurs when the complete and correct electronically-submitted LSR is sent via one of the ALEC ordering interfaces (EDI, TAG, RoboTAG™, or LENS), flows through the mechanical edit checking and Local Exchange Service Order Generator ("LESOG") system, is mechanically transformed into a service order by LESOG, and is accepted by the Service Order Communications System

("SOCS") without any human intervention.

Q. IS IT FEASIBLE FOR LSRS FOR ALL COMPLEX SERVICES TO BE SUBMITTED ELECTRONICALLY AND FLOW THROUGH THE BELLSOUTH SYSTEMS?

A. No. As I discussed earlier in my testimony, many of BellSouth's retail services, primarily complex services, involve substantial manual handling by BellSouth account teams for BellSouth's own retail customers. The orders at issue here are those that the ALEC may submit electronically, but fall out by design. In most cases, these orders are complex orders. For certain orders, BellSouth has, for the ease of the ALEC, allowed them to be submitted electronically even though such orders are then manually processed by BellSouth. The specialized and complicated nature of complex services, together with their relatively low volume of orders as compared to basic exchange services, renders them less suitable for mechanization, whether for retail or resale applications. Complex, variable processes are difficult to mechanize, and BellSouth has concluded that mechanizing many lower-volume complex retail services would be imprudent for its own retail operations, in that the benefits of mechanization would not justify the cost. Because the same manual processes are in place for both ALEC and BellSouth retail orders, the processes are competitively neutral, which is exactly what both the Act and the FCC require.

Q. WHAT ARE THE REASONS THAT ELECTRONICALLY SUBMITTED ORDERS FALL OUT FOR MANUAL HANDLING?

A. There are two main reasons that electronically submitted orders fall out for manual handling. The first reason is that the Local Exchange Service Order Generator ("LESOG") has not been programmed to handle requests for certain types of products and services, typically complex services. Another example might be the inability to justify the economics of programming for some types of low ordering volume products and services, e.g. a "T" activity type, which is an outside move of an end user location.

The second reason for fallout concerns unique circumstances related to the LSR. Requests with pricing plans specific to the ALEC, requests which have other related requests being processed, and subsequent requests on an account prior to the new telephone number being posted to the billing system are all examples of LSRs that are subject to fallout due to unique circumstances.

Q. DOES THE FCC REQUIRE THAT ALL LSRS BE SUBMITTED ELECTRONICALLY WITHOUT MANUAL INTERVENTION?

A. No. Non-discriminatory access does not require that all LSRs be submitted electronically, and, further, the FCC does not require that all electronically submitted LSRs have to flow through without manual

intervention. In its approval of in-region interLATA services for both Southwestern Bell Telephone Company for Texas (paragraph 180) and Bell Atlantic for New York (footnote 488), the FCC recognized that some services could properly be designed to fall out for manual processing.

Q. HAS THE FLORIDA PUBLIC SERVICE COMMISSION ADDRESSED PART A OF THIS ISSUE?

A. Yes. In its order filed June 28, 2001 in the AT&T Arbitration Docket 000731-TP the Commission stated, "With regard to the CCP, the Commission agreed with AT&T that change requests (numbers 0137 and 0160) were issued requesting that BellSouth modify its systems so that additional order types will flow through its systems without manual intervention. We disagree with BellSouth that "AT&T is attempting to avoid the CCP" on this issue. We find that the proper mechanism to address this issue is the CCP. It would be beneficial for AT&T and other ALECs to have the ability to electronically enter all LSRs and have them flow through to SOCS without designed manual fall-out. However, the system in place does not create disparity for AT&T regarding order submission as stated earlier. Therefore, this issue is currently best suited to be pursued through the CCP process."

Q. IS BELLSOUTH PREPARED TO RESOLVE PART A OF THIS ISSUE WITH SUPRA?

A. Yes. BellSouth is willing to incorporate the same language in Supra's agreement that BellSouth and AT&T has agreed to.

Q. WHAT IS BELLSOUTH'S UNDERSTANDING OF SUPRA'S POSITION ON PART B OF THIS ISSUE.

A. BellSouth believes that Supra wants BellSouth to relieve it of its responsibility to submit a complete and accurate LSR. If this is truly what Supra intends, this is totally unreasonable and unacceptable. Supra should not expect BellSouth to assume what is clearly Supra's obligation. Supra has elected to provide local exchange service to its customers and by doing so, is obligated to handle the administrative duties associated with this responsibility. BellSouth expects no less from other ALECs doing business with BellSouth.

Moreover, BellSouth utilizes the industry standard local service request for local ordering for the express purpose of ensuring consistency and uniform ordering procedures.

Q. WHY ARE SERVICE REQUESTS RETURNED TO ALECS FOR CLARIFICATION?

A. Requests for clarification are generally received by ALECs because the required fields on a local service request have not been completely and accurately populated. This appears to be the case in most of the

clarifications Supra receives.

Q. WHAT IS THE IMPACT OF SUBMITTING LOCAL SERVICE REQUESTS THAT ARE INCOMPLETE AND INACCURATE?

A. Failure to submit a complete and accurate local service request will result in a clarification or a rejection. Receiving a clarification or rejection could affect the confirmation date an ALEC expects. Time is of the essence. Not until the LSR is corrected and resubmitted can the request be processed for provisioning.

Q. HAVE YOU EVALUATED SUPRA'S USE OF THE ELECTRONIC INTERFACES BASED ON THE DATA CONTAINED IN THE PERCENT FLOW THROUGH SERVICE REQUESTS REPORT?

A. Yes. To better understand Supra's use of electronic interfaces, a comparative analysis of their individual data with the ALEC aggregate was conducted using the Percent Flow Through Service Report for the six-month period of June 2000 through November 2000. The Percent Flow Through Service Requests is a monthly report provided to ALECs, including Supra, as part of the BellSouth Service Quality Measurements. The report reflects the percentage of Local Service Requests (LSR) submitted via the ALEC mechanized ordering process that flow through to the BellSouth's Operations Support Systems (OSS) without manual intervention. As BellSouth's ordering and provisioning centers are

regionally based, all data reflected in this report reflects the BellSouth nine-state region. BellSouth does not track any state specific data for LSR flow through submissions.

