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July 25, 2003

Mrs. Blanca S. Bayó
Division of the Commission Clerk and
Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: **030349-TP (Supra $75 Cash Back Promotion)**

Dear Ms. Bayó:

Enclosed are an original and fifteen copies of BellSouth Telecommunications, Inc.'s Rebuttal Testimony of Ronald Pate, John A. Ruscilli, Tamra Schoeche, Michelle N. Summers, and Edward Wolfe, which we ask that you file in the captioned docket.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,

E. Earl Edenfield, Jr.

E. Earl Edenfield, Jr. (KA)

Enclosures

Pate - 06747-03
Ruscilli - 06748-03
Schoeche - 06749-03
Summers/Wolfe - 06750-03

cc: All Parties of Record
Marshall M. Criser III
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Nancy B. White

AUS
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CERTIFICATE OF SERVICE
DOCKET NO. 030349-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Electronic Mail and Federal Express this 25th day of July, 2003 to the following:

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BELLSOUTH TELECOMMUNICATIONS, INC.

DIRECT TESTIMONY OF RONALD M. PATE

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

DOCKET NO. 030349-TP

JULY 25, 2003

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 the Georgia Institute of Technology in 1973, with a Bachelor of Science degree. In 1984, I received a Masters of Business Administration degree from Georgia State University. My professional career spans over 30 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?

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A. Yes. I have testified before the Public Service Commissions in Alabama, Florida, Georgia, Louisiana, South Carolina and Kentucky, the Tennessee Regulatory Authority, and the North Carolina Utilities Commission.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. The purpose of my rebuttal testimony is to respond to portions of the testimony of Mr. David A. Nilson filed on June 27, 2003 on behalf of Supra Telecommunications and Information Systems, Inc. ("Supra").

This testimony contains many acronyms, so I have attached Exhibit RP-04, which is a list of acronyms along with a brief definition of each.

Q. DO YOU HAVE ANY GENERAL COMMENTS REGARDING MR. NILSON'S TESTIMONY?

A. Yes. As will be established in my testimony, Mr. Nilson has provided no evidence that BellSouth retail and wholesale Operations Support System ("OSS") function improperly with each other. Moreover, Mr. Nilson's understanding of BellSouth's OSS, including LENS, and how the LSRs flow through SOCS is out-of-date at the very least, and in some cases, entirely incorrect. This is not surprising given that Mr. Nilson is attempting to describe BellSouth's and not Supra's systems. My testimony sets the record straight regarding these issues.

Q. ON PAGE 6 OF HIS TESTIMONY, MR. NILSON DISCUSSES OPERATIONS SUPPORT SYSTEMS, OR "OSS," AND THEIR FUNCTIONS. DO YOU AGREE WITH MR. NILSON'S DISCUSSION?

A. In general, I agree with Mr. Nilson's discussion, if you were to consider OSS to be just "engines," as Mr. Nilson calls them. OSS, however, consists of more than just "engines." OSS consists of computer-based systems, information, databases and personnel that telecommunications carriers use to perform essential customer and business support functions. The Federal Communications Commission ("FCC") has defined OSS "as consisting of pre-ordering, ordering, provisioning, maintenance and repair, and billing functions supported by an incumbent LEC's databases and information. OSS includes the manual, computerized, and automated systems, together with associated business processes and the up-to-date data maintained in those systems ... Specifically, the Commission identified the five functions of OSS that incumbent LECs must make available to competitors on an unbundled basis: pre-ordering, ordering, provisioning, repair and maintenance and billing." [1]

Q. IS BELLSOUTH REQUIRED TO PROVIDE CLECS WITH ACCESS TO ITS OSS?

A. Yes. Specifically, BellSouth is required by the FCC to provide CLECs with nondiscriminatory access to its OSS.

[1] Federal Communication Commission Third Report and Order and Fourth Further Notice of Proposed Rulemaking in CC Docket No. 96-98 released on November 5, 1999 at 425, hereinafter "319 Order."

Q. DOES BELLSOUTH PROVIDE CLECS WITH NONDISCRIMINATORY ACCESS TO ITS OSS?

A. Yes. In 2002, the FCC found three times that BellSouth provides nondiscriminatory access to its OSS. First, in its Order approving BellSouth's application for long distance in Georgia and Louisiana, the FCC found, at ¶101, that "consistent with the Georgia and Louisiana Commissions, that BellSouth provides competitive LECs nondiscriminatory access to its OSS and, thus, satisfies the requirements of checklist item 2. Specifically, in reaching this decision, the FCC analyzed "BellSouth's performance in providing access to pre-ordering, ordering, provisioning, and maintenance and repair as well as BellSouth's change control process."

Second, the FCC reiterated its findings in ¶ 128 of its Order approving BellSouth's application for Alabama, Kentucky, Mississippi, North Carolina, and South Carolina:

> We find, as did the state commissions, that BellSouth provides nondiscriminatory access to its OSS and, thus, satisfies the requirements of checklist item 2. We find that the evidence presented in this record shows that BellSouth provides nondiscriminatory access to its OSS functions for pre-ordering, ordering, provisioning, maintenance and repair, and billing. We base this determination on BellSouth's actual performance in each of the states and, in certain instances, on its performance in Georgia. The Commission may evaluate BellSouth's

performance in an individual state for enforcement purposes pursuant to section 271(d)(6).[2] [Footnotes omitted.]

Third, the FCC again affirmed its findings in ¶ 67 of its Order for Florida and Tennessee:

> We find, as did the state commissions, that BellSouth provides nondiscriminatory access to its OSS and, thus, satisfies the requirements of checklist item 2. We find that the evidence presented in this record shows that BellSouth provides nondiscriminatory access to its OSS functions for pre-ordering, ordering, provisioning, maintenance and repair, and billing. We base this determination on BellSouth's actual performance in Florida and Tennessee.[3] [Footnotes omitted.]

Q. HAVE THE STATE COMMISSIONS, INCLUDING THIS COMMISSION, FOUND THAT BELLSOUTH PROVIDES NONDISCRIMINATORY ACCESS TO ITS OSS?

A. Yes. Before it applied for long distance relief at the FCC, BellSouth sought approval from each of the state public service commissions in its nine-state region. All the state commissions found that BellSouth provides CLECs with

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[2] *Joint Application by BellSouth Corporation, BellSouth Telecommunications, Inc., and BellSouth Long Distance, Inc. for Provision of In-Region, InterLATA Services in Alabama, Kentucky, Mississippi, North Carolina, and South Carolina*, Memorandum Opinion and Order, WC Docket No. 02-150, FCC 02-260 (rel. Sept. 18, 2002) ("*Five State Order*").

[3] *Joint Application by BellSouth Corporation, BellSouth Telecommunications, Inc., and BellSouth Long Distance, Inc. for Provision of In-Region, InterLATA Services in Florida and Tennessee*, Memorandum Opinion and Order, WC Docket No. 02-307, FCC 02-331 (rel. Dec. 19, 2002).

nondiscriminatory access to its OSS.[4] The Florida PSC, in its Opinion issued in Docket No. PSC-02-1305-FOF-TL on September 25, 2002, stated:

> We believe BellSouth provides CLECs nondiscriminatory access to its OSS. Additionally, we find that BellSouth is providing the necessary documentation and support functions and has demonstrated that its systems are operationally ready and provide an appropriate level of performance. As a result, it is our opinion that BellSouth has satisfied the OSS requirements of Section 271 of the 1996 Telecommunications Act.

Q. ON PAGE 11, MR. NILSON STATES THAT THE CLEC AND RETAIL INTERFACES OPERATIONS DO NOT OPERATE IN ESSENTIALLY THE SAME TIME AND MANNER. TO THE EXTENT MR. NILSON IS INTIMATING THAT SUPRA IS ENTITLED TO DIRECT ACCESS, WHAT IS YOUR RESPONSE?

A. First, direct access is not an element of the FCC's definition for nondiscriminatory access to an Incumbent Local Exchange Carrier's ("ILEC's") OSS. Second, the Florida Public Service Commission ("Florida Commission") found, on page 121, of in its Order No. PSC-02-0413-FOF-TP, dated March 26, 2002 in Docket No. 001305-TP, that, "upon consideration we shall not require BellSouth to provide Supra with direct access to the same databases BellSouth

[4] BellSouth's Intention to File a Petition for In-Region InterLATA Authority was approved by Alabama – May 22, 2002; Kentucky – April 26, 2002; Mississippi - October 4, 2001; North Carolina – May 23, 2002; South Carolina – February 14, 2002, Georgia – October 2, 2001, Louisiana – September 19, 2001, Florida – September 9, 2002, and Tennessee – August 26, 2002.

uses to provision service to its retail customers. The CLEC OSS interfaces allow CLECS, including Supra, to perform the functions of pre-ordering, ordering, provisioning, maintenance and repair, and billing in substantially the same time and manner as BellSouth provides [these functions] for itself, as described in ¶581 of FCC 96-325."

It is abundantly clear that this matter has been thoroughly adjudicated and that BellSouth provides CLECs, including Supra, nondiscriminatory access to its OSS. Any differences between BellSouth's retail systems and those for the CLECs do not constitute any discrimination.

Q. HOW DO CLECS SUBMIT ORDERS TO BELLSOUTH?

A. The CLECs submit Local Service Requests or LSRs. An LSR is the industry standard form that CLECs use to order resale and UNEs from ILECs, which was established by the Ordering and Billing Forum ("OBF"). The LSR may be submitted electronically or manually (via facsimile). The LSR is based on the Local Service Ordering Guide ("LSOG") and the EDI LSOG Mechanization Specification ("ELMS"), which are established by the OBF.

Q. IN HIS REBUTTAL TESTIMONY ON PAGE 6, MR. NILSON STATES THAT THE BUSINESS RULES FOR CLECS AND BELLSOUTH DIFFER. CAN YOU RESPOND TO THIS STATEMENT?

A. Yes, but first let me provide some background information on LSRs.

Q. HOW DOES BELLSOUTH "TRANSLATE" THE INDUSTRY STANDARD LSR INTO AN ORDER THAT CAN BE PROCESSED BY BELLSOUTH'S OSS?

A. After BellSouth receives an LSR from the CLEC, it sends the LSR through a process that uses different systems to check the LSRs for errors and transforms it into a format that can be accepted by BellSouth's service order generator.

