ATTACHMENT B

REQUEST FOR SPECIFIED CONFIDENTIAL CLASSIFICATION FOR PORTIONS OF EXHIBITS B AND C TO BELLSOUTH'S COMPLAINT FILED ON JUNE 27, 2002 IN DOCKET NO. 020611-TP

TWO REDACTED COPIES

Supra Telecom
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December 21, 2001

VIA FACSIMILE (404) 614-4054 and U.S. MAIL
Parkey D. Jordan, Esq.
General Attorney
BellSouth Telecommunications, Inc.
Legal Department – Suite 4300
675 W. Peachtree St.
Atlanta, Georgia 30375

Re: LENS DOWNTIME TRACKING SYSTEM

Dear Parkey:

We are in receipt of your letter dated December 11, 2001 on the above subject matter. The parties' agreement provides that:

Cite to sections regarding parity and notice of inactivity or downtimes.

There is no dispute that LENS provides discriminatory access to OSS. Despite being ordered to provide Supra with direct access to BellSouth's own OSS, BellSouth has refused.

. When LENS goes down without notice, hundreds of Supra employees are dispossessed of the tools they need to support our customers. A delay in returning over 500 employees to work by even 5 mins. after an outage has a fundamental financial impact. Thus, awareness of LENS downtime will assist Supra to schedule its workforce appropriately and also determine employee productivity accordingly.

Your contention that LENS is not being accessed by a human being is correct. Your attempts to wordsmith the LENS logon ("RESTRICTED: FOR USE ONLY BY AUTHORIZED INDIVIDUALS." into a complaint against access by a "mechanized process" is misguided, if not downright disingenuous in light of BellSouth's published specifications. BellSouth has, for years, published a document entitled "BellSouth Local Exchange Navigation System Common Gateway Interface Specification Document" (i.e. LENS-CGI). In the first paragraph of the referenced document, under the heading of "Purpose" BellSouth's specification states.

For the majority of BellSouth's CLEC customers, access to LENS is via a standard browser product such as Microsoft Internet Explorer or Netscape Navigator. However, some customers may wish to bypass the use of a browser

Exhibit B

> and use existing application software. This document serves as a common gateway interface (CGI) specification which allows those users access to LENS via an application client, bypassing the need for a browser.

As you may or may not know, CGI, is a standard for external gateway programs to interface with information servers such as HTTP servers. It forms the basis for all HTML Forms and posting. Your implication that other users are delayed "when trying to utilize LENS in a proper fashion" clearly ignores the fact that Supra is accessing LENS in a proper fashion, but no logout code was executing.

In order to address your concern regarding "log out", Supra has redesigned the program so that it logs out. Because the WWW, and HTML are stateless rather than stateful processes, any attempt to identify a browser based client (and maintenance and disposal of such identification) is the responsibility of BellSouth written server code. However your description of "1400 logins each day with no corresponding log out" implies a situation more grave than real. In your LENS CGI Specification, the section on logout states:

> The logoff function allows the user to terminate a session with the BellSouth LENS server. **This function is automatically initiated after a timeout period of approximately 30 minutes.** See the *LENS User Guide* for more information. (Emphasis Added)

By your own specification there should never have been more than 29 (or 30) logins open for this purpose at any given time. Supra has modified its code to assure a logout each time.

Your claim that Supra is improperly viewing the CSRs is incorrect. As stated in your letter, "the system is being accessed not by individuals, but through a mechanized process." Further, the program only views "LENS Main Page" and as such could and does not view actual CSRs.

If the problem with the "log out" persists, or if you wish to discuss this further, please call me at 305 476-4248.

Very truly yours,

BRIAN CHAIKEN
General Counsel

cc: Mr. Olukayode Ramos

Parkey D. Jordan
General Attorney

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January 29, 2002

VIA FEDERAL EXPRESS

Brian Chaiken, Esq.
Supra Telecommunications & Information
Systems, Inc.
2620 Southwest 27th Avenue
Miami, FL 33133-3001

Re: Unauthorized Use of LENS

Dear Brian:

Thank you for your letter of December 21, 2001, regar access to LENS. I understand that your client has impleme ted a log out feature in the mechanized access process in response to my Decembe 11 letter to you. While I appreciate that you have made some movement to alleviat the situation I described to you, my clients tell me that the mechanical access is contin ng.

BellSouth does provide notification of scheduled LENS downtime. That notice is provided to Supra via the Carrier Notifications on the Web site. In addition, for certain OSS matters, CLECs participating in the Change Control Process receive e-mail notification of LENS downtime. Apparently, Supra has not elected to receive e-mail notifications from Change Control, but you may have a contact name included on that distribution list by sending an e-mail request to change.control@bridge.bellsouth.com. Please state "Subscribe CCP" in the subject field of the e-mail.

In addition to notification regarding scheduled LENS downtime, BellSouth also notifies carriers of unscheduled LENS outages in excess of twenty (20) minutes. These notices are posted to the Web site and are also available real time via e-mail should you elect to join the Change Control distribution list. Thus, BellSouth provides notices of scheduled downtime as well as additional real time notice of outages. The agreement

Exhibit C

does not permit Supra to implement a downtime tracking mechanism of any kind, much less one that interferes with LENS usage and capacity.

The fact that a browser is used to access LENS does not mean that the system is being accessed mechanically rather than by individuals. Every individual accesses the Web via a browser or an interface, and LENS is a Web based product. However, individuals are utilizing the browser or interface to access the information rather than having equipment utilize the browser or interface.

BellSouth has no way of knowing what data from LENS is being accessed, copied or viewed, if any. However, we know that Supra is using LENS in a manner and for a purpose that is not specified or permitted under the interconnection agreement, and that as a result of such misuse, LENS is experiencing significant delays. Even with the log out process you claim to have implemented, the mechanical access to LENS is still causing excessive volume and can result in system failures. Thus, the use of the mechanized process to detect LENS downtime may well be the cause of outages. In addition, your tracking of unscheduled outages, if any, will not enable you to schedule employees around the outages as you imply, as there is no way to predict when such an outage may occur.

BellSouth provides the very information Supra claims it needs from the unauthorized LENS access. We are certainly willing to discuss that data with you if you feel you need assistance, but we cannot allow CLECs to utilize LENS in a manner that jeopardizes the system for all users. This letter again constitutes notice under your interconnection agreement that we are asking you to confirm that you will refrain from the use of LENS in this manner.

Sincerely,

Parkey D. Jordan

PDJ:cjj

cc: Kay Ramos

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