BELLSOUTH

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October 12, 2001

VIA HAND DELIVERY

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

Re: *Docket to Determine the Compliance of BellSouth Telecommunications, Inc.'s Operations Support Systems with State and Federal Regulations*
Docket No. 01-00362

Dear Mr. Waddell:

Enclosed are fourteen copies of the non-proprietary sections of BellSouth's responses to the CLECs' interrogatories. Responses containing proprietary information will be submitted under separate cover. Copies of the enclosed are being provided to counsel of record.

Very truly yours,

Guy M. Hicks

GMH:ch
Enclosure

415228

CERTIFICATE OF SERVICE

I hereby certify that on October 12, 2001, a copy of the foregoing document was served on counsel for known parties, via the method indicated, addressed as follows:

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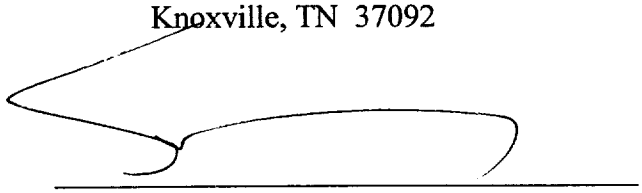

REQUEST: Please identify all persons who provided any information for purposes of answering these interrogatories and for each person identify the Interrogatory with which that person assisted.

RESPONSE:

Milton McElroy (Director- BellSouth Interconnection Operations); Kathy Wilson-Chu (Director – BellSouth Interconnection Operations); Maria Boykin (Contractor - BellSouth Interconnection Operations); Beth Craig (Operations Director – BellSouth Interconnection Operations); Olivia Mahon (Manager - BellSouth Interconnection Operations); Ranae Stewart (Program Manager – BellSouth Product Commercialization).

Ron Pate (Director – Interconnection Operations)-Victor Wakeling (Manager-Federal Regulatory)Alphonso Varner (Senior Director-Interconnection) Keith Milner (Senior Director)Ken Ainsworth (Director)

REQUEST: For the Georgia and Florida OSS tests, please identify all individuals involved in the tasks listed below, and describe the nature and time period of each individual's involvement in that task. Please provide the information organized in response to the following subparts and indicate which individual is best able to provide information on the details of the topic referenced in the subpart.

(a) Negotiations surrounding the initial and any subsequent engagements for third-party testing between BellSouth ("BellSouth") and KCI;

(b) the drafting or revision of any and all fee arrangements or contracts for hire that reflect an agreement for performed by KCI, by version;

(c) the development, review and/or revision of the Georgia and Florida OSS Tests Master Test Plans including any supplemental test plans, by version, including decisions regarding the scope of the Georgia and Florida OSS Tests;

(d) the implementation of the Georgia and Florida OSS Test Master Test Plans including all supplemental test plans;

(e) the collection or reporting of data or supporting information under the Georgia and Florida OSS Test Master Test Plans, including all supplemental test plans;

(f) for each test domain, the identification of exceptions under the Georgia and Florida OSS Test Master Test Plans, including all supplemental test plans;

(g) for each exception report, the resolution or closure of exceptions under the Georgia and Florida OSS Test Master Test Plans, including all supplemental test plans;

(h) the drafting and revision of the Georgia OSS Test Master Test Plan Final Report and the Supplemental Test Plan Final Report.

RESPONSE:

With respect to Georgia OSS tests:

(a) Milton McElroy (Director – BellSouth Interconnection Operations) served as the primary negotiator of the letter purchase order (LPO) with KPMG Consulting, Inc. ("KPMG") as well as rates for the OSS Test; William N. Stacy (Assistant Vice President – BellSouth Interconnection Operations) provided oversight and approval authority for the LPO; Frank Depalo (Director – BellSouth Supplier Alignment) assisted in negotiating the LPO and the rates for the OSS Test. KPMG was represented in the negotiations by Michael Weeks (Managing Director), Paul Brown (Partner), and David Frey (Test Manager). The negotiations began in late 1999, although the initial LPO has been extended to cover additional time periods for the OSS Test.

(b) See BellSouth's response to Interrogatory 2(a).

(c) The following individuals with Ernest & Young were involved in developing and revising Version 1.0 of the Georgia OSS Test Master Test Plan: John Putnam, Keith Hartford, Shannon Gerne, Suneet Kumar, Andrea Washington, Nick Dryfuse, Bill Headlee, Craig Engel, Gaeron McClure, Michael Hall, and Richard Scoggins. Drafts of Version 1.0 were reviewed by William Stacy, Kathy Wilson-Chu, Fred McCallum (General Counsel – BellSouth Georgia), and Michael Weeks. The following individuals were involved in developing and revising Version 2.0 of the Georgia OSS Test Master Test Plan: Karen Bond (Hewlett Packard); Paul Gill (Hewlett Packard); David Frey (KPMG), Brian Rutter (KPMG), and Nicole Giugno (KPMG). Kathy Wilson-Chu provided clarification and technical corrections to those developing Version 2.0 of the Georgia OSS Test Master Test Plan. Versions 3.0, 4.0, and 4.1 of the Georgia Master Test Plan were developed and revised by David Frey (KPMG) and Brian Rutter (KPMG).

d) To the extent available, this information is contained in Version 1.0 of KPMG's Master Test Plan Final Report and Evaluation Supplemental Test Plan and Flow-Through Evaluation Report. Other information that may be responsive to this request is not in the possession, custody, or control of BellSouth.

RESPONSE: (Cont.)

(e) To the extent available, this information is contained in Version 1.0 of KPMG's Master Test Plan Final Report and Evaluation Supplemental Test Plan and Flow-Through Evaluation Report. Other information that may be responsive to this request is not in the possession, custody, or control of BellSouth.

(f) To the extent available, this information is contained in Version 1.0 of KPMG's Master Test Plan Final Report and Evaluation Supplemental Test Plan and Flow-Through Evaluation Report. Other information that may be responsive to this request is not in the possession, custody, or control of BellSouth.

(g) To the extent available, this information is contained in Version 1.0 of KPMG's Master Test Plan Final Report and Evaluation Supplemental Test Plan and Flow-Through Evaluation Report or is otherwise available to AT&T through the Georgia Public Service Commission's website at www.psc.state.ga.us. Other information that may be responsive to this request is not in the possession, custody or control of BellSouth.

(h) To the extent available, this information is contained in Version 1.0 of KPMG's Master Test Plan Final Report and Evaluation Supplemental Test Plan and Flow-Through Evaluation Report. Other information that may be responsive to this request is not in the possession, custody, or control of BellSouth.

With respect to Florida OSS tests:

a. Milton McElroy (Director-BellSouth Interconnection Operations) served as primary negotiator of the letter purchase order (LPO) with KPMG Consulting, Inc. (KPMG) as well as rates for the OSS Test; William N. Stacy (Network Vice President – BellSouth Interconnection Operations) provided oversight and approval authority for the LPO; Frank Depalo (Director – BellSouth Supplier Alignment), Kathy Wilson-Chu (Director-BellSouth Interconnection Operations) and Marion Tilson (General Attorney) assisted in negotiating the LPO and the rates for the OSS Test. KPMG was represented in the negotiations by Michael Weeks (Managing Director), Paul Brown (Partner), and Michael Adderly (Test Manager). The Florida Public Service Commission staff was represented by Lisa Harvey (Chief, Bureau of Regulatory Review). The negotiations began in late 1999, although the initial LPO has been extended to cover additional time periods for the OSS Test.

RESPONSE: (Cont.)

b. See BellSouth's response to Interrogatory 7(a).

c. In the same manner as the CLEC community, Kathy Wilson-Chu and Milton McElroy provided feedback, clarification and technical corrections to Versions 1.0, 2.0 and 3.0.

d. To the extent available this information is contained in KPMG's Florida Master Test Plan Version 3.0, Monthly Status reports and is available to AT&T through the Florida Public Service Commission's website at http://www.scri.net/psc/industry/telecomm/oss/oss.html. In both the FL and GA OSS tests, KPMG implemented all test plans.

e. To the extent available this information is contained in KPMG's Florida Master Test Plan Version 3.0, Monthly Status reports or is otherwise available to AT&T through the Florida Public Service Commission's website at http://www.scri.net/psc/industry/telecomm/oss/oss.html. Other information that may be responsive to this request is not in the possession, custody or control of BellSouth. In both the FL and GA OSS tests, KPMG collected and reported data and other supporting information for all test plans.

RESPONSE: (Cont.)

f. To the extent available this information is contained in KPMG's Florida Master Test Plan Version 3.0, Monthly Status reports, and is available to AT&T through the Florida Public Service Commission's website at http://www.scri.net/psc/industry/telecomm/oss/oss.html. In both the FL and GA OSS tests, KPMG identified exceptions for all test plans.
To the extent available this information is contained in KPMG's Florida Master Test Plan Version 3.0, Monthly Status reports, and is available to AT&T through the Florida Public Service Commission's website at http://www.scri.net/psc/industry/telecomm/oss/oss.html. BellSouth supplements its response with the following list of personnel who contributed to the resolution and closure process for exceptions in the GA and FL OSS Tests:

GA OSS Test	
Milton McElroy	Project Management
Kathy Wilson-Chu	Project Management
Cassandra Daniels	Project Management
Beth Craig	Transaction Testing
Michael Curnick	Metrics
Clayton Lindsey	Metrics
David Scollard	Billing

FL OSS Test	
Milton McElroy	Project Management
Kathy Wilson-Chu	Project Management
Beth Craig	Order Management
Tommy Rainwater	Provisioning/M&R
Natasha Davis	Account Establishment
Clayton Lindsey	Metrics
Jennifer Vogel	Billing

g. To the extent available this information is contained in KPMG's Florida Master Test Plan Version 3.0, Monthly Status reports, and is available to AT&T through the Florida Pu8blic Service Commission's website at http://www.scri.net/psc/industry/telecomm/oss/oss.html.

RESPONSE: (Cont.)

h.. To the extent available, this information is contained in Version 1.0 of KPMG's Master Test Plan Final Report, Evaluation Supplemental Test Plan and Flow-Through Evaluation Report. In both the GA and FL OSS tests, KPMG is or has drafted and revised all final reports for all test plans.

REQUEST: Please identify the participants in each of the weekly conference calls referenced in the Georgia Status Reports.

RESPONSE: Pursuant to agreement of the parties, BellSouth will provide the names of subject matters experts one level below Mr. McElroy:

GA OSS Test

Milton McElroy	Project Management
Kathey Wilson-Chu	Project Management
Cassandra Daniels	Project Management
Beth Craig	Transaction testing
Michael Curnick	Metrics
Clayton Lindsey	Metrics
David Scollard	Billing

FL OSS Test

Milton McElroy	Project Management
Kathy Wilson-Chu	Project Management
Beth Craig	Orders Management
Tommy Rainwater	Provisioning/M&R
Natasha Davis	Acct. Establishment
Clayton Lindsey	Metrics
Jennifer Vogel	Billing

REQUEST: Please identify all individuals who drafted or revised all plans or reports submitted to the GPSC during the course of the Georgia OSS Test and for each, identify the report drafted or revised.

RESPONSE: To the extent available, this information is contained in Version 1.0 of KPMG's Master Test Plan Final Report and Evaluation Supplemental Test Plan and Flow-Through Evaluation Report. Other information that may be responsive to this request is not in the possession, custody, or control of BellSouth.

REQUEST: Please identify all individuals who drafted or revised all documents, plans or reports submitted to the FPSC during the course of the Florida OSS Test (beginning with the creation of the Master Test Plan and all periods thereafter) and for each, identify the report drafted or revised.

RESPONSE:

To the extent available this information is contained in KPMG's Florida Master Test Plan Version 3.0, Monthly Status reports, or is otherwise available to AT&T through the Florida Public Service Commission's website at http://www.scri.net/psc/industry/telecomm/oss/oss.html.

REQUEST: Please describe the policies and procedures KCI employed in the Georgia and Florida OSS Tests, identify any input by BellSouth as to the policies and procedures and specify the ways in which these policies and procedures differ, if any, from Generally Accepted Auditing Principles and/or standards promulgated by the American Institute of Certified Public Accountants.

RESPONSE:

Georgia - To the extent available, this information is contained in Version 1.0 of KPMG's Master Test Plan Final Report and Evaluation Supplemental Test Plan and Flow-Through Evaluation Report. Other information that may be responsive to this request is not in the possession, custody, or control of BellSouth.

Florida – To the extent available this information is contained in KPMG's Florida Master Test Plan Version 3.0, Monthly Status reports, or is otherwise available to AT&T through the Florida Public Service Commission's website at http://www.scri.net/psc/industry/telecomm/oss/oss.html.

REQUEST: Please identify all of the differences between the procedures, testing, monitoring and reporting used in the Georgia OSS Test and the procedures used and being used in the Florida OSS test. Please explain how these differences relate to data reporting and test results.

RESPONSE: Pursuant to agreement of the parties BellSouth will respond to this request. See attachment.

ATTACHMENT

GA/FL 3PT Comparison

Test Target	GA	FL	Comments
Third Party Roles/Responsibilities			
Test Plan Development	X	X	
Test Management & Execution	X	X	
Report/Opinion	X	X	
Test Approach			
Blindness	X	X	
Military Style/Regression	X	X	
End-to-End	X	X	
Volume Test Bed	X	X	GA-RSIMMS and Production. KPMG certified RSIMMS as replication of production. FL-Production.
CLEC Involvement			
Test Plan Development	X	X	
Test Execution (Live CLEC)	X	X	
Status/Issue Review	X	X	

GA/FL 3PT Comparison

Test Target	GA	FL	Comments
Pre-Ordering			
Basic Capabilities (Electronic)	X	X	
(Addr Val, TN, Srvc Avail, DD, CSR)			
Loop Qual/Makeup (Manual)	X	X	
(Electronic)	-	X	GA-Didn't have xDSL electronic capability at the time of testing.
GUI Functional Test	-	X	Not tested in GA due to existence of commercial volumes on LENS.
App-to-App Functional Test	X	X	
Performance Results			
Response Timeliness	X	X	
Response Accuracy/Completeness	X	X	
System Availability	X	X	
Ordering			
Products (FT & Non-FT)			
Simple Resale	X	X	
Complex Resale	X	X	
UNE-P	X	X	
UNE Loops	X	X	
UNE Loop + LNP	X	X	
xDSL Loops	X	X	GA-Manual Only, Did not have electronic capability at the time of the test
EELs, Line Sharing	-	X	GA/FL - No/Low CLEC demand to date.
OSDA/OLNS	-	X	
Interconnection Trunks	-	X	

GA/FL 3PT Comparison

Test Target	GA	FL	Comments
Ordering (Cont'd)			
Activities/Requests			
New/Add	X	X	
Change	X	X	
Conversion	X	X	
Move	X	X	
Suspend/Restore	X	X	
Disconnect	X	X	
Supplement/Cancels	X	X	
Errors	X	X	
Manual Order Transaction Test	X	X	GA-xDSL Loops only
GUI Functional Test	-	X	Not tested in GA due to existence of commercial volumes on LENS.
App-to-App Functional Test	X	X	EDI & TAG
Process Parity Evaluation	X	X	GA-xDSL Loops only
Order Status Accuracy	X	X	
Performance Results			
FA Timeliness & Completeness	X	X	
FOC/REJ Interval & Completeness	X	X	
DD Accuracy vs. Std Interval Guide	X	X	
Pre-Order/Order Integration	X	X	Both 3PTs address format/mapping.

GA/FL 3PT Comparison

Test Target	GA	FL	Comments
Provisioning			
Provisioning Verification/Accuracy	X	X	
Coordinated Provisioning Evaluation	X	X	
Provisioning Process Parity Evaluation	X	X	GA-xDSL Loops only
Performance Results			
Notice Interval & Completeness			
Jeopardy Notices	X	X	
Missed Appt Notices	X	X	
Completion Notices	X	X	
Hot Cut Timeliness	X	X	
Maintenance & Repair			
Basic Functionality			
Enter Trouble Report	X	X	
Status Trouble Report	X	X	
Close/Cancel Trouble Report	X	X	
Access Trouble History	X	X	
Perform MLT Test	X	X	
M&R Process Parity Evaluation	X	X	

GA/FL 3PT Comparison

Test Target	GA	FL	Comments
Maintenance & Repair (Cont'd)			
M&R Process Evaluation			
Process Review & Adherence	X	X	GA-Overall M&R Process.
Manual Operations Review	-	X	FL- Manual M&R process
Web/GUI Functional Test	X	X	TAFI
App-to-App Functional Test	X	X	ECTA
Network Surveillance Support	-	X	
Performance Results			
Missed Appointments	X	X	
Trouble Report Rate	X	X	
Maintenance Avg Duration	X	X	
% Repeat Troubles	X	X	
% Out of Service for 24 Hours	X	X	
M&R Center Speed to Answer	X	X	
M&R OSS Response Timeliness	X	X	
Avg Delay on Missed Appointments	-	X	GA- Not a Performance Measure.
Billing			
CRIS/CABS Invoicing Functional Test	X	X	
DUF Usage Functional Test	X	X	
Performance Results			
Invoice Accuracy	X	X	
Usage Data Delivery	X	X	
Invoice Delivery Timeliness	X	X	
Usage Data Delivery Timeliness	X	X	

GA/FL 3PT Comparison

Test Target	GA	FL	Comments
Volume Testing & Scalability Analysis			
Normal Volume Testing			
Pre-Ordering & Ordering	X	X	GA- EDI, TAG FL- LENS, EDI, TAG, ROBOTAG, Manual
M&R	X	X	GA- ECTA FL- ECTA, TAFI
Peak Volume Testing			
Pre-Ordering & Ordering	X	X	GA- EDI, TAG FL- LENS, EDI, TAG, ROBOTAG, Manual
M&R	X	-	GA- ECTA FL- ECTA, TAFI
Stress Volume Testing			
Pre-Ordering	-	X	FL- LENS, EDI, TAG, ROBOTAG
M&R	-	X	FL- ECTA, TAFI
Systems Capacity Mgmt Evaluation			
Ordering	X	X	
M&R	X	X	
Billing	X	X	
Workcenter Scalability			
Ordering	X	X	GA-xDSL Loops Only (All Centers).
Provisioning	-	X	
M&R	-	X	

GA/FL 3PT Comparison

Test Target	GA	FL	Comments
Documentation Evaluation			
Web/GUI User's Guides			Not tested in GA due to existence of commercial volumes
Pre-Ordering/Ordering	-	X	
M&R	X	X	
Process Business Rules			
Pre-Ordering	X	X	
Ordering	X	X	
M&R	X	X	
CRIS/CABS Invoicing	X	X	
Daily Usage Files	X	X	
Programmer's Guides (Interface Specs)			GA-Interfaces built by HP, but not in the scope of the test.
Pre-Ordering	-	X	
Ordering	-	X	
Document Management Process	X	X	
Change Management Process			
Process Definition	X	X	
CR Prioritization/Severity Process	X	X	

GA/FL 3PT Comparison

Test Target	GA	FL	Comments
Change Management Process (Cont'd)			
Notice & Implementation Intervals	X	X	
Release Versioning Policy	X	X	
Documentation Completeness	X	X	
Stable/Separate Test Environment	X	X	
Defect Management Process	X	X	
OSS Interface Development Review	X	X	GA-Observation of OSS '99 (major release)
Relationship Management			
Account Establishment & Mgmt	-	X	GA-Not tested due to commercial volume
Certification Testing	-	X	GA-KPMG/HP executed, not evaluated
Help Desk Support			GA-Utilized the help desk support, but did not evaluate.
Pre-Ordering & Ordering	-	X	
Billing	-	X	
EC Support	-	X	
CLEC Training	-	X	GA-KPMG attended as test prep; not evaluated

GA/FL 3PT Comparison

Test Target	GA	FL	Comments
Performance Metrics			
Raw Data Accuracy & Completeness	X	X	
ETE Data Transformation Integrity	X	X	
External Documentation Analysis	X	X	
SQM Definitions	X	X	
Raw/Source Data User's Guide	X	X	
Quantitative Result Replication	X	X	
Data Security & Administration	X	X	
SQM Development & Change Mgmt	X	X	
CLEC/Wholesale	X	X	
RBOC Retail	X	X	
Network Design, Collocation, & Interconnection Planning	-	X	GA-Commercial volumes & performance metrics.

REQUEST: Please identify all electronic, telephonic or other communication received from any third party, including CLECs, regarding exceptions, conduct, scope, assumptions, problems, deficiencies, concerns, or any other issues related to the Georgia and Florida OSS Tests. For each communication, please describe how the third party communication was processed, to whom the information was disseminated, and any resulting action.

