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REGULATORY AUTH.

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EXECUTIVE SECRETARY

May 7, 2001

By Hand

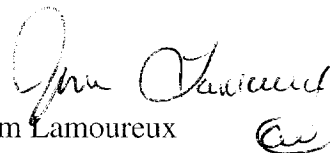
David Waddell
Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243

RE: Docket to Establish Generic Performance Measurements, Benchmarks and Enforcement Mechanisms for BellSouth Telecommunications, Inc.
Docket No. 01-00193

Dear Mr. Waddell:

Enclosed please find the original and thirteen copies of AT&T's First Set of Interrogatories and Request for Production of Documents to BellSouth, pursuant to the Authority's procedural schedule as set forth during the pre-hearing conference on May 1, 2001. A copy has been sent via facsimile to BellSouth, and copies have been sent via U.S. Mail to all other parties. If you have questions, please call me.

Sincerely,


Jim Lamoureux

Encls.

cc: Parties of service

**BEFORE THE
TENNESSEE REGULATORY AUTHORITY**

IN RE:

**Docket to Establish Generic
Performance Measurements, Benchmarks
and Enforcement Mechanisms for
BellSouth Telecommunications, Inc.**

Docket No. 01-00193

**AT&T's FIRST SET OF INTERROGATORIES AND REQUEST FOR
PRODUCTION OF DOCUMENTS TO BELL SOUTH
TELECOMMUNICATIONS, INC.**

AT&T of the South Central States, Inc. and TCG MidSouth, Inc. (collectively, "AT&T") serves its First Set of Interrogatories and Requests for Production of Documents upon BellSouth Telecommunications, Inc. to be answered on June 18, 2001, pursuant to the Tennessee Regulatory Authority's ("TRA") Transcript of Proceedings of the Pre-hearing Conference held on May 1, 2001.

DEFINITIONS

1. "BellSouth" means BellSouth Telecommunications, Inc., and its parents, subsidiaries, and affiliates, their present and former officers, employees, agents, representatives, directors, and all other persons acting or purporting to act on behalf of BellSouth Telecommunications, Inc.

2. The terms "you" and "your" refer to BellSouth.

3. The term "person" means any natural person, corporation, corporate division, partnership, other unincorporated association, trust, government agency, or entity.

4. The term "document" shall have the broadest possible meaning under applicable law. "Document" means every writing or record of every type and description that is in the possession, custody or control of BellSouth, including, but not limited to, correspondence, memoranda, drafts, workpapers, summaries, stenographic or handwritten notes, studies, publications, books, pamphlets, reports, surveys, minutes or statistical compilations, computer and other electronic records or tapes or printouts, including, but not limited to, electronic mail files; and copies of such writings or records containing any commentary or notation whatsoever that does not appear in the original. The term "document" further includes, by way of illustration and not limitation, schedules, progress schedules, time logs, drawings, computer disks, charts, projections, time tables, summaries of other documents, minutes, surveys, work sheets, drawings, comparisons, evaluations, laboratory and testing reports, telephone call records, personal diaries, calendars, personal notebooks, personal reading files, transcripts, witness statements and indices.

5. The term "referring or relating to" means any oral, graphic, demonstrative, telephonic, verbal, electronic, written or other conveyance of information, including, but not limited to, conversations, telecommunications and documents.

6. The term "referring or relating to" means consisting of, containing, mentioning, suggesting, reflecting, concerning, regarding, summarizing, analyzing,

discussing, involving, dealing with, emanating from, directed at, pertaining to in any way, or in any way logically or factually connected or associated with the matter discussed.

7. "And" and "or" as used herein shall be construed both conjunctively and disjunctively and each shall include the other whenever such construction will serve to bring within the scope of these discovery requests and information that would not otherwise not be brought within their scope.

8. The singular as used herein shall include the plural and the masculine gender shall include the feminine and the neuter.

9. "Identify" or "identifying" or "identification" when used in reference to a natural person means to state:

- a) the full legal name of the person;
- b) the name, title and employer of the person at the time in question;
- c) the present or last known employer of such person;
- d) the present or last known home and business addresses of the person; and
- e) the present home address.

10. "Identify" or "identifying" or "identification" when used in reference to a person other than a natural person means to state:

- a) the full name of the person and any names under which it conducts business;
- b) the present or last known address of the person; and
- c) the present or last known telephone number of the person.