When a CLEC submits an LSR, BellSouth must process the LSR through all its systems necessary to deliver a service to the end user customer. As part of that process, BellSouth must convert the CLEC's LSR into a SOCS-compatible format required by BellSouth's OSS for downstream service order provisioning. BellSouth refers to this as the ordering process. SOCS stands for Service Order Communications System.

There are three steps to the ordering and provisioning process:

- Submission of the LSR – The CLEC creates an LSR in the format defined by the OBF and BellSouth's business rules, and transmits it to BellSouth via an electronic interface or manual interface (facsimile). BellSouth checks the LSR for errors.
- Service Order Generation - BellSouth's systems accept the information on accurate and complete LSRs. BellSouth takes the information from the LSR and transforms it into a SOCS-compatible BellSouth service order format.

- Service Order Acceptance – The transformed LSR, now a BellSouth service order, is accepted by BellSouth's service order management system, SOCS. The service order is then sent by SOCS to the downstream OSS to be processed, resulting in the provisioning of service, the inventorying of equipment, and the updating of customer accounts.

Q. ON PAGE 9, LINES 19-22 OF HIS TESTIMONY, MR. NILSON MENTIONS TWO BUSINESS RULES DOCUMENTS ISSUED BY BELLSOUTH FOR CLECS. HE ALSO NOTES, ON PAGE 6, THAT THE BUSINESS RULES FOR CLECS DIFFER FROM THOSE THAT BELLSOUTH USES. PLEASE COMMENT.

A. Yes, the business rules for CLECs, which are now contained in a document called the Local Ordering Handbook, and BellSouth, differ. It should not be surprising that the business rules for CLECs and for BellSouth contain differences. Each party uses different interfaces and methods to initiate orders. The CLECs may order resale services and UNEs, but BellSouth does not order UNEs. The CLECs submit their requests on the LSR, which BellSouth does not use. The underlying purpose, however, of the business rules for the CLECs and those for BellSouth is the same. The business rules enable BellSouth's or the CLECs' representatives to submit service requests that will be handled by BellSouth's OSS without errors.

Q. ON PAGE 10, AT LINES 9-10, OF HIS TESTIMONY, MR. NILSON STATES THAT, "PAPER ORDERS ARERQUIRED [SIC] FOR VIRTUALLY ALL SERVICES EXCEPT POTS." IS THIS STATEMENT CORRECT?

A. Absolutely not. As I stated before, CLECs may submit the LSR via an electronic interface or manual interface (facsimile). CLECs may order a wide variety of resale services and UNEs, including the unbundled network element platform ("UNE-P"), via the EDI, TAG, and LENS electronic interfaces. BellSouth provides information about which services and UNEs may be ordered electronically at its public interconnection web site.[5] The Local Ordering Handbook ("LOH") contains specific information.[6] Some resale services and UNEs must be ordered manually (via paper LSRs), but these are considered to be complex. These complex services and UNEs are also described in the LOH.

CLECs, in fact, send most of their LSRs via the electronic interfaces. In the first quarter of 2003, CLECs submitted approximately 96% of all their LSRs electronically, or approximately 670,000 LSRs per month during this quarter. Only about 4% of the LSRs were sent manually.[7]

Q. PLEASE DESCRIBE HOW THE REMAINDER OF YOUR REBUTTAL TESTIMONY WILL BE ORGANIZED.

A. In order to fully explain why Mr. Nilson's characterization of BellSouth's OSS is out-dated or incorrect, I will describe in detail BellSouth's Pre-Ordering, Ordering, and Provisioning OSS for both CLEC and BellSouth Retail initiated requests. I will also describe the flow of all service requests through SOCS.

[5] http://www.interconnection.bellsouth.com/index.html
[6] http://www.interconnection.bellsouth.com/guides/html/leo.html
[7] Although these LSRs would likely be for complex services, BellSouth notes that it does not require CLECs to use the electronic interfaces for services and UNEs that can be ordered electronically. Thus, CLECs for their own business reasons may order such services manually.

First, I will describe the pre-ordering and ordering interfaces and OSS for CLEC requests. A graphical representation of the wholesale pre-ordering and ordering flows is shown at Exhibit RP-01. Next, I will describe the pre-ordering and ordering interfaces and OSS for BellSouth's retail units' service requests. A graphical representation of the retail pre-ordering and ordering flows is shown at Exhibit RP-02. Third, I will describe the provisioning OSS beginning with SOCS. Exhibit RP-03 provides a diagram of the downstream provisioning system flows for non-designed services after they pass through SOCS. Lastly, I will explain why "common Ethernet connections" do not necessarily result in improper communications between systems.

Pre-Ordering and Ordering Interfaces and OSS for CLEC Requests

Q. HOW DO CLECS ACCESS BELLSOUTH'S OSS FOR PRE-ORDERING, ORDERING, AND PROVISIONING?

A. CLECs have nondiscriminatory access to BellSouth's OSS through three different electronic interfaces: EDI, TAG, and LENS. A CLEC's selection of an electronic interface depends on its business plan and entry strategy. BellSouth has designed and implemented a variety of electronic interfaces to suit the varied business plans and entry methods of CLECs in BellSouth's region. CLECs can select from among the interfaces described below to match their particular mix of services, volume of orders, technical expertise, resources and future plans.

Q. PLEASE DESCRIBE THE EDI INTERFACE.

A. Electronic Data Interchange ("EDI") is a machine-to-machine interface. EDI, which has been available since December 1996 for ordering, follows the industry standard protocol that was established for ordering interfaces by the Telecommunications Industry Forum ("TCIF") committee of the Alliance for Telecommunications Industry Solutions ("ATIS"). EDI ordering follows the industry standard guidelines for LSRs that are established by the Ordering and Billing Forum ("OBF") committee of ATIS. In June 2003, BellSouth implemented an EDI pre-ordering interface.

Q. PLEASE DESCRIBE THE TAG INTERFACE.

A. The Telecommunications Access Gateway ("TAG") is a machine-to-machine interface, which was developed in response to specific requests from mid-sized and large CLECs. TAG is based on Common Object Request Broker Architecture ("CORBA"), which is one of the industry protocols for pre-ordering by TCIF, and follows the OBF guidelines for Local Service Requests ("LSRs"). TAG pre-ordering has been available since August 31, 1998; TAG ordering since November 1, 1998.

BellSouth is changing the architecture of the current TAG interface from the C++ Application Program Interface ("API") to the Extensible Markup Language ("XML"). XML is simply a standard specification language used to describe data. This technical specification language will provide a schema for request and

response data for both pre-order and firm order transactions. This change does not affect the functionality of TAG, but rather it will change the method by which the CLECs access TAG. XML allows the CLEC to create direct links from its internal applications using its choice of the appropriate commercial software, shareware, or freeware. The language selection for processing XML-formatted files would be driven by the CLEC rather than by an API, as is currently the case. BellSouth now offers a TAG XML CORBA interface and a TAG XML HTTPS interface. BellSouth is still supporting various versions of the TAG API. Versions of the API will begin expiring on September 30, 2003. The transition to XML will be complete in March 2004.

Q. WHAT DOES "MACHINE-TO-MACHINE" MEAN?

A. In simple terms, a machine-to-machine interface (sometimes called "application-to-application interfaces") permits transmittal and receipt of data electronically so that the data will automatically populate computer systems and databases without human intervention. Of course, there is typically data entry by an individual to initiate the transaction. After that initial entry, the processing of the data associated with the transaction and the updating of systems and databases is automatic. For example, when a CLEC submits a request for service, the CLEC will receive confirmation of that request and that information can automatically be integrated into the CLEC's internal databases or OSS.

Q. WHAT DO CLECS USE IF THEY DO NOT WANT TO BUILD A MACHINE-TO-MACHINE INTERFACE?

A. BellSouth recognizes that some CLECs may not choose to use machine-to-machine interfaces. They may use the Local Exchange Navigation System ("LENS"), which is a human-to-machine interface. With a human-to-machine interface, the data in the previous example typically is not directly integrated into the CLEC's systems. It would require CLEC programming to take "screen scrapes" that would strip the information and allow input into other systems and databases, or it would require someone to take the retrieved data and re-key or re-enter that information in order to update other systems and databases.

Q. PLEASE DESCRIBE THE LENS INTERFACE.

A. LENS is a web-based graphical user interface ("GUI") that requires software development only on BellSouth's side of the interface. BellSouth therefore is responsible for implementing any changes or new versions of the interface. LENS provides integrated pre-ordering and ordering in its firm order mode. In order to use LENS, a CLEC must have, at a minimum, a personal computer, web browser software, and an Internet connection. The CLEC must also test with BellSouth, attend training, and obtain a password. LENS has been available since April 1997.

Q. ON PAGE 10 OF HIS TESTIMONY, BEGINNING AT LINE 3, MR. NILSON DISCUSSES THE LENS INTERFACE. PLEASE COMMENT.

A. Mr. Nilson's description of LENS is completely out-of-date. When LENS was originally implemented, the submitted LSRs would flow to the Local Exchange Ordering ("LEO") and Local Exchange Service Order Generator ("LESOG") systems. I will discuss shortly what LEO and LESOG are and what they do. In this arrangement, CLECs using LENS were able to only order resale services. On January 14, 2000, LENS became a GUI to the TAG gateway. On April 15, 2000, LENS began using TAG's ordering functionality for designed and non-designed unbundled analog loops, unbundled digital loops, and for CLECs with contracts, unbundled two-wire analog port plus two-wire analog loop combinations (the "UNE Platform"). LENS used TAG's architecture and gateway, and therefore had TAG's pre-ordering functionality for resale services and UNEs, and TAG's ordering functionality for resale services. In December 2002 BellSouth began the transition of LENS from the TAG API to an XML interface, beginning with Firm Order submissions. On June 22, 2003 LENS converted fully to the XML Interface. Today, LENS interfaces directly with the ServiceGate Gateway ("SGG"), which I will discuss in detail later in my testimony.

Q. WHICH INTERFACE DOES SUPRA USE?

A. As Mr. Nilson mentions in his testimony, on page 11, Supra uses LENS. His description, at lines 17-19 of page 11, however, of what happens to an LSR once it has been sent is out of date, as I have just explained. I will explain more about the flow of LSRs from LENS and the other interfaces shortly.