RESPONSE:

To the extent AT&T is referring to the weekly CLEC calls, CLECs generally did not provide information to BellSouth on these calls. Therefore, BellSouth did not develop a process for dissemination, evaluation, or response to CLEC information provided during the weekly CLEC calls. On one occasion, AT&T requested that BellSouth provide AT&T's LNP flow through raw data. BellSouth honored this request and provided AT&T's raw LNP data for 1 of AT&T's 2 requested OCNs for December 2000, and indicated there was no data for the other OCN. AT&T provided PONs indicating there should have been data for the missing OCN. BellSouth researched this issue and corrected a problem with LNP reporting as of the January 2001 data. By contrast, CLECs regularly provided information to KPMG during the weekly CLEC calls, although information concerning the process by which such communications were disseminated and evaluated by KPMG is beyond the possession, custody, or control of BellSouth.

BellSouth is unaware of any communication from any third party other than AT&T that is responsive to this request. AT&T already has information in its possession concerning its communications regarding the Georgia OSS Test, and thus no further responsive from BellSouth is required.

Florida – All third party communication was routed through KPMG as the Florida Test Manager. Any issues shared with BellSouth were also shared with all CLECs participating on the weekly status calls. All resulting action was published in KPMG's weekly status meeting minutes which can be found on the Florida Public Service Commission's website: http://www.scri.net/psc/industry/telecomm/oss/oss.html

REQUEST: Please describe the process by which the Georgia and Florida OSS Test Master Test Plan was developed. Please identify and describe each revision to the Master Test Plan and for each describe the date of the revision, the basis for the revision, and the impact of the revision on the respective OSS Test.

RESPONSE:

Georgia - To the extent available, this information is contained in Version 1.0 of KPMG's Master Test Plan Final Report and Evaluation Supplemental Test Plan and Flow-Through Evaluation Report. Other information that may be responsive to this request is not in the possession, custody, or control of BellSouth.

Florida – To the extent available this information is contained in KPMG's Florida Master Test Plan Version 3.0, Monthly Status reports, or is otherwise available to AT&T through the Florida Public Service Commission's website at http://www.scri.net/psc/industry/telecomm/oss/oss.html.

REQUEST: Please identify and describe the standard, if any, for military testing used in designing the Georgia and Florida OSS Tests, including, but not limited to, any differences between the two tests.

RESPONSE:

Georgia - To the extent available, this information is contained in Version 1.0 of KPMG's Master Test Plan Final Report and Evaluation Supplemental Test Plan and Flow-Through Evaluation Report. Other information that may be responsive to this request is not in the possession, custody, or control of BellSouth.

Florida – To the extent available this information is contained in KPMG's Florida Master Test Plan Version 3.0, Monthly Status reports, or is otherwise available to AT&T through the Florida Public Service Commission's website at http://www.scri.net/psc/industry/telecomm/oss/oss.html.

REQUEST: The Georgia Master Test Report states at Page II-6 that "[i]n a military style test, a mindset of 'test until you pass' was generally adopted." Please identify all of the tests in the Georgia OSS Test in which KCI deviated from military testing and, for each test, explain the basis for the deviation.

RESPONSE:

To the extent available, this information is contained in Version 1.0 of KPMG's Master Test Plan Final Report and Evaluation Supplemental Test Plan and Flow-Through Evaluation Report. Other information that may be responsive to this request is not in the possession, custody, or control of BellSouth.

KPMG determined the methodology used to select the statistically valid sample size for each of their tests. BellSouth was not involved in the development or implementation of this methodology.

REQUEST: Please describe BellSouth's involvement in selecting sample sizes in the Georgia and Florida OSS Tests for each test by individual test or, if appropriate, by groups of tests, the methodology used by BellSouth in selecting sample sizes, and identify the individuals responsible for developing and implementing that methodology.

RESPONSE:

Georgia - To the extent available, this information is contained in Version 1.0 of KPMG's Master Test Plan Final Report and Evaluation Supplemental Test Plan and Flow-Through Evaluation Report. Other information that may be responsive to this request is not in the possession, custody, or control of BellSouth.

KPMG determined the methodology used to select the statistically valid sample size for each of their tests. BellSouth was not involved in the development or implementation of this methodology.

Florida – BellSouth was not involved in the development or implementation of this methodology. To the extent available this information is contained in KPMG's Florida Master Test Plan Version 3.0, Monthly Status reports, or is otherwise available to AT&T through the Florida Public Service Commission's website at http://www.scri.net/psc/industry/telecomm/oss/oss.html.

REQUEST: For the Georgia and Florida OSS Test, please identify each test for which sample size or methodology was changed during any retest and describe the basis for each change. For each change, please identify the individuals involved in determining that the change should be made, their qualifications for making that determination, the standard and/or methodology they applied, and the factors that informed their decision.

RESPONSE:

To the extent available, this information is contained in Version 1.0 of KPMG's Master Test Plan Final Report and Evaluation Supplemental Test Plan and Flow-Through Evaluation Report. Other information that may be responsive to this request is not in the possession, custody, or control of BellSouth.

KPMG determined the methodology used to select the statistically valid sample size for each of their tests. BellSouth was not involved in the development or implementation of this methodology.

REQUEST: For the Georgia and Florida OSS Tests, please identify all exceptions for which further testing was conducted after issuance of the closure report and describe the nature and results of that testing.

RESPONSE:

Georgia - To the extent available, this information is contained in Version 1.0 of KPMG's Master Test Plan Final Report and Evaluation Supplemental Test Plan and Flow-Through Evaluation Report. Other information that may be responsive to this request is not in the possession, custody, or control of BellSouth.

Florida – To the extent available this information is contained in KPMG's Florida Master Test Plan Version 3.0, Monthly Status reports, or is otherwise available to AT&T through the Florida Public Service Commission's website at http://www.scri.net/psc/industry/telecomm/oss/oss.html.

REQUEST: For the Georgia and Florida OSS Tests, please identify all exceptions that were closed based upon proposed fixes.

RESPONSE:

Georgia - Information concerning the closure of exceptions is available to AT&T through the Georgia Public Service Commission's website at www.psc.state.ga.us. Other information responsive to this request is not in the possession, custody, or control of BellSouth.

All actions by BellSouth to resolve Exceptions are noted in the Exception Responses and KPMG's subsequent closure statements.

Florida – Information concerning the closure of exceptions is available to AT&T through the Florida Public Service Commission's website at http://www.scri.net/psc/industry/telecomm/oss/oss.html.

REQUEST: Please identify all tests which were considered for inclusion in the Georgia and Florida OSS Tests. For each test in each state, please identify the basis upon which the decision to include or exclude the test was made. Please also identify all individuals involved in making the decision for each test and describe the standards they applied.

RESPONSE:

Georgia - To the extent available, this information is contained in Version 1.0 of KPMG's Master Test Plan Final Report and Evaluation Supplemental Test Plan and Flow-Through Evaluation Report. Other information that may be responsive to this request is not in the possession, custody, or control of BellSouth.

Florida – To the extent available this information is contained in KPMG's Florida Master Test Plan Version 3.0, Monthly Status reports, or is otherwise available to AT&T through the Florida Public Service Commission's website at http://www.scri.net/psc/industry/telecomm/oss/oss.html.

REQUEST: Please describe all parameters of each test bed account in the Georgia and Florida OSS Tests.

RESPONSE:

Georgia - To the extent available, this information is contained in Version 1.0 of KPMG's Master Test Plan Final Report and Evaluation Supplemental Test Plan and Flow-Through Evaluation Report. Other information that may be responsive to this request is not in the possession, custody, or control of BellSouth.

Florida – To the extent available this information is contained in KPMG's Florida Master Test Plan Version 3.0, Monthly Status reports, or is otherwise available to AT&T through the Florida Public Service Commission's website at http://www.scri.net/psc/industry/telecomm/oss/oss.html. Specific KPMG requirements on testbed accounts are provided in AT&T's Request for Production Nos. 32 & 33.

REQUEST: For the Georgia and Florida OSS Tests, please identify each test in which KCI acted as if it were a CLEC. For each of these tests, please specify: (a) whether BellSouth could identify test transactions from KCI from commercial transactions from CLECs; (b) the steps taken by BellSouth to make the OSS test "blind;" (c) any instances in which BellSouth provided different treatment to test transactions from KCI than it provided to similar commercial transactions from CLECs servicing Tennessee consumers; (d) the reason for providing different treatment to KCI test transaction; and (e) the person(s) responsible for initiating such different treatment.

RESPONSE: Please see response to Interrogatory, Item 49.

REQUEST: Please describe the process by which volume testing for capacity management testing was conducted in the Georgia and Florida OSS Tests.

RESPONSE:

Georgia - To the extent available, this information is contained in Version 1.0 of KPMG's Master Test Plan Final Report and Evaluation Supplemental Test Plan and Flow-Through Evaluation Report. Other information that may be responsive to this request is not in the possession, custody, or control of BellSouth.

Florida – To the extent available this information is contained in KPMG's Florida Master Test Plan Version 3.0, Monthly Status reports, or is otherwise available to AT&T through the Florida Public Service Commission's website at http://www.scri.net/psc/industry/telecomm/oss/oss.html

REQUEST: Please identify all order types that are designed to fall out of the mechanized order process in the Georgia and Florida OSS Tests. For each order type, describe the basis for the design choice.

RESPONSE: Planned Manual Fallout is based on the following categories. The rationale for each category being classified as planned manual fallout is included. This list of Planned Manual Fallout is included in the Performance Measurements Flow Through SQM.

- Complex- The product offering complexity does not allow the system to generate service orders, which is the same for retail.
- Special Pricing Plans – Require intervention by the Account Representative and their unique nature is not conducive to mechanized order generation.
- Some Partial Migrations- The system is unable to provide corrections to directory listings when migrating part of the CSR, which is a level of complexity not conducive to mechanized service order generation.
- New telephone number not yet posted to BOCRIS- BellSouth's systems are unable to compare the LSR against correct CSR records.
- Pending order review required- Pending activity needs to be checked or posted to the CSR before requests from CLECS can be processed.
- CSR inaccuracies such as invalid or missing CSR data in CRIS- Records must be accurate as compared to the LSR. The system can detect but not correct inaccuracies.
- Expedites (requested by the CLEC) - Interval guide deviations do not allow the system to assign an earlier due date.
- Denials, restore and conversion, or disconnect and conversion orders – BellSouth's systems are unable to complete the two different processes required to complete these type of requests simultaneously.

RESPONSE: (Cont.)

- Class of service invalid in certain states with some types of service - Although a class of service is available in a particular state, the tariff does not allow certain classes of service with other service variables (USOCS), making mechanized service order generation not possible.

- Low volume such as activity type "T" (move) – Coding resources allocation is more wisely spent on higher demand activities.

- More than 25 business lines - These request types require project coordination and are therefore not conducive to mechanized service order generation.

- Transfer of calls option for the CLECS end users - Due to multiple transfer of calls options available, the options are too complex to mechanize.

- Directory Listings (Indentions and Captions) - Due to multiple directory listing options available, the options are too complex to mechanize.

REQUEST: In connection with the Georgia and Florida OSS Tests, please identify, by order type, the percent of manual orders BellSouth receives from the test CLEC.

RESPONSE: See BellSouth's Objections filed September 24, 2001 in this docket. Subject to and without waiving said Objection, BellSouth responds as follows.

Georgia: To the extent available, this information is contained in Version 1.0 of KPMG's Master Test Plan Final Report and Evaluation Supplemental Test Plan and Flow-Through Evaluation Report.

Florida: To the extent available this information is contained in KPMG's Florida Master Test Plan Version 3.0, Monthly Status reports, or is otherwise available to AT&T through the Florida Public Service Commission's website at <http://www.scri.net/psc/industry/telecomm/oss/oss.html>.

The following represents the percent of manual orders, by order type from January 2001 to June 2001.

January 2001

ACT field	Percent of Manual Orders
N	89.13%
V	8.70%
D	2.17%

February 2001

ACT field	Percent of Manual Orders
NO DATA	

March 2001

ACT field	Percent of Manual Orders
N	34.29%
D	22.86%
V	14.29%
W	14.29%
C	14.29%

April 2001

ACT field	Percent of Manual Orders
W	22.22%
D	21.11%
N	20.00%
C	17.78%
V	16.67%
R	2.22%

May 2001

ACT field	Percent of Manual Orders
V	42.35%
N	24.12%
D	12.35%
C	6.47%
W	5.29%
L	2.94%
P	2.94%
B	1.18%
R	1.18%
T	1.18%

June 2001

ACT field	Percent of Manual Orders
N	37.36%
V	21.98%
C	15.38%
D	12.09%
R	5.49%
L	3.30%
W	2.20%
P	2.20%

REQUEST: Please describe the information that BellSouth provided to KCI or Hewlett Packard ("HP") for purposes of constructing the TAG and EDI interfaces for the Georgia OSS Test and the extent to which such information was readily available to CLECs. Please also describe the extent of assistance that BellSouth provided to HP or KCI, and who provided such assistance.

RESPONSE:

To the extent available, this information is contained in Version 1.0 of KPMG's Master Test Plan Final Report and Evaluation Supplemental Test Plan and Flow-Through Evaluation Report. Other information that may be responsive to this request is not in the possession, custody, or control of BellSouth.

REQUEST: Please describe all communications between BellSouth and HP in connection with the Georgia OSS Test.

RESPONSE: BellSouth produced documents responsive to this request to AT&T in Georgia Docket No. 8354-U and North Carolina Docket No. P-55, Sub 1022. Due to the voluminous nature of the documents, BellSouth will file a set of these documents with the TRA, but will not provide them to AT&T again. BellSouth will make a set available to other CLECs for inspection at its Tennessee offices located at 333 Commerce Street, Nashville, TN 37201.

REQUEST: For the Georgia and Florida OSS Tests, please identify the types of directory listings tested for: (a) unbundled network element loop orders; and (b) loop/port orders.

RESPONSE:

Georgia - To the extent available, this information is contained in Version 1.0 of KPMG's Master Test Plan Final Report and Evaluation Supplemental Test Plan and Flow-Through Evaluation Report. Other information that may be responsive to this request is not in the possession, custody, or control of BellSouth.

Florida – To the extent available this information is contained in KPMG's Florida Master Test Plan Version 3.0, Monthly Status reports, or is otherwise available to AT&T through the Florida Public Service Commission's website at http://www.scri.net/psc/industry/telecomm/oss/oss.html.

REQUEST: Please provide the definition and meaning of the term "parity" as it is used in the Georgia and Florida OSS Tests and explain how it relates to data reporting and results.

RESPONSE:

Georgia - To the extent available, this information is contained in Version 1.0 of KPMG's Master Test Plan Final Report and Evaluation Supplemental Test Plan and Flow-Through Evaluation Report. Other information that may be responsive to this request is not in the possession, custody, or control of BellSouth.

Florida – To the extent available this information is contained in KPMG's Florida Master Test Plan Version 3.0, Monthly Status reports, or is otherwise available to AT&T through the Florida Public Service Commission's website at http://www.scri.net/psc/industry/telecomm/oss/oss.html.

REQUEST: Please identify by test activity all BellSouth retail operations used for purposes of assessing parity in the Georgia and Florida OSS Tests.

RESPONSE:

Georgia - To the extent available, this information is contained in Version 1.0 of KPMG's Master Test Plan Final Report and Evaluation Supplemental Test Plan and Flow-Through Evaluation Report. Other information that may be responsive to this request is not in the possession, custody, or control of BellSouth.

Florida – To the extent available this information is contained in KPMG's Florida Master Test Plan Version 3.0, Monthly Status reports, or is otherwise available to AT&T through the Florida Public Service Commission's website at http://www.scri.net/psc/industry/telecomm/oss/oss.html.

REQUEST: Please provide the definition and meaning of the phrase "retail analog" as it is used in the Georgia and Florida OSS Tests and explain how it relates to data reporting and results.

RESPONSE:

Georgia - To the extent available, this information is contained in Version 1.0 of KPMG's Master Test Plan Final Report and Evaluation Supplemental Test Plan and Flow-Through Evaluation Report. Other information that may be responsive to this request is not in the possession, custody, or control of BellSouth.

Florida – To the extent available this information is contained in KPMG's Florida Master Test Plan Version 3.0, Monthly Status reports, or is otherwise available to AT&T through the Florida Public Service Commission's website at http://www.scri.net/psc/industry/telecomm/oss/oss.html.

REQUEST: Please identify all CLEC operations that were part of the Georgia and Florida OSS tests for which BellSouth contends there is no retail analog for purposes of assessing parity and describe the basis for the contention.

RESPONSE: BellSouth refers AT&T to BellSouth's Service Quality Measurements filed in both this Docket and in the Authority's performance measurements docket, particularly to those measures for which there are retail analogues.

REQUEST: In connection with the Georgia OSS Test, please provide the definition and meaning of the phrase "original source" as it is used on page 22 of the Flow-Through Evaluation Report.

RESPONSE:

To the extent available, this information is contained in Version 1.0 of KPMG's Master Test Plan Final Report and Evaluation Supplemental Test Plan and Flow-Through Evaluation Report. Other information that may be responsive to this request is not in the possession, custody, or control of BellSouth.

REQUEST: In connection with the Georgia and Florida OSS Tests, were any data regarding CLECs' use of BellSouth's OSS analyzed and compared with any test results with actual CLEC results? If so, please describe such analysis and comparison, the individuals performing the analysis and comparison, and their conclusions. If not, please explain and provide the basis for the decision not to make reference to actual CLEC data and identify the individuals involved in making that decision.

RESPONSE:

Georgia - To the extent available, this information is contained in Version 1.0 of KPMG's Master Test Plan Final Report and Evaluation Supplemental Test Plan and Flow-Through Evaluation Report. Other information that may be responsive to this request is not in the possession, custody, or control of BellSouth.

Florida – To the extent available this information is contained in KPMG's Florida Master Test Plan Version 3.0, Monthly Status reports, or is otherwise available to AT&T through the Florida Public Service Commission's website at http://www.scri.net/psc/industry/telecomm/oss/oss.html.

REQUEST: Did BellSouth ever provide KCI data or information from the AT&T Georgia 1000 Test of BellSouth provision of unbundled network element platform ("UNE-P")? If so, describe any use KCI made of that data or information.

RESPONSE:

No.

REQUEST: Please explain why the Georgia OSS Test was terminated and identify the individuals involved in requesting, considering, and approving the termination of the Test.

RESPONSE:

To the extent available, this information is contained in Version 1.0 of KPMG's Master Test Plan Final Report and Evaluation Supplemental Test Plan and Flow-Through Evaluation Report. Other information that may be responsive to this request is not in the possession, custody, or control of BellSouth.

REQUEST: Please identify and describe all exceptions, exception amendments, exception responses, and exception closures issued since the submission of the Georgia Final Report on March 20, 2001.

RESPONSE:

The information responsive to this request is either in the possession of AT&T or is available to AT&T through the Georgia Public Service Commission's website at www.psc.state.ga.us

To BellSouth's knowledge, there are no outstanding exception reports that have not been filed with the GPSC.

REQUEST: Please state and provide the data results for all orders classified as partially mechanized orders during the second retest of O&P Test 1-2-3 and O&P Test 1-3-3.

RESPONSE:

To the extent available, this information is contained in Version 1.0 of KPMG's Master Test Plan Final Report and Evaluation Supplemental Test Plan and Flow-Through Evaluation Report.

REQUEST: Describe in detail any errors in the BellSouth October 2000 Flow-Through Report provided to KMPG for validation in the Georgia and Florida Third-Party Tests that caused that report to be different from the official reports filed with the Georgia and Alabama Public Service Commissions.

RESPONSE: Following is BellSouth's response to KPMG Observation 68 which describes in detail the errors found in the October 2000 Flow Through Report:

In this Observation, KPMG has found that the number of auto clarifications calculated in their test of the October 2000 Percent Flow Through Service Requests Report is not the same number of auto clarifications reported by BellSouth.

KPMG previously tested the October 2000 flow through report in Georgia. In their Georgia test, KPMG found that BellSouth was incorrectly counting auto clarifications. In March of 2001, BellSouth responded to Georgia Exception 21 in which BellSouth stated that a change was being made in the flow through script that had been causing the auto clarification count to be incorrect. BellSouth implemented this change effective with the April run of March data and going forward. There was no requirement at the time to rerun the October flow through report. In this observation, KPMG has again tested the October 2000 flow through report with the same results. BellSouth has now rerun the October report with the change implemented in Georgia exception 21, and find that the count of auto clarifications calculated by KPMG and the new count extracted by BellSouth match exactly (41,568)

Due to the October report not being re-run until May of 2001, the number of auto clarifications on the re-run report is not the same number reported to the Georgia and Alabama Commissions in 2000.