11. "Identify" or "identifying" or "identification" when used in reference to a document means to provide with respect to each document requested to be identified by

these discovery requests a description of the document that is sufficient for purposes of a request to produce or a subpoena duces tecum, including the following:

- a) the type of document (e.g., letter, memorandum, etc.);
- b) the date of the document;
- c) the title or label of the document;
- d) the Bates number or other identifier used to number the document for use in litigation;
- e) the identity of the originator;
- f) the identity of each person to whom it was sent;
- g) the identity of each person to whom a copy or copies were sent;
- h) a summary of the contents of the document;
- i) the name and last known address of each person who presently has possession, custody or control of the document; and
- j) if any such document was, but is no longer, in your possession, custody or control or is no longer in existence, state whether it: (1) is missing or lost; (2) has been destroyed; or (3) has been transferred voluntarily or involuntarily, and, if so, state the circumstances surrounding the authorization for each such disposition and the date of such disposition.

12. "Identify," "identifying" or "identity" when used in reference to a communications means to state the date of the communications, whether the communication was written or oral, the identity of all parties and witnesses to the communication, the substance of what was said and/or transpired and, if written, the identity of the document(s) containing or referring to the communication.

GENERAL INSTRUCTIONS

1. If you contend that any response to any interrogatory may be withheld under the attorney-client privilege, the attorney work product doctrine or any other privilege or basis, please state the following with respect to each such response in order to explain the basis for the claim of privilege and to permit adjudication of the propriety of that claim:

- a) the privilege asserted and its basis;
- b) the nature of the information withheld;
- c) the subject matter of the document, except to the extent that you claim it is privileged.

2. These discovery requests are to be answered with reference to all information in your possession, custody or control or reasonably available to you. These discovery requests are intended to include requests for information which is physically within BellSouth's possession, custody or control as well as in the possession, custody or control of BellSouth's agents, attorneys, or other third parties from which such documents may be obtained.

3. If any interrogatory cannot be answered in full, answer to the extent possible and specify the reasons for your inability to answer fully.

4. These interrogatories are continuing in nature and require supplemental responses should information unknown to you at the time you serve your responses to these interrogatories subsequently become known.

5. For each interrogatory, provide the name of the company witness(es) or employee(s) responsible for compiling and providing the information contained in each answer.

INTERROGATORIES

1. Please state the date that BellSouth will begin to provide CLECs with raw data for each of the following reports:

Ordering

- LNP_PCT_Reject_Interval_Service_Requests_Total_Mech.txt
- LNP_PCT_Reject_Interval_Service_Requests_Partial_Mech.txt
- LNP_PCT_Reject_Interval_Service_Requests_Fully_Mech.txt
- LNP_Reject_Interval_Service_Requests_Total_Mech.txt
- LNP_Reject_Interval_Service_Requests_Partial_Mech.txt
- LNP_Reject_Interval_Service_Requests_Fully_Mech.txt
- LNP_Firm_Order_Confirmation_Total_Mech.txt
- LNP_Firm_Order_Confirmation_Partial_Mech.txt
- LNP_Firm_Order_Confirmation_Fully_Mech.txt
- Note that no LNP Non-Mechanized data is reported in the Ordering
- reports or raw data files

Provisioning

- LNP_Total_Order_Cycle_Time_Mechanized.txt
- LNP_Total_Order_Cycle_Time_Mechanized_with_Appointment_codes.txt
- LNP_Percent_Missed_Installation_Appointments.txt
- LNP_Disconnects.txt
- Note again that no LNP Non-Mechanized data is reported in the Provisioning reports or raw data files

Billing

- Invoice Accuracy CLEC (Region)

- Mean Time to Deliver Invoices CLEC (Region)
 - Usage Data Delivery Accuracy CLEC
 - Usage Timeliness & Completeness CLEC
2. Identify, on an individual measure basis, any and all studies or other documents, that BellSouth has caused to be prepared or possesses that justify and/or explain the differences between its SQM measures and its SEEM measures, including, but not limited to, differences in disaggregation.
 3. Describe the method(s) and/or procedure(s) BellSouth uses to ensure the accuracy of the error assignment for the flow-through report.
 4. For each of the following SEEM sub-measures, list any and all CLEC products and/or services offered by BellSouth that will be aggregated together for comparison with BellSouth's retail data:
 - a. Percent Missed Installation Appointments – UNE Loops
 - b. Average Completion Interval (OCI) – UNE Loops
 - c. % Provisioning Troubles Within 30 Days – UNE Loops
 - d. Missed Repair Appointments – UNE Loops
 - e. Customer Trouble Report Rate – UNE Loops
 - f. Maintenance Average Duration – UNE Loops
 - g. Percent Repeat Troubles Within 30 Days – UNE Loops
 5. Please provide the standard order interval offered by BellSouth.

for each of the products/services listed in response to Interrogatory No. 4, sub-measures (a) through (g).