Q. ON PAGE 9 OF HIS TESTIMONY, AT LINES 17-19, MR. NILSON CLAIMS THAT TAG IS A "PROPRIETARY" SYSTEM AND COMMENTS THAT BELLSOUTH DID NOT IMPLEMENT AN EDI PRE-ORDERING INTERFACE. WHAT IS YOUR RESPONSE?

A. TAG is proprietary to BellSouth, but I am not sure why Mr. Nilson has made this comment, as it has no relevance to the issues in this proceeding. Although TAG is BellSouth's API interface, Mr. Nilson apparently does not know that TAG uses the industry standard protocol for pre-ordering, CORBA. In September 1997, when the industry voted to approve two standard protocols for pre-ordering interfaces, CORBA and EDI TCP/IP/SSL3,[8] the industry anticipated that CORBA would become the preferred long-term solution. BellSouth, therefore, built its machine-to-machine pre-ordering interface to the CORBA standard, rather than the EDI standard. BellSouth named its CORBA-based interface the Telecommunications Access Gateway, or TAG. Similarly, Verizon calls its CORBA-based pre-ordering interface the "CORBA Gateway."[9] SBC calls its interface the "CORBA interface."[10] In addition to providing a TAG pre-ordering interface, BellSouth also decided to build a TAG ordering interface based on the same protocol. As I mentioned earlier, the architecture of TAG is changing from the API to the XML.

On September 26, 2000, MCI/WorldCom submitted CR0186 to the Change Control Process ("CCP"), which is the collaborative change management process

[8] TCP/IP/SSL3 stands for Transmission Control Protocol/Internet Protocol over Secure Sockets Layer 3.
[9] http://www22.verizon.com/wholesale/lsp/connguide/1,,4-East-PreOrder-corba,00.html
[10] https://clec.sbc.com/clec/hb/

used by BellSouth and the participating CLECs, requesting an EDI pre-ordering interface. The change request proceeded through the CCP process. During the Change Review Prioritization Meeting of April 25, 2001, the CCP participants prioritized CR0186 as 21st out of 36 pre-ordering and ordering change requests. BellSouth implemented the EDI pre-ordering interface the weekend of June 21-22, 2003. However, I would note that, in 2001 and 2002, nine states and the FCC found that BellSouth provided nondiscriminatory access without an EDI pre-ordering interface.

Q. ON PAGES 9-10 OF HIS TESTIMONY, MR. NILSON DESCRIBES "PRE-ORDERING." WHAT IS PRE-ORDERING AND IS MR. NILSON'S DESCRIPTION CORRECT?

A. Mr. Nilson's information on pre-ordering is incomplete and inaccurate. Pre-ordering is defined as the steps needed to gather the required information for a CLEC to submit an accurate and complete service request. These functions include: validating addresses, reserving telephone numbers, determining the availability of due dates, determining the availability of products and services, obtaining customer service record information, and obtaining loop make-up information. CLECs use the EDI, TAG, or LENS pre-ordering interfaces to perform these functions and obtain pre-ordering information.

Q. DO CLECS HAVE NONDISCRIMINATORY ACCESS TO PRE-ORDERING OSS VIA THESE INTERFACES?

A. Yes. All three interfaces, not just TAG, as Mr. Nilson comments on page 9, starting at line 22, obtain the pre-ordering information from various BellSouth databases. Mr. Nilson mentioned most of the pre-ordering interfaces on page 9 of his testimony: CRIS, RSAG, ATLAS, P/SIMS, COFFI, and DSAP. I would like to note, however, that he did not mention access to CABS, LFACS, or CFD. Once again, Mr. Nilson's information about BellSouth's OSS is out-of-date.

Q. PLEASE DESCRIBE THE PRE-ORDERING OSS ACCESSED BY CLECS.

A. This table describes the pre-ordering OSS and their associated pre-ordering functions.

Pre-Ordering Function	Name of the System	Acronym	Description of the System
Obtaining telephone numbers	Application for Telephone number Load Administration and Selection	ATLAS	ATLAS is used to administer the pool of available telephone numbers and to reserve selected numbers from the pool for use on pending service requests/service orders.
Obtaining features and services information	Central Office Features File Interface	COFFI	COFFI contains USOC information based on the current tariffs filed and PIC/LPIC Carrier data.
Obtaining customer service record information	Customer Records Information System	CRIS	CRIS is the database and billing system for non-access customers and services. It contains the "official" records of the account information, which is used to generate the appropriate customer billing. It is a complex mainframe system consisting of multiple functional software applications. CRIS accrues charges to customer accounts and generates billing invoices according to the formatting options selected by the customer.
Obtaining customer service record information	Carrier Access Billing System	CABS	CABS is the database and billing system for access customers and services. It contains the "corporate official" records of the account information which is used to generate the appropriate customer billing. CABS accrues charges to customer accounts and generates billing invoices according to the formatting options selected by the customer.

Pre-Ordering Function	Name of the System	Acronym	Description of the System
Obtaining due date information	Distributed Support Application	DSAP	DSAP assists service representatives in negotiating service provisioning commitments for non-designed services and UNEs. DSAP contains information and guidance to help establish a realistic and meaningful appointment dates.
Obtaining loop make-up information	Loop Facilities Assignment and Control System	LFACS	LFACS is an inventory system that manages outside plant loop facilities. LFACS contains data on cable pairs, terminals, loop qualification information, circuits and addresses. It is used to assign appropriate loop facilities to serve the address(es) on the service order.
Obtaining loop make-up information	Corporate Facilities Database	CFD	The CFD is a digitized version of the plats available in Georgia, North Carolina, South Carolina, Florida and thirteen (13) wire centers in Alabama. When LFACS is queried for loop qualification information, and all of the necessary information is not resident in LFACS, an electronic query will be automatically launched to the CFD to generate the required additional information. Once generated, the loop makeup data is populated in the LFACS database.
Obtaining features and services information	Product/Services Inventory Management System	P/SIMS	P/SIMS contains availability information on switching system features and capabilities and on BellSouth service availability. P/SIMS is used to verify the availability of a feature or service in a switch before making a commitment to the customer.
Validating addresses	Regional Street Address Guide	RSAG	RSAG contains street addresses validated to be accurate with state and local governments. This information is used to ensure a consistent and accurate address for the purposes of matching loop facilities available to a customer address and for dispatching outside field technicians.

Q. PLEASE DESCRIBE IN DETAIL HOW THE CLECS' LSRS TRAVEL FROM EDI, TAG, OR LENS TO SOCS, BELLSOUTH'S SERVICE ORDER MANAGEMENT SYSTEM.

A. Before I discuss the flow of CLECs' LSRs, I would like to comment on Mr. Nilson's description of this process, which appears on page 11 of his testimony. As my testimony will show, Mr. Nilson's description is out-of-date. It is also incomplete, because he has omitted the process for LSRs with LNP and LSRs for xDSL-compatible loops, unbundled copper loops, and such. There are actually

three basic order flows for CLEC requests: one for DSL orders, one for LNP orders, and one for the remainder of the requests.

Exhibit RP-01 is a graphical representation of the CLEC ordering process. Before a mechanized service order is created, the LSR submitted through EDI, TAG, or LENS must pass edits that check for valid data entries and formats as well as conditions between various fields. The business rules, such as those found in the Local Ordering Handbook,[11] set forth all the necessary requirements for submitting accurate and complete LSRs.

All requests that are submitted *via LENS or TAG* are routed to SGG.[12] The Programmable Rules Engine ("PRE") performs first-level edit checks for these LSRs (subsequent edit valuations are performed by downstream systems, described below). SGG routes orders for xDSL-compatible loops, Unbundled Copper Loops ("UCLs"), Enhanced Extended Links ("EELs"), or Universal Digital Channels ("UDCs") to the Order Manager ("OM"). All other LSRs are routed to LSR Router ("LSRR"). LSRs that are routed to the LSRR will be sent to either the LNP Gateway or to LEO, depending upon the type of service being requested.

A CLEC LSR submitted *via EDI* is first sent to the LSRR.[13] The LSRR will determine what type of service is being ordered so that the LSR can be routed to

[11] The current version of the LOH may be found on the Interconnection website at http://www.interconnection.bellsouth.com/guides/leo/bbrlo_releases/13_0/index.html.

[12] Older versions of the TAG API (pre version 8.0) route orders to the TAG Gateway for preorder validation checks before being routed to the SGG. TAG API version 8.0 and higher route LSRs to SGG for preorder validation checks.

[13] In Release 13.2, currently scheduled for September 2003, firm order LSRs submitted *via EDI* will be routed to SGG and will follow the same routing as orders submitted *via TAG or LENS*

the correct system. If the LSR is for LNP, it is sent to the LNP Gateway. If the service is for non-number portability xDSL-compatible loops or UCL, EELs, or UDC, the LSR is sent to the ServiceGate™ Gateway ("SGG"). All other LSRs sent *via EDI* are routed to LEO.

Q. AT LINES 8-9, ON PAGE 9 OF HIS TESTIMONY, MR. NILSON COMMENTS THAT EDI "EITHER FLOWS THROUGH TAG, OR HAS IMPLEMENTED THE SAME VALIDATION RULES USED BY TAG." WHAT IS YOUR RESPONSE?

A. Mr. Nilson is incorrect. EDI does not flow through TAG and never has. Further, BellSouth is at a loss as to which "validation rules" he is referring.

Q. WHAT IS THE PURPOSE OF LEO?

A. LEO is the Local Exchange Ordering system. Accurate and complete non-LNP and non-DSL LSRs flow mechanically to the LEO system. The LEO system receives the LSR and mechanically performs edit checks to determine if all the required fields have been correctly populated. If the LSR fails the edit checks in LEO, it will be returned to the CLEC via the applicable interface as a "fatal reject." Fatal rejects are errors that prevent an LSR from being processed further. The CLEC receives a fatal error notification that contains an error code and an English-language description of the fatal reject.

If an LSR passes LEO's edit checks, it then will mechanically "flow" from LEO to LESOG.

Q. WHAT IS THE PURPOSE OF LESOG?

A. LESOG stands for Local Exchange Service Order Generator. LESOG performs further checks for errors and provides manual fallout for LSRs that cannot be mechanically handled. If the LSR contains an error or errors, or if it is not a candidate for mechanical handling, it will not flow-through to SOCS.