REQUEST: From January 2001 to present, for each indivudual state in BellSouth's region and for the BellSouth region in total, please identify the achieved flow through rate and the CLEC error excluded flow through rate, by interface (i.e., LENS, TAG, EDI, and all interfaces) for the following categories:

a) LNP;

b) UNE;

c) Business Resale;

d) Residence Resale; and

e) Total (i.e., UNE, Business Resale, and Residential Resale combined)

RESPONSE: BellSouth does not produce this data on flow through rates on a per state basis. Please reference the attached file, *TN Docket No. 01-00362 No. 36.xls*, for the BellSouth for the achieved flow through rate and the CLEC error excluded flow through rate, by interface for the months of January 2001 through August 2001.

REQUEST: From January 2001 to present, for each individual state in BellSouth's region and for the BellSouth region in total, please identify the volume of LSRs (segregated by manual and electronic) and the volume of issued service orders by interface (i.e., LENS, TG, EDI, and all interfaces) for the following categories:

a) LNP;

b) UNE;

c) Business Resale;

d) Residence Resale; and

e) Total (i.e., UNE, Business Resale, and Residential Resale combined)

RESPONSE: Please see BellSouth's response to Production of Documents No. 54 for the Flowthrough reports (Percent Flow Through Service Requests) responsive to this request. These are the same reports made publicly available monthly to AT&T and other CLECs through the password protected BellSouth Interconnection Services Performance Measurement Reports website (https://pmap.bellsouth.com/clec_specific_reports.cfm). These reports can be utilized to compile the data requested above.

REQUEST: Please describe the information that BellSouth disclosed to PWC regarding "all know matters contradicting the assertion and communications from regulator agencies affecting the subject matter or the assertion that have been disclosed" to PWC.

RESPONSE:

This statement was provided to PricewaterhouseCoopers in the content of BellSouth's Mr. William N. Stacy letter dated, May 3, 2001 to confirm the representations made during PwC's Regionality review and management assertion validation. Any regulatory driven matters impacting BellSouth's assertion would have been disclosed to PwC prior to May 3, 2001. Regulatory driven requirements are integrated into BellSouth's process and system documentation to ensure compliance. PwC reviewed such documentation during their review.

REQUEST: Please describe BellSouth's current plans to replace existing OSS with different OSS solutions, including but no limited to the anticipated technology to be used, functionality, and implementation schedule.

RESPONSE: Please see BellSouth's response to AT&T's 1st Request for Production of Documents, Item No. 54.

REQUEST: Please identify each type of switch used by BellSouth in each state where BellSouth provides service. (For example: Lucent 5ESS, Nortel DMS XX, etc.) Also provide the numbers of each type of switch in each state.

RESPONSE:

Explanation of Equipment Type Abbreviations:

Abbr	Description
DCO	Siemens - Stromberg Carlson digital
D1/2	Nortel DMS-100/200 digital
D10	Nortel DMS-10 digital
D100	Nortel DMS-100 digital
D500	Nortel DMS-500 digital
EWSD	Siemens EWSD digital
RDGT	generic digital remote - vendor not determined
RILU	Lucent remote ISDN line unit
RLCM	Nortel remote digital line concentrating module
RLM	Nortel remote digital line module
RLS	Siemens - Stromberg Carlson remote digital line switch - 100 series
RLS4	Siemens - Stromberg Carlson remote Line Switch - 4000 series
RLU	Siemens Remote digital line unit (from EWSD) (without standalone capability)
RCU	Siemens Remote digital control unit (from EWSD) (with standalone capability
LRCU	Siemens Large Remote digital control unit (from EWSD) (with standalone capability)
RNS	Siemens - Stromberg Carlson Remote digital network switch
RSC	Nortel Telecom digital remote switching center
SRSC	Nortel Telecom digital remote switching center (SONET based)
1AES	Lucent analog 1A ESS
5ES	Lucent digital 5ESS
5ORM	Lucent digital 5ESS remote switch module (fiber links)
5RSM	Lucent digital 5ESS remote switch module
5EXM	Lucent digital 5ESS remote switch module (extended architecture)

Alabama		Florida		Georgia		Kentucky	
Equipment Type	Number	Equipment Type	Number	Equipment Type	Number	Equipment Type	Number
DCO	3	D1/2	5	D1/2	6	DCO	1
D10	4	D100	39	D100	38	D1/2	3
D100	19	EWSD	12	RSC	34	D10	1
D500	5	RILU	1	SRSC	12	D100	14
EWSD	3	RLCM	1	1AES	20	EWSD	1
RLS4	1	RLU	6	5ES	47	RCU	9
RLU	2	RSC	13	5EXM	8	RLCM	6
RNS	3	SRSC	8	5ORM	8	RNS	5
RSC	10	1AES	19	5RSM	27	RSC	41
SRSC	9	5ES	64			SRSC	28
1AES	11	5EXM	2			1AES	2
5ES	37	5ORM	13			5ES	17
5EXM	12	5RSM	29			5EXM	5
5ORM	2					5ORM	3
5RSM	28					5RSM	45

Louisiana		Mississippi		North Carolina		South Carolina	
Equipment Type	Number	Equipment Type	Number	Equipment Type	Number	Equipment Type	Number
DCO	12	DCO	15	D1/2	3	D1/2	1
D1/2	3	D10	14	D10	7	D100	29
D10	6	D100	3	D100	61	RLCM	1
D100	21	D500	2	RSC	16	RSC	12
EWSD	3	EWSD	3	SRSC	1	SRSC	9
RLCM	4	RCU	3	5ES	33	5ES	26
RLS	3	RLS	2	5EXM	0	5EXM	3
RLS4	22	RLS4	45	5RSM	23	5RSM	37
RNS	16	RLU	1				
RSC	24	RNS	23				
SRSC	26	RSC	3				
1AES	13	1AES	1				
5ES	34	5ES	23				
5EXM	10	5EXM	21				
5RSM	35	5ORM	1				
		5RSM	46				

Tennessee

Equipment Type	Number
DCO	11
D1/2	6
D10	2
D100	22
EWSD	9
RCU	11
RLS4	4
RNS	11
RSC	13
SRSC	20
1AES	3
5ES	47
5EXM	3
5ORM	25
5RSM	14

REQUEST: Identify the capacities of RSIMMS and ENCORE at the time of volume testing in Georgia and at the present time. Describe how BellSouth calculated such capacities.

RESPONSE:

For GA3PT, the RSIMMS capacity was 5,800 orders/hour. This is based on the successful 8hr KPMG/HP Peak test conducted in RSIMMS on 7/13/00. KPMG actually submitted a total of 43,300 orders for the day.

For GA3PT, the ENOCRE Production stated capacity (combining KPMG and CLEC transaction volumes) was 2,000 orders/hour. KPMG/HP successfully conducted the ENCORE Production volume test on 7/31/00. KPMG actually submitted 21,600 orders for the day.

Current RSIMMS capacity is at least 5,000 orders/hour. Current Local Exchange Service Order Generator (LESOG) capacity in RSIMMS is sized to handle a sustained rate of 5,000 orders/hour. This capacity has been verified through numerous internal volume tests. Given the queuing capabilities in LESOG, the actual short-duration capacity is higher than 5,000 orders/hour.

Current ENCORE Production capacity is at least 8,200 orders/hour. Current LESOG capacity in the ENCORE Production environment is sized to handle a sustained rate of 8,200 orders/hour. This capacity has been verified through numerous internal volume tests. Given the queuing capabilities in LESOG, the actual short-duration capacity is higher than 8,200 orders/hour.

REQUEST: Beginning with January 1, 2001, provide the service order accuracy rate for CLEC orders for Tennessee and each other state in BellSouth's region. For the purpose of this interrogatory, "service order accuracy rate" is defined as the percentage of service orders for CLECs that were processed by BellSouth exactly as they were ordered or prepared by CLECs.

RESPONSE: BellSouth does not mechanically record, on a historical basis, whether the local service requests (LSR) submitted by the CLECs were processed exactly as submitted or whether some change was necessitated. The only way to ascertain the answer to this question would be to go back and find the local service request submitted by the CLEC and then compare it to the service order that was issued, which would have to be done manually, if it could be done at all for the period requested.

REQUEST: Identify the individual(s) who are responsible for; (a) developing BellSouth's plans for replacing existing OSS with different OSS solutions; (b) deciding whether and when to implement such plans.

RESPONSE: Dan L. King – Network VP, BellSouth Technology Group, Inc.
Susan E. Baughman – VP, Network, BellSouth Technology Group, Inc.
William N. Stacy – Network VP, Interconnection Operations

REQUEST: Describe BellSouth's current plans to replace any of its existing OSS with any different OSS solutions, and identify the date of such plans.

RESPONSE: Please see BellSouth's response to AT&T's 1st Request for Production of Documents, Item No. 54.

REQUEST: Provide the monthly turn-over (retention) rates for BellSouth employees at each of its CLEC support centers (e.g., LCSC, CWINS, etc.).

RESPONSE:

The Average Monthly Turnover (Attrition, etc.) for the Department (RC-H02) in which the LCSC, CWIN, and LISC Centers reside are as follows:

	Average Monthly Year 2000	Average Monthly 07/2001 YTD
MA (WS20)	2.73%	1.94%
SR (WS23)	1.45%	1.75%
ET & TT (WS32)	2.23%	1.47%

REQUEST: Identify the individual(s) at BellSouth who are most knowledgeable about the internal measures that BellSouth utilizes to monitor and manage the productivity and performance of its personnel, work centers, and other organizational unites involved in pre-ordering, ordering, provisioning, maintenance & repair, or billing functions for BellSouth's wholesale operations or, to the extent that BellSouth does not segregate its wholesale operations and retail operations, for BellSouth's overall operations. Such internal measures may include, but are not limited to, those external measures contained in any BellSouth's Service Quality Measurement Plan.

RESPONSE: Central Office Operations:

Diane La Montagne
Specialist Network Operations and Support
Rm 805
829 Orange Ave
Port Orange, FL 32119

Dan Stinson
Specialist Network Operations and Support
25B55 BSC
675 West Peachtree Street
Atlanta, GA 30375

Clyde L. Greene
Billing Specialist
600 North 19th Street
Room 28A1
Birmingham, Al 35203

RESPONSE: (Cont.)

I&M Operations: Brad Coleman
Manager – I&M Support
4NW
601 West Chestnut St
Louisville, KY 40203

Outside Plant Engineering:
Kevin Boudreaux
Manager OSPE Support
15EE1 BellSouth Tower
Jacksonville FL, 32202

Construction: Terry L. Small
Manager – OSPCM Support
3535 Colonnade Pkwy, Rm N3A
Birmingham, AL 35243
Ron Royster, Network Reliability Cen

AFIG & CPG:

Bill Lindley - Specialist – (AFIG Center Measures)
NW2F 3535 Colonnade Pkwy
Birmingham, AL 35243

Jo Ann Atwell - Specialist – (AFIG Personnel Measures)
NW2F,
3535 Colonnade Pkwy,
Birmingham, AL

Belinda Mays, Specialist – CPG Staff Support
3535 Colonnade Parkway
W2H1
Birmingham, AL 35243

RESPONSE: (Cont.)

Network Reliability Center:
Clinton A. Flesher
NRC Staff Specialist
9139 Research Drive, 4th Floor
Charlotte, NC 28262

REQUEST: Identify: (a) those performance measures for which BellSouth contends there is sufficient commercial usage in Tennessee upon which the TRA can base its section 271 recommendation; (b) those performance measures for which BellSouth contends there is insufficient commercial usage in Tennessee, but will offer commercial usage from another specified state for the purposes of the TRA's section 271 recommendation; (c) those performance measures for which BellSouth contends there is insufficient commercial usage in Tennessee, but will offer regional commercial usage for the purposes of the TRA's section 271 recommendation.

RESPONSE: In BellSouth's opinion, given the number of lines served by the CLECs and the number of CLECs operating in Tennessee, there is sufficient commercial usage both at the individual CLEC and the aggregate CLEC levels for the TRA to render its Section 271 recommendation. BellSouth contends that the TRA can use data from other states in BellSouth's region in any case in which it wants additional information.

REQUEST: At any time since January 2000, has BellSouth had any policies or practices to provide a higher priority or special handling in terms of any OSS function (pre-ordering, ordering, provisioning, maintenance & repair, and billing) to CLEC service requests (e.g., resale, unbundled network elements) for customers in one or more states (e.g., Georgia, Florida) over similar service requests for customers from other states in the BellSouth region (e.g., Tennessee)? If so, please:

A. Describe such policies and practices;

B. State the purpose of such policies and practices; and

C. Identify the person within BellSouth who was responsible for instituting such policies and practices.

RESPONSE: A and B. Please refer to the attached Rebuttal Testimony of Milton McElroy, Jr. filed October 8, 2001 in NC Dkt No. P-55, Sub 1022, pages 10-20 and 49-53.

C. Dee Freeman-Butler, General Manager, Interconnection

ATTACHMENT

BELLSOUTH TELECOMMUNICATIONS, INC.

REBUTTAL TESTIMONY OF MILTON MCELROY, JR

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

DOCKET NO. P-55, SUB 1022

OCTOBER 8, 2001

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

A. My name is Milton McElroy, Jr. I am employed by BellSouth Telecommunications, Inc. ("BellSouth") as a Director, Interconnection Services. In this position, I am responsible for Operations Support Systems ("OSS") Testing across the BellSouth region. My business address is 675 West Peachtree Street, Atlanta, Georgia 30375. I have over 13 years of experience in Engineering and Operations. I earned a Bachelor of Science degree from Clemson University in Civil Engineering in 1988 and a Master's degree in Business Administration from Emory University in 2001. Additionally, I am a registered Professional Engineer in North Carolina, South Carolina and Alabama.

Q. HAVE YOU PREVIOUSLY FILED TESTIMONY IN THIS DOCKET?

A. No, but I did adopt a portion of the testimony that was filed by Ron Pate on April 12, 2001.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. The purpose of my testimony is to rebut the testimony filed on September 10, 2001 by Jay Bradbury of AT&T, Colette Davis of Covad, Sherry Lichtenberg of MCI/WorldCom and John Idoux of Sprint.

Q. IN WHAT CONTEXT SHOULD YOUR TESTIMONY BE READ?

A. My testimony should be read in conjunction with other testimony and rebuttal testimony supporting BellSouth's 271 application.

Q. DO YOU HAVE PRELIMINARY COMMENTS?

A. Yes. In this testimony, I will address the interveners' comments regarding the independent third-party test that was performed by KPMG for the state of Georgia and the regionality testing completed by PricewaterhouseCoopers ("PwC"). I will provide an overview of both topics and then address some of the specific Competing Local Providers ("CLP") comments.

KPMG'S THIRD-PARTY TEST IN GEORGIA

Q. PLEASE ADDRESS THE CLPS' COMPLAINTS ABOUT THE ADEQUACY OF THE INDEPENDENT THIRD-PARTY TEST IN GEORGIA.

A. The testimonies filed by the CLPs on September 10, 2001, in particular that of Mr. Jay Bradbury of AT&T, Ms. Colette Davis of Covad, Mr. John Idoux of Sprint, and Ms. Sherry Lichtenberg of MCI WorldCom, complain extensively about the scope of the independent third-party test in Georgia, often comparing it with tests that have taken or are taking place in other states. When reading these witnesses' statements, it is easy to forget that the Master Test Plan ("MTP") was ordered and approved by the Georgia Commission and that it was administered and executed by an independent tester – KPMG. The very CLPs that are complaining in this proceeding had ample opportunity to participate in the design and execution of this Georgia test.

CLPs have been active throughout the third-party testing process in Georgia. The Georgia Commission considered the input of the CLPs, such as that obtained from the OSS workshop in 1997 as well as CLP filings encouraging the Commission to adopt a third-party testing plan. The CLPs provided input to the formation of the initial Master Test Plan, as well as the subsequent Supplemental Test Plan ("STP"). The CLPs have also filed comments on the MTP and STP, and on KPMG's status

reports. Beginning in January 2000, with the support of BellSouth and the Georgia Commission, KPMG invited the CLPs to participate in weekly conference calls to discuss the status of the third-party test, including exception resolution, and to entertain any questions the CLPs might have about the progress of the test. The first meeting was face-to-face rather than by teleconference, and it was held on February 1, 2000. A second face-to-face meeting was held on April 26, 2000. The weekly teleconferences continued until the testing was completed. CLPs were also involved in the testing itself. CLPs actually submitted requests throughout the test in various areas (Local Number Portability, or LNP, and Digital Subscriber Line, or xDSL) and were involved in the numerous interviews with KPMG, as the test progressed.

A portion of the operational testing in the MTP involved interviewing selected CLPs to gain an understanding of their experience with different components of the test. For instance, participants were asked to provide documentation of attempts to gain access to BellSouth's flow-through reports and to reconcile their actual flow-through with that reported by BellSouth, as well as any issues observed.

Beginning on page 143 of Ron Pate's direct testimony of April 12, 2001, he described in detail the scope and purpose of the Georgia test. Before discussing the specific issues raised by the CLPs, I would like to summarize the scope, purpose, and conclusions of the independent third-party test in Georgia.

When it first ordered an independent third-party test of BellSouth's OSS more than two years ago, the Georgia Commission correctly recognized that actual "commercial usage" should be the primary factor in evaluating nondiscriminatory access – a view shared by the FCC.[1] As a result, the Georgia Commission originally structured the third-party test as a "focused, supervised audit" of BellSouth's OSS in recognition of the extensive commercial usage that BellSouth's OSS experienced since the Georgia Commission first began examining BellSouth's systems in 1995.

In response to CLP concerns, however, the Georgia Commission subsequently expanded the scope of the Georgia third-party test. With the implementation of the Master Test Plan ("MTP") and the Supplemental Test Plan ("STP"), KPMG tested the OSS functions of pre-ordering, ordering and provisioning, maintenance and repair, and billing, along with capacity management, change management and flow-through. The depth and breadth of KPMG's testing is evident from the sheer volume of KPMG's Final Reports. These reports were attached to Ron Pate's testimony of April 12, 2001, as Exhibits OSS-64 through OSS-66.

To be sure, the test conducted in Georgia is different in scope from third-party OSS tests conducted in other states, as the CLPs have pointed out.

[1] In determining operational readiness, the FCC examines "performance measurements and other evidence of commercial readiness to ascertain whether the BOC's OSS is handling current demand and will be able to handle reasonably foreseeable demand volumes." *New York Order* ¶ 89. According to the FCC, "actual commercial usage" is the most probative evidence that OSS functions are operationally ready. *Id.*; *see also Texas Order* ¶ 98. Absent commercial usage data, the FCC will consider the results of carrier-to-carrier testing, independent third-party testing, and internal testing in assessing the commercial readiness of a BOC's OSS. *Id.*

Such differences, however, are expected, as is evident from the FCC's Section 271 decisions, wherein the FCC has rejected any "cookie cutter" approach to third-party OSS tests. (*See Texas Order* ¶ 103 rejecting argument that Southwestern Bell Telephone Company's 271 application is "inadequate" because "the third-party test in Texas was less comprehensive than the test executed by KPMG in New York, with respect to the Bell Atlantic Section 271 process".) The scope of the third-party OSS test in New York was different from the scope of the Texas test, which was different from the scope of the third-party test in Massachusetts. In short, that the Georgia test was different by design from other third-party OSS tests does not detract from the usefulness of the Georgia test.

Nevertheless, the Georgia test is comparable in scope to the third-party tests conducted in New York and Texas, both of which received 271 approval. The similarities and differences between the Georgia test and those in New York and Texas can be seen in Exhibit MM-1. The Georgia test included the same functionality review of OSS Business processes as New York and Texas. In addition, all three tests assess OSS scalability. All three tests included normal volume and peak testing of the interfaces. Moreover, the Georgia test reviewed all documentation for maintenance, updates and communication, as did New York and Texas. Like New York and Texas, the Georgia test assessed change management (including the notice and completion intervals), release versioning policy, defect management process, and OSS interface development review. All three

tests included functional testing of pre-ordering and ordering. All three tests provisioned orders, evaluated provisioning processes, and tested the performance of specific provisioning measures. Georgia and New York tested basic functionalities of Maintenance and Repair (M&R), and included an M&R process parity evaluation. In some cases, the Georgia test went beyond the tests in New York and Texas. For example, the Georgia test included manual ordering for xDSL loops while the New York test did not. Moreover, the Georgia test included a more extensive performance metrics evaluation than either New York or Texas.

The Georgia test meets all of the criteria established by the FCC in its decision on Bell Atlantic's New York application. Specifically, in the Georgia test, like the New York test, KPMG was an independent tester, conducted a military-style test, made efforts to place itself in the position of an actual market entrant, and made efforts to maintain blindness when possible. In compliance with FCC decisions, the Georgia test is a focused test that appropriately concentrates on the specific areas of BellSouth's OSS that had not experienced significant commercial usage. As set forth in the Master Test Plan, the test covered all five core OSS processes (pre-ordering, ordering, provisioning, maintenance and repair, and billing) and electronic interfaces to the OSS (TAG, EDI, TAFI, ECTA, ODUF, ADUF, CRIS and CABS[2]), along with capacity management and change management. The test crossed product types of Unbundled Network

[2] TAG - Telecommunications Access Gateway; EDI – Electronic Data Interchange; TAFI – Trouble Analysis Facilitation Interface; ECTA – Electronic Communications Trouble Administration; ODUF – Optional Daily Usage File; ADUF – Access Daily Usage File; CRIS – Customer Record Information System; CABS – Carrier Access Billing System

Elements ("UNE") analog loops (with and without number portability), UNE switched ports, UNE business and residence port-loop combinations. The Georgia test also provides for an audit of BellSouth's Flow-Through Service Request Report for the three months of data.