6. List each and every BellSouth product and/or service that is included in each of the following SEEM retail analogs:
 - a. Retail Residence and Business
 - b. Retail Residence and Business Dispatch
 - c. Retail Design
7. Please specify the standard offered order interval for each of the BellSouth products and/or services identified in response to Interrogatory No. 6.
8. For the months of December 2000, January and February 2001, please state, expressed in percentages and by BellSouth retail analog category, the number of each BellSouth product and/or service sold.
9. Please describe in detail BellSouth's procedure(s) for ensuring that its raw data includes all BellSouth and CLEC transactions, and is otherwise accurate.
10. Explain with specificity how the product disaggregation for provisioning and maintenance sub-measures specified in BellSouth's SEEM proposal, supports BellSouth's claim that SEEM incorporates "like-to-like" comparisons with BellSouth's retail results.
11. Describe BellSouth's process, including raw data collection, systems accessed for data, and report creation, used for assembling the performance measure billing reports. In your description, state what aspects of the process are manual or

electronic, and to the extent to which it is manual, whether it is a totally or partially manual process.

12. For each and every measure for which BellSouth provides raw data, please state what data, if any, is excluded from the PMAP raw data files.
13. For all sub-measures for which BellSouth is currently providing performance -- results, please state the following: BellSouth and CLEC means, BellSouth and CLEC standard deviations, and BellSouth and CLEC sample sizes.
14. Please provide the following values missing from the first 2 tables in Attachment 3 of the BellSouth's Comments filed April 9, 2001 in Docket No. 01-00193:
 - o In both tables: the ILEC samples sizes for each of the ten cells.
 - o In the first table (MIA): the count of missed ILEC appointments for each of the ten cells.
 - o In the second table (OCI): the ILEC standard deviation for each of the ten cells.
15. For the months of December 2000, January and February 2001, what are the average CLEC and BellSouth sample sizes for each SQM sub-measure.
16. In BellSouth's SEEM, within which disaggregation category are LNP standalone performance results reported for the following measures?
 - a. Average Completion Interval
 - b. Percent Troubles Within 30 Days
 - c. Missed Repair Appointment

- d. Customer Trouble Report Rate
- e. Maintenance Average Duration
- f. Repeat Troubles Within 30 Days
- g. FOC Interval
- h. Rejection Interval

17. In BellSouth's SEEM, within which disaggregation category are LNP with UNE loop performance results reported for the following measures?

- a. Average Completion Interval
- b. Percent Troubles Within 30 Days
- c. Missed Repair Appointment
- d. Customer Trouble Report Rate
- e. Maintenance Average Duration
- f. Repeat Troubles Within 30 Days
- g. FOC Interval
- h. Rejection Interval

18. In BellSouth's SEEM, within which disaggregation category are Switch Ports performance results reported for the following measures?

- a. Average Completion Interval
- b. Percent Troubles Within 30 Days
- c. Missed Repair Appointment
- d. Customer Trouble Report Rate
- e. Maintenance Average Duration
- f. Repeat Troubles Within 30 Days
- g. Percent Missed Appointments
- h. FOC Interval
- i. Rejection Interval

19. In BellSouth's SEEM, within which disaggregation category are Transport performance results reported for the following measures?

- a. Average Completion Interval
- b. Percent Troubles Within 30 Days
- c. Missed Repair Appointment

- d. Customer Trouble Report Rate
- e. Maintenance Average Duration
- f. Repeat Troubles Within 30 Days
- g. Percent Missed Appointments

20. In BellSouth's SEEM, within which disaggregation category are EEL performance results reported for the following measures?

- a. Average Completion Interval
- b. Percent Troubles Within 30 Days
- c. Missed Repair Appointment
- d. Customer Trouble Report Rate
- e. Maintenance Average Duration
- f. Repeat Troubles Within 30 Days
- g. Percent Missed Appointments
- h. FOC Interval
- i. Rejection Interval

21. Please provide all information on test responsiveness results used by BellSouth in the development of its benchmark for the Loop Make Inquiry –Electronic measure.