If an LSR is "passed" by LESOG, LESOG will mechanically transform the LSR into the service order format that can be accepted by SOCS and by the other downstream BellSouth systems through which BellSouth's own service orders, as well as CLEC orders, are processed. From LESOG, the CLEC service order flows to and is accepted by SOCS without any manual intervention. Once an order is accepted, its path through BellSouth's downstream legacy system is the same for CLEC orders as it is for BellSouth's retail orders.

Q. EARLIER YOU MENTIONED THAT THE LSRS FOR LNP TRAVEL A DIFFERENT PATH FROM THE CLEC INTERFACE TO SOCS. PLEASE DESCRIBE THAT PATH.

A. Certainly. The LNP Gateway is the major link in the LNP process because it supports both internal and external communications with various interfaces and process, including the link between BellSouth and the CLECs for the electronic

ordering of LNP. The electronic pre-ordering steps for LNP are the same as those for other UNEs and resale services. An accurate and complete LSR for LNP is transmitted to the LNP Gateway, where additional error checks are performed for accuracy, completeness, and format. If an error is found, a reject notification is returned to the CLEC via the interface that was used to transmit the LSR to BellSouth. If no errors are detected, the LSR is sent to LAUTO ("LNP Automation") for further processing. LAUTO interfaces with other BellSouth OSS to further check the LSR for validity. If an error is found, the error is recorded in the LNP Gateway database, and a clarification is returned to the CLEC. If LAUTO detects no errors and the LSR is eligible for mechanization, a service order is mechanically generated and transmitted to SOCS. Once an order is accepted, its path through BellSouth's downstream legacy system is the same for CLEC orders as it is for BellSouth's retail orders.

Q. YOU ALSO MENTIONED EARLIER THAT LSRS FOR XDSL-COMPATIBLE LOOPS, UCLs, EELS, AND UDCS TAKE A DIFFERENT PATH FROM THE CLEC INTERFACE TO SOCS. PLEASE DESCRIBE THAT PATH.

A. LSRs for xDSL-compatible loops, UCLs, EELs and UDCs flow through the SGG and Order Manager ("OM").

If an LSR is "passed" by Order Manager, Order Manager will transmit the order to the Service Order Generator ("SOG"), which mechanically transform the LSR into the service order format that can be handled by SOCS and by the other

downstream BellSouth systems through which BellSouth's own service orders, as well as CLEC orders, are also processed.

If an LSR does not "pass" Order Manager's checks, the LSR will be sent back automatically to the CLEC for clarification ("auto-clarified") or will fall out of Order Manager for manual handling by the Local Carrier Service Center ("LCSC").

Q. HOW DOES A CLEC KNOW IF ITS LSR HAS BEEN ACCEPTED AND A BELLSOUTH SERVICE ORDER HAS BEEN GENERATED?

A. When the LSR is accepted by SOCS for an end user customer in Florida, the Facilities Check (Fac-Chk) feature waits until the status of the last "qualifying" service order on a given LSR has obtained either the Pending Dispatch ("PD") or Pending Facilities ("PF") status. By qualifying, BellSouth means orders that are impacted by facilities and the CLEC is not required to check facilities as part of its pre-order process. For example, Line Sharing requires the CLEC to check the facilities before placing the order, and therefore these orders are excluded. Feature only orders are also excluded. At this point, a Firm Order Confirmation ("FOC") is returned to the CLEC.[14] The FOC is the CLEC's assurance that its LSR has successfully passed through the various edits and formatting checks and is pending as an order in SOCS.

[14] BellSouth returns the FOC in the other states when the first order on the LSR obtains the Assignable Order ("AO") status.

Pre-Ordering and Ordering Interfaces and OSS for BellSouth Retail Requests

Q. WHAT DOES BELLSOUTH USE FOR ITS RETAIL OPERATIONS?

A. For its retail basic exchange service customers, BellSouth uses two retail marketing and sales support systems for service order negotiation. BellSouth's retail operations use the Regional Negotiation System ("RNS") for most types of residential service requests. For business customers, BellSouth's retail operations use the Regional Ordering System ("ROS"). A graphical representation of the retail pre-ordering and ordering flows is shown at Exhibit RP-02.

Q. EXPLAIN HOW SERVICE REQUESTS SUBMITTED VIA RNS AND ROS REACH SOCS.

A. Service requests submitted via RNS and ROS are handled similarly to the way CLEC requests are handled. In both systems, pre-order transactions are performed to validate addresses, calculated due dates, determine available products and services, reserve telephone numbers or circuit IDs, and perform loop qualification. For its own business needs, BellSouth also obtains end user credit information and customer profile information so that the service representative can determine the best product mix to offer the end user. A CLEC can, likewise, perform similar transactions with its end user customer. Upon completion of gathering all the necessary information for submission of a service request and basic edit validations are "passed", ROS/RNS mechanically transforms the request into the service order format that can be accepted by SOCS and by the

other downstream BellSouth systems for provisioning. The request is forwarded to the Store and Forward Messaging Infrastructure ("SFMI"), a message transport middleware that provides a "queuing" function assuring delivery of the request to SOCS. The request is then transmitted directly to SOCS (for BellSouth Telecommunications ("BST") orders) or to the System Wide Integrated Switching Hub ("SWISH") (for Cingular Wireless, BellSouth Entertainment, IntelliVentures, etc.) where edits are further applied and the request is accepted or returned for clarification.[15] Exhibit RP-02 is a graphical representation of the retail ordering process.

Q. PLEASE DESCRIBE THE RNS INTERFACE.

A. RNS is a distributed computing system that allows users to log on to one integrated system rather than multiple "backend" mainframe applications. The system presents icons, menus, and windows to access those applications that the BellSouth service representatives need to efficiently provide customer care to BellSouth end-user customers. Because the RNS distributed system receives data from the mainframe "behind the scenes," service representatives need only log-on to one place and know one system to be productive.

Q. PLEASE DESCRIBE THE ROS INTERFACE.

[15] Orders that include BellSouth Long Distance ("BSLD") services pass information from SOCS to BSLD for provisioning; the BSLD provisioning does not follow the standard BST Provisioning OSS Flow described in my testimony.

A. ROS is also a distributed computing system that allows users to log on to one integrated system rather than multiple "backend" mainframe applications for service order entry/editing. Using menus and drop-down boxes, service representatives are able to perform all functions associated with Service Order Negotiation.

Q. ON PAGE 7 OF HIS TESTIMONY, MR. NILSON LISTS 25 "ENGINES/DATABASES" THAT HE CLAIMS BELLSOUTH USES FOR PRE-ORDERING. IS MR. NILSON CORRECT?

A. No. Once again, Mr. Nilson is out-of-date or incorrect in his knowledge of BellSouth's OSS. Mr. Nilson incorrectly listed "OASIS1" and "AMOS" as pre-ordering databases used by BellSouth; however, Product Common Business Services ("PCBS") replaced the application-specific OASIS and AMOS systems for accessing product information in July 2002. Many of the systems that Mr. Nilson listed have nothing to do with pre-ordering, are not "engines" or "databases" as Mr. Nilson describes them, or are acronyms that are unknown to BellSouth.[16] Rather than try to dispute each system listed by Mr. Nilson, it would be easier to describe exactly what OSS BellSouth DOES use for pre-ordering.

Q. PLEASE DESCRIBE THE PRE-ORDERING OSS USED BY BELLSOUTH RETAIL UNITS.

[16] For example, AAND and SWISH are not pre-ordering interfaces; CDIA is the Corporate Document Information Access system, a repository for BellSouth Methods and Procedures for the LCSC; and BellSouth does not know what ZTRK is.

A. BellSouth's retail units access most of the same pre-ordering systems and databases described above for the CLEC Pre-Ordering OSS, with a few exceptions, noted here. (ROS and RNS interface with RSAG, CRIS, ATLAS, and DSAP). ROS and RNS do not directly access P/SIMS and COFFI,[17] and they do not use LFACS or CFD; but they have access to PCBS and Loop Qualification System ("LQS").[18] PCBS is a product catalog that stores product information for BellSouth wireline products and services, Cingular Wireless (RNS only), and BellSouth Long Distance ("BSLD") products. LQS is used to determine if a telephone number(s) at a specific service address are qualified for BellSouth ADSL (Asymmetric Digital Subscriber Line) Service. As I mentioned before, pre-ordering functions include: validating addresses, reserving telephone numbers, determining the availability of due dates, determining the availability of products and services, obtaining customer service record information, and obtaining loop make-up information. The OSS I have noted in this paragraph are the only systems BellSouth uses for pre-ordering, as defined by the FCC.

Mr. Nilson has mistakenly listed some additional systems that BellSouth has built for its own business needs as pre-ordering interfaces. They include systems used to perform credit checks on end users, customer profile databases, and the like, but these are NOT pre-ordering systems. CLECs could similarly have their own OSS to perform like functions for their own business operations. To set the record straight, I will describe these OSS and their functions. BellSouth has built interfaces from RNS to the following OSS:

[17] P/SIMS and COFFI provide BellSouth switch dependent data to PCBS via an indirect feed.
[18] CLECs have direct access to LQS.

- GIMI (Geographic Integrated Marketing Intelligence) is a marketing intelligence system of residential customers that incorporates storage and retrieval of RNS customer profiles, canceled and completed order processing, storage and retrieval of sales and sales recommendations, and the sending of sales campaign information to RNS.
- CBI (Credit Bureau Interface) provides an interface for RNS service representatives to perform credit verification for residential service customers.
- LIST (List Information System) is a database containing listing and directory information.
- IMAT (In-House Match Exchange) is an application that is part of a mechanized regional debtor database system designed to identify new customers with a record of non-payment for telephone service (live or final accounts) within the BellSouth region.[19]

BellSouth has built an interface from ROS to a reference database used to query product specific (not customer specific) information on rates, products and services, product packages, directory information, etc. This reference data is collected from various systems via a batch process. The OSS indirectly accessed are as follows:

- BRIS (Business Revenue Information System) is a database of business customers, which drives assignment of customers and revenues to BBS and SBS COUs, directly impacting COU size and performance.

[19] RNS has indirect access to IMAT via CRIS.