In the Supplemental Test Plan, the Georgia Commission expanded the test to include an assessment of the change management process as it applied to the implementation of Release 6.0 ("OSS99"), an evaluation of manual pre-ordering, ordering and provisioning of xDSL loops, a functional test of resale pre-ordering, ordering, provisioning, maintenance and repair, and billing transactions for the top 50 electronically orderable retail services available for resale, and an evaluation of the processes and procedures for the collection and calculation of performance data.

In all, KPMG analyzed 1,173 criteria in eight functional areas. KPMG analyzed each criterion, and the results fell into five categories: "satisfied", "not satisfied", "not complete", "no result", and "not applicable". KPMG determined that 95.5% of the completed criteria were "satisfied". Of the remaining criteria, 1.8% are "not satisfied," 1.5% are "no report," and 0.3% are "not applicable". Eleven criteria (0.9%; all metrics) remain categorized as "not complete" at this time. Of the few "not satisfied" criteria, KPMG stated in its March 20, 2001 opinion letter, "that no deficiencies creating potentially material adverse impacts on competition currently exist in Pre-Ordering, Billing, Maintenance and Repair, Capacity Management, Change Management and Flow-Through. KPMG addressed the "not

satisfied" evaluation criteria by stating, "In the Ordering and Provisioning category, all evaluation criteria have been satisfied except for those in three areas: timeliness of responses to fully mechanized requests, timeliness and accuracy of clarifications to partially mechanized requests, and accuracy of translation from external (CLP) to internal (BellSouth) service orders resulting in switch translation and directory listing errors. It is our [KMPG] professional judgment that the evaluation criteria, which have been assigned "not satisfied" results in the final reports, could potentially have a material adverse impact on a CLP's ability to compete effectively. The [Georgia] Commission will be able to monitor these issues on an on-going basis through the performance measures and/or penalty plans in place that address the timeliness of BellSouth responses, service order accuracy, and percent of provisioning troubles within 30 days." (Attached to Ron Pate's direct testimony of April 12, 2001, as Exhibit OSS-67.)

Notwithstanding any suggestion to the contrary, KPMG conducted a comprehensive independent third-party test of BellSouth's OSS as approved and ordered by the Georgia Commission. KPMG's Final Reports and Opinion Letter offer to this Commission persuasive evidence that BellSouth has met its obligation to provide nondiscriminatory access to its OSS as required by the Telecommunications Act of 1996 ("1996 Act").

Q. THERE HAVE BEEN COMMENTS FILED INDICATING PREFERENTIAL TREATMENT MAY HAVE BEEN GIVEN TO CLPS IN GEORGIA AND FLORIDA IN AN EFFORT TO SKEW THE RESULTS OF THE THIRD PARTY TEST RESULTS. HAS KPMG BEEN ASKED ABOUT THE ISSUE OF PREFERENTIAL TREATMENT?

A. Yes. In AT&T's second set of interrogatories to KPMG in this proceeding, AT&T posed three questions to KPMG. Those questions and KPMG's responses can be found in Exhibit MM-2.

Q. WAS KPMG ASKED WHAT IMPACT THERE WOULD HAVE BEEN IF BELLSOUTH WAS PROVIDING A HIGHER PRIORITY OF PROCESSING PARTIALLY MECHANZIED OR MANUAL LOCAL SERVICE REQUESTS ("LSRS") FOR KPMG DURING THE GEORGIA AND FLORIDA TESTS?

A. Yes. In response to question three of AT&T's second set of interrogatories, KPMG concluded that the only limited impact on the test there "would be a potential impact on the values observed in evaluation of the timeliness of responses associated with the partially mechanized and manual requests."

Q. COULD YOU PROVIDE SOME DETAIL ON BELLSOUTH'S INVESTIGATION OF THIS ISSUE ON PROVIDING PREFERENTIAL

TREATMENT TO REQUESTS DURING THE GEORGIA AND FLORIDA THIRD PARTY TESTS?

A. Yes. First, please allow me to provide some additional background on this issue. The OSS test in Georgia consisted of two fundamental types of testing, transaction-based testing and operational testing. These two test types are explained beginning on page II-5 of the MTP Final Report. (See Exhibit OSS-64) One of the goals of transaction-based testing was for the KPMG pseudo-CLP to "live the CLP experience." While this certainly is and was an appropriate goal, it must be viewed in the context of the environment in which testing is conducted. More specifically, it should be understood that the structure and the nature of the third-party testing process makes it difficult for the third-party test CLP to truly live a normal CLP's experience with BellSouth.

For example, when BellSouth initiates its relationship with a normal CLP, there is a customer initiation process whereby BellSouth seeks to learn about the CLP's business, what types of products and services the CLP will be providing, where the services will be provided, and when the CLP will begin doing business. BellSouth's service centers, such as the Local Carrier Service Center ("LCSC"), often provide tours and have introductory discussions to introduce the CLP employees to the BellSouth employees who will be assisting them in working their requests.

After the CLP begins business, there is a constant dialog that occurs between the BellSouth representatives and managers working on the CLP's requests, and employees of the CLP. During these discussions, the CLP provides immediate feedback on specific requests that may be encountering problems, requests that need to be escalated, and other similar types of issues. The third-party test did not always include the type of daily interaction that BellSouth normally has with a CLP. KPMG had a dual role as an auditor. KPMG communicated their issues by means of issuing exceptions. In response to the exceptions, BellSouth was expected to take management action to provide additional training, to change its practices, and take other actions in order to satisfy the concerns raised in the exception. Often, particularly in the case of issues raised in the processing of requests in the LCSC, BellSouth responded by providing service representatives with additional training on the issues that were raised, and continued training through the re-test process in order to ensure that the issues raised in the exception were addressed.

In addition, the third-party CLP was unlike an ordinary CLP in the nature of the requests it was submitting to BellSouth to be processed. In the normal CLP experience, the CLP chooses certain market segments and then focuses its efforts on obtaining customers by providing the same general types of services – for example, the Unbundled Network Element – Platform ("UNE-P"). In most instances, the CLP request patterns become somewhat routine over time, with the CLP submitting the same types of requests over and over again. However, in the case of the KPMG CLP,

multiple types of requests were submitted, using multiple customer scenarios. In this light, the third-party CLP was much more than the typical CLP, which added difficulty in KPMG and BellSouth living the typical "CLP Experience" during the test.

Q. HOW DID BELLSOUTH RESPOND TO THE ISSUES BEING RAISED THROUGH EXCEPTIONS FOR THE UNE FUNCTIONAL TESTING OF THE MTP?

A. Because of the structure and nature of the testing process, there were certain actions taken by BellSouth during the test in order to address issues raised primarily through the exception process in order to have adequately trained representatives to work the wide variety of third-party test requests. These actions are not unlike actions BellSouth has taken and continues to take in order to process requests on behalf of other CLPs in an attempt to improve operational efficiencies in the LCSC. Nevertheless, the nature of these actions should be known and the rationale for them should be understood.

During the test, third-party test requests were designated by the company code "CKS." While the Georgia test primarily involved the processing of mechanized requests, which do not involve the LCSC, there were requests that fell out of the electronic systems for manual handling, referred to as partially mechanized requests. There was also a small

subset of requests (xDSL capable loops) that were submitted manually, generally using a FAX server. These are referred to as non-mechanized or manual requests. The manual requests submitted for the Georgia test were limited to xDSL capable loops as previously described in the STP.

During the execution of the Master Test Plan, BellSouth received unsatisfactory results, accompanied by related exceptions, on several of the initial tests relating to the timeliness and accuracy of processing UNE requests. As a result, a re-test was conducted beginning in approximately August of 2000. Prior to and during the re-test, BellSouth center support staff employees reviewed the service representatives' work on CKS clarifications, firm order confirmations ("FOCs"), and service orders in order to provide additional training as necessary to meet the requirements of the pseudo-CLP customer and any other CLP submitting similar requests. The purpose of this review was to improve the skills of the service representatives in handling these requests and increase the overall accuracy of the responses to all service requests. This type of training activity is usual and indeed goes on constantly in the LCSC. In the ordinary course of processing other CLP's requests in the LCSC where customer expectations were not being met, BellSouth reviews the requests of other CLPs in order to satisfy the customers' expectation. Thus, BellSouth has reviewed and continues to review requests from other CLPs in a similar fashion, when conditions warrant.

Q. WHAT SPECIFIC INDIVIDUAL TESTS OR EVALUATION CRITERIA WOULD THIS IMPACT IN THE MTP FINAL REPORT?

A. As it related to the activities of the LCSC, the 2000 UNE re-test involved eight evaluation criteria related to the timeliness of errors/clarifications and firm order confirmations and the accuracy of errors/clarifications and firm order confirmations for partially mechanized requests.[3] Six of these criteria were deemed satisfied at the conclusion of the third-party test, and two were deemed not satisfied, as can be seen in Exhibit OSS-64. Regardless of these results, and even if they were to be totally disregarded, BellSouth has experienced significant commercial usage for all of these activities both during and after the third-party test, and has proven that it is meeting the current performance benchmarks over the last three months even in the face of increasing demand.

For example, in North Carolina in July 2001 BellSouth returned approximately 1,000 errors on UNE orders to CLPs on a partially mechanized basis. All levels of disaggregation exceeded the 85% in 24 hour standard. BellSouth returned 700 errors back to CLPs on a non-mechanized basis, and met the applicable performance standard of 85% in 24 hours in every sub-metric except one, "2W Analog Loop w/LNP non-

[3] O & P criteria 1-3-2b (satisfied), 1-3-3b (satisfied), 1-4-1 (satisfied), 1-4-2 (not satisfied), 2-3-2b (satisfied), 2-3-3b (satisfied), 2-4-1 (satisfied), and 2-4-2 (not satisfied).

design", a sub-metric that included only 13 errors. For firm order confirmations, BellSouth returned over 3,200 firm order confirmations on partially mechanized orders, and met the performance benchmark for every sub-metric. BellSouth returned over 1,500 firm order confirmations on non-mechanized requests and met the performance benchmark for all disaggregated sub-metrics.

Q. WAS THE RESALE TESTING UNDER THE STP CONDUCTED IN A SIMILAR MANNER?

A. Yes. The Resale group at the LCSC handles simple resale requests. As part of the STP, which was ordered by the Georgia Public Service Commission on January 12, 2000, the test was expanded to include functional testing of certain resold services. The objective of this part of the test was to evaluate the functionality of BellSouth's pre-ordering and ordering systems for resold services in processing pre-ordering queries via the TAG interface, and LSRs submitted via the TAG or EDI interface. However, the test also included criteria that evaluated whether BellSouth's representatives in the LCSC provided timely orders errors/clarifications and firm order confirmations, as well as whether the LCSC representatives provided clear, accurate and complete errors/clarifications and firm order confirmations. There were a total of 370 resale errors/clarifications and firm order confirmations that were handled by the LCSC as a part of this test.

The Resale workgroup within the LCSC handles resale service requests. In this workgroup, each representative typically has the opportunity to work on service requests from any CLP. If an issue with a particular CLP's service requests or for a particular product requested by multiple CLPs develops, the Resale group takes action to address the issue. The group has the ability to designate representatives who may be more experienced or skilled in a certain area. These representatives may be designated to handle an issue on a case-by-case basis. The issue could result from CLP problems or problems within the BellSouth systems or processes.

If the issue is on a global scale, all representatives are trained to handle the issue while only a few representatives may be designated to address a more limited issue. The Resale group designated a group of representatives to handle the third-party test requests for some of the reasons previously mentioned (i.e. wide variety of products requested and accuracy of responses as identified through exceptions). At times, this could have allowed for the retrieval of third-party test requests before other pending CLP requests. Assuming requests were retrieved ahead of other requests, this additional time could potentially impact the timeliness and accuracy of the response delivered back to the CLP.
However, given the low volume of test resale requests submitted during the third-party test during the four month test period of August through November of 2000, (a total of 370 requests, or less than 5 per day), it is

doubtful that this process resulted in any meaningful advantage for third-party resale requests.

Q. WHAT EVALUATION CRITERIA WOULD BE IMPACTED FOR THE RESALE FUNCTIONAL TESTING OF THE STP?

A. In the test, there were a total of six evaluation criteria relating the partially mechanized timeliness and accuracy of these resale requests.[4] Of these six criteria, BellSouth received a satisfactory finding on three of them, and an unsatisfactory finding on the other three as can be seen in Exhibit OSS-65. Regardless, to the extent the Commission is concerned about the results of the third-party test in these areas, BellSouth's more recent performance with regard to commercial usage demonstrates BellSouth success in meeting its obligations in these areas.

For resale errors in North Carolina in July 2001, BellSouth delivered over 900 rejections to CLPs on partially mechanized orders. BellSouth met the performance benchmark in all areas. On non-mechanized orders, BellSouth provided over 120 rejections and met the performance standards for all levels of disaggregation where there were 5 or more transactions. BellSouth provided 2,700 partially mechanized firm order confirmations in July, and satisfied all of the performance benchmarks. For non-mechanized orders, 175 were delivered and all performance

[4] These were POP Evaluation Criteria 11-3-3A (Satisfied), 11-3-3B (Not Satisfied), 11-3-5A (Satisfied), 11-3-5B (Satisfied), 11-4-3 (Not Satisfied), and 11-4-4 (Not Satisfied). The first four of these criteria relate to timeliness, and the last two relate to accuracy.

benchmarks were met except for ISDN which was at 80% with only 5 transactions.

As information, there is a third group of representatives in the LCSC who handle complex services. There are and have been designated work groups that handle requests for specific CLPs within the Complex work group. For example, all of AT&T's complex requests that come into the complex group are routed to a designated group of service representatives that handle AT&T's requests. During the testing, the third-party test requests were also routed directly to a designated work group to be processed. Because requests are routed directly to these work groups, they bypass a basket where other CLP and types of requests are placed, and which is checked and emptied by the load manager approximately once per hour; therefore, it is possible that the third-party test requests, as well as the requests for the other CLPs who had designated work groups, received a timing advantage on these requests up to one hour in the placement to the service representatives for handling. However, because of the wide variety of requests that were submitted by third-party tester, and the concomitant level of complexity (which was the reason why these requests were delivered to the designated representatives to begin with), BellSouth does not believe that these requests received "preferential" or any different treatment that similar types of requests submitted by other CLPs. For complex orders, BellSouth also has proven through commercial usage and its performance reports that it consistently returns errors/clarifications and firm order confirmations to CLPs in a timely

fashion. Complex orders, which consist of both complex resold services as well as complex UNEs, would be included in the performance data discussed above in connection with UNE and resale performance.

In summary, KPMG test orders submitted during the third-party test did not receive preferential treatment. From a LCSC process standpoint, KPMG orders were handled consistent with other CLP orders. To the extent that the aforementioned handling could have the result of affecting the timeliness or accuracy of the responses, BellSouth is ultimately relying on its commercial data to provide proof that its systems provide non-discriminatory access and that these systems meet the needs of its CLP customers.

GEORGIA VOLUME TESTING

Q. MR. IDOUX ON PAGE 16 OF HIS TESTIMONY CLAIMS THAT THE GEORGIA TEST FAILED TO TEST REAL LIFE EXPERIENCES DUE TO THE STRUCTURE OF THE VOLUME TESTS. IS HE CORRECT?

A. No, he is not correct. As part of the third-party test, KPMG conducted normal volume and peak volume tests in the Reengineered Services, Installation and Maintenance Management System ("RSIMMS"). RSIMMS emulates the production environment in interoperability and end-to-end (flow-through) testing in support of the functionality that facilitates a CLP's ability to process the following transaction types on BellSouth's OSS:

submit Local Service Requests, receive Functional Acknowledgments, receive Firm Order Confirmations, receive Completion Notices, and receive Rejects, Clarifications and Service Jeopardies.[5]

The purpose of the volume tests was to evaluate BellSouth's OSS associated with specified volumes of pre-ordering and ordering activities. By performing these volume tests, KPMG evaluated BellSouth's ability to accurately and quickly process pre-orders and orders using the EDI and TAG interfaces under "normal" and "peak" year-end 2001 projected transaction load conditions. These volume tests and KPMG's results are detailed in the MTP Final Report in the sections for TAG Normal Volume Pre-Order Performance Test (PRE-4), TAG Peak Volume Pre-Order Performance Test (PRE-5), EDI/TAG Normal Volume Performance Test (O&P-3), EDI/TAG Peak Volume Performance Test (O&P-4) and EDI/TAG Production Volume Performance Test (O&P-10).

The decision to perform the volume tests in RSIMMS was made in mid-1999 during the development of the MTP. The language describing these tests and the evaluation of the RSIMMS environment against the production environment first appeared in version 2.0 of the MTP (filed with the Georgia Commission in August 1999). This decision was approved by the Georgia Commission and then incorporated into the Introduction section of the MTP. On page II-3, the final version of the MTP states that:

> "Normal and peak volume tests will be run against a volume test environment (RSIMMS) developed by BellSouth to support the transaction volumes specified by the test. KPMG will evaluate this

[5] BellSouth's production environment is called "ENCORE."

environment to determine if the hardware and software configurations mirror those of BellSouth's production systems, except where additional hardware or software resources have been created to support the specified test volume."

As directed by the MTP, KPMG compared the RSIMMS environment with the ENCORE production environment. This review was conducted in parallel to the planning and execution of the volume tests associated with the BellSouth – Georgia OSS Evaluation described in the MTP (PRE-4, PRE-5, O&P-3, and O&P-4). Based on its evaluation of RSIMMS and the ENCORE production environment, KPMG reported in the Appendix to the MTP Final Report, at page 5, that ..."except for specific, preauthorized changes that were made in RSIMMS to support the requirements of the volume test, the applications implemented in the RSIMMS environment mirrored those of BellSouth's ENCORE production system. Specific changes were made to the RSIMMS environment to support the business volumes required to accomplish KPMG's volume test. KPMG is not aware of any reasons, and is satisfied, that these same changes could be made to the production environment such that it could support the same volumes as were tested in KPMG's volume evaluation."

There are some differences between the hardware used by RSIMMS and that used by the ENCORE production environment. These differences, as well as the hardware components that are the same, are detailed in the RSIMMS and ENCORE System Review Appendix to the MTP Final report. The RSIMMS and ENCORE production environments, however, are not defined only by their hardware, but by the software applications – such as TAG, LESOG, LEO – that run on the hardware. Both the RSIMMS and

ENCORE production environments contain copies of these same applications. The sameness of the applications used in both environments was validated by KPMG in its report.

The MTP Final Report directed KPMG to perform five volume tests: two normal volume tests in RSIMMS (PRE-4, O&P-3); two peak volume tests in RSIMMS (PRE-5, O&P-4), and one volume test in the ENCORE production environment (O&P-10). The TAG/EDI "normal" volume test evaluated BellSouth's performance by sending approximately 35,000 orders with 118,000 associated pre-orders on two occasions over a ten-hour period through RSIMMS. The pre-ordering volume test (PRE-4) and ordering volume test (O&P-3) were executed concurrently.[6] The TAG/EDI "peak" volume test evaluated BellSouth's performance by sending approximately 43,000 orders with 118,000 associated pre-orders on two occasions over an eight-hour period through RSIMMS. The pre-ordering volume test (PRE-5) and ordering volume test (O&P-4) were also executed concurrently.[7]

Using the production environment, KPMG tested BellSouth's ability to accurately and quickly process requests and their associated pre-orders using EDI and TAG at the projected year-end 2001 transaction mix in the production environment at then-current system capacity.[8] KPMG sent approximately 7,400 requests with 24,600 associated pre-orders which combined with actual live production activity to produce transaction levels

[6] See Version 1.0 Master Test Plan Final Report at V-C-6.
[7] See Version 1.0 Master Test Plan Final Report at V-C-6.
[8] See Version 1.0 Master Test Plan Final Report at V-J-1 (describing ordering volume test (O&P-10)).

of 21,600 orders and 73,400 pre-orders over an eight-hour period. After completing the test, KPMG found that BellSouth had satisfied each of the 21 evaluation criteria associated with this EDI and TAG production performance test. KPMG's production testing confirmed that BellSouth's EDI and TAG interfaces provide timely Functional Acknowledgements, timely and accurate Firm Order Confirmations, timely and accurate pre-order responses, and accurate order errors and clarifications. There was a 38 percent difference in magnitude of volume levels between the production volume test and normal volume tests. The transaction levels of the production volume test were set at the stated capacity level for BellSouth's production environment at the time of the test. These volume levels prove that the production environment was able to handle this load and satisfy all evaluation criteria associated with the third-party test.