22. Describe each and every step of the process by which data flows from the CLEC to receipt of a response by the CLEC for the OSS Response Interval Measure and identify what portion of the data flow process is included in the time captured for this measure by BellSouth.

23. Describe each and every step of the process by which data flows from the CLEC to receipt of a response by the CLEC for the FOC Timeliness Measure and

identify what portion of the data flow process is included in the time captured for this measure by BellSouth.

24. Describe each and every step of the process by which data flows from the CLEC to receipt of a response by the CLEC for the Reject Interval Measure and identify what portion of that flow is included in the time captured for this measure by BellSouth.

25. Describe each and every step of the process by which data flows from the CLEC to the receipt of a response by the CLEC for the Completion Notice Interval Measure and identify what portion of that flow is included in the time captured for this measure by BellSouth.

26. Describe in detail how BellSouth gathers data regarding CLEC interface users that is needed to implement the following business rules used to determine if a full outage is incurred for the Interface Availability Measure:

“ . . .When only one work center accesses an application or system and 40% or more of the clients in that work center cannot access the application.”

27. With respect to the Pre-Order Order Interface Availability measure, please state whether BellSouth considers it an outage if the CLEC interface, i.e. LENS, EDI, TAG is down, but the legacy systems are functionally available?

28. Describe the actions taken by BellSouth to disconnect telephone numbers in the central office switch following the receipt of an activate message indicating the porting of a number by a CLEC.
29. For the database update interval measure, indicate whether the “date and time stamp when a service order is completed” noted in the business rules is for a “CP” completion or a “CPX” completion.
30. Describe in detail BellSouth’s process for obtaining a statistically valid sample of CLEC orders for the Percent (%) Database Update Accuracy measure.
31. Identify and describe the methods by which BellSouth captures, tracks, and reports problems with NPA/NXX activation and their resolution.
32. Identify the BellSouth SQM measure(s) that include the time interval for completion of xDSL loop conditioning and describe in detail the start and stop times of the interval, and any information or request types excluded from the interval.
33. Please identify each of BellSouth’s LCSC locations that are included in the Speed of Answer in Ordering Center Measure.

34. Please describe any differences in the data included in the LSR's in the denominator of the Percent LSRs total mechanized measure, and the LSRs included in the "LSRs submitted" in the flow-through report.
35. Please describe any differences in the data included in the LSRs in the fully mechanized rejections measure and the LSRs in the auto-clarifications of the flow-through report.
36. Please describe any differences in the data included in the LSRs in the partially mechanized rejections measure and the LSRs included in the "CLEC caused fallout" of the flow-through report.
37. Please describe any differences in the data included in the LSRs in the fully mechanized FOCs measure and the LSRs included in the "Issued Service Orders" of the flow-through report.
38. Please describe any differences in the completed orders used in the calculation of the missed appointment metric and the completed orders used in the calculation of the completion notice measure.
39. Please describe any differences in the completed orders used in the calculation of the Missed appointments – LNP measure and the completed orders in the calculation of the LNP Disconnect Timeliness measure.

40. Please describe any differences in the completed orders used in the calculation of the Missed Appointments UNE with LNP metric and the completed orders used in the calculation of the Hot Cut Timeliness measure.
41. Describe in detail the process BellSouth uses to track and report performance results for coordinated customer conversions (loops with and without number portability).
42. Identify all supporting documentation that references or discusses the process. BellSouth uses to track and report performance results for coordinated customer conversions (loops with and without number portability).
43. With respect to the Coordinated Hot Cut Timeliness % Within Interval Measure, please provide all performance data, studies, or other information that support the benchmark of 95% within 4hour window for IDLC loops.
44. For the months of October 2000 through February 2001, please state, by month, the percentage of coordinated cutovers in Tennessee that involved IDLC.
45. For the months of October 2000 through February 2001, please state the number and percentage of coordinated customer conversion service orders in Tennessee

involving IDLC for which BellSouth failed to meet the Coordinated Hot Cut Timeliness % Within Interval Measure.

46. Describe in detail the carrier notifications that are included in BellSouth's change control measures and the carrier notifications that are excluded from BellSouth's change control measures.

47. Describe in detail the documentation releases that are included in BellSouth's change control measures and the documentation releases that are excluded from BellSouth's change control measures.

48. Please state the average interval by which BellSouth initiates local service for a new retail customer through the "win-back" process via loop cut-overs performed in the central office.