- Quantum (Not an Acronym) is an accounts receivable billing system that provides a breakdown of amounts due from retail customers.
- SOER (Service Order Edit Routines) is a sub task of SOCS. The SOER logic is used to provide edits of each section of the service order, validating all USOCS, FIDS (Field IDentifierS), and FID data.

Order Provisioning OSS

Q. IS THE OSS USED FOR PROVISIONING SERVICE REQUESTS THE SAME FOR ALL REQUESTS, INCLUDING BOTH CLEC SUBMITTED REQUESTS AND BELLSOUTH RETAIL REQUESTS?

A. Yes. As I have previously noted, after orders have been accepted by SOCS, the path for CLEC or BellSouth orders is the same through the downstream provisioning OSS.

Q. CAN YOU PROVIDE MORE INFORMATION ABOUT SOCS?

A. Certainly. SOCS is responsible for the collection, storage, and distribution of service orders, either CLECs' or BellSouth's, to all user departments, including service order-driven mechanized systems. SOCS is an online system used by many departments to process service orders. In addition to the SOCS online programs, the SOCS daily off-line cycle performs data base maintenance and report generation functions necessary to administer the pending order file. The major functions of the off-line programs are to purge completed and canceled

orders, create statistical and administrative reports, and create service order files for other mechanized systems. It is important to note that SOCS is the common point of entry into the BellSouth OSS for provisioning of service orders by both the BellSouth retail units and the CLECs.

Q. WHAT HAPPENS TO BELLSOUTH AND CLEC SERVICE ORDERS AFTER THEY ENTER SOCS?

A. SOCS receives service requests from BellSouth retail operations or from the CLECs and further applies edit validations to ensure the data is in a format that can be accepted for provisioning by downstream systems. At the time SOCS accepts the request, the request is considered to be an order and the provisioning process begins. SOCS communicates the order with the Service Order Activation and Control System ("SOAC"), which manages the service order process with respect to the specialized systems that design and activate network-based services, assign facilities, maintain central office inventory, and manage customer account information. In doing so, SOAC directs each service order through all steps necessary to complete the order and provision the service. Exhibit RP-03 provides a diagram of the downstream provisioning system flows for non-designed services after they pass through SOCS.

Communications Between Systems

Q. ON PAGES 14 AND 15 OF HIS TESTIMONY, MR. NILSON STATES BECAUSE "A COMMON TCP/IP OVER ETHERNET CONNECTION

SERVES TO PROVIDE ACCESS TO ALL BELLSOUTH'S OSS...DIRECTLY VIA BOSIP...[I]N THIS MANNER IT IS RELATIVELY EASY TO ADD NEW SYSTEMS TO PROVIDE ADDITIONAL FUNCTIONALITY. THE SYSTEMS NEED ONLY BE PROGRAMMED TO SEND DATA TO EACH OTHER, THE INFRASTRUCTURE IS PRE-BUILT." PLEASE COMMENT.

A. Mr. Nilson's implication is that data input in any system can be retrieved by any other system anywhere along the line within BellSouth, just because the systems are "connected." This is completely untrue. Just because systems are connected via Ethernet connections does not allow data to flow freely between them.

Let me provide an analogy to clarify my point. Let's say that several people all have access to a certain building. Each person may have a key allowing him or her to get into the building. Each may be able to take the elevators to get to certain floors, or there may be some floors they are restricted from entering without additional access mechanisms. Just because each person has a key to the building does not mean that he or she has access to every office, or every floor, or every file cabinet or desk within the building. These individuals are granted access to be in those specific locations that are needed ***and authorized.***

Likewise, just because data flows into certain databases and is passed to downstream systems does not mean that it accessible at other locations or to other users. BellSouth's systems are designed with strict security in mind. Contracts are agreements between each of the systems that are established to specify what information will be transmitted, and in what format, between the systems.

"Simple" programming, as described by Mr. Nilson, would not alter these contracts. Rather, each contract must meet strict guidelines regarding what data will be shared.

Further, Mr. Nilson does not have any evidence that BellSouth has, in fact, made any programming changes that allow systems to improperly send proprietary data to each other because this simply is not the case.

Q. ON PAGES 22-23 OF HIS TESTIMONY, MR. NILSON MENTIONS "SIMPLE C." PLEASE COMMENT.

A. The correct term is "single C." Single C allows BellSouth to process the local service request (from a CLEC) by converting an account to UNE-P via the issuance (by BellSouth's' systems) of a single C (Change) Order. Before BellSouth implemented single C for UNE-P, two orders (New and Disconnect Orders, also known as N and D Orders) were required to execute the local service request. The benefit of Single C is that it eliminates the need for two internal BellSouth orders and associated coordination. The only change that the CLECs saw when the single C order was implemented was a 'C' instead of 'N' on the FOCs and completion notifications.

BellSouth uses the single C order to process orders for conversions of "non-complex" Residence and Business accounts to an equivalent UNE Port/Loop Service Combination offering. Single C applies when a CLEC sends an LSR for:

- Resale to UNE-P: Same CLEC or Different CLEC

- Retail to UNE-P: BellSouth to CLEC
- UNE-P to UNE-P: CLEC to CLEC

Note that single C orders are not generated for existing retail, resale, or UNE-P accounts that involve Multi-line Hunt Groups and DID Groups. Single C orders are not generated for "partial migrations." N and D orders are still issued for these items.

Q. ON PAGE 22 OF HIS TESTIMONY, AT LINES 16-20, MR. NILSON IMPLIES THAT BELLSOUTH IMPLEMENTED THE SINGLE C PROCESS IN ORDER TO GAIN POSSESSION OF CLECS' PROPRIETARY INFORMATION. ON PAGES 23-24, MR. NILSON IMPLIES THAT BELLSOUTH MAINTAINS THE N AND D ORDER PROCESS IN ORDER TO GAIN WINBACKS. WHAT IS YOUR RESPONSE?

A. Nothing could be less true. In fact, the Georgia Public Service Commission *ordered* BellSouth to implement the single C process on October 2, 2001, as stated in Docket 6863-U, in its Order issued on October 19, 2001. This is the same order by which the Georgia PSC found BellSouth has met the 14-point checklist as defined by Section 271 of the Act of 1996.

Accordingly, BellSouth implemented this process for Georgia, Louisiana, Florida, and Mississippi on March 23, 2002. BellSouth implemented single C for Alabama and South Carolina on July 21, 2002, and for Kentucky, North Carolina, and Tennessee on August 4, 2002.

When BellSouth processes N and D orders, it coordinates the orders by using a code on each. The Georgia Commission ordered the single C process for UNE-P because, very occasionally, the N and D orders for UNE-P became uncoordinated and an end user would lose dial-tone. I want to emphasize that this occurs rarely. For example, BellSouth analyzed conversions for January through April 2003, and determined that a mere 0.09% lost dial tone during conversion.

Q. ON PAGE 24, LINES 6-13, MR. NILSON CLAIMS THAT IDS RECENTLY COMPLAINED OF PROBLEMS WITH N AND D ORDERS. PLEASE COMMENT.

A. Mr. Nilson's information is out-of-date. Although IDS made such a complaint in May 2001, it voluntarily dismissed its complaint with prejudice nearly two years ago, on September 28, 2001.

Q ON PAGE 23, MR. NILSON STATES THAT SUPRA CAN SPEAK ONLY TO THE BELLSOUTH LCSC IN ORDER TO RESOLVE PROBLEMS IN PROVISIONING SERVICE AND THE ONLY NUMBER THE PUBLIC CAN SEE IS FOR THE BELLSOUTH RETAIL CENTER. PLEASE RESPOND.

A. Supra is correct. The LCSCs were created to serve the CLEC community. The LCSC's contact information for CLECs is located on the Interconnection website. The CLECs' end users are not LCSC customers or BellSouth's retail end users.

The CLECs are responsible for providing the CLECs' contact information to their end users so that their end users know to call them.

Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?