Another validation of sameness between the RSIMMS and ENCORE production environment is that KPMG used the exact same test scenarios for all five-volume tests. The common set of scenarios produced a common set of performance results in both the RSIMMS and ENCORE production environments, thus validating the sameness of functionality between the RSIMMS and ENCORE production environments.

Q. SINCE THE CONCLUSION OF THE GEORGIA VOLUME TEST, HAS BELLSOUTH ADDED MORE CAPACITY TO ITS ENCORE PRODUCTION ENVIRONMENT?

A. Yes. Since the third-party test in Georgia concluded, BellSouth has increased the capacity of its production environment. BellSouth has performed routine, on-going, internal normal, peak, and stress volume tests that have shown that BellSouth's production environment has sufficient capacity. BellSouth's production environment provides CLPs with sufficient capacity to process current and projected volumes. The following table shows the RSIMMS environment at the time of the third-party test, the ENCORE production environment at the end of 2000, and the production environment on June 30, 2001. As validated by KPMG in the Final Report, BellSouth has an extensive Capacity Management process where resource utilization is monitored for system components and elements and integrated into forecasting business volumes and transactions to meet the needs of its CLP customers.

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Type	Application	RSIMMS2 Georgia 3PT	Production on 12/31/2000	Production on 06/30/2001
Midrange	TAG	3-HP K580	2-HP K570	3-HP K570 1-HP K580 4-HP N4000
	LESOG	2-HP K580	2-HP K370 2-HP N4000	2-HP K370 2-HP N4000 1-HP K580
	LEO/UNIX	1-HP K580	Retired. Functionality moved to Leo/Mainframe	N/A
	LNP	1-HP K360 2-HP K580	3-HP K460	3-HP K460
Mainframe	LEO/Main-frame	(U4SY-Test) Hitachi Skyline – 625 620 Mips - 24% Share	(B2SY) Hitachi CMOS P9-89S 1078 Mips – 35% Share	(B2SY) IBM Freeway 2064-109 1552 Mips – 33% Share
	SOCS, ATLAS, DSAP, RSAG	(U4SY-Test) Hitachi Skyline – 625 620 Mips - 24% Share	(O1SY) Hitachi Skyline – 727 878 Mips – 100% Share	(O1SY) IBM Freeway – 2064-1C8 1615 Mips - 83% Share
	BOCRIS, COFFI	(O1SY-Production) Hitachi Skyline – 727 878 Mips – 100% Share	(O1SY) Hitachi Skyline – 727 878 Mips – 100% Share	(O1SY) IBM Freeway – 2064-1C8 1615 Mips - 83% Share
	P/SIMS	(D2SY-Production) Hitachi (HDS) P8-98S 846 Mips – 60% Share	(D2SY) Hitachi CMOS P8-98S 846 Mips – 60% Share	(D2SY) IBM Freeway – 2064-108 1443 Mips - 35% Share

GEORGIA LOOP MAKEUP AND XDSL TESTING

Q. MS. DAVIS OF COVAD ALLEGES ON PAGE 8 OF HER TESTIMONY THAT BELLSOUTH FAILED TO ADEQUATELY RESPOND TO PRE-ORDER LOOP MAKEUP SERVICE INQUIRIES SENT VIA E-MAIL, AND

THAT THIS DEFICIENCY WAS NOTED BY KPMG. PLEASE COMMENT.

A. While the test criteria is "Not Satisfied" in the final report, BellSouth has made a number of procedural and documentation changes in the Complex Resale Services Group ("CRSG") and the LCSC to address the issues raised by KPMG. Specifically, on September 11, 2000, the CRSG began acknowledging all loop makeup service inquiries ("LMU-SIs") sent via fax and e-mail. BellSouth disagreed with KPMG's findings on 55 LMU-SIs identified in exception 134. Based on its investigation, BellSouth found that the 55 LMU-SIs fell into one of seven categories: Not Found - 5; Recalled by CLEC - 1; Rejected by CRSG – 24; Acknowledged – 3; Clarified by CRSG – 6; VER not received in CRSG – 3; PON cancelled due to no response to clarification – 12. Nonetheless, BellSouth clarified the procedures the CRSG has documented in their process flow that a rejection should be treated by the CLP as an acknowledgement.

Q. MS. DAVIS OF COVAD ALLEGES THAT KPMG'S TESTING OF LOOP MAKEUP FOUND THAT 68% OF SUBMITTED REQUESTS WERE REJECTED OR RETURNED FOR FURTHER CLARIFICATION. PLEASE RESPOND.

A. Ms. Davis has misstated the issue of Exception 117. The intent of PO&P-12-3-1 was to test BellSouth representatives' ability to provide pre-order rejections/clarifications within the agreed-upon standard intervals. This

was a timeliness issue, not a functionality or an accuracy issue. During the initial test, 75% of the LMU-SIs submitted by KPMG received the rejection or clarification within seven days. As a result, KPMG initiated a re-test January 2001 and 100% of the LMU-SIs received the rejection or clarification within the seven-day interval that satisfactorily resolved the issue and satisfied the evaluation criteria. The issuance of the exception does not indicate a problem with how BellSouth personnel reject or clarify manual pre-order requests, rather whether they respond within the standard interval. In addition, KPMG did test the clarity, accuracy and completeness of the clarification responses as test criteria PO&P-12-4-4 and found BellSouth's representatives satisfied the criteria during the initial test.

Q. PLEASE RESPOND TO THE ISSUE ON THE GEORGIA TEST BED ESTABLISHMENT AS DESCRIBED ON PAGES 11 TO 14 OF COVAD'S MS. DAVIS' TESTIMONY.

A. BellSouth established the test bed accounts based on KPMG's specifications. These test beds were established in live BellSouth central offices. The Sandy Springs and Alpharetta test locations were physically located at HP buildings and served from the Sandy Springs and Alpharetta Central Offices. In addition, two physical locations for KPMG were served from the Courtland central office. These test points do reflect the experience of customers served in the four business locations.

Additionally, KPMG used actual CLP end-user customer addresses for pre-order testing in order to obtain actual customer loop characteristics.

Q. MS. DAVIS OF COVAD ASSERTS THAT BELLSOUTH DID NOT PROVIDE PARITY REGARDING LOOP MAKEUP INFORMATION BECAUSE THE CLPS DID NOT HAVE ACCESS TO MECHANIZED LOOP MAKEUP INFORMATION VIA ITS LOOP QUALIFICATION SYSTEM ("LQS"). PLEASE RESPOND.

A. Ms. Davis' concern is not factual. On page 12 of her testimony, Ms. Davis's complaint is in reference to Georgia Exception 107, and the CLP's lack of access to LQS for loop makeup information. As a part of the POP-15 test of the STP, KPMG thoroughly tested this issue of parity associated with Loop Makeup. KPMG concluded that LQS provides a yes/no response for BellSouth's Retail /Wholesale ADSL requests and was originally offered to Internet Service Providers ("ISP") and Network Service Providers ("NSPs") only. In April 2000, BellSouth's LQS was offered on an interim basis to CLPs providing Line Sharing services; and the CLPs were given access to more detailed explanations of the loop makeup information. Since September 2000, LQS has been provided, with detailed explanations, to any CLP with the appropriate contract language. KPMG closed Georgia Exception 107 when BellSouth made LQS available to CLPs. Additionally, Mechanized Loop Makeup Information has been available to the CLPs since November 18, 2000. BellSouth made available a beta test version of the mechanized loop makeup

process on July 28, 2000. The first beta test transactions were sent on September 7, 2000. All outstanding issues were cleared and mechanized loop makeup information was made available in a production environment on November 18, 2000. KPMG satisfied all evaluation criteria associated with xDSL process parity in their issuance of the STP Final Report on March 20, 2001.

Q. MS. DAVIS STATES THAT KPMG'S TESTING OF XDSL PROVISIONING SHOULD HAVE MONITORED A GREATER NUMBER OF XDSL INSTALLATIONS BOTH IN THE FIELD AND IN THE UNE CENTER. DO YOU AGREE?

A. No. The purpose of the test was to assess BellSouth's performance with respect to certain criteria. KPMG was responsible for developing and executing their actual test plan and test scenarios as prescribed in the STP. KPMG appropriately tested scenarios utilizing the evaluation criteria PO&P 13-2-1 where ADSL coordination provisioning procedures were conducted in adherence with methodologies prescribed in internal method and procedure documentation. KPMG compared BellSouth's ability to adhere to the documented procedures as they observed ADSL installations, and KPMG found that BellSouth had a performance rate of over 99% so the evaluation criteria was rated as satisfied.

KPMG, as the independent auditor and test manager, monitored the number of transactions it believed were necessary to qualify those

evaluation criteria as satisfied. This extensive testing of xDSL resulted in all "satisfied" ratings for the evaluation criteria.

Q. MS. DAVIS OF COVAD CLAIMS THAT THE ONLY WAY TO PROVIDE EVIDENCE THAT BELLSOUTH PROVIDES NONDISCRIMINATORY ACCESS TO ITS OSS IS THROUGH THIRD PARTY TESTING THAT ELECTRONIC OSS FOR DSL OPERATES AT PARITY WITH RETAIL SYSTEMS. PLEASE COMMENT.

A. I disagree. The objective of the xDSL Process Parity Review in the STP Final Report was to review the processes and systems that provide pre-ordering, ordering and provisioning for the CLP requests. The review focused on pre-ordering, ordering and provisioning systems along with workflow definitions, workforce testing and acceptance processing, exception handling and completion notices.

KPMG began the xDSL Process Parity evaluation with a review of xDSL pre-order, order and provisioning process and system documentation. KPMG identified relevant systems and interfaces and conducted interviews with center personnel, including process owners and staff. Structured center walk-throughs and direct observation of personnel performing their daily work supplemented the planned test interviews and document reviews. Physical systems and communications environments were inspected and process models were developed to assess the parity between wholesale and retail pre-order, order and provisioning processes.

All eighteen of the evaluation criteria were satisfied by KPMG as can be seen in the PO&P 16 section of the STP Final Report.

The Georgia test did not encompass mechanized ordering of xDSL-capable loops since third-party tests are conducted as snapshots in time and mechanized ordering of xDSL capable loops was not available during the Georgia test. However, BellSouth did complete pre-order and carrier-to-carrier testing of this new system functionality prior to the pre-ordering functionality rollout in November 2000 and ordering functionality rollout in February 2001. For a review of this carrier-to-carrier testing, please see Mr. Pate's testimony. The FCC has stated that carrier-to-carrier testing provides more conclusive proof of nondiscriminatory access than third-party testing.

GEORGIA CHANGE CONTROL PROCESS TESTING

Q. MR. BRADBURY ASSERTS ON PAGE 46 OF HIS TESTIMONY THAT KPMG HAS NOT RETESTED BELLSOUTH'S OSS TO ASCERTAIN WHETHER CR0313 CORRECTED THE DUE DATE CALCULATION DEFICIENCIES IDENTIFIED BY KPMG. PLEASE RESPOND

A. Change Request 0313 was implemented on February 25, 2001 after KPMG had concluded the re-testing of items identified during the GA test, therefore, KPMG did not have the opportunity to test this change. This change request was to address a specific problem associated with

calculating due dates for REQTYP M (Port/Loop Combinations). While KPMG did not re-test the electronic fix, there have not been any Type-6 defect notifications submitted for this problem by any CLP, which indicates that the due date issue identified during the Georgia test was resolved.

Q. PLEASE DESCRIBE THE SCOPE OF THE GEORGIA THIRD PARTY TEST REGARDING CHANGE MANAGEMENT.

A. The scope of the Change Management test in Georgia included the evaluation of the processes and procedures of BellSouth's Change Control Process ("CCP"). BellSouth's change event notifications and documentation were reviewed. Interviews were conducted with BellSouth personnel and change control meetings were observed.

In assessing BellSouth's Change Management process, KPMG conducted the following tests: (1) evaluated overall policies and practices for managing changes to the procedures and OSS necessary for establishing and maintaining effective operations between BellSouth and CLPs (CM-1); and 2) examined the methods and procedures that BellSouth used to develop and release the OSS99 applications package and supporting documentation (CM-2). KPMG participated in the change management process for approximately a year and a half attending meetings and reviewing documentation in the process. KPMG found that BellSouth had satisfied all of the Change Management evaluation criteria. (See KPMG

Final MTP Report, at VIII-A-15 - VIII-A-23 for CM-1 and the Final STP Report at VII-1 and VII-A-1 for CM-2 that is filed as Exhibits OSS-64-65).

The majority of the complaints stem from the fact that BellSouth's change management plan continues to evolve, and there is nothing particularly new or controversial about an evolving change management process. As the FCC has noted, "We do not expect any change management process to remain static. Rather, a key component of an effective change management process is the existence of a forum in which both competing carriers and the BOC can work collaboratively to improve the method by which changes to the BOC's OSS are implemented." Texas Order ¶ 117. Mr. Pate extensively discusses BellSouth's change management process and its evolution in his testimony.

GEORGIA TEST – OPEN FLORIDA EXCEPTIONS

Q. PLEASE RESPOND TO MS. LICHTENBERG'S COMMENTS REGARDING OPEN EXCEPTIONS FOUND DURING THE FLORIDA TEST REGARDING BELLSOUTH'S CHANGE CONTROL PROCESS.

A. Ms. Lichtenberg asserts that the exceptions found in the Third Party Test in Florida demonstrate that there are inadequacies in BellSouth's change management process that were not discovered during the Georgia test. These statements are derived from a biased view and are not based upon a thorough review of the exceptions. KPMG has raised various levels of

documentation and process issues in both the Georgia and Florida tests.

A review of the specific open exceptions follows:

Florida Exception 12

Issue Identified: BellSouth does not adhere to the procedures for System Outages (Type 1) established in the BellSouth Change Control Process, Version 2.0 . During the review of the BellSouth Change Management Activities, KPMG Consulting has found the BellSouth is not adhering to the System Outage procedures as established in the BellSouth Change Control Process, Version 2.0.

Specifically, BellSouth does not adhere to the following procedures:

- E-mail procedures were not sent to CLECs involved in the Change Control Process when System Outages last longer than 20 minutes.
- E-mail notifications were not sent to CLECs involving in the Change Control Process within one hour of the outage.
- Accurate updates were posted to the website of the current status and final resolution of each outage.

BellSouth has made enhancements to the outage notification process including an upgrade of the email system. In addition, updates to documentation have been made to clarify the process and the definitions of an outage. BellSouth is now conducting daily reviews to track results and insure BellSouth is meeting its outage commitment going forward. BellSouth is ready for re-testing to begin. KPMG plans to resolve exception 81, which is an outage notification metric issue prior to beginning a re-test of Exception 12. BellSouth expects this re-test to prove that it is now meeting the timeliness standards.

Florida Exception 88

Issue Identified: The BellSouth Change Control Prioritization process does not allow CLECs to be involved in prioritization of all CLEC impacting change requests. CLECs are unable to participate in the prioritization of change requests that originate from internal BellSouth organizations (regulatory team, third-party testing team, the LCSC, and project managers) that affect BellSouth's wholesale business and therefore the CLEC community. This policy inhibits one of the primary objectives of the CCP "to allow for mutual impact assessment and resource planning to manage and schedule changes."

BellSouth responded that the Change Control Prioritization Process does allow CLECs to be involved in the prioritization of CLEC impacting Change Requests. A CLEC impacting Change Request is defined as, "Any change that either requires the CLEC to modify the way it operates or causes it to rewrite system code." Examples of this are:

- Business rule LSR field usage changes
- New functionality for an interface
- Change existing functionality for an interface
- New REQTYPs
- New field on the LSR form
- Electronic ordering of a product/service

This definition should impact the majority of the CLEC community, if not the entire community, since it is impossible to know how each CLEC has coded its systems.

CLEC impacting change requests may originate from various sources: the (external) Change Control Process, the Third Party Testing Team, the Regulatory Team, the LCSC, or Project Managers. It is transparent to the CLECs what internal BellSouth entity is the actual originator of a request since the originator is only identified, on the Change Request form, as BellSouth. Thus, CLECs have already prioritized Change Requests

originated by internal BellSouth organizations in four separate Change Review Meetings. Mandates are not prioritized by the CLECs per the Change Control Process.

All such Change Requests should come through the Change Control Process providing the CLECs an opportunity to prioritize them. As a result of BellSouth's commitment to provide CLECs the ability to participate in the prioritization of these requests, BellSouth has a better understanding of what is important to the CLEC community. BellSouth is continuing to work through the exception process to resolve this issue.

Florida Exception 106

Issue Identified: The BellSouth IT Team does not have criteria to develop the scope of a Release Package. The BellSouth IT Team methods and procedures documentation does not provide the criteria utilized by the BellSouth IT Team to develop the priorities, capacity, and capabilities of a software release nor does it provide an explanation of how scenarios are built.

The BellSouth IT Team utilizes the strategies described in the "Encore Electronic Interface Ordering (EIO) Application Rolling Release Plan" for scope development of Release Packages. BellSouth provided this proprietary document to KPMG and working through the exception resolution process.

GEORGIA TESTING –COMPLETION NOTICES

Q. DOES AT&T QUESTION BELLSOUTH'S RETURN OF COMPLETION NOTIFICATIONS?

A. Yes. On pages 77-78 of his testimony, Mr. Bradbury claims that BellSouth routinely fails to return completion notifications ("CNs") to CLPs. AT&T apparently bases this assertion on KPMG's receipt of completion notifications during the Third Party Test in Georgia.

During the Georgia test, KPMG opened Georgia Exception 125 to address the issues of untimely or erroneous CNs. BellSouth responded by reminding KPMG that it offers the CLEC [CLP] Service Order Tracking System ("CSOTS') system as a method by which CLPs can check the status of a service order, including completion date. BellSouth issued system change requests for CNs that are mechanically returned to CLPs, but the test concluded prior to KPMG re-testing this issue. As outlined in Georgia Exception 125, KPMG did perform a functional test to observe the accuracy of the CSOTS system. Based upon these test results, KPMG found that less than 3% of all transactions contained CN inconsistencies. KPMG concluded that these inconsistencies were "not significant enough to affect the overall evaluation of the test criterion." Thus, KPMG determined that the exception had been satisfied and closed the exception with the approval of the Georgia Public Service Commission.

CLP INVOLVEMENT IN THE GEORGIA TEST

Q. WERE THE CLPS INVOLVED IN THE GEORGIA TEST?

A. Yes. On pages 4-5, Ms. Davis of Covad, and on page 14 Mr. Idoux of Sprint, both complain about the level of involvement that CLPs had in the Georgia Test. CLPs have had ample opportunity to participate in the testing process in Georgia. The third-party test was actually commenced in response to a petition filed by a coalition of CLPs, which helped shape the scope of the test. CLPs have had the option to file written responses to each monthly interim status report filed by KPMG and to participate in weekly conference calls to address ongoing issues associated with the test. KPMG held weekly conference calls with CLPs, conducted numerous CLP interviews, and posted all exceptions and meeting minutes to a website accessible to all CLPs. In certain cases, it was not practical for KPMG to conduct transactions as a pseudo-CLP, such as the provisioning of xDSL loops and the ordering of LNP. CLPs supplied test scenarios for the test plan, and KPMG had the CLPs submit selected requests on its behalf (e.g. LNP and xDSL). Finally, CLPs also were given the opportunity by the Georgia Commission to discover the basis for KPMG's conclusions, which included serving voluminous discovery requests and deposing four KPMG witnesses over the course of two days, as well as to cross-examine KPMG's principal witnesses at the May 8, 2001 hearing. At the conclusion of the hearing, all interested parties

submitted written comments addressing the test and KPMG's conclusions. In short, CLPs were actively involved the test process.

Q. WOULD YOU SUMMARIZE YOUR COMMENTS ON THE GEORGIA TEST?

A. Yes. In summary, the Georgia Test met its objective of providing – in conjunction with extensive commercial usage in Georgia – a comprehensive, independent third-party test of the readiness of BellSouth's Operational Support Systems, related interfaces, documentation and processes to support local market entry by CLPs. Contrary to CLP comments, BellSouth resolved issues identified by KPMG through the exception process in an appropriate manner while KPMG conducted a thorough series of volume tests, extensively tested xDSL pre-ordering and ordering to ensure BellSouth provides parity of service, comprehensively audited the change control process for over a year, and ensured that CLPs had a meaningful opportunity to participate. This test was adequate and its results were both independently attained and based upon facts.