49. Beginning with October 1, 2000 provide the service order accuracy rate for CLEC orders and the service order accuracy rate for BellSouth's retail operation for Tennessee. For purposes of this interrogatory, "service order accuracy rate" with respect to CLEC orders is defined as the percentage of service orders for CLECs that were processed by BellSouth exactly as they were ordered or prepared by the CLECs.

50. Please describe in detail BellSouth's rationale for the 85% met benchmarks for the Percent Flow through Service Requests measure.
51. Explain why "D" orders associated with LNP Standalone Orders are not excluded from the Average Order Completion Interval measure.
52. For each SQM measure, describe the source of the data used to calculate the performance measurement results, e.g. LESOG. SOC's, etc.
53. Please describe BellSouth's rationale for excluding from its Held Order Interval Measure those orders that were held during the month, but were completed by the end of the month.
54. For each measure, describe the data that is stored or otherwise placed in BARNEY. If data for a measure is not stored or otherwise placed in BARNEY, please identify the database or system where such information is stored or otherwise placed.
55. Please identify all systems that feed information and/or data into PARIS.
56. Please describe the type information that is feed into and/or retained in PARIS.

57. Please describe in detail how data used to support BellSouth's SQM and SEEM plan is collected and stored.
58. For each measure in BellSouth's SQM, describe whether the data specified as excluded in BellSouth's SQM is also excluded from the raw data provided to CLECs.
59. Describe in detail BellSouth's procedure(s) for ensuring that its raw data includes all BellSouth and CLEC transactions, and is otherwise accurate.
60. Provide a SEEM report for AT&T data for February 2001 results, including payment amounts that would be due, if any, including all back-up detail. If results are not available for all measures, please provide a report on those measures for which data is available.
61. Provide BellSouth's basis for excluding appointments missed subsequent to the original committed due date from its Percent Missed Appointments measure.
62. For the months of October 2000 through February 2001, please provide the following information for each SEEM measure described below:

Measure	For CLEC Service Orders	For CLEC Service Orders	For BST Retail Analog Service Orders	For BST Retail Analog Service Orders

	% Field Dispatch	% Central Office Dispatch	% Field Dispatch	% Central Office Dispatch
Average Completion Interval/UNE Loops				
% Missed Installation Appointments/UNE loops				
Maintenance Avg. Duration/UNE Loops				
% Provisioning Troubles within 30 Days/UNE Loops				

63. Please provide the October 2000 through February 2001 monthly performance results for the “ADSL provided to retail” analog included in BellSouth’s proposed SQM.

- a. Average Completion Notice Interval
- b. Average Jeopardy Notice Interval
- c. % Missed Installation Appointments
- d. Missed Repair Appointments
- e. Maintenance Average Duration
- f. % Troubles within 30 Days

64. Describe and identify any and all analysis BellSouth has conducted on the pay-outs that would have been required of BellSouth for the months of January 2001 and February 2001 based on the remedy plan proposed by BellSouth.

65. Describe and identify any and all correlation studies and/or documents that BellSouth possesses or has caused to be prepared to justify its exclusion of measures from its remedies plan.

66. For the months of January, February, and March 2001, please state the times that network access lines or connections from BellSouth to LENS were accessible to CLEC's?

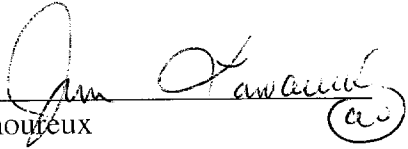
67. For the months of January, February, and March 2001, please state the times that that the computer application system that support LENS was accessible to CLEC's?

68. Provide all formulas required to compute the balancing critical value for proportion measures and please provide in an Excel spreadsheet, a numerical example illustrating the necessary computations.

67. Please provide the BellSouth mean and standard deviation for installation intervals of residential lines requiring dispatch.

DOCUMENT REQUESTS

1. Please produce any and all documents you relied upon to respond to the Interrogatories above.
2. Please produce any and all documents identified by BellSouth in responding to the Interrogatories above.



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Attorneys for AT&T Communications of
the Southern States, Inc. and on behalf of the
CLEC Coalition

May 7, 2001

CERTIFICATE OF SERVICE

I, the undersigned, do hereby certify that the foregoing AT&T'S FIRST SET OF INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS TO BELLSOUTH TELECOMMUNICATIONS, INC. was served upon BellSouth Telecommunications, Inc. via facsimile and on the remaining parties of record in this matter via U.S. mail, postage paid.

This the 7th day of May, 2001.

_____  _____
Jim Lamoureux 