Exhibit RMP - 6 (marked confidential and proprietary) shows the results of this analysis. The data and resulting analysis clearly show that Supra has a substantially higher rate than the ALEC aggregate for auto clarifications and ALEC caused fallout. From the high auto clarification and ALEC error rate, one can conclude that Supra's service representatives have difficulty submitting complete and accurate LSRs.

Q. WHAT IMPACT DOES THIS HAVE ON SUPRA'S ABILITY TO SERVE ITS END-USER CUSTOMERS.

A. The most obvious impact is that the service cannot be provisioned until Supra provides a complete and accurate LSR. Thus, Supra's end-user customer may be impacted by not receiving the service on the date expected. This is why it is imperative that Supra provides expeditious turnaround on the auto clarifications and ALEC caused errors sent back for correction and resubmission.

Q. IS BELLSOUTH WILLING TO RESOLVE PART B OF THIS ISSUE?

A. Yes. BellSouth is willing to incorporate the MCI language to settle this issue; however, Supra must understand its obligation to provide a

complete and accurate LSR. Conversely, BellSouth should be expected to provide Supra a clarification that is accurate and provided in a timely manner. The exact language can be found in John Ruscilli's Exhibit JAR – 1.

Issue 51: Should BellSouth be allowed to impose a manual charge when it fails to provide an electronic interface?

Q. WHAT IS YOUR UNDERSTANDING OF THE NATURE OF THE DISPUTE CONCERNING ISSUE 51?

A. Because Supra failed to negotiate this issue during the Intercompany Review Board Meetings, BellSouth assumes Supra's position is that BellSouth should not be allowed to impose a manual ordering charge where BellSouth does not provide an electronic means for ordering the product or service.

Q. WHAT IS BELLSOUTH'S POSITION ON THIS ISSUE?

A. Certain resale and unbundled network element ("UNE") services must be submitted manually and BellSouth is entitled to recover its OSS costs by imposing a manual ordering charge.

Q. PLEASE EXPLAIN WHEN BELLSOUTH APPLIES THE ELECTRONIC

AND THE MANUAL ORDERING CHARGE.

A. BellSouth charges the electronic charge for LSRs that are submitted over any of BellSouth's electronic interfaces. BellSouth applies the manual ordering charge for LSRs submitted manually to BellSouth's Local Carrier Service Center ("LCSC") via facsimile.

Q. WILL SUPRA PAY ELECTRONIC ORDERING CHARGES FOR CERTAIN MANUALLY SUBMITTED ORDERS?

A. Yes. BellSouth has agreed to charge ALECs electronic ordering charges for complete and accurate LSRs that ALECs must submit manually when BellSouth's existing electronic interfaces utilized by ALECs are unavailable for reasons other than scheduled maintenance, provided the down time does not occur outside the scheduled maintenance window or for other reasonable scheduled activities for which reasonable advance notification is provided by BellSouth, and provided the activities do not occur outside the scheduled window. However, Supra should not be permitted to avoid manual charges in a wholesale fashion as Supra seeks to do.

Q. HAS THE FLORIDA PUBLIC SERVICE COMMISSION RULED ON THIS ISSUE?

A. Yes. In the Commission's order in the MCI WorldCom Arbitration Order

Number PSC-01-0824-FOF-TP dated March 30, 2001, the Commission stated, "Finally, with regard to the issue as framed, we find that where it is determined that BellSouth has an electronic interface in place for its retail offerings, but there is no analogous system in place for comparable services obtained by an ALEC, it would be a reasonable presumption that an ALEC is being denied a meaningful opportunity to compete; where such a finding is made, BellSouth should charge an electronic ordering charge. However, such a determination will need to be made on a case-by-case basis.

Q. HOW DOES BELLSOUTH PROPOSE RESOLVING THIS ISSUE?

A. BellSouth is willing to include language in Supra's agreement on this issue.

Issue 55: Should BellSouth be required to provide an application-to-application access service order inquiry process?

Q. WHAT DO YOU UNDERSTAND SUPRA IS REQUESTING REGARDING ISSUE 55?

A. To be quite honest, I have absolutely no idea what Supra is requesting. Supra is asking for something which it has no legitimate reason to request. Supra is not an Interexchange Carrier doing business as an ALEC;

therefore, BellSouth is confused by Supra's request. BellSouth can only assume that Supra selected an issue raised by MCI in its Arbitration with BellSouth and thought that it might be a good idea to have the same capability.

B. Again, since Supra failed to negotiate this issue during the Intercompany Review Board Meetings, BellSouth assumes Supra is requesting BellSouth to develop an application-to-application electronic interface to process service inquiries (pre-ordering) for access service requests ("ASR"). Supra indicates that pre-order information on Unbundled Network Elements ("UNEs") is required electronically via this process.

Q. DOES SUPRA NEED A NEW INTERFACE FOR ACCESS SERVICE ORDER INQUIRIES IN ORDER TO OBTAIN PRE-ORDERING INFORMATION ELECTRONICALLY FOR UNBUNDLED NETWORK ACCESS ELEMENTS?

A. No. Supra's claim is that Supra needs the Access Service Request ("ASR") interface to "obtain pre-order information electronically for UNEs ordered via access service request" is wrong. The national standard for ordering UNEs is the Local Service Request ("LSR"), not the ASR. BellSouth provides electronic pre-ordering functionality for UNEs and resale services via the Local Exchange Navigation System ("LENS"), RoboTAG™, and Telecommunications Access Gateway ("TAG") interfaces. Thus, the electronic pre-ordering functionality that Supra seeks

is available through the LSR process.