REGIONALITY ISSUES AND THE PRICEWATERHOUSECOOPERS (PWC) REGIONALITY REPORT

Q. DID YOU ADOPT REGIONALITY TESTIMONY FROM MR. PATE'S DIRECT TESTIMONY DATED APRIL 12, 2001?

A. Yes. I adopted testimony on page 186 from line 14 to line 20, as well as Mr. Pate's Late-Filed Exhibit OSS-71, that is the PwC Report on the Region-wide Comparability of BellSouth's Pre-Order and Order Operational Support Systems as of May 3, 2001 and the Affidavit of Robert Lattimore of May 21, 2001.

Q. WHY DID BELLSOUTH ENGAGE PWC TO COMPLETE A REGIONALITY ASSESSMENT?

A. The reason BellSouth undertook this effort was to address some of the issues raised by Mr. Idoux of Sprint on pages 2 to 6 and pages 10 to 11 of his testimony. BellSouth would like this Commission to rely on its commercial performance data supplemented by the Georgia Third Party Test and system regionality proof as sufficient evidence that BellSouth provides non-discriminatory access to its OSS. Specific to his point on page 6 on identifying systems and processes used by one or more states, PwC was engaged as an independent auditor to undertake this task. The outcome of this task is additional proof that BellSouth's systems are regional; therefore, third-party testing specific to the state of North

Carolina is not needed. BellSouth modeled its attestation examination (found in Exhibit OSS-71) directly after the Southwestern Bell Telephone Company (SBC) Five State Regional OSS Attestation Examination, which is attached as Exhibit MM-3. This model was successfully used in SBC filings, so BellSouth used that model as its roadmap to establish the same burden of proof. The only difference between the SBC and BellSouth Attestation examinations is that BellSouth added a second assertion on two of its manual order input systems used by its LCSC. These two systems are Direct Order Entry ("DOE") and Service Order Negotiation System ("SONGS"), which are used within the BellSouth LCSC to issue certain types of service orders

Q. PLEASE DESCRIBE THE PWC REGIONALITY REPORT, AND THE VALID AND PROFESSIONAL PRINCIPLES THAT SUPPORT SUCH AN ATTESTATION.

A. BellSouth engaged PwC to examine BellSouth's assertions on the regionality of its OSS in accordance with attestation standards established by the American Institute of Certified Public Accountants (AICPA). An attest engagement is one in which a practitioner is engaged to issue a written communication that expresses a conclusion about the reliability of a written assertion that is the responsibility of another party; in this case the party was BellSouth. Under the AICPA attestation standards, an examination is the highest level of assurance that can be provided on an

assertion and results in an opinion on the part of PwC that the assertions presented are fairly stated in all material respects.

The two Management Assertions validated by PwC are as follows:

First, BellSouth utilizes the same Pre-Order and Order operational support systems (OSS) throughout its nine-state region to support wholesale competing local provider (CLP) activity, based on the criteria established in the Report of Management Assertions and Assertion Criteria on BellSouth Telecommunication's Operational Support Systems.

As it relates to the first assertion, "sameness" is defined as the following:

> The applications and interfaces implemented and available are identical across the nine-state region. "Identical" is defined as one unique set of software coding and configuration ("version") installed on either one or multiple computer servers ("instances") that support all nine-states in an equitable manner.
>
> The processes, personnel and work center facilities are consistently available and employed across the nine-state region and there are no significant aspects to the processes, personnel or work center facilities that would provide one state a greater service level or benefit than the other states in the nine-state region.

Second, BellSouth's DOE and SONGS systems have no material differences in the functionality or performance for service order entry by the LCSC, based on the criteria established in the Report of Management Assertions and Assertion Criteria on BellSouth Telecommunication's Operational Support Systems. PwC examined functionality and performance. These two systems are different, but not materially different.

The functionality component of the assertion was based on the following criteria:

- The same Local Service Requests ("LSRs"), created from a single set of business rules are used for order entry.
- Service Order Communication System ("SOCS") requires the same LSR screening and validating procedure.
- Similar processes are used for creating a Service Order.
- SOCS requires checking for and clearing order entry or initiation errors.
- Both systems output must adhere to the service order edits housed in SOCS.

BellSouth also asserted that there was no material difference in performance of order entry between DOE and SONGS based on the following criteria:

- Orders that are input through both DOE and SONGS are created in SOCS on a real-time basis upon submission.
- Similar orders from throughout the nine-state region can be input within reasonably similar timeframes, regardless of whether DOE or SONGS is used.
- Service Representatives are cross-trained on both DOE and SONGS and utilize both systems on a regular basis dependent upon the relative volume and type of transactions by state.

PwC completed the comparability examination for DOE and SONGS with the following testing approach:

- Observed transactions input into DOE and SONGS and ensured that the process was not materially different. Transactions included each service type (i.e., Resale, Complex, and UNE) and were for each state.
- Observed DOE and SONGS data validation controls and ensured that they were not materially different (i.e., required fields). LSRs are created from a single set of business rules for the purposed for submitting transactions. LSRs are submitted to SOCS in the same format and subject to the same SOCS validations.

- Ensured that there are no material differences between DOE and SONGS based on the End User State. This was completed via observation of LSRs from all states within the BellSouth region and ensuring the process for submission is consistent.
- Ensured that there are no material differences between DOE and SONGS launch, logon and navigational commands via observation of service representatives completing daily work.
- Observed the process for submitting orders to SOCS and ensured that consistent processes are followed for DOE and SONGS and for each state in BellSouth's region.

PwC concluded that its examination provided a reasonable basis for their opinion. In its opinion, PwC determined that the BellSouth management assertions were fairly stated, in all material respects, as of May 3, 2001, based on the criteria set forth in the Report of Management Assertions and Assertion Criteria on BellSouth Telecommunication's Operational Support Systems. The PwC Report provides data and validated factual assertions that this Commission can rely upon to establish the regionality of BellSouth's OSS.

Q. WHY DID BELLSOUTH ADD THE SECOND ASSERTION ON DOE AND SONGS?

A. The LCSC uses DOE in the original Southern Bell states while SONGS is used in the original South Central Bell states to create service orders within the LCSC. The two systems' functionality and performance is materially the same. Because Georgia and North Carolina both use DOE, this issue is not as germane to North Carolina as in other states. For purposes of completeness, however, BellSouth will discuss this aspect of the PwC attestation.

Q. DID BELLSOUTH ENGAGE PWC FOR A SECOND EXAMINATION FOCUSED ON DOE AND SONGS TIMELINESS AND ACCURACY?

A. Yes. Following an Informal Conference held on May 10, 2001, with the Kentucky PSC staff wherein the PwC Regionality Attestation report was discussed, BellSouth requested that PwC perform a statistically based evaluation of the time it takes to input orders in DOE versus SONGS along with an analysis of downstream errors. Mr. Idoux with Sprint alleges on pages 12 and 13 of his testimony that the Kentucky Commission concluded the PwC report was inadequate to demonstrate Regionality of BellSouth's systems. This is not true. The Kentucky staff did not question the Regionality of the systems, which was BellSouth's first assertion. They requested that a statistical validation of the one component within BellSouth's OSS that is not regional (DOE and SONGS systems) be conducted as BellSouth has described in its second assertion. This was the whole point of our second assertion. As described below, PwC has completed this evaluation and re-substantiated BellSouth's original assertion that there are no material performance differences in DOE and SONGS.

The specifics are contained in the PwC DOE and SONGS Comparability Accuracy and Timeliness Report of July 20, 2001, which is attached as Exhibit MM-4, along with the associated Affidavit of PwC's Mr. Robert L. Lattimore of July 20, 2001. In his affidavit, Mr. Lattimore describes the

report along with an overview of the level of involvement of PwC professionals. He identifies that the engagement was performed under the Consulting Standards of the American Institute of Certified Public Accountants (AICPA) and then describes standards of professional competence, due professional care, planning and supervision, and sufficient relevant data. PwC completed the timeliness assessment using a statistically based methodology. In their report, PwC defined how it reached its sample determination using a confidence level of 95%, a tolerable rate of 1% and an expected rate of 0%.

PwC's report defines these terms and expresses the significance of why these levels were selected since PwC's objective was to yield a high confidence level and to minimize the risk of the sample not being representative of the entire population. PwC defined its scope, methodology and procedures used for the timeliness assessment for the transaction input in DOE and SONGS. PwC measured (via a stopwatch) the amount of time it took LCSC service representatives to successfully submit orders into SOCS via DOE and SONGS. PwC found that based on a statistically valid sample, the average input time for DOE was 8 minutes and 22 seconds, while the SONGS input time was 5 minutes and 26 seconds. The less-than-3-minute difference between the two input times is not material. PwC depicted the relationship and the relative materiality of the time incurred inputting an order into DOE and SONGS compared to the FOC timeliness for the partially mechanized orders standard of 18 hours and for the manual orders standard of 36 hours. This depiction can

be seen on pages 5 and 6 of the PwC report of July 20, 2001. The pie charts demonstrate that the average time to process an order through either system is less than 1% of the overall process for the FOC interval for either partially mechanized or manually submitted requests. There is no material difference for this order input activity particularly when you consider the FOC Timeliness Service Quality Measure ("SQM") standard in which this component process resides. This report validates the results from the original May 3, 2001 PwC report.

Additionally, PwC defined its scope, methodology and procedures used for the accuracy of downstream system edit assessment for the transaction input in DOE and SONGS. This assessment can also be seen in the July 20, 2001 report found in Exhibit MM-4. To determine the accuracy of orders input into DOE and SONGS, PwC reviewed the history log files maintained in SOCS. PwC documented the orders that experienced downstream system edit errors, which had to be subsequently corrected by a BellSouth service representative. PwC was unable to review SOCS history log files for some orders due to a change in the original order due date which resulted in an earlier completion of the order. The completed order history is purged from SOCS the day after an order completes. In these cases, PwC observed the final status of the order within the Mechanized On-line Billing System (MOBI). This allowed them to determine if the order had completed, was in pending status or had been cancelled. PwC did review the SOCS history log files for 239 orders that had been input through DOE and 220 orders that had been input through

SONGS. A distribution across product types and by types of errors can be found in their July 20, 2001 report. A description of each downstream system edit error type along with examples of what caused the edit errors can also be found in the report. BellSouth utilizes strong edit checks within its systems to help eliminate potential downstream provisioning errors. PwC determined that 19.7% of the orders submitted through DOE and 20.0% of the orders submitted through SONGS experienced downstream system edit errors. Again, PwC was able to validate that BellSouth's assertion that there is no material difference in performance for service order entry by the LCSCs through the DOE and SONGS systems is accurate and correct.

Q. DO THE TWO PWC REPORTS PROVIDE PROOF THAT BELLSOUTH'S SYSTEMS ARE REGIONAL?

A. Yes. Contrary to comments like the ones Mr. Idoux filed on pages 9 and 10 of his testimony, the reports do provide proof for this Commission. PwC has now completed two independent assessments on the two BellSouth assertions on Regionality of its systems. These assessments have concluded that BellSouth's systems are regional and that there are no material differences between DOE and SONGS.

Q. HAVE ANY ISSUES ASSOCIATED WITH PREFERENTIAL TREATMENT TO CLP REQUESTS FROM GEORGIA AND FLORIDA ARISEN IN THIS PROCEEDING?

A. Yes. Beginning on page 31 of his testimony, Mr. Bradbury with AT&T references the PricewaterhouseCoopers (PwC) report and claims that the PwC report provides little useful information regarding the Regionality of BellSouth's OSS and that BellSouth provided preferential treatment to requests submitted by CLPs in Georgia and Florida.

PwC found this issue during its April 2001 investigation into whether BellSouth's operational support systems used to provide pre-ordering and ordering functions to CLPs are regional in nature. During its examination, PwC conducted numerous interviews with personnel in the Local Carrier Service Centers located in Atlanta, Birmingham and Jacksonville. As a result of these interviews, PwC prepared notes of the substance of the interviews as a part of its backup material. These notes were provided to AT&T and others pursuant to discovery requests in the North Carolina proceeding.

In the summer of 2000, the Georgia Public Service Commission adopted a set of performance standards in its OSS docket, 8354-U. Also during this time, the Georgia Commission was in the process of hearing and deciding the performance metrics and standards that would be applied on a permanent basis in Docket 7892-U. Earlier in 2000, the Florida Public Service Commission had adopted performance standards to be applied to all CLP performance in connection with the Florida Third Party Test.

These orders included tighter targets for the timeliness of many items, such as FOCs and Rejects that are worked by the LCSC personnel.

As a result, BellSouth took steps to increase the workforce in the LCSCs in order to be able to satisfy these tighter standards. Throughout the late summer and into the fall of 2000, BellSouth was training and deploying new service representatives into the LCSCs. In addition, and in order to meet the benchmarks for all CLPs in Georgia and Florida, for a short period of time, priority was given to manually submitted requests from these two states.

Priority was given only to requests submitted manually, using fax machines. Mechanized requests are handled through the electronic systems and are handled on a first come, first served basis for the region. For partially mechanized requests, which are those that fall out for handling, these requests are also processed using electronic systems. This treatment for manual requests from Florida and Georgia was started in August, 2000 and was to have ended in December 2000. This priority applied to all manually submitted (faxed) CLP requests in these two states.

In the course of the PwC examination during April, they interviewed personnel at the Birmingham LCSC who had not yet ceased the priority

treatment for Georgia and Florida manual requests. This was noted in the minutes of the interview, and produced to AT&T in response to data requests. BellSouth took action to correct this process in the Birmingham LCSC. PwC validated the correction and closed the issue. This issue itself is not contained in the PwC Regionality Reports. The reason is quite simple; this preferential treatment issue was found and resolved with no impact on the scope or reporting of their Attestation on the Regionality of BellSouth's systems.

Q. HOW CAN STATES ASSESS THE IMPACT OF PREFERENTIAL TREATMENT FOR MANUALLY SUBMITTED LSRS FOR CLPS OPERATING WITHIN THEIR JURISDICTION?

A. In its applications and testimony filed in support of its 271 applications, BellSouth has urged all Commissions to adopt performance measures and performance standards adopted by the Georgia Public Service Commission in January of this year, and to judge BellSouth's performance by the very same performance standards that are applied by the Georgia Public Service Commission. These measures and performance standards have been programmed into BellSouth's systems, and the adoption of these by the states will allow every state to directly compare the performance in that state with BellSouth's performance in the other states.

BellSouth publishes measures results on its interconnection website (**http://www.interconnection.bellsouth.com/mss/index.html**) for all nine states utilizing the Georgia measurements and standards. The results for North Carolina along with the other states served by BellSouth can be found on this website. Priority treatment for manual requests in the LCSC for Georgia and Florida would primarily impact two measurements, Reject Timeliness and FOC Timeliness for manually submitted LSRs. The results for these two measures for all nine states can be seen in Exhibit MM-5. For the period July 2000 through July 2001, the results show a consistent improvement in all nine states beginning in October of 2000. For the four disaggregation categories with very significant volumes, resale residence and business non-mechanized requests, UNE analog loops non-mechanized requests, and UNE-P combinations non-mechanized requests, the data shows that, beginning in the January-March 2001 time period, BellSouth's performance has been consistent across all nine states, with all states exceeding the relevant benchmark on both measures for nearly every month. In short, the actual performance in all of BellSouth's states through July 2001 clearly demonstrates that the priority given to Georgia and Florida manual requests was very short-lived and caused very little disparity in the actual performance between or among states.

Q. DOES MR. BRADBURY COMMENT ON MEASURING PERFORMANCE BETWEEN STATES?

A. Yes. On page 33 of his testimony, Mr. Bradbury states that what really matters is whether performance is similar from state to state, not the physical configuration of the OSS systems. As I have described in the previous section on measures and results, this Commission has the capability to review their state specific performance along with the performance of each state served by BellSouth. Then Mr. Bradbury contradicts himself on page 34 of his testimony when he says the study is incomplete because it did not examine the systems, specifically the pre-order query applications. PwC did review the systems used by CLPs to query pre-order applications. Mr. Idoux, on page 12 of his testimony, also contradicts Mr. Bradbury's original position where he states that the only way to determine non-discriminatory access to BellSouth's OSS in North Carolina is to test the systems and processes. No matter what the CLP position, however, BellSouth has provided the proof to this Commission to refute it – the NCUC has performance data, it has third-party testing, and it has a regionality attestation by a third party.

Q. SUMMARIZE THE REASONS THAT THIS COMMISSION SHOULD RELY UPON THE PWC REPORT TO FIND THAT BELLSOUTH'S OSS ARE REGIONAL IN NATURE ACCORDING TO THE REQUIREMENTS OF STATE AND FEDERAL COMMISSIONS.

A. BellSouth adopted the roadmap that SBC used to provide the proof and gain the support and approval of state and federal commissions. PwC examined BellSouth's assertions on the regionality of BellSouth's OSS in

accordance with attestation standards established by the American Institute of Certified Public Accountants and PwC concluded that its examination provided a reasonable basis for its opinion that the BellSouth management assertions were fairly stated, in all material respects. There is substance to the PwC report and this Commission can rely on it as a component in its consideration of BellSouth's application.

CONCLUSION

Q. PLEASE CONCLUDE YOUR TESTIMONY.

A. The Georgia Final Reports as completed by KPMG provide complementary proof to commercial data that BellSouth provides nondiscriminatory access to its systems, processes and procedures to serve its CLP customers. BellSouth's OSS is designed, developed, modified, and measured for performance on a region-wide basis to operate in an undistinguishable manner whether a CLP is in North Carolina, Georgia or any of the other seven states in BellSouth's region. PwC evaluated and confirmed BellSouth's assertion that its OSS is regional in nature. BellSouth respectfully submits that the Commission can rely on the results of the independent third-party test performed in Georgia and the regionality testing, to the extent it deems necessary in light of the evidence of actual commercial usage in North Carolina, to determine that BellSouth provides CLPs with nondiscriminatory access to its OSS in North Carolina.

Q. Does this conclude your testimony?

A. Yes.

REQUEST: At any time since January 2000, has BellSouth had any policies or practices to provide a higher priority or special handling in terms of any OSS function (pre-ordering, ordering, provisioning, maintenance & repair, and billing) to service requests (e.g., resale, unbundled network elements) for any particular CLEC (including any third party tester operating as a pseudo-CLEC) over similar service requests from other CLECs? If so, please:

A. Describe such policies and practices;

B. State the purpose of such policies and practices; and

C. Identify the person within BellSouth who was responsible for instituting such policies and practices.

RESPONSE: Please see BellSouth's response to Interrogatory No. 49

REQUEST: Identify all of the internal measures that BellSouth utilizes to monitor and manage the productivity and performance of its personnel, work centers, and other organizational units involved in pre-ordering, ordering, provisioning, maintenance & repair, or billing functions for BellSouth's wholesale operations or, to the extent that BellSouth does not segregate its wholesale operations and retail operations, for BellSouth's overall operations. Such internal measures may include, but are not limited to, those external measures contained in any BellSouth's Service Quality Measurement Plan. The work centers and other organizational units would include, but are not limited to BellSouth's: (a) local carrier service centers; (b) residential service center; (c) business service center; (c) regional central office operations; (d) regional installation and maintenance operation; (e) regional engineering and construction operations; (f) work management centers; (g) network reliability center; (h) address/facility inventory group; (i) circuit provisioning group; (j) customer wholesale interconnection services (CWINS) center; (k) billing data centers.

RESPONSE: Please see attached.