A. Yes.

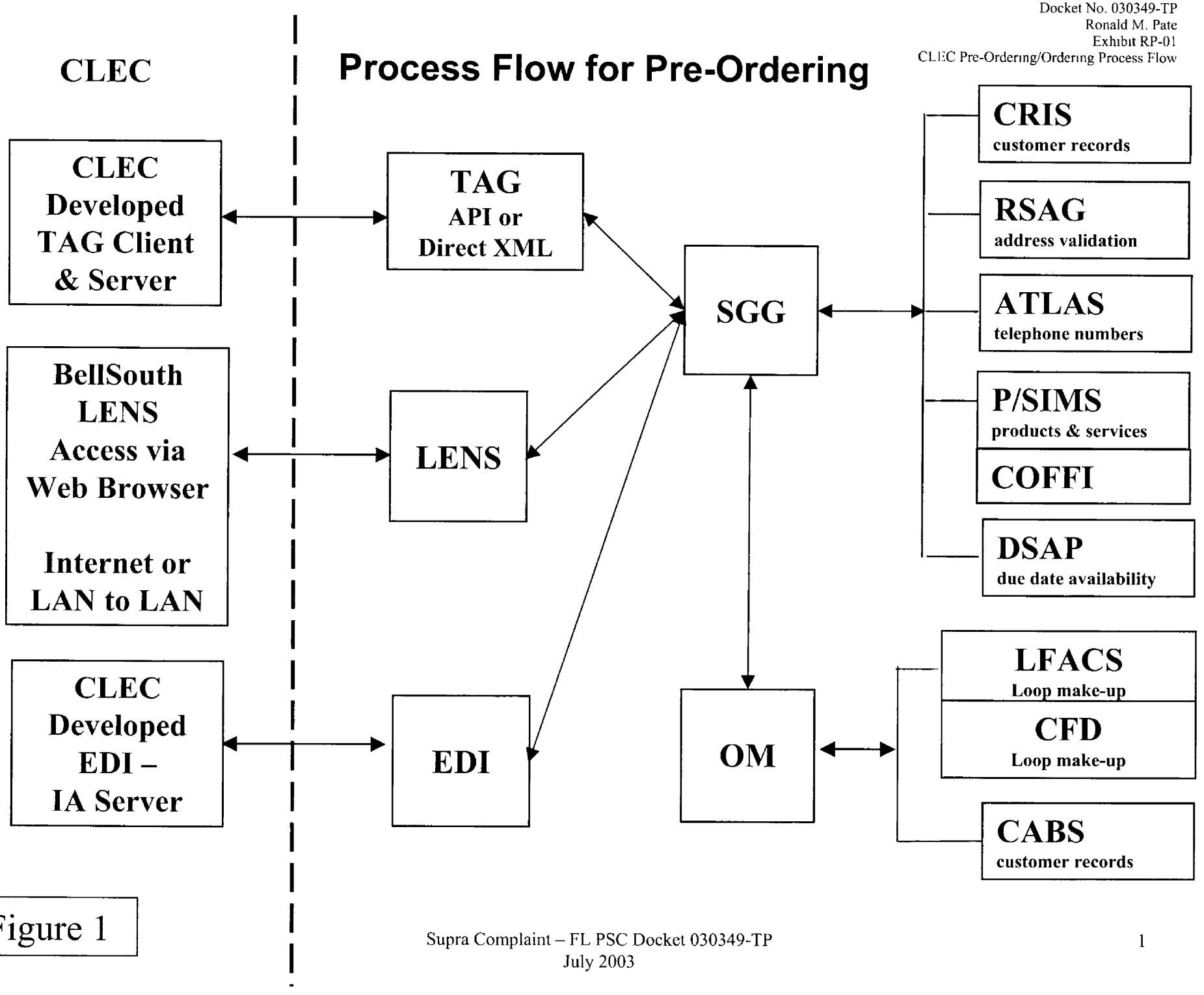

CLEC
Process Flow for Pre-Ordering
CLEC Developed TAG Client & Server
BellSouth LENS Access via Web Browser
Internet or LAN to LAN
CLEC Developed EDI – IA Server
TAG
API or Direct XML
LENS
EDI
SGG
OM
CRIS
customer records
RSAG
address validation
ATLAS
telephone numbers
P/SIMS
products & services
COFFI
DSAP
due date availability
LFACS
Loop make-up
CFD
Loop make-up
CABS
customer records

Figure 1

Process Flow for Ordering (excluding xDSL, UCL-ND, EELs, & UDC)

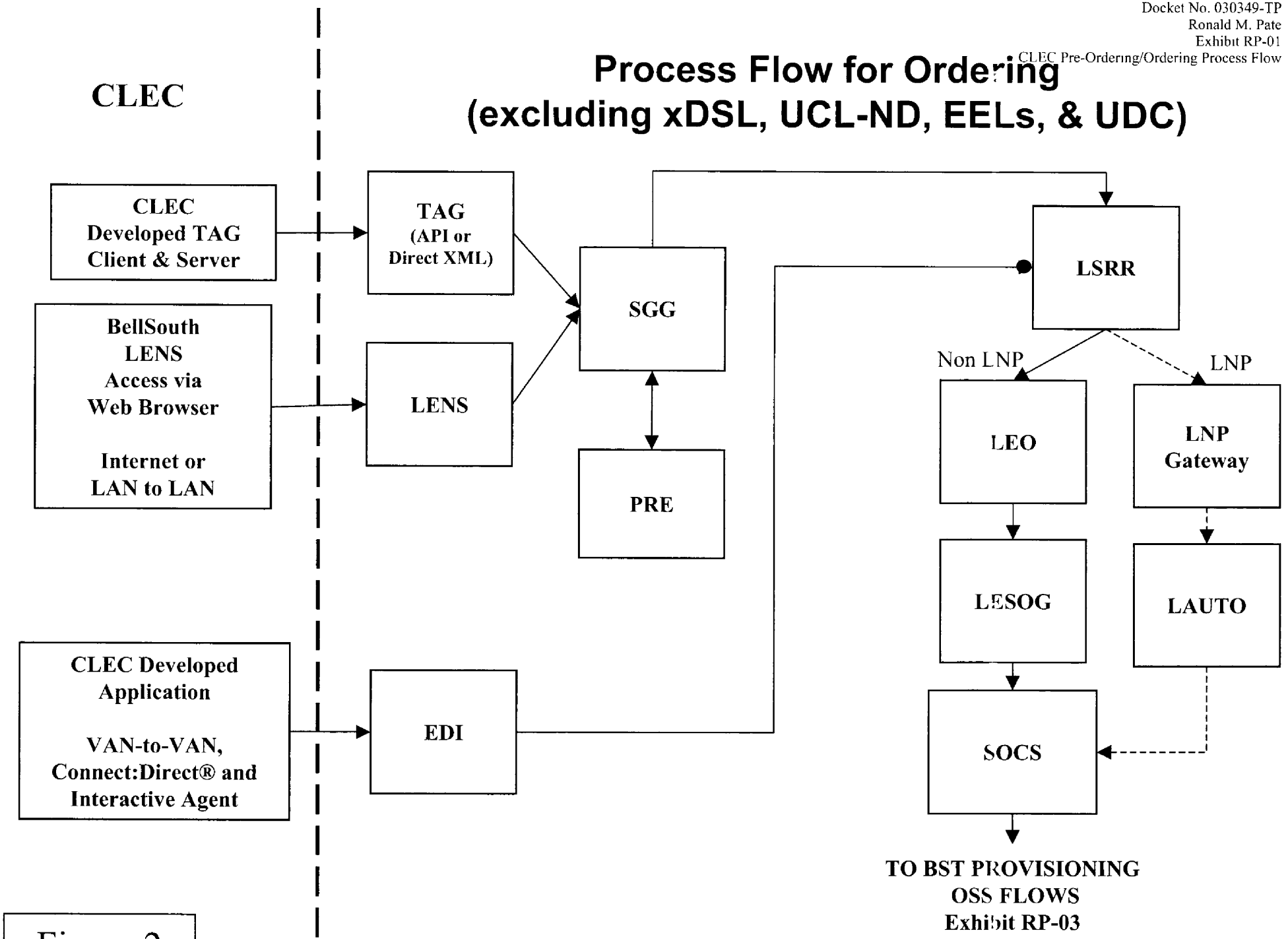


Figure 2

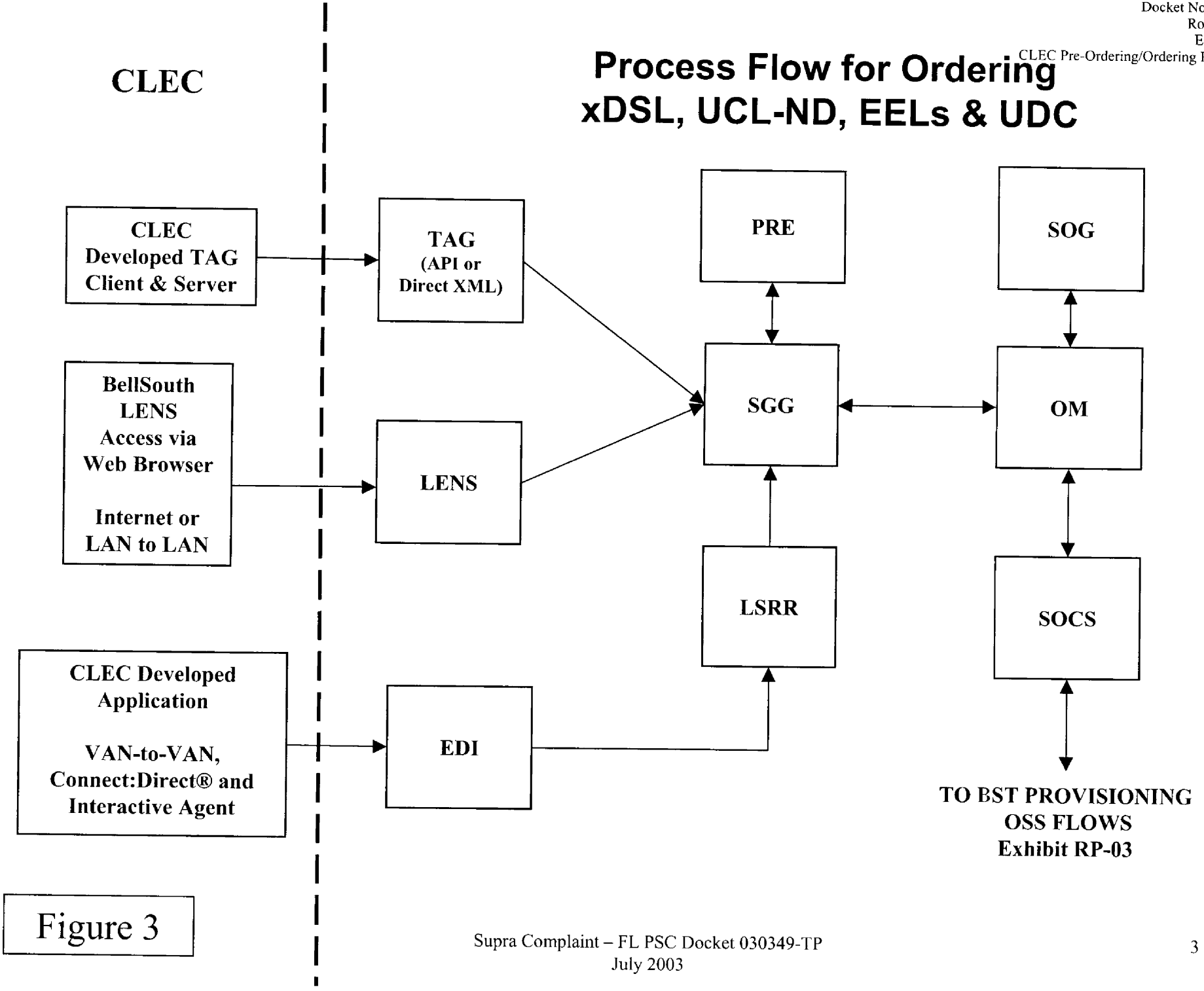

CLEC
Process Flow for Ordering
xDSL, UCL-ND, EELs & UDC
CLEC Developed TAG Client & Server
TAG (API or Direct XML)
BellSouth LENS Access via Web Browser
Internet or LAN to LAN
LENS
CLEC Developed Application
VAN-to-VAN, Connect:Direct® and Interactive Agent
EDI
PRE
SOG
SGG
OM
LSRR
SOCS
TO BST PROVISIONING OSS FLOWS Exhibit RP-03

Figure 3

RNS Pre-Order/Order Flow

PCs

RNS

Pre-Ordering

Ordering

SFMI

SWISH

SOCS

TO CINGULAR WIRELESS, BELLSOUTH ENTERTAINMENT, INTELLIVENTURES, ETC.