Q. HAS THE COMMISSION ADDRESSED THIS ISSUE?

A. Yes. The Commission addressed this issue in MCI Order No. PSC-01-0824-FOF-TP. Specifically, the Commission said, "In summary we are not persuaded by arguments from WorldCom's Lichtenberg that BellSouth should develop an application-to-application interface and convert a system developed for interexchange access to local service ordering for use by a single competitor. The evidence in this record indicates that BellSouth is providing non-discriminatory access to OSS ordering and pre-ordering, and the availability of an industry standard means of ordering local service leads us to conclude that competitive entry would not be impaired by using the existing BellSouth LSR system. Accordingly, we find that BellSouth shall not be required to provide an application-to-application access service order inquiry process to WorldCom."

Q. WHAT DOES BELLSOUTH REQUEST THIS COMMISSION DO WITH RESPECT TO THIS ISSUE?

A. BellSouth request this Commission confirm that BellSouth need not develop an application-to-application access service order inquiry interface for Supra.

Issue 57: Should BellSouth be required to provide downloads of RSAG, PLATS, P/SIMS, and PIC databases without license agreements and without charges?

Q. WHAT DO YOU UNDERSTAND THAT SUPRA IS REQUESTING OF BELLSOUTH IN THE AREA OF RSAG, PLATS, P/SIMS and PIC DOWNLOADS?

A. My understanding is Supra wants BellSouth to provide initial and subsequent database downloads of the BellSouth Regional Street Address Guide ("RSAG"), Product/Service Inventory Management ("P/SIMS"), and Primary Interexchange carrier ("PIC") databases. Further, Supra wants BellSouth to provide these downloads without charge to Supra and without a license agreement. I am not clear about Supra's reference to plats. I assume that Supra is referring to BellSouth's plat records that contain nearly every detail of BellSouth's outside plant network (i.e. records for conduits, poles, cables, terminals, etc.). BellSouth considers this detailed plat information as proprietary.

Q. SHOULD BELLSOUTH BE REQUIRED TO PROVIDE DOWNLOADS OF RSAG, WITHOUT CHARGE AND WITHOUT A LICENSE AGREEMENT?

A. No. BellSouth should not be required to provide a download of RSAG because Supra already has real-time access to RSAG through BellSouth's

robust electronic interfaces.

Q WHAT ARE P/SIMS AND PIC?

A. The Product/Services Inventory Management System ("P/SIMS") is a BellSouth database containing feature availability information based on software and hardware capabilities of the central office switches.

The Preferred Interexchange Carrier ("PIC") database contains carrier information about long distance carriers who contract with BellSouth to supply long distance access to BellSouth end users.

Q. WILL BELLSOUTH PROVIDE A DOWNLOAD OF THE P/SIMS AND PIC DATABASE TO SUPRA WITHOUT A LICENSE AGREEMENT OR CHARGE?

A. Yes. BellSouth will, upon request, provide a flat file extraction of the P/SIMS, which also includes PIC information, for all nine states on a monthly basis. Supra should submit the request for these downloads via their BellSouth account team.

Q. HAS THE COMMISSION ADDRESSED THIS ISSUE?

A. Yes.

Q. HOW DOES BELLSOUTH PROPOSED RESOLVING THIS ISSUE?

A. BellSouth is willing to incorporate the same language that BellSouth and MCI have agreed to. The exact language can be found in John Ruscilli's Exhibit JAR – 1.

Issue 60: When BellSouth rejects or clarifies a Supra Telecom order, should it be required to identify all errors in the order that would cause it to be rejected of clarified?

Q. WHAT IS YOUR UNDERSTANDING OF SUPRA'S REQUEST TO HAVE BELLSOUTH IDENTIFY ALL ERRORS IN THE ORDER THAT WOULD CAUSE IT TO BE REJECTED OR CLARIFIED?

A. BellSouth assumes Supra wants all errors on Supra's Local Service Request to be identified by BellSouth prior to returning that service request to Supra for correction and resubmission. Supra believes this would prevent the potential for submitting the service request multiple times.

Q. WHAT IS BELLSOUTH'S POSITION ON THIS ISSUE?

A. Foremost, BellSouth's position is it is the responsibility of Supra to submit complete and accurate LSRs such that rejections and/or clarifications are

not necessary. Additionally, the type and severity of certain errors may prevent some LSRs from being processed further once the error is discovered by BellSouth's system. Without first correcting the error in question and then resubmitting for further processing, other errors on the LSR cannot be identified.

Q. PLEASE GIVE AN EXAMPLE OF AN ERROR THAT WOULD PREVENT FURTHER PROCESSING.

A. An example of this type of error, which is frequently incurred, is an invalid address. If the address is incorrect, the LSR cannot be processed further and will be returned to the ALEC. This is so because the address for a service request is a major determinate as to the services available from the central office serving switch. As a result, a LSR with an incorrect address must be returned to the ALEC before additional edit checks are applied against the LSR for the specific services being requested.

Q. CAN BELLSOUTH CHANGE ITS SYSTEMS, AS REQUESTED?

A. Possibly, but only at considerable time and expense. Much work would be necessary to even evaluate what would be involved in modifying BellSouth's systems as proposed by Supra. Furthermore, Supra can avoid the problem entirely by submitting complete and accurate LSRs to BellSouth.

Q. IS BELLSOUTH WILLING TO RESOLVE THIS ISSUE?

A. Yes. BellSouth is willing to incorporate the same language found in the MCI agreement on this issue. The exact language can be found in John Ruscilli's Exhibit JAR –1.

Issue 61: Should BellSouth be allowed to drop an order after ten days (or any other time period), when the order has been accepted by the front-end ordering system (such as LENS) but sent back into clarification by BellSouth? Alternately, if BellSouth drops any order, should it be required to notify Supra telecom the same day the order has been dropped?