ATTACHMENT

Central Office Operations:

- COEPP: Time per Task
- BSTMP: Trunk Outage Report
- Report Rates: Code 5, 7 and 8s
- WFA: WOT and LPCT
- **Network Health Indicator: Performance of the Switch**

Installation and Maintenance:

- ITP – POTS field technicians (hours per call – revisit rate – completion efficiency)
- SSITP – Special Service field technicians (hours per call – revisit rate – completion efficiency)
- Ranking Report – Unnecessary Dispatches, Safety, PF rate, Residence Re-installs, Report Rate, SQI (Service Quality Index), Customer Desired Due Date, Mean Time to Repair, ADSL Sync Appt.
- I&M Tracking Report – Hours per Dispatch, Tracks Misc. hours and Disposition breakdown
- ICAMP – Provisioning – measures POTS service order completions on Due date, number without dispatch, delay days, missed company or subscriber

Outside Plant Engineering Measures

- Service Orders missed due to lack of Company Facilities (CF)
- Service Orders held pending installation of Company Facilities (PF)
- % Xboxes < 1yr spares
- ADSL CF
- Facility Modifications
- % Re-installs w/o a Visit
- CAP $/EALIM
- EXP $/EAALIS
- Code 4
- Held Applications >30 days
- CDDD
- OSP Quality Score

Construction Measures

- Job Cycle Time
- Construction Efficiency Percentage (CPEP), results at all levels down to technician
- % Utilization of Construction Time
- Construction Months Work on Hand
- Material Investment Index
- Rush Jobs
- Overage Jobs
- Workload
- Dollars and Hours by Budget Charged
- Dispatch Analysis

Network Reliability Center Measures:

- Defects per Million
- Customer Satisfaction
- Percent Inaccurate Tickets
- Average Abnormal Hand-off Time
- Outage Duration of Major Network Events
- Overall Employee Satisfaction
- Supervisor Communication
- Training Completed
- Percent SONET elements tested by Alarm Effective date
- Comm Link Failure Rate
- IOF Alarms Chronic/Sys
- Percent ATM Availability
- Percent Frame Relay Availability
- Percent CO DSLAM Availability
- Unit Cost
- Cost Management
- Productivity

AFIG and CPG Measures:

AFIG Center Measures -

- % Past Due Orders
- # of Employees/10,000 Access Lines in Service
- % Flow Through
- % RMAs Hands Off Assignment Logic (HAL) Resolved
- # of Assignment Changes per 1000 Inward Access Lines
- Cost/Service Order
- Monthly cost/Access lines in service

CPG Measures

- Headcount
- Expense Budget
- Record Issue Date (RID) Performance provides data on the numbers of special service, message, and carrier trunks added, disconnected and rearranged each month.
  - Total number of RID issued
  - Total percent of RID issued on time
  - Total Items Issued by Employee
  - Total CP $/Item (total expense dollars by total RID issued)
  - Total 0-4 Day Items Issued
  - 0-4 Day RID items completed
  - Percent of 0-4 Day RIDs on time
  - Circuit Provisioning (CP) Hours includes data and calculations on the following:
    - Hours worked
    - Overtime hours worked
    - Total hours worked (hours worked plus overtime hours)
    - CP $/hrs worked (total expense dollars by hours worked)
    - CP $/Total Hours (total expense dollars by total hours worked)
    - Items/Hrs worked (total number of RID issued by hours worked)
    - Items /Total Hours (total number of RID issued by total hours worked)
    - Work Order Record Details Quality % Error
    - Trunk Administration Systems Quality % Error

Following is a listing of the internal measures that BellSouth utilizes to monitor and manage billing functions:

1. Impact of Ref/Rec – BBS
2. Impact of Ref/Rec – Consumer
3. Impact of Ref/Rec – ICS
4. Impact of Ref/Rec – SBS
5. Account Inq Responsiveness – Consumer
6. Account Inq Responsiveness – ICS
7. Account Inq Responsiveness – SBS
8. Account Inquiry Responsiveness (BBI)
9. Acct Impact of Ref/Rec – BBS
10. Acct Impact of Ref/Rec – Consumer
11. Acct Impact of Ref/Rec – SBS
12. BBI 2001 Budget – Budget vs. Actual
13. Billing Invoice Accuracy – BST Aggregate
14. Billing Invoice Accuracy – CLEC's
15. Cost/Bill Page – All (Service Ful)
16. Cost/Retail Bill Page
17. Cost/Retail Bill Page (Business)
18. Cost/Retail Bill Page (Consumer)
19. CRIS Billing Errors – Accounts (Service Ful)
20. CRIS Billing Errors – Usage (Service Ful)
21. Impact of Refunds/Recoveries (Accounts)
22. Impact of Refunds/Recoveries (Revenue)

23. No. of Account Inquiries (BBI)
24. No. of Billing Errors (Total)
25. No. of DJM Errors (BBI)
26. No. of Refunds & Recoveries (Total)
27. Pct of Bills With Refunds
28. Bill Guarantee Writeoffs – BBI
29. Bill Guarantee Writeoffs – Total (Service Ful)
30. CABS: Service Order Error Rate
31. Carrier Adjustments (Service Ful)
32. CLEC Message Delivery – ADUF
33. CLEC Message Delivery – ODUF
34. Lost Msg Revenue – Switch (Service Ful)
35. Message Delivery – ADUF/ODUF (Service Ful)
36. Message Delivery – CMDS (service Ful)
37. Service Installation Guarantee Writeoffs
38. .Net/E-Center: bill Release Timeliness
39. .Net/E-Center: Customer Adjustments (Amt)
40. .Net/E-Center: Customer Adjustments (No.)
41. .Net/E-Center: Errors Found (Amount)
42. .Net/E-Center: Errors Found (No.)
43. .Net/ENS: Bill Release Timeliness
44. .Net/ENS: Customer Adjustments (Amt)
45. .Net/ENS: Customer Adjustments (No.)
46. .Net/ENS: Errors Found (Amount)
47. .Net/ENS: Errors Found (No.)
48. .Net/MSS: Bill Release Timeliness
49. .Net/MSS: Customer Adjustments (Amt)
50. .Net/MSS: Customer Adjustments (No.)
51. .Net/MSS: Errors Found (Amount)
52. .Net/MSS: Errors Found (No.)
53. .Net/.Net Errors Found (Amount)
54. .Net/.Net Errors Found (No.)
55. .Net: BIG Errors (Amount)
56. .Net: BIG Errors (No.)
57. .Net: Bill Release Timeliness (by Segment)
58. .Net: Bill Release Timeliness (Composite)
59. .Net: BOCRIS Errors Found (Amount)
60. .Net: BOCRIS Errors Found (No.)
61. .Net: Credit Card Bad Debt
62. .Net: Consumer Adjustments (Amount)
63. .Net: Consumer Adjustments (No.)
64. Amt of 5040 (CRIS) Adjustments – ICS
65. Amt of 5040 (CRIS) Adjustments – Total
66. Amt of 5040 Adjustments – BBS
67. Amt of 5040 Adjustments – Consumer

68. Amt of 5040 Adjustments p SBS
69. Backlog of Adjustments (No. of Days on Hand)
70. BBI Financial Rptg - $ Billing Errors Found
71. BBI Financial Rptg - $ Revenue Errors Found
72. BBI Financial Rptg – No. Billing Errors Found
73. BBI Financial Rptg – No. Revenue Errors Found
74. BBI Process Improvements – Hours Saved
75. BBI Settlement Accuracy ($)
76. BBI Settlements – Internal Failures by $ Value (000's)
77. BBI Settlements – Timeliness of Processing by # Late

Payments

78. BBI Settlements – Value Added Errors Pre-Settlement
79. BBI Settlements Accuracy (# of Settlements) by % Accurate
80. BBI Settlements: Errors Found Before Settlement
81. MIC Unbillable Writeoffs (Service Ful)
82. MIC: Average Age of Messages
83. MIC: BST Penalty Payments
84. MIC: Recovered Revenue per MIC Employee
85. MIC: Unbillable Msg Rev (BST + IXC) – Error Rate
86. MIC: Unbillable Msg Revenue (BST)
87. No. of 5040 (CRIS) Adjustments – ICS
88. No. of 5040 (CRIS) Adjustments – Total
89. No. of 5040 Adjustments – BBS
90. No. of 5040 Adjustments – Consumer
91. No. of 5040 Adjustments – SBS
92. No. of Days to Process Refunds
93. No. of DJM Errors (Usage)
94. Number of CRIS Service Orders on Hold File
95. Number of Days to Release Misc. Bills
96. Pct of Bills No Adj – BBS
97. Pct of Bills No Adj – Consumer
98. Pct of Bills No Adj – SBS
99. Pct of Code Memos Updated to DRIS Data Base by

Milestone 3

100. Pct of CRIS Bills No Adj – ICS
101. Pct of CRIS Bills No Adj – Total
102. Pending Deposits > 60 Days

103. RUB: Flex Unbillables
104. RUB: Gateway Quality Index
105. RUB: Usage Refunds – Timeliness of Resolution
106. RUB: Usage Refunds/Recoveries – Accounts Impacted
107. Settlement Account Writeoffs
108. Unbillable Message Revenue – BBS
109. Unbillable Message Revenue – Consumer
110. Unbillable Message Revenue – ICS
111. Unbillable Message Revenue – SBS
112. Account Inq Responsiveness – BOCRIS/Ref/Database
113. Account Inq Responsiveness - Cellular
114. Account Inq Responsiveness – Misc Bill (Adj)
115. Account Inq Responsiveness – Misc Bill (Ref/Dep)
116. Account Inq Responsiveness – Misc Bill (Tax)
117. Account Inq Responsiveness – CRIS Bill Ver
118. Account Inq Responsiveness – CRIS Hold File
119. Account Inquiry Responsiveness - Journals
120. Acct Inquiry Responsiveness - MIC
121. Acct Inquiry Responsiveness – Usage Proc
122. Bill Release – 8.5 X 11 Bills (5WD)
123. Bill Release – 8.5 X 11 Bills (6WD)
124. Bill Release – CABS Bills
125. Bill Release – CLUB Bills (5WD)
126. Bill Release – CLUB Bills (6WD)
127. Bill Release – RSB (6WD)
128. Bill Release – RSB (7WD)
129. Bill Release – Std CRIS Bills (5WD)
130. Bill Release – Std CRIS Bills (6WD)
131. Bill Transmission – EDI (5WD)
132. Bill Transmission – EDI (6WD)
133. CABS Bill Release (Service Ful)
134. CLEC Invoice Delivery (Impact99)
135. CRIS Bill Release (Service Ful)
136. Invalid Account Inquiries
137. No. of DJM Errors (CRIS Database)

138. Release of CRIS Bills (Composite)
139. Release of Treatment Notices
140. CATTS Measurements
141. CEO Measurements
142. UNE Measurements
143. Detail/CMRS Measurements
144. ARTSS: AMA Records Processed
145. ARTSS: ALPHA Usage Not Posted by 7:00AM
146. ARTSS: Bill Periods Missed
147. ARTSS: Switches More Than 48 Hours Behind
148. ARTSS: Revenue Journalized Due to Lost or Uncollectible AMA Usage
149. ARTSS: Duplicate Usage Data Released
150. ARTSS: AMA Usage Omitted from Processing
151. ARTSS: IBIS Cases Issued
152. ARTSS: IBIS Cases Closed
153. ARTSS: REM Tickets Generated
154. ARTSS: Security Data Requests
155. ARTSS: Budget Actuals
156. Daily Status Report
157. Corporate Impact Award Commitment
158. BBI Wholesale Hold File: Monthly Top 10 Error Codes (All Centers)
159. **BBI Wholesale Hold File: Monthly top 5 Error Codes For Each Individual Center**
160. BBI Wholesale Hold File: Error Code Types For Each Center Over 3 Month Period
161. BBI Wholesale Hold File: # of Hold File Errors Received Monthly
162. BBI Wholesale Hold File: # of Hold File Errors Corrected Monthly
163. BBI Wholesale Rate File: Number of Monthly CLEC Contract and Tariff Updates
164. BBI Wholesale Rate File: Number of Total CLEC Contract and Tariff Updates
165. BBI Wholesale Rate File: Number of Monthly BIBS Rage File Usage Updates
166. BBI Wholesale Rage File: Number of BIBS Rate File Usage Updates
167. BBI Wholesale Bill Verification: Number of J&N Bills Received Per Month
168. BBI Wholesale Bill Verification: Number of CABS Bills Received Per Month
169. PERQ Non-Management Performance Evaluation

Management Commitments
CRIS Service Order Hold File – Orders Posted Per Hour
CRIS Rate Database – Number of Updates Per Rate Manager on Monthly Basis
Report Number BG1 – Bell Revenue – all carriers
Report Number BG2 – Bell Revenue – by carrier
Report Number BG3 – Written Off – Bell Revenue – all carriers
Report Number BG 4 – Written Off – Bell Revenue – by carrier
Report Number BG5 – Meet Point Billing – Billed Bell Revenue – all carriers
Report Number BG 6 – Meet Point Billing – Billed Bell Revenue – all carriers
Report Number BG 7 – Detailed – Billed Bell Revenue – all OLECs
Report Number BG 8 – Detailed – Billed Bell Revenue – All OLECs
Report Number BG 9 – Summary – Billed Bell Revenue – all OLECs
Report Number BG 10 – Summary – Billed Bell Revenue – all OLECs
Monthly SIG and SAW Queries
CATTS 101 – Percent of Out of Control Compares
CATTS 102 – Percent of Minutes of Use at Risk
CATTS 103 – Percent of MOUs at Risk – Sourced
CATTS 104 – Bill Impacting Access Minutes of Use
CATTS 105 – Unsourced Access Minutes or Use
CATTS 106 – Percent of Minutes of Use at Risk
CATTS 103A – Percent of MOUs at Risk - Sourced
CATTS Open RCAs (101-106)
CATTS Closed RCAs (101-106)
Rpt. #301M - % Absolute Bill Adjusted
301M RCA Report
Rpt. #501 - Prior Period Usage Billed - Detail Bell and Indep
Rpt. #502 - Prior Period Usage Billed - Summary within 30 days of IBC Bill Date
Rpt. #503 - Prior Period Usage Billed - Summary Without MOU
PP Usage RCAs (500s)
Late ICO (500s)
MOU List (500s)
Rpt. #600M - Usage Reconciliation (Monthly)
Rpt. #600C - Usage Reconciliation (Cycle)
Usage Rec RCAs (600s)

204. Rpt. #901 - Mechanized MAVRIC
205. Rpt. #902 - Manual MAVRIC
206. Rpt. #903 - CABS Rate Table Update
207. Change Mgmt. Notification
208. Self Report
209. Trunk Port Trending
210. Change Mgmt. Log
211. SOT Results
212. LIDB
213. Process Improvement Log
214. Switched Financial
215. Inward Operator Services
216. Process Improvements
217. Summary
218. CCS7/Link
219. PICC
220. 301M PICC

221. PICC Self Report
222. PICC Reconciliation Report
223. PICC Balance Sheet
224. PICC Volume Expense Summary
225. PICC RCA
226. Comparison Report
227. Comparison Report Explanation
228. Retail Usage: Total Number of Accounts Impacted by Incorrect Billing
229. Average Number of Days An Account Impacted by Incorrect Billing
230. Monthly Number of SMDR Recreates and Recoveries
231. Monthly Number of Usage-Related Account Inquiries
232. Gateway Quality Index
233. Number of CRIS Billing Errors
234. Number of CRIS Account Inquiries
235. Number of CRIS Hold Bills

Performance Productivity Measures – BBS Customer Care
Service Order Metrics
Service Order Quality
Speed of Error Correction
Service Orders
Service Order Updates
Service Orders/ CSA
Revenue
Average Booked Revenue (Net)
Average Booked Revenue (Net)/CSA
Average Booked Revenue (Net) /SO
Aspirational Measures
Show Me The Money (SMTM) - Revenue Referral Program
Expired Contract Renewal
Preeminent Service - Sales Program
Service Level - SBS Mid-Market Call Ctrs.
% of Calls Answered in 60 Seconds
% of Calls Abandoned (>60 sec.)
% of Transfers
Overflow In
Average Talk Time (mm:ss)
Total Calls
Average Available CSA
Service Level - Vendor Service Centers
% of Calls Answered in 60 Seconds
% of Calls Abandoned (>60 sec.)

% of Transfers
Average Talk Time (mm:ss)
Total Calls
Average Available CSA
Envision Productivity
CSA Productivity
SC Productivity
SPP Results
Transactional Provisioning (POTS)
Transactional Provisioning (Spcls)
Billing Metrics
Essex Disconnect Activity
IBIS Billing Errors Correction Rate
BARS Errors
BARS Errors
5297 Q A Summary
Statusing
Customer Readiness (DD-2)

TN Residence Service Centers

Productivity and Performance Measures:

Access – percent of incoming calls abandoned by customer
Average Talk Time – average time spent talking to a customer on a call
Availability – percent of time representative is available to answer calls
Adherence – percent measure of adherence to a pre-determined schedule
Average Handling Time – total time to handle a customer call including closed-key or follow-up
Attendance – measure of frequency and type of absences from scheduled work

Number of Calls Handled – average number of calls handled per available employee
Transferred Calls – number of calls initially received in one gate and ultimately transferred to another
Call Types – identification of incoming call type
Service Order Error Rate – measure of input errors on service orders

Customer Satisfaction – follow-up interviews with customers to measure service satisfaction
Sales – various measures of sales effectiveness including revenue per call, revenue per employee, units per employee
Offer Rates – measure of employee performance in offering products to customers
Order types – identification of various types of orders received from customers
Churn – measure of turnover frequency of key products
Appeals – measure of number of customer appeals to higher management or regulatory authorities
Employee Satisfaction – internal survey of employee satisfaction with work environment
Attrition – measure of employee turnover
Overtime – measure of number of hours worked by employee over scheduled hours

For Small Business in TN:
PERFORMANCE:
Sales
Revenue (annual billed revenue, revenue per order)
Products (ADSL, Packages, Contracts, Pagers, Wireless, Internet Access, Lines)
Quality of Service Delivered
Service Order errors not resolved
Repair commitments changed
Repair commitments unprocessed
PRODUCTIVITY:
Absences
Orders per employee
Average Speed of Answer

REQUEST: Identify all of the internal reports that BellSouth utilizes to communicate and analyze the data generated by the internal performance measures identified in the preceding interrogatory.

RESPONSE: Please see BellSouth's response to Production of Documents No. 51.

REQUEST: Identify the amount of fees that BellSouth (and its affiliates) has paid PWC for professional services (including but not limited to attestations, consulting, financial audits), broken down by engagement, in the year 2000 and the year 2001 to date.

RESPONSE: BellSouth pursuant to agreement of the parties to produce the amount paid to PWC by BellSouth for its regionality attestation, BellSouth states that BellSouth paid PWC as follows:

Amount for two regionality reports- $805,000.00

REQUEST: Describe the process by which BellSouth updates and maintains its OSS databases used to support pre-ordering functions. The description should include, but is not limited to,:

A. the organization responsible for updating and maintaining such databases for each state:

B. the extent to which such databases are segregated by state (or by regions within states);

C. the extent to which such databases are maintained in separate computer hardware;

D. the means by which BellSouth monitors or measures the timeliness of updating such databases and the accuracy of such databases.

RESPONSE: BellSouth Telecommunications (BST) asserts that BST utilizes the same Pre-order operational support systems (OSS) throughout BST's nine-state region to support wholesale competing local exchange carrier (CLEC) activity. Please see the attachment **EXHIBIT OSS – 74 Affidavit of Robert L. Lattimore, with the PriceWaterhouseCoopers Report.** In the **PriceWaterhouseCoopers Report's** section 4, page 7, the Pre-Order process is defined as such functions as address verifications, requests for telephone numbers, requests for customer service record, service availability inquires, service appointment scheduling and facility availability inquiries.

PricewaterhouseCoopers LLP, provided an Independent Accountant's Report confirming BST's assertions as of May 3, 2001. PricewaterhouseCoopers examination was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants. This report is intended solely for the information and use of BellSouth Corporation, BST and the Federal Communications Commission or any Public Service Commission within the BellSouth operation region.

RESPONSE: (Cont.)

As discussed in the PricewaterhouseCoopers report, Local Exchange Navigation System (LENS), Telecommunications Access Gateway (TAG), and Robo Telecommunications Access Gateway (RoboTAG™) are the primary CLEC interfaces providing "pre-order" functionality.

The following legacy OSS, which include but are not limited to; Application for Telephone Number Load Administration and Selection (ATLAS), Business Office Customer Records Information System (BOCRIS), Loop Facilities Assignment and Control System (LFACS), Product/Services Inventory Management System (P/SIMS)/ Central Office Features File Interface (COFFI) and Regional Street Address Guide (RSAG) support pre-ordering information.

LENS, TAG, and RoboTAG™ do maintain local databases only for Service/Feature availability and Carrier Information, which are downloaded weekly from P/SIMS/COFFI. Other pre-order requests to ATLAS, BOCRIS, LFACS, and RSAG are obtained near real-time. TAG does handle pre-order queries to BOCRIS differently than LENS and RoboTAG™. Since TAG is a machine to machine interface, TAG queries BOCRIS for a Customer Service Records (CSR)s. Data retrieved in the query is kept until midnight of the day requested then the query is flushed out of TAG. This allows CLECs to populate their LSRs mechanically or update their internal databases, but prevents the CLEC from reusing that query ensuring that the snapshot obtained in a query is always current.

BellSouth Technology Services, Inc. (BTSI) is the organization responsible for managing software, hardware changes, and the maintenance of databases for each state through BellSouth's various vendors.

The attached document lists where the above mentioned pre-ordering databases reside.

REQUEST: (Cont.)

For billing, the CRIS databases run on a server in either the Charlotte or Birmingham. The extent to which such databases are maintained in separate computer hardware are the server and mainframe. The means by which BellSouth monitors or measures the timeliness of updating such databases and the accuracy of such databases is adherence to the Billing Cycle Schedule and Critical Service Levels (CSL).