TO BSLD

TO BST PROVISIONING OSS FLOWS Exhibit RP-03

CRIS
customer records

IMAT
fraud/
debtor database

RSAG
address validation

ATLAS
telephone numbers

GIMI
customer profile

CBI
credit bureau

LIST
listings/directories

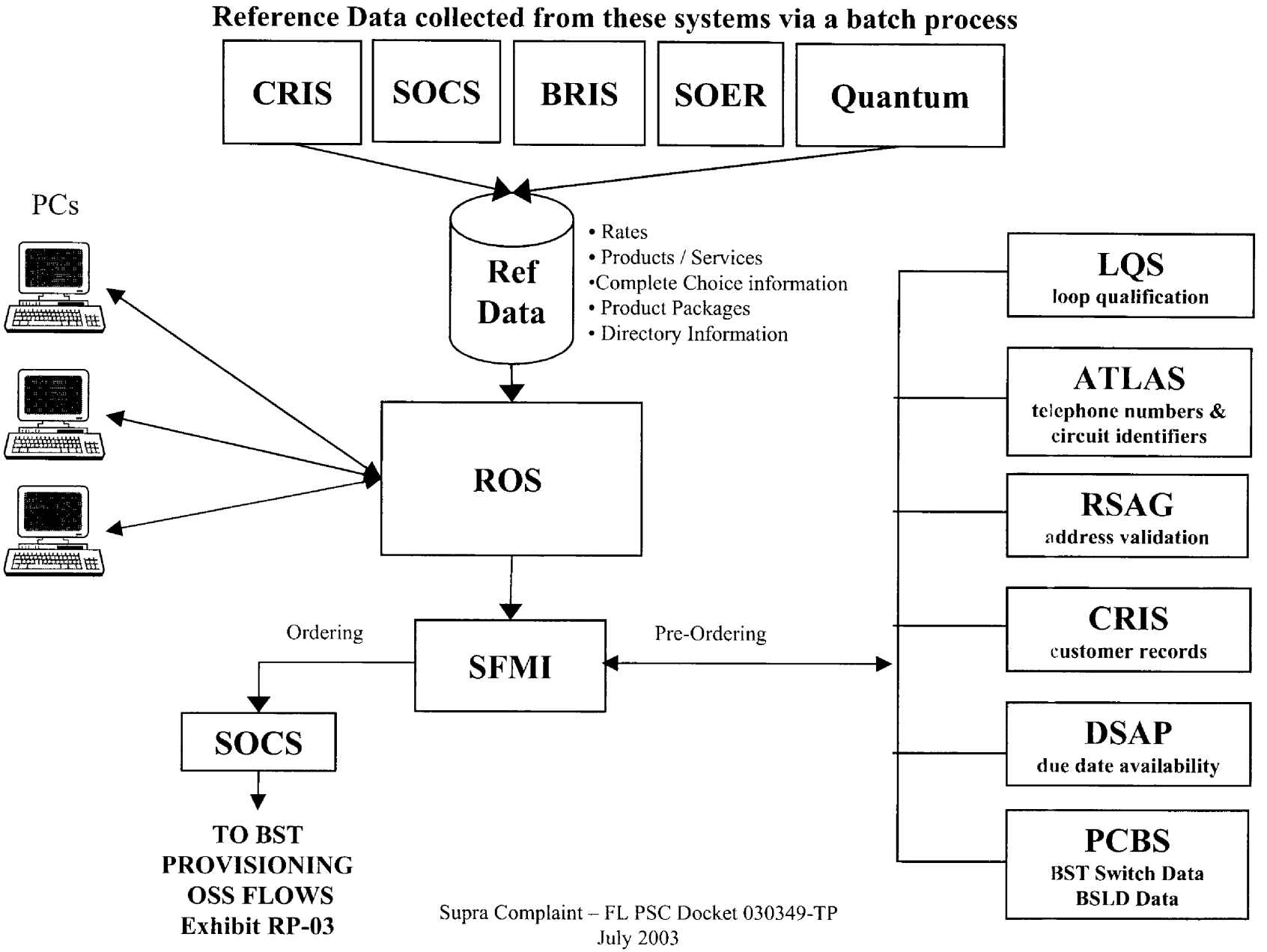
PCBS
products & services

- BST Switch Data
- BSLD
- Cingular Wireless

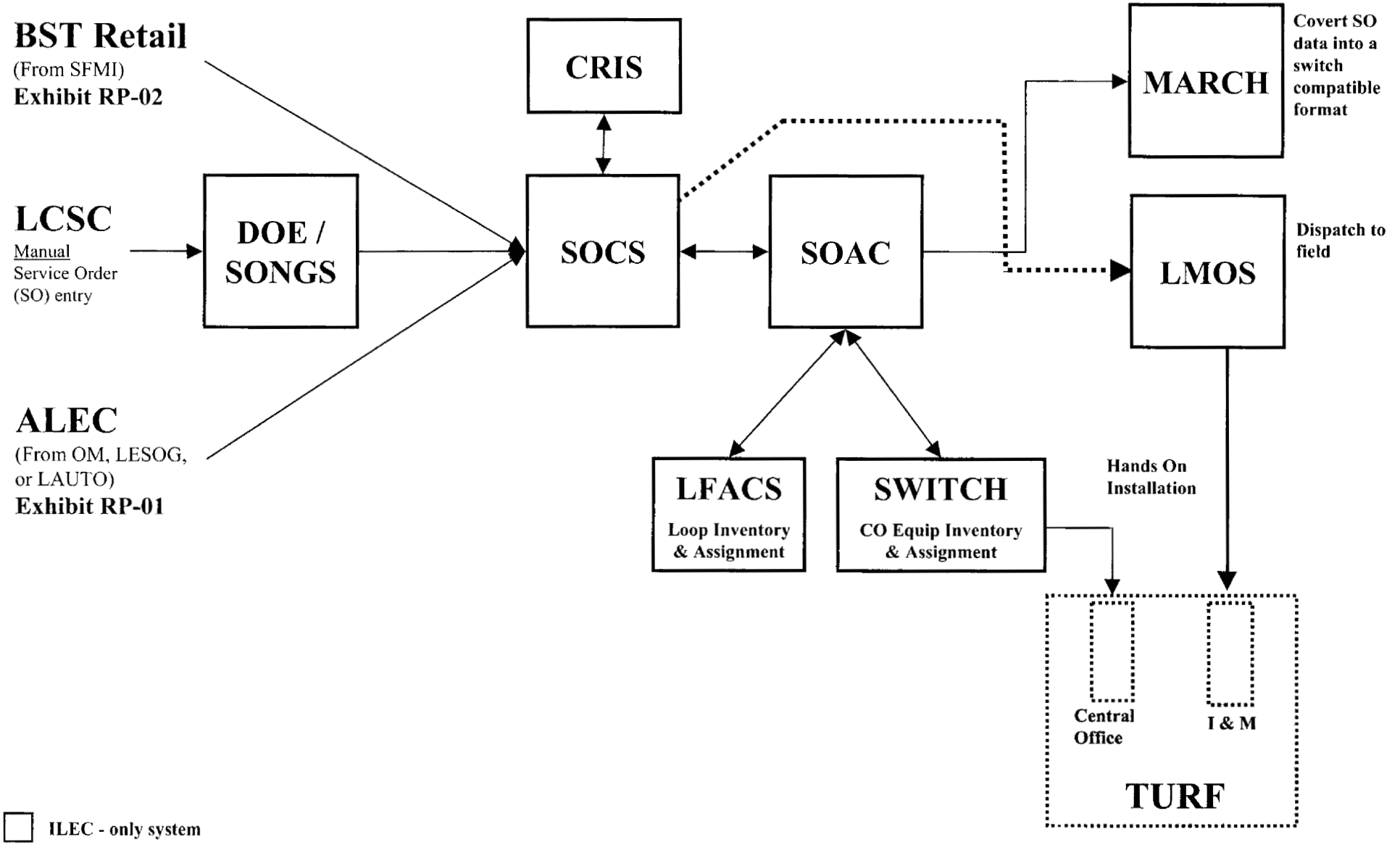
DSAP
due date availability

LQS
loop qualification

ROS Pre-Order/Order Flow



Process Flow for Provisioning (Non-Designed Circuits)



Acronym	Definition
AAND	Adverse Action Notification Database – maintains a record of all contacts in which "adverse action" was taken and sends written notification to the customer that explains the specific reasons for the "adverse action".
ADSL	Asymmetric Digital Subscriber Line
API	Application Program Interface
ATIS	Alliance for Telecommunications Industry Solutions
ATLAS	Application for Telephone number Load Administration and Selection — The BellSouth OS used to administer the pool of available telephone numbers (also referred to as "directory numbers") and to reserve selected numbers from the pool for use on pending service requests/service orders.
BBS	BellSouth Business Systems - a marketing segment in BellSouth serving large business customers.
BRIS	Business Revenue Information System - a database of business customers, which drives assignment of customers and revenues to BBS and SBS COUs, directly impacting COU size and performance.
BST	BellSouth Telecommunications
CABS	Carrier Access Billing System — The BellSouth proprietary corporate database and billing system for access customers and services. CABS is a complex mainframe system consisting of multiple functional software applications. CABS contains the "corporate official" records of the account information which is used to generate the appropriate customer billing. CABS accrues charges to customer accounts and generates billing invoices according to the formatting options selected by the customer.
CBI	Credit Bureau Interface - CBI provides an interface for RNS services representative to perform credit verification for Residential Service Customers. Small Business and BellSouth Business can also launch this application from the desktop for determining deposit requirements.
CFD	Corporate Facilities Database - The CFD is a digitized version of the plats available in Georgia, North Carolina, South Carolina, Florida and thirteen (13) wire centers in Alabama.
CO	Central Office
COFFI	The Central Office Features File Interface – The BellSouth database OS that contains USOC information based on current tariffs filed and PIC/LPIC Carrier data.
CLEC	Competitive Local Exchange Carrier
CONNECT:Direct®	A value-added network (VAN) service of Sterling Commerce, Inc. which supports VTAM and TCP/IP protocols. This VAN is used by BellSouth to support customer access into BellSouth systems. An example is the CLEC option to receive Daily Usage Files.