Q. WHAT IS BELLSOUTH'S UNDERSTANDING OF SUPRA'S REQUEST?

A. My assumption is that Supra expects BellSouth to (1) maintain orders in clarification status for more than 10 days and (2) notify Supra when 10 days has passed and that the order has been dropped. Aside from being totally ridiculous, BellSouth does not manage other ALEC'S inefficiency and should not be expected to manage Supra's. Supra should be required to manage its ordering process and manage it in such a way that Supra has responsibility for ensuring that its representatives submit a complete and accurate LSR. Supra cannot and must not assume that BellSouth should handle this responsibility. Supra must take responsibility for managing its operation.

BellSouth believes that Supra can accomplish this by using the tools BellSouth makes available to Supra and other ALECS. These tools include utilizing the BellSouth Business Rules ("BBR") for local ordering. The BBR is a mammoth document developed by BellSouth for the express purpose of providing local service ordering instructions for ALECs that offer local telecommunications services utilizing BellSouth® Resale Services or Unbundled Network Elements ("UNEs"). The BBR provides a common point of reference to simplify the manual and electronic ordering processes for ALECs that conduct business with BellSouth®.

Q. DOES BELLSOUTH PROVIDE CLARIFICATION RULES IN THE BELLSOUTH'S BUSINESS RULES DOCUMENT?

A. Yes.

Q. WHAT IS A CLARIFICATION TO A LOCAL SERVICE REQUEST?

A. A clarification to a Local Service Request involves the return of a LSR to the ALEC for correction of information provided by the ALEC in the submission of the LSR. BellSouth will return any LSR to the ALEC when incomplete, incorrect or conflicting information results in BellSouth's inability to issue the order(s) as requested on the LSR. When ordering electronically, errors will be returned to the ALEC electronically.

Q. ONCE BELLSOUTH RETURNS THE LSR TO THE ALEC FOR CLARIFICATION, WHAT IS THE MAXIMUM INTERVAL THAT THE ALEC HAS TO RESPOND UNTIL BELLSOUTH CANCELS THAT LSR?

A. BellSouth Business Rules have established a maximum of ten (10) business days to respond to the request for clarification by submitting a supplemental LSR. BellSouth position is that ten (10) business days is sufficient time for the investigation and clarification of any LSR error. Ten days is ample time for an efficient ALEC operation to resolve clarifications returned by BellSouth.

Orders unresolved beyond ten business days, that are canceled by BellSouth's system, may be resubmitted as new service request and will be promptly processed by BellSouth.

Q. IN THE EVENT THAT SUPRA DOES NOT RESPOND TO A REQUEST FOR LSR CLARIFICATION, WITHIN TEN (10) BUSINESS DAYS OF NOTIFICATION, DOES BELLSOUTH PROVIDE ADDITIONAL NOTIFICATION TO SUPRA PRIOR TO CANCELING THE LSR?

A. No. BellSouth provides notification to Supra when the need for clarification is identified. Supra has ten business days to respond and if no response is not received by the 10^{th} business day, the LSR is canceled. Supra is familiar with the BellSouth Business Rules relating to clarifications and has every interest in resolving errors as soon as notified

and far sooner than 10 business days.

Q. SHOULD BELLSOUTH SEND A NOTICE TO ALECS PRIOR TO CANCELING A SERVICE REQUEST THAT HAS BEEN WAITING CLARIFICATION MORE THAN 10 BUSINESS DAYS?

A. No. BellSouth should not be required to notify the ALEC, a second time - on the 10th business day that a clarification is required and that cancellation will be on the 11th business day. The ALEC, who has the primary responsibility to its end-user, is responsible for the overall ordering and tracking of the ALECs service requests. BellSouth, having notified the ALEC of a clarification request, should not be asked to assume "reminder" duties for the ALEC. Nor should BellSouth be asked to retain aging LSRs in a "clarification status" beyond 10 business days in its OSS, many of which may never receive a clarification reply. The ALEC, once it has resolved its reason for delay, can simply issue the LSR as a new service request and the provisioning time will essentially be the same as having supplemented the original LSR with correct information.

Q. WHAT DO YOU RECOMMEND THE COMMISSION DO REGARDING THIS ISSUE?

A. The Commission should allow BellSouth to follow its business rules which instruct all ALECs on the proper format for local service requests.

Q. IS BELLSOUTH WILING TO RESOLVE THIS ISSUE?

A. BellSouth is willing to incorporate language found in the MCI agreement. The exact language can be found in John Ruscilli's Exhibit JAR – 1.

Issue 62: Should BellSouth be required to provide completion notices for manual orders?

Q. WHAT IS BELLSOUTH'S POSITION ON THIS ISSUE?

A. While BellSouth cannot provide the same kind of completion notification to Supra as when the order is submitted electronically, BellSouth does provide information regarding the status of an order, including completion of the order, through its CLEC Service Order Tracking System ("CSOTS").

Q. DOES BELLSOUTH HAVE THE CAPABILITY TO SEND COMPLETION NOTICES FOR MANUAL ORDERS?

A. No. BellSouth does not provide completion notices for manual orders for ALECs or for its own retail service orders.

Q. HOW WILL SUPRA KNOW WHEN BELLSOUTH HAS SWITCHED OVER SERVICE FOR A SUPRA CUSTOMER WITHOUT A COMPLETION NOTICE ON MANUAL ORDERS?

A. BellSouth provides Supra with the operational tools needed in order that Supra can determine the current status of its orders on a daily basis, including if manual orders are completed. This tool is the CSOTS system and it became available to ALECs in December 1999. The CSOTS system is designed to provide the ALEC community the capability to view service orders on-line, determine order status, including completion status on manual orders, and track service orders. CSOTS interfaces with BellSouth's Service Order Communications System ("SOCS") and provides service order information on a real-time basis for manually submitted and electronically submitted LSRs. CSOTS is available on BellSouth's Web Site at: https://clecview.bellsouth.com

CSOTS is a secured site and requires a password for access that ALECs can obtain by contacting their BellSouth Account Team. The CSOTS User Guide is also available on BellSouth's Web Site at: http://www.interconnection.bellsouth.com/guides/html/lsr.html

CSOTS provides ALEC's access to the same service order information available to BellSouth's own retail units.

Q. HOW TO YOU RECOMMEND THE COMMISSION RESOLVE THIS ISSUE.

A. BellSouth would like this Commission to determine that the interfaces

BellSouth makes available to Supra and other ALECs, is sufficient to provide the completion notification Supra and other ALECs require.

Q. PLEASE SUMMARIZE YOUR TESTIMONY.

A. In this testimony, I have addressed ten of the issues raised by Supra concerning OSS. I have demonstrated that Supra's allegations on these points are completely without merit and this Commission should rule in BellSouth's favor on each of these issues.

Q. Does this conclude your testimony?

A. Yes.

BellSouth Telecommunications, Inc.

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EXHIBIT RMP - 1

Transmittal Cover Sheet for Pate EXHIBIT RMP – 1

This sheet transmits the

LENS 9.3 Customer Service Record

Consists of 2 pages

COMMON EQUIP	This section contains equipment which is common in function to the entire account or system and auxiliary items connected with a system or account but not directly related to the main service.
NONKEY LINES/STA	This section contains all pertinent information on Lines and Stations, plus miscellaneous items of equipment which are not associated with a key system.
TRUNKS	This section contains all information associated with each trunk on the account, including all appropriate data (i.e., TLI, OGO, DSNA, etc.)
SLA LISTINGS	This section contains a list of all System Listing Addresses (SLA) and appropriate number for all systems other than system 1 on multi-system accounts.

3.7.3 Examples of Customer Records

Below are some examples of Customer Records you may see.

Example of a Customer Record for a Simple Residence account:

```
        205 NNN XXXX 015 *CSR*

          LN    Customer Name
          LA    Customer Address
                , HOOVER
          SA    4699 SANDPIPER LN, BIRMINGHAM
          DZIP  35244

          ---DIR
          DDA   SA
          DEL   A1, B1

          ---BILL
          BN1   Billing Name
          BA2   4699 SANDPIPER LN
          PO    BIRMINGHAM AL  35244

  ---S&E

                (OTHER)

     1  NW101 Network Interface-Outside+
                /CSN COV/ZSER 0C10000001

                (LINES & STATIONS)
```

Figure 33 Customer Record for a Simple Residence Account (Top Half)

```
1  MBSRX MemoryCall  Answering Ser+
         /TN NNN-XXXX/BTN NNN-XXXX
         /DLNN 2-LISTED NAME
         /SED 06-21-94/ZSER 4310000002
1  MWN   Message Waiting - Stutter+
         /TN NNN-XXXX/SED 06-21-94
         /ZSER 4A10000003
1  ACR   Area Calling Service, Dea+
         /PIC 0333/PCA CH, 10-28-96
         /NMC/ZSER 5110000004

      1  TTR   Touch-Tone

         /ZSER 5810000005
 1  AH6   Telecommunications Relay +
         /CSN COV/ZSER 5F10000006
 1  ESX   Call Waiting
         /ZSER 6610000007
 1  GCE   Call Forwarding Busy Line
         /SED 06-21-94/ZSER 6D10000008
 1  GCJ   Call Forwarding Don't Ans+
         /RCVC 3/SED 06-21-94
         /ZSER 7410000009
 1  UPPE1 Area calling service-usag+
         /CSN COV/ZSER 7B1000000A
 1  OLM   FCC Charge for Network Ac+
         /ZSER 8310000008

         (CALLING CARD SERVICE)

 1  BSXCC Co-Branded BellSouth Call+
         /CSN COV/ZSER 8910000000C
         /SED 01-16-96

ZDS NNN XXXX 015 *CSR*

---COMPLETED ACTIVITY
```

Figure 34 Customer Record for a Simple Residence Account (Bottom Half)

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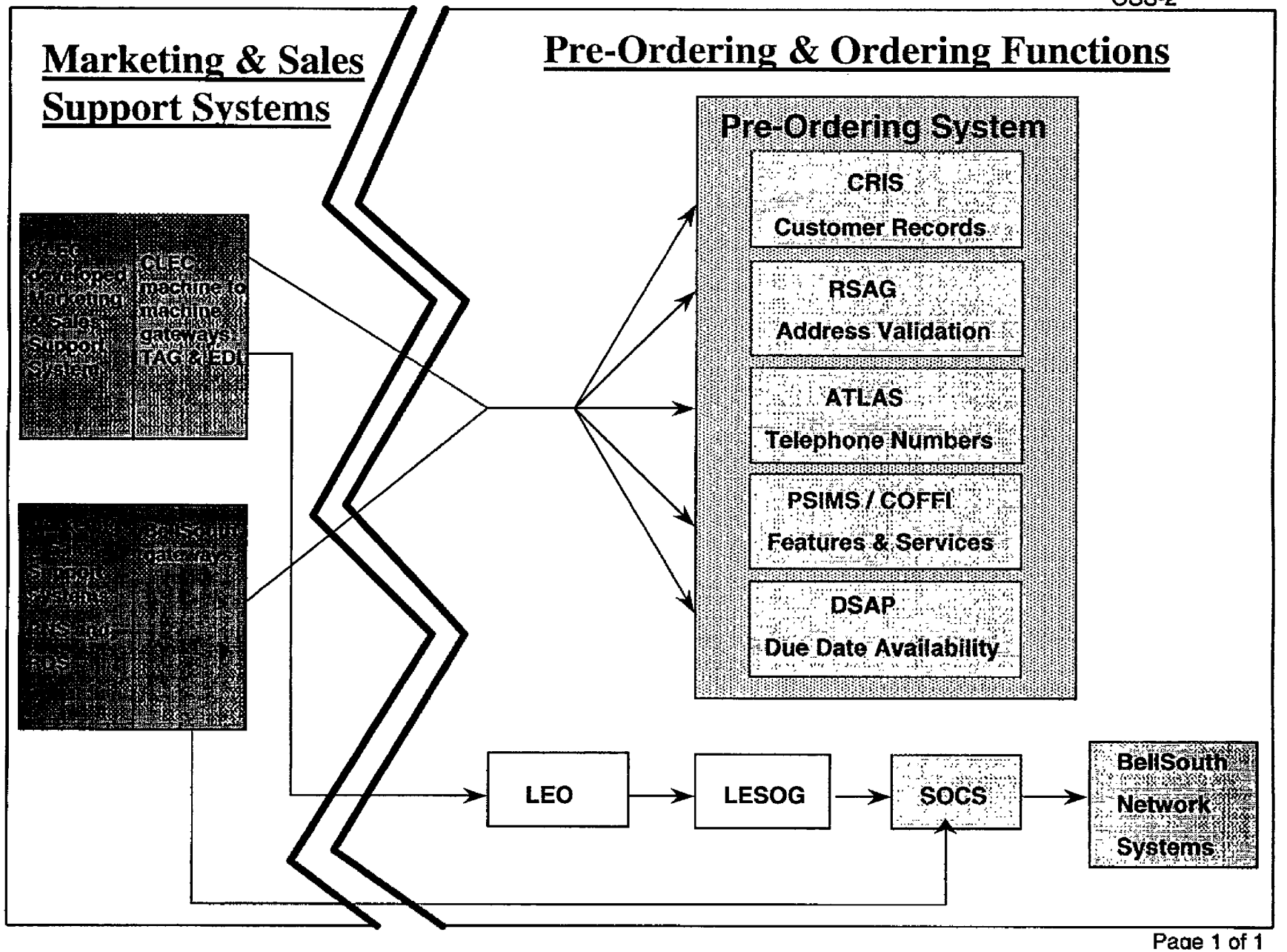
EXHIBIT RMP - 2