Acronym	Definition
Consumer	Consumer Services - a marketing segment in BellSouth serving residential customers.
CORBA	Common Object Request Broker Architecture
COU	Customer Operations Unit
CRIS	Customer Records Information System — The BellSouth proprietary corporate database and billing system for non-access customers and services. CRIS contains the "corporate official" records of the account information which is used to generate the appropriate customer billing. CRIS is a complex mainframe system consisting of multiple functional software applications. CRIS accrues charges to customer accounts and generates billing invoices according to the formatting options selected by the customer.
DOE	Direct Order Entry System — An internal BellSouth service order entry system used to input service orders in BellSouth format with the proprietary coding and formatting necessary for downstream processing by provisioning and billing systems. This system was developed and deployed within the former Southern Bell states of BellSouth.
DSAP	Distributed Support Application — The BellSouth OS which assists a Service Representative or similar carrier agent in negotiating service provisioning commitments for non-designed services and UNEs. DSAP has information regarding closed dates, CTs and restricted areas, and other information/guidance to help establish a realistic and meaningful appointment date.
DSL	Digital Subscriber Line
EDI	Electronic Data Interchange — The computer-to-computer exchange of inter and/or intra company business documents in a public standard format. The ordering interface sanctioned by the Ordering & Billing Forum (OBF) for implementation based on OBF standards and proposals.
EELs	Enhanced Extended Links
FID	Field IDentifier
GIMI	Geographic Integrated Marketing Intelligence - GIMI is a marketing intelligence system of residential customers that incorporates storage and retrieval of RNS customer profiles, canceled and completed order processing, storage and retrieval of sales and sales recommendations, and the sending of sales campaign information to RNS.
I&M	Installation and Maintenance — The BellSouth field work group which installs and repairs "POTS-like" non-designed services/circuits. This is an "outside" technician work group which normally performs work at the customer premise or at remote facility locations.
IA	Interactive Agent - is a software component that handles security and acts as a message manager or traffic cop for the receipt and disposition of EDI transactions in a near real-time mode.

Acronym	Definition
IMAT	The In-House Match Exchange (IMAT) system is part of a mechanized regional debtor database system designed to identify new customers with a record of non-payment for telephone service (live or final accounts) within the BellSouth region.
LAUTO	LNP Automation - LAUTO applies edit and formatting checks, formats the request into BellSouth service order record format, and passes it to SOCS.
LCSC	Local Carrier Service Center — The center, which is dedicated to handling CLEC LSRs, and Preordering transactions, along with associated expedite requests and escalations.
LENS	Local Exchange Navigation System — The BellSouth LAN/web server/OS application developed to provide both preordering and ordering electronic interface functions for CLECs.
LEO	Local Exchange Ordering System — A system that accepts the service request, applies edits and formatting checks, and forwards the service request to LESOG.
LESOG	Local Exchange Service Order Generator — A system which accepts the service request output of LEO, applies additional edits and formatting checks, formats the request into BellSouth service order record format, and passes it to SOCS.
LFACS	Loop Facilities Assignment and Control System — LFACS is an inventory system that manages outside plant loop facilities. LFACS contains data on cable pairs, terminals, loop qualification information, circuits and addresses. It is used to assign appropriate loop facilities to serve the address(es) on the service order.
LIST	List Information System – database containing listing and directory information.
LMOS	Loop Maintenance Operations System — The system provides a mechanized means of maintaining customer line records and for entering, processing, and tracking trouble reports. LMOS is used by the Work Management Center in the dispatching of service orders and trouble reports to outside forces.
LNP	Local Number Portability —The capability for a subscriber to retain his current telephone number as he transfers to a different local service provider.
LNP Gateway	LNP Gateway – Performs error checks on LNP service requests for accuracy, completeness, and formatting
LOH	Local Ordering Handbook
LQS	Loop Qualification System – used to determine if a telephone number(s) at a specific service address are qualified for BellSouth ADSL (Asymmetric Digital Subscriber Line) Service.

Acronym	Definition
LSR	Local Service Request — A request for local resale service or unbundled network elements (UNEs) from a CLEC. LSRs are to be transmitted in compliance with OBF standards where such standards have been finalized.
LSRR	Local Service Request Router – routes LSR to the proper BellSouth operations support system for handling.
MARCH	MARCH® is a product name, not an acronym — A BellSouth OS of Telcordia design which accepts service orders, interprets the coding contained in the service order image, and constructs the specific switching system Recent Change command messages for input into end office switches. Recent Change messages instruct the switching system to make the necessary assignments and associations in its translations database to activate service and any assigned features or capabilities.
Non Designed Service	A local service that does not require special conditioning or design. Such services are usually called "POTS" ("Plain Old Telephone Service") type service.
OBF	Ordering and Billing Forum
OM	Order Manager (OM) provides the programmable sequence and control functionality necessary to manage BellSouth's creation of Service Order Generation from LSRs for xDSL-compatible loops, UCLs, EELs and UDCs. LSRs for these are received from SGG, and validated within OM.
OSS	Operations Support Systems - computer-based systems, information, databases and personnel that telecommunications carriers use to perform essential customer and business support functions.
PCBS	Product Common Business Services - replaced the application-specific OASIS and AMOS systems for accessing product information with a corporate-wide API. This product catalog stores product information for wireline, wireless, and BSLD products.
PRE	Programmable Rules Engine - a component of ServiceGate Gateway, performs LSR edit validations.
P/SIMS	Product/Services Inventory Management System — The BellSouth database OS that contains availability information on switching system features and capabilities and on BellSouth service availability. This database is used to verify the availability of a feature or service in an NXX prior to making a commitment to the customer.
Quantum	Not an acronym – an accounts receivable billing system. Provides a breakdown of amounts due from retail customers. Identifies balance due by entity, product (account code) and deniability.

Acronym	Definition
RNS	Regional Negotiation System – RNS is a distributed computing system used by Consumer (residential customers) that allows users log on to one integrated system rather than multiple "backend" mainframe applications. The system presents icons, menus, and windows to access those applications that the users need to do their jobs. Because the RNS distributed system receives data from the mainframe "behind the scenes," users need only to log-on one place and know one system to be productive.
ROS	The Regional Order System (ROS) is a negotiation and service order generation platform that is utilized by BellSouth Customer Markets. ROS supports service order entry for BellSouth. ROS provides regional order capability via a graphical user interface, which features English-language descriptions for high-volume and strategic products.
RSAG	Regional Street Address Guide — The BellSouth database that contains street addresses validated to be accurate with state and local governments. This information is used to ensure a consistent and accurate address for the purposes of matching loop facilities available to a customer address and for dispatching outside field technicians.
SBS	Small Business Services – a marketing segment in BellSouth serving small business customers.
SFMI	Store and Forward Messaging Infrastructure – acts as a "job queue" to hold pending order information prior to submission of the firm order to SOCS. SFMI is a message transport middleware that is built on MQSeries technology. SFMI provides assured delivery, auditing, logging, alarming and automated failover.
SGG	ServiceGate® Gateway (SGG) provides a flexible and expandable gateway for the CLEC interconnection environment. SGG serves as an interface between data gathering/user interface systems provided by BellSouth's customers and the various task performing systems belonging to BellSouth. SGG provides security, logging and mapping capabilities needed by BellSouth to both receive and send interconnection requests.
SOAC	Service Order Analysis & Control — A BellSouth OS of Telcordia design which controls the flow of service orders to appropriate downstream assignment OSS, such as LFACS. SOAC controls the flow based on the type of order and the required facilities using BellSouth codes contained in the Service Order image.
SOCS	Service Order Communications System — A BellSouth OS responsible for the collection, storage, and distribution of service orders to all user departments, including service order-driven mechanized systems.

Acronym	Definition
SOER	Service Order Edit Routines – SOER, a sub task of SOCS, is an on-line, real-time editor of the service order. SOER is designed to provide online edit of each section of every service order entered into SOCS. SOER validates all USOCS, FIDS (Field IDentifierS), and FID data. Each time a service order is updated, it is edited again.
SOG	Service Order Generator – converts customer-provided data and assignment information into the format expected by the downstream systems in order to provision service. SOG validates the generated request to determine the accuracy and completeness of the data provided.
SONGS	Service Order NeGotiation System — An internal BellSouth service order entry system used to input service orders in BellSouth format with the proprietary coding and formatting necessary for downstream processing by provisioning and billing systems. This system was developed and deployed within the former South Central Bell states of BellSouth.
SWISH	System Wide Integrated Switching Hub – Transfers order information between negotiation systems and affiliate companies (such as Cingular Wireless and Paging, BellSouth Entertainment, Intelliventures).
SWITCH	Not an acronym — BellSouth OS for distributing frame administration, switch concentrator load balance operations, tie pair administration, provisioning selection of line-side switching system terminations ("OEs", or Office Equipments), and issuance of frame wiring orders.
TAG	Telecommunications Access Gateway ("TAG") is a machine-to-machine interface, based on the CORBA industry protocol for pre-ordering by TCIF, and follows the OBF guidelines for LSRs. TAG allows customers to establish an interface with the following benefits: • CLECs actually receive the data instead of just viewing it • CLECs develop their own presentation layer (GUI) • Real time processing, not batch • Access pre-order information and submit firm orders
TCIF	Telecommunications Industry Forum
UCL-ND	Unbundled Copper Loop – Non-Designed
UDC	Unbundled Digital Carrier
UNE	Unbundled Network Element
UNE-P	Unbundled Network Element Platform. An unbundled network element port/loop combination service that combines a 2-wire voice grade (measured) port, switching functionality, shared interoffice transport, tandem switching, and a voice grade loop to create an end-user-to-end-user transmission path that provides basic local exchange service.
USOC	Universal Service Order Code — USOC codes are assigned to all tariffed services and features. BellSouth OSs and work groups used these codes in provisioning, repair, and billing activities.

Acronym	Definition
VAN	Value Added Network — A data transmission network that provides features beyond basic transmission of information. For example, a data network that provides protocol translation or store-and-forward capabilities. BellSouth uses CONNECT: Direct®, for instance, in the billing electronic interfaces offered to CLEC customers.
XML	Extensible Markup Language