Transmittal Cover Sheet for Pate EXHIBIT RMP – 2

Diagram depicting how BellSouth's and ALECs systems interact

With the pre-ordering and ordering OSS

Consists of 1 page


Marketing & Sales Support Systems
Pre-Ordering & Ordering Functions
Pre-Ordering System
CRIS
Customer Records
RSAG
Address Validation
ATLAS
Telephone Numbers
PSIMS / COFFI
Features & Services
DSAP
Due Date Availability
CLEC machine to machine gateways TAG & EDI
LEO
LESOG
SOCS
BellSouth Network Systems

BellSouth Telecommunications, Inc.

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EXHIBIT RMP - 3

Transmittal Cover Sheet for Pate EXHIBIT RMP – 3

ALEC Usage of pre-ordering and ordering interfaces

Consists of 7 pages

Compilation of users as of September and October 2000

OSS - 3

CLEC	Uses EDI Ordering	Pre-Ordering used with EDI ordering	Uses TAG Ordering	Pre-Ordering used with TAG ordering	Uses LENS Ordering & Pre-Ordering
1			X	TAG	X
2					X
3					X
4					X
5					X
6			X	TAG	X
7			X	TAG	X
8					X
9			X	TAG	X
10			X	TAG	X
11					X
12					X
13					X
14					X
15					X
16					X
17					X
18					X
19					X
20					X
21					X
22					X
23					X
24					X
25	X	TAG			
26					X
27					X
28					X
29	X	LENS			X
30	X	LENS	X	LENS	
31					X
32					X
33					X
34			X	TAG	X
35					X
36			X	TAG	

CLEC	Uses EDI Ordering	Pre-Ordering used with EDI ordering	Uses TAG Ordering	Pre-Ordering used with TAG ordering	Uses LENS Ordering & Pre-Ordering
37					X
38	X	LENS			X
39					X
40					X
41	X	TAG			X
42	X	TAG			
43					X
44					X
45					X
46			X	TAG	X
47					X
48					X
49					X
50					X
51					X
52	X	LENS			
53	X	LENS			X
54					X
55					X
56					X
57					X
58					X
59					X
60			X	TAG	X
61					X
62			X	LENS	
63					X
64					X
65			X	TAG	X
66					X
67					X
68					X
69					X
70					X
71					X
72			X	TAG	X
73					X
74					X
75					X

CLEC	Uses EDI Ordering	Pre-Ordering used with EDI ordering	Uses TAG Ordering	Pre-Ordering used with TAG ordering	Uses LENS Ordering & Pre-Ordering
76	X	LENS	X	TAG	X
77					X
78					X
79					X
80					X
81					X
82					X
83					X
84					X
85					X
86			X	TAG	
87					X
88			X	TAG	X
89	X	TAG			
90					X
91					X
92					X
93					X
94					X
95			X	TAG	
96					X
97					X
98			X	TAG	X
99					X
100					X
101					X
102					X
103					X
104					X
105					X
106					X
107					X
108					X
109			X	TAG	X
110					X
111					X
112					X
113			X	TAG	X
114					X

CLEC	Uses EDI Ordering	Pre-Ordering used with EDI ordering	Uses TAG Ordering	Pre-Ordering used with TAG ordering	Uses LENS Ordering & Pre-Ordering
115			X	TAG	
116					X
117					X
118					X
119					X
120			X	TAG	X
121					X
122			X	TAG	X
123					X
124					X
125					X
126					X
127					X
128					X
129					X
130					X
131					X
132					X
133					X
134					X
135					X
136			X	TAG	X
137			X	TAG	X
138			X	TAG	X
139			X	TAG	
140			X	TAG	
141			X	TAG	
142			X	TAG	X
143			X	TAG	X
144					X
145					X
146					X
147	X	LENS	X	TAG	X
148					X
149					X
150					X
151					X
152					X
153					X

CLEC	Uses EDI Ordering	Pre-Ordering used with EDI ordering	Uses TAG Ordering	Pre-Ordering used with TAG ordering	Uses LENS Ordering & Pre-Ordering
154					X
155					X
156			X	TAG	
157					X
158					X
159			X	TAG	
160	X	LENS			
161					X
162					X
163					X
164					X
165					X
166					X
167					X
168					X
169	X	LENS			
170	X	LENS			
171	X	LENS			
172					X
173					X
174	X	LENS	X	TAG	
175			X	LENS	X
176					X
177					X
178			X	TAG	X
179					X
180					X
181			X	TAG	X
182	X	LENS			
183	X	LENS			X
184	X	LENS			X
185					X
186			X	TAG	X
187					X
188					X
189			X	TAG	X
190	X	LENS	X	LENS	X
191					X
192					X

CLEC	Uses EDI Ordering	Pre-Ordering used with EDI ordering	Uses TAG Ordering	Pre-Ordering used with TAG ordering	Uses LENS Ordering & Pre-Ordering
193					X
194					X
195					X
196					X
197					X
198					X
199					X
200					X
201			X	TAG	
202			X	LENS	X
203					X
204					X
205					X
206					X
207					X
208					X
209					X
210					X
211					X
212					X
213					X
214					X
215					X
216					X
217					X
218					X
219					X
220					X
221					X
222	X	TAG			X
223	X	LENS			X
224					X
225					X
226					X
227			X	TAG	X
228			X	TAG	X
229					X
230					X
231					X

CLEC	Uses EDI Ordering	Pre-Ordering used with EDI ordering	Uses TAG Ordering	Pre-Ordering used with TAG ordering	Uses LENS Ordering & Pre-Ordering
232					X
233	X	LENS	X	TAG	X
234	X	LENS			
235					X
236					X
237					X
238					X
239			X	TAG	X
240			X	TAG	X
241					X
242					X
243					X
244	X	TAG			
245					X
246					X
247					X
248					X
249					X
250					X
251					X
252					X
253					X
254					X
255					X
256					X
257					X
258			X	LENS	X
259					X
260					X

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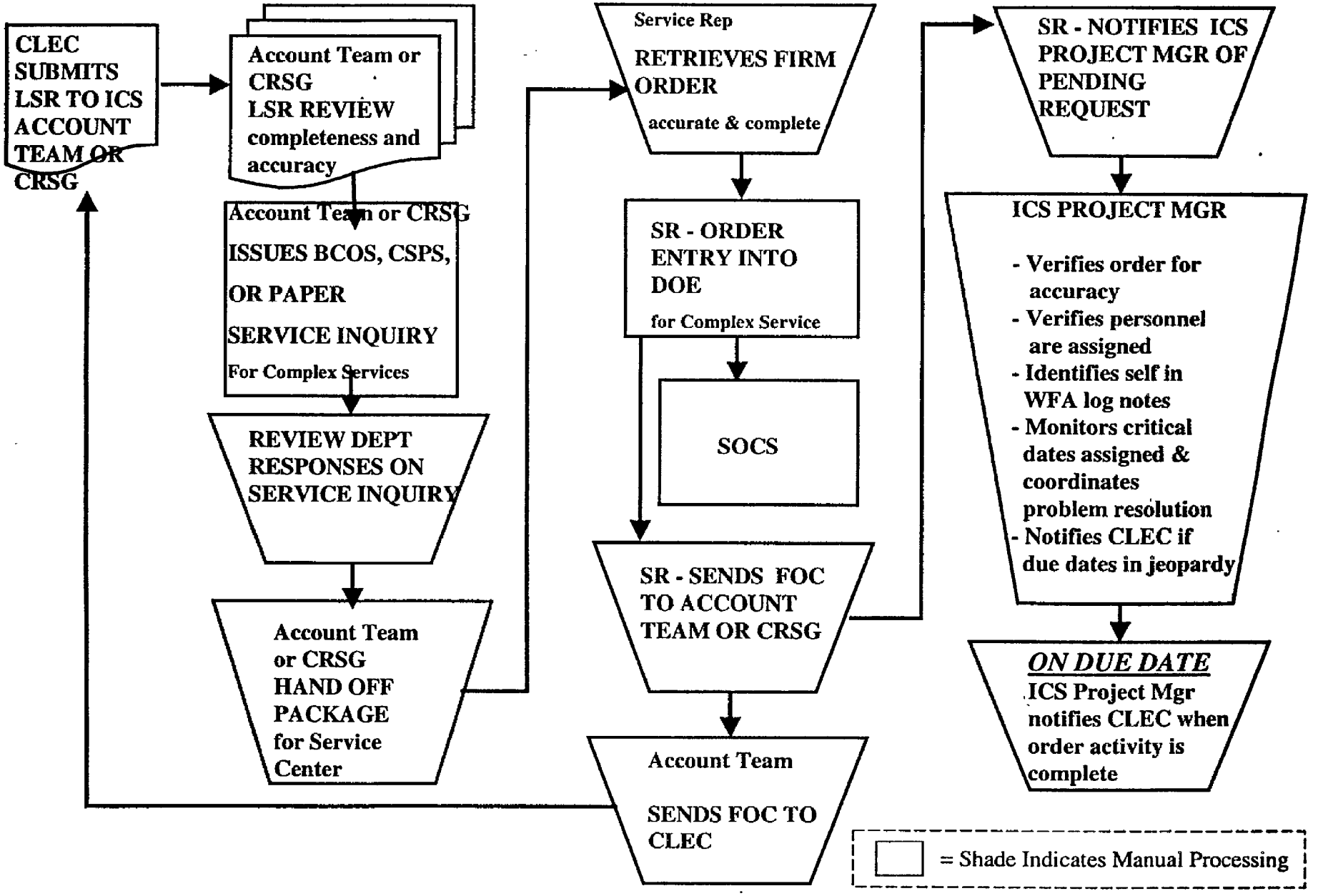
EXHIBIT RMP - 4

Transmittal Cover Sheet for Pate EXHIBIT RMP – 4

Process Flow for ordering MultiServ® service by ALECs

Consists of 1 page

CLEC: Complex Services - MultiServ®



BellSouth Telecommunications, Inc.

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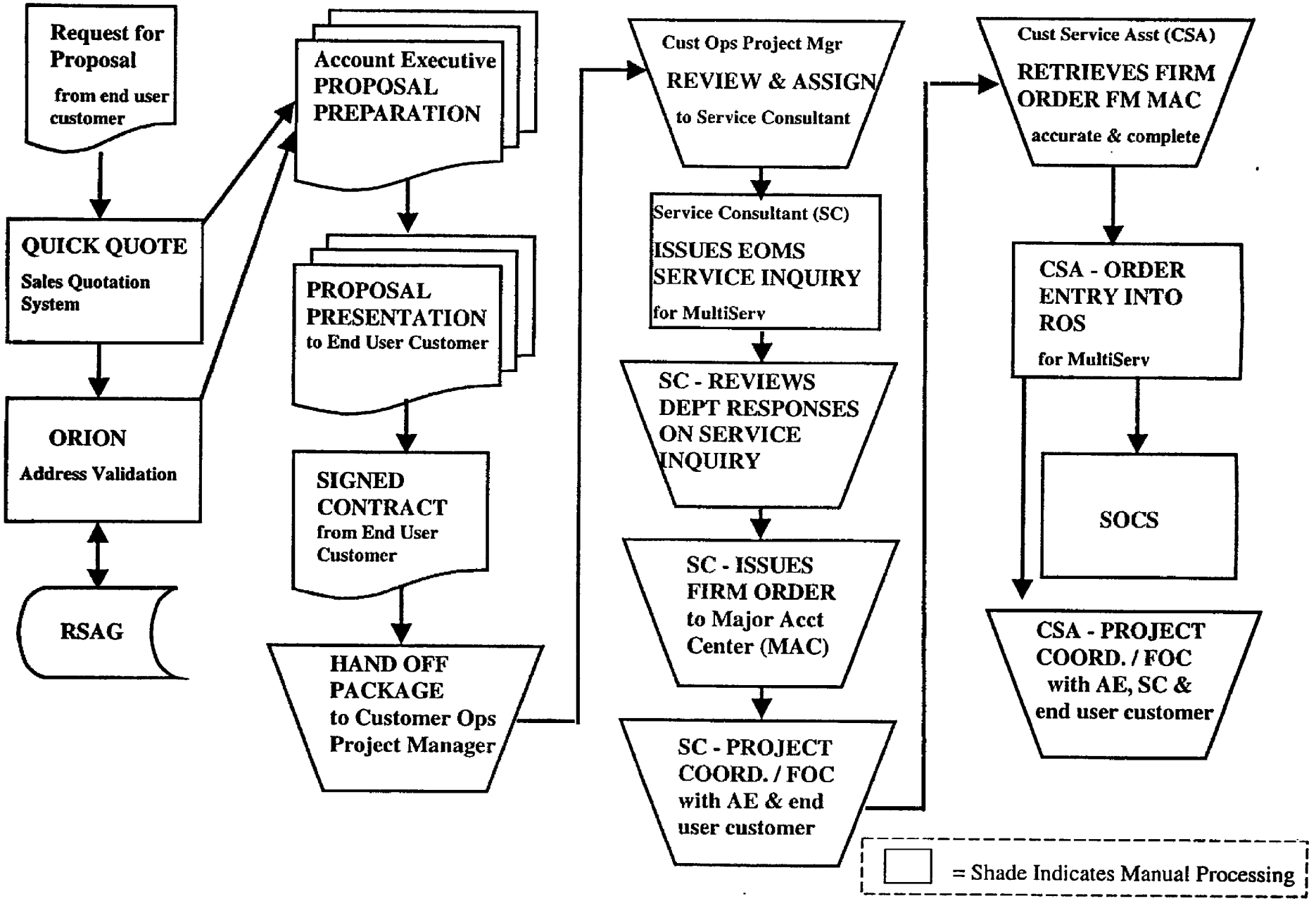
EXHIBIT RMP - 5

Transmittal Cover Sheet for Pate EXHIBIT RMP – 5

Process Flow for ordering MultiServ® service by BellSouth

Consists 1 page

BST RETAIL: Complex Services - MultiServ®



BellSouth Telecommunications, Inc.

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EXHIBIT RMP - 6

Transmittal Cover Sheet for Pate EXHIBIT RMP – 6

Consists of 1 page

CONFIDENTIAL AND PROPRIETARY

ANALYSIS OF SUPRA TELECOM ELECTRONIC LSR SUBMISSION TO THE CLEC AGGREGATE

CATEGORY	SUPRA FACSIMILE	SUPRA LENS	SUPRA TAG	SUPRA TOTAL
No. LSRs Submitted (Jun – Nov 2000)	97	32,747	0	32,747
% of Total	0.3%	99.7%	0.0%	100.0%
No. LSRs Submitted (November 2000)		9,715	0	9,715
% of Total	0.0%	100.0%	0.0%	100.0%

	NOVEMBER 2000			JUNE – NOVEMBER	
CATEGORY	SUPRA	CLEC AGGREGRATE		SUPRA	CLEC AGGREGRATE
Total Mech LSRs	9,715	282,637		32,747	1,680,090
Fatal Rejects	194	7,383		1,053	70,396
Total Manual Fallout	1.047	23,773		3,535	149,968
Auto Clarifications	2,390	32,733		8,135	171,847
CLEC Caused Fallout	434	7,166		1,432	40,447

	NOVEMBER 2000			JUNE – NOVEMBER 2000	
CATEGORY	SUPRA	CLEC AGGREGRATE		SUPRA	CLEC AGGREGRATE
Fatal Reject Rate	2.0%	2.6%		3.2%	4.1%
Manual Fallout Rate	10.8%	8.4%		10.8%%	8.9%
Auto Clarification Rate	24.6%	11.6%		24.8%	10.2%
CLEC Caused Fallout Rate	4.5%%	2.5%		4.4%%	2.4%

Notes:

(1) All data represents regional results as BellSouth does not track LSRs at the state level.

(2) Except for the Facsimile LSR submissions, all data is from the Percent Flow Through Service Requests which is one of the BellSouth Service Quality Measurements provided monthly to CLECs.