BellSouth Telecommunications, Inc.
Tennessee Regulatory Authority
Docket No. 01-00362
AT&T, TCG and SECCA's 1st
Interrogatories
September 17, 2001
Item No. 54
Attachment

ATTACHMENT

EXHIBIT OSS - 74

Affidavit of Robert L. Lattimore
With
the PriceWaterhouseCoopers Report

AFFIDAVIT OF ROBERT L. LATTIMORE

State of Georgia)
)
County of Fulton)

Robert Lattimore, having first been duly sworn, hereby states as follows:

1. I am a Global Risk Management Solutions (GRMS) partner in PricewaterhouseCoopers LLP's (PwC's) Telecommunications Industry Practice. In this capacity, I am responsible for providing information technology assurance services to PwC's telecommunications clients. I am a Certified Public Accountant with over 16 years of relevant experience including performing audits of financial statements and attestations in a variety of industries. I also lead the data management practice for the PwC 's Southeast Region which delivers data and transactional analysis, data quality and transformation services for new system implementations and stand-alone database development. I am a graduate of the University of Memphis.
2. I directed and coordinated PwC's performance of an attestation examination of the BellSouth Telecommunications, Inc. (BST) management assertions that: (1) the same pre-ordering and ordering operational support systems (OSS), processes and procedures are used to support competing local exchange carrier (CLEC) activity across BST's nine-state region, and that (2) there are no material differences in the functionality or performance of BST's Direct Order Entry (DOE) and Service Order Negotiation System (SONGS) systems.
3. This affidavit is being prepared to provide additional detail of the types of procedures we utilized in our attest examination on BST's management assertions as of May 3, 2001 as described within our report dated May 3, 2001.

4. A total of 16 PwC professionals spent over 2,800 hours performing the work described in this affidavit. The PwC professionals included four partners, a managing director, and managers. Our partners, managing director and managers led all aspects of the fieldwork. All of the PwC partners, managing director and managers, and many of the staff, who worked on this engagement, have extensive telecommunications industry and telecommunications business process and/or systems experience. The remainder of this affidavit describes PwC's approach to the attestation examination.
5. The attestation examination discussed herein was conducted in accordance with the attestation standards of the American Institute of Certified Public Accountants (AICPA). An attestation examination is one in which a practitioner is engaged to issue a written communication that expresses a conclusion about the reliability of a written assertion that is the responsibility of another party. An attestation examination is the highest level of assurance that can be provided on a written assertion under these standards. PwC's conclusions regarding its attestation examination of BST's management assertion are set forth in the "Independent Accountant's Report" which is appended hereto as Attachment A. Also, a copy of the BST management assertion is appended hereto as Attachment A.
6. BST Management has asserted the following:

   - BST utilizes the same Pre-Order and Order operational support systems (OSS) throughout BST's nine-state region to support wholesale competing local exchange carrier (CLEC) activity; and that
   - BST's DOE and SONGS systems have no material differences in the functionality or performance for service order entry by the Local Carrier Service Centers (LCSC).

The following criteria has been defined by BST in relation to the Management assertions:

Region-wide Sameness of Pre-Order and Order OSS

With the exception of DOE and SONGS, discussed below, BST management asserts that BST utilized the same Pre-order and Order OSS throughout BST's nine-state region to support wholesale CLEC activity. As it relates to this assertion, "sameness" is defined as the following:

- The applications and interfaces implemented and available are identical across the nine-state region. "Identical" is defined as one unique set of software coding and configuration ("version") installed on either one or multiple computer servers ("instances") that support all nine-states in an equitable manner.
- The processes, personnel and work center facilities are consistently available and employed across the nine-state region and there are no significant aspects to the processes, personnel or work center facilities that would provide one state a greater service level or benefit than the other states in the nine-state region.

Comparability of DOE and SONGS

Direct Order Entry (DOE) and Service Order Negotiation and Generation System (SONGS) are two of the order entry systems used within the BST Local Carrier Service Centers (LCSC) to create service orders for various types of customer requests. These systems use screens, menus, on-line access to back-end legacy systems and on-line editing to automatically generate common order data entries. DOE is used in the "old Southern Bell states" (GA, FL, NC & SC), while SONGS is used in the "old South Central states" (LA, MS, TN, AL, & KY).

a. *Comparability of "Functionality"*

Both systems feed into Service Order Communications System (SOCS), an on-line system responsible for the collection, storage, and distribution of service orders to all user departments. SOCS accepts service orders from various input or negotiation systems. Pending orders and their associated history files are maintained and viewable in SOCS until they are cancelled, or the billing system notifies SOCS that a completed order has been posted. Once it is posted, the order is purged from the SOCS database.

BST asserts that there is no material difference in functionality between DOE and SONGS. This assertion is based upon the following criteria:

- The same Local Service Requests (LSRs), created from a single set of business rules, are used for order entry
- SOCS requires the same LSR screening and validating procedure
- Similar processes are used for creating a Service Order
- SOCS requires checking for and clearing order entry or initiation errors
- Both systems output must adhere to the service order edits housed in SOCS

It should be noted that there are some input differences between DOE and SONGS. However, these differences are not considered to be material in nature. Examples of these differences are:

- Launch and log-on procedures
- Commands to navigate
- Function keys to initiate action

- Procedures for entering information, sending it to SOCS and clearing errors

b. Comparability of "Performance"

BST utilizes a workforce modeling tool to capacity manage its LCSC transactions and personnel. Additionally, BST measures performance of service for quantity and quality without regard to which system is used. The work force model utilizes standard work units of LSRs per hour per service representative as their basis regardless of whether the mode of entry for manual LSRs is through DOE or SONGS.

Regardless of state, service representatives use the same processes for LSR handling prior to order entry and for processing of orders after they are submitted to SOCS from DOE or SONGS. The time spent inputting an LSR into DOE or SONGS represents a small component of the overall lifecycle of an LSR. Considering the above, BST asserts that there is no material difference in performance of order entry between DOE and SONGS based on the following criteria:

- Orders that are input through both DOE and SONGS are created in SOCS on a real-time basis upon submission.

- Similar orders from throughout the nine-state region can be input within reasonably similar timeframes, regardless of whether DOE or SONGS is used.

- Service Representatives are cross-trained on both DOE and SONGS and utilize both systems on a regular basis dependent upon the relative volume and type of transactions by state.

The remainder of this affidavit describes the scope of our review and procedures taken to test Management's assertions and criteria. PwC professionals, under my supervision, performed the work below.

6. Our examination covered pre-ordering and ordering domains as represented to PwC as of May 3, 2001 and the primary processes associated with each, including the manual processes and the underlying systems. The systems included in our examination are listed as follows:

   - Local Exchange Navigation System (LENS)
   - Telecommunications Access Gateway (TAG)
   - RoboTAG™
   - Electronic Data Interchange (EDI)
   - LSR Router (LSRR)
   - Local Exchange Ordering System (LEO)
   - Local Exchange Service Order Generator (LESOG)
   - Service Order Communication System (SOCS)
   - LNP Gateway
   - LNP Service Order Generator (SOG)
   - LNP Graphical User Interface (GUI)
   - Corporate Gateway (COG)
   - Delivery / Order Manager (D/OM)
   - Service Order Generator (SOG)
   - Exchange Access Carrier Tracking (EXACT)
   - Access TaskMate Ordering Process System (ATOPS)

- Direct Order Entry (DOE)
- Service Order Negotiation System (SONGS).

A description of each of these systems has been included in the attached report in Attachment A.

BST has multiple data centers where many of the applications listed above reside. BST's LCSC is housed in three locations that are used for the processing of CLEC orders and for responding to requests by CLECs for pre-order and ordering information and data. One LCSC is located in Atlanta, Georgia, one in Birmingham, Alabama, and one in Jacksonville, Florida. The Atlanta and Birmingham LCSC each process CLEC pre-order requests and orders from each of the nine states in BST's nine-state region. CLECs are assigned to either the Atlanta or Birmingham LCSC to balance expected volumes. The Jacksonville LCSC currently is used primarily as a call center, although live orders are processed in Jacksonville if an overflow exists from the other LCSC locations.

Region-wide Sameness of Pre-Order and Order OSS Testing

7. In examining management's assertion on the comparability of the pre-ordering and ordering OSS, processes and procedures across BST's nine-state region, we made observations regarding a number of factors relevant to that comparability. The factors include, but are not limited to the following:

    - *Technical Configuration Consistency*: The consistency of technical configurations and applications for systems used to process pre-ordering and ordering transactions across the nine state region and the treatment of transactions by the systems in the LCSC locations.

- *Documentation and Process Consistency*: The consistency of documentation of systems and processes in each of the LCSC locations, and the understanding communicated during our interviews regarding:
  - Key applications and functionality of the systems;
  - Procedural documentation, such as methods and procedures or user guidance designed to provide users with the information necessary to execute and monitor transactions; and
  - System screen views, reporting, output formats, system notification records, transaction record layouts, and data elements for transactions.

8. In examining systems comparability for processing pre-ordering and ordering transactions across the nine state region, we performed the following:
   - Requested and received documentation related to systems architecture overview and process flow for pre-ordering and ordering transactions in each of the LCSC locations and the BST Data Centers. This documentation included a description of how a CLEC gains access to and utilizes each pre-ordering and ordering application. The documentation also enabled us to determine whether pre-ordering and ordering applications are running multiple instances and/or versions of the application code. Based on our review of this documentation, we determined that BST uses a single set of documentation to provide BST employees and specialists information regarding the process flows for pre-ordering and ordering transactions in each LCSC.
   - Interviewed key BST employees in both the systems and operational organizations, and found their descriptions and understanding of processes and systems were consistent

with the documentation we examined. The documentation we examined included user manuals and system requirements.

9. Next, we examined the pre-ordering and ordering applications to determine whether the same application was used across the region. We performed the following tests:

   - Verified that application instances asserted to be of the same version were in fact the same. In this regard, we obtained and reviewed the application library code listing and verified that the objects for each instance were the same. This allowed us to verify that only one version of software was in production at the time of our review.
   - Compared the Change Management application release logs for the pre-ordering and ordering applications which allowed us to determine that one version of application software was loaded into production for all instances of an application. We sought explanation for any discrepancies as to whether each application was running the same version.
   - We received a signed letter from BST stating that only 3 CLECs utilized the RoboTag™ application, and that new versions are implemented by BST as they become available. Since RoboTag™ resides on CLEC premises, we did not review library code listings for that application.
   - We then verified whether the actual transaction flow through each application instance/version was consistent with management's assertion on comparability. This was accomplished by obtaining user logon information from LENS and TAG, and identifying the CLECs associated with the logon information. For each such CLEC, we verified that the transactions exist in LEO for each of the front-end systems used, and we observed whether each CLEC that uses TAG only submits requests via one version

of TAG. We observed activity by CLECs on the front-end applications (e.g., TAG, LENS and EDI) to verify that the expected front-end application was used to submit orders. This allowed us to verify the version of each application in which the logons occurred and establish its availability to CLECs in multiple states.

- We made a selection of pre-ordering and ordering transactions for each of the nine states in BST's region through the relevant pre-ordering and ordering systems to verify that the specified instances/versions of the OSS were used. We also reviewed version differences for all applications where relevant to verify that multiple versions of the application code were not CLEC, LCSC or state specific. Table 1 in Attachment B contains a summary of applications and transactions that were observed by us to validate the sameness of pre-order and ordering applications across the region.

10. To determine whether current or future changes in applications would materially affect the conclusions resulting from our examination, we performed the following:

- Determined whether any application changes implemented during the timeframe of our engagement had an impact on our conclusion regarding management's assertion.
- Reviewed whether consistent CLEC communication procedures are used when placing an application change into production.
- Documented the change control process for each application, noting any difference in the process among the applications, and observed the suitability and existence of change control procedures surrounding a selection of pre-ordering and ordering applications.

Documentation and Process Consistency

11. To begin our examination of pre-ordering and ordering process comparability, we requested, received and examined BST user guides, documentation related to the execution of processes for pre-ordering and ordering in each of the LCSC locations and other documentation provided to CLECs in the nine state region that is related to pre-ordering and ordering. We observed whether the documentation was the same for all nine states in the BST region. This documentation included:

    - CDIA (Corporate Documentation and Information Access)
    - User Guides listed on the Interconnection Services website

We also requested, received and examined internal BST documentation related to the execution of processes for pre-ordering and ordering in each of the LCSC locations, and determined whether the documentation was the same for all LCSC locations.

12. In each of the LCSC locations, we performed "walkthroughs" on a selection of actual orders in order to compare processes/procedures among the centers. The walkthroughs included interviews with BST personnel who were subject matter experts in the processes under review and observation of the pre-ordering and ordering processes for a selection of order types. We selected combinations of order types (e.g., move, add, change, disconnect) and wholesale services (e.g., residential resale, business resale, UNEs, xDSL, ISDN, directory listings) in order to assess whether the format, content and processing of pre-ordering and ordering transactions were the same used for all nine states.

13. We reviewed the CLEC set-up process to validate how CLEC users are provided access to the OSS. This enabled us to verify whether consistent procedures are used throughout the region to grant CLEC users access to the front-end ENCORE systems.

DOE/SONGS Comparability

14. In testing management's assertion that there are no material differences between the functionality and performance characteristics of DOE and SONGS, we requested, obtained and reviewed BST training manuals and documentation related to both DOE and SONGS, including flowcharts and narratives of processes for those applications. To complete our review of DOE and SONGS, we interviewed BST subject matter experts including LCSC representative trainers, IT personnel and LCSC supervisors/managers, and we observed how manual entry of new orders, and processing of orders that drop out for manual handling, were performed using both DOE and SONGS.

15. Next, we obtained from BST's management the criteria they used in making the assertion as to the comparability of DOE/SONGS from a functional standpoint. These criteria included:

- The same Local Service Requests (LSRs), created from a single set of business rules, are used for order entry
- SOCS requires the same LSR screening and validating procedure
- Similar processes are used for creating a Service Order
- SOCS requires checking for and clearing order entry or initiation errors
- Both systems output must adhere to the service order edits housed in SOCS

We tested whether DOE/SONGS met these criteria by performing the following procedures:

- confirmed source code version;
- compared process for creating a service order for DOE and SONGS;

- compared LSR screening and validating procedures for the two applications;
- compared process for managing number pooling;
- determined whether both applications validated order entry errors in the same manner;
- validated that any discrepancies related to end-user states as between DOE and SONGS were not material;
- validated that any discrepancies related to launch and log-on procedures were not material;
- validated that any discrepancies related to navigation commands were not material;
- validated that any discrepancies related to order entry procedures were not material; and
- validated that any discrepancies related to order completion and sending to SOCS were not material.

16. We tested whether the asserted functional comparability was consistent across the nine state region by performing the following test procedures on both DOE and SONGS:

- reviewed application release logs to determine whether all application versions have the same date, version release and program logic;
- observed LSR order entry performed on the two applications in the Atlanta, Birmingham and Jacksonville LCSC locations;
- verified that both DOE and SONGS interface with CRIS, ATLAS, SOCS and COFI for billing, number pooling, service order communication, and features and services;
- identified, verified and compared validation checks (i.e., minimum data allowance, maximum data allowance, alphanumeric requirements, product codes and space logic); and

- followed a selection of transactions entered through both DOE and SONGS for each of the nine states. See Table 2 on Attachment B for a summarized list of manual transactions input into either DOE or SONGS that were observed by PwC.

17. We found the following functional differences between DOE and SONGS:

- Launch and log-on procedures
- Commands to navigate
- Function keys to initiate action
- Procedures for entering information, sending it to SOCS and clearing errors.

We determined these differences are not material by observing transactions input and validated in DOE and SONGS and submitted to SOCS. For example, logon procedures in DOE force a user to input a user id twice, however in SONGS a user id is only required once. Also, we concluded that 'procedures for entering information', is more accurately stated as 'keystrokes for entering information'. 'Keystrokes for entering information' into SONGS includes entering the field name/information combination (i.e., input 'Account Number: xxxxxx') and DOE provides fields to be populated with the same information (i.e., input 'xxxxxx' in the proper field).

18. We examined BST's management criteria they used in making the assertion as to the comparability of DOE and SONGS from a performance standpoint. These criteria included:

- the timeliness of DOE and SONGS submissions to downstream systems;
- system usability in terms of ease in which LCSC service representatives can enter orders into system;

- system efficiency as measured by the service representatives abilities to complete LSR submissions to SOCS in a comparable timeframe between DOE and SONGS;
- level of training necessary for representatives to utilize DOE and SONGS; and,
- the general level of understanding service representatives have of each application.

We tested whether DOE and SONGS met these criteria by performing the following procedures:

- Observed data entry performed by LCSC representatives using both DOE and SONGS;
- Observed and traced transactions entered into DOE and SONGS and measured how long it took a transaction to be submitted to SOCS. As part of our observations, we noted the timeliness of order submissions averaged about 15 minutes for both DOE and SONGS. We also observed order submission to SOCS resulted in immediate acceptance or validation errors for both DOE and SONGS;
- Reviewed training manuals and interviewed subject matter experts on training courses for DOE and SONGS. We noted during our observation and interviews of service representatives that the proficiency level of employees using either DOE or SONGS appeared to be comparable; and
- Observed that the service representatives in the LCSC are cross-trained on both DOE and SONGS, and they have the opportunity to use both on a daily basis. We observed no material input timeliness differences in the service representative's order submission for either DOE or SONGS for similar types of orders.

19. Our conclusion is included within our report dated May 3, 2001, which has been included as Attachment A.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on May 21, 2001

Robert L. Lattimore
Partner, PricewaterhouseCoopers LLP

Subscribed and sworn to before me this 21st day of May 21, 2001.

Christine A. Hebert 5/21/01
expiration 5/25/04

Attachment A

(Our report dated May 3, 2001 with BST Assertions in PDF)

Attachment B

Automated transactions traced by PwC

Table 1

Application	FL, GA, NC, SC Southern Bell States	LS, TN, MS, AL, KY South Central Bell States	Total
LENS version 9.2 into LEO version 9.2	12	13	25
TAG versions 7.1.24, 7.5, 7.5.15 into LEO version 9.2	31	48	79
TAG version 2.2.14 into LSRR version 4.10.01	61	39	100
EDI Version 4010 into LEO version 9.2	24	52	76
EDI Version 3050 into LEO version 9.2	50	0	50
LEO version 9.2 into LESOG version 9.2 and SOCS	48	52	100
LSRR version 4.10.01 into LEO version 9.2	46	54	100
LEO version 9.2 into LSRR version 4.10.01	31	48	79
LSSR into LNP Gateway version 6.1, LNP GUI version 6.1, LNP SOG version 6.1 & SOCS	34	16	50
COG, SOG, D/OM (DSL applications)	25	25	50
EXACT version 9.5 into SOCS	30	20	50
Totals	**392**	**367**	**759**

Manual transactions input into either DOE or SONGS that were observed by PwC:

Table 2

	# of Transactions
Southern Bell States – DOE	49
South Central Bell States – SONGS	30
Totals	**79**

Attachment A

PricewaterhouseCoopers Report

BELLSOUTH

BellSouth Telecommunications, Inc.
675 West Peachtree Street, N.E.
Atlanta, GA 30375

May 3, 2001

PricewaterhouseCoopers LLP
1155 Peachtree St. NE
Atlanta, Georgia 30309

We are providing this letter in connection with your examination of management's assertions that, based on the stated criteria outlined in Attachment A of this letter:

- BellSouth Telecommunications (BST) utilizes the same Pre-order and Order operational support systems (OSS) throughout BST's nine-state region to support wholesale competing local exchange carrier (CLEC) activity; and that
- BST's DOE and SONGS systems have no material differences in the functionality or performance for service order entry by the Local Carrier Service Centers (LCSC).

We confirm, to the best of our knowledge and belief, as of May 3, 2001, the date of your report, the following representations made to you during your examination:

1. We have made available to you all significant information that we believe is relevant to the assertion, including, if applicable, information about actions taken at meetings of the board of directors and committees of the board of directors.
2. We are responsible for the subject matter and presentation of the assertion and the appropriateness of the measurement and disclosure criteria on which it is based.
3. All known matters contradicting the assertion and communications from regulatory agencies affecting the subject matter or the assertion have been disclosed to the practitioner.
4. Any known events subsequent to the reporting date that would have a material effect on the assertion have been disclosed to the practitioner.
5. No significant matters have been brought to our intention that would affect the above assertions.

W N Stacy

William Stacy
Network Vice President

Attachment

ASSERTION CRITERIA

Region-wide Sameness of Pre-Order and Order OSS

With the exception of DOE and SONGS, discussed below, BST management asserts that BST utilized the same Pre-order and Order OSS throughout BST's nine-state region to support wholesale CLEC activity. As it relates to this assertion, "sameness" is defined as the following:

- The applications and interfaces implemented and available are identical across the nine-state region. "Identical" is defined as either one instance of an application (on one server) that processes transactions across all states, *or* multiple instances of the same version of an application that support all nine-states in an equitable manner.

- The processes, personnel and work center facilities are consistently available and employed across the nine-state region and there are no aspects to the processes, personnel or work center facilities that would provide one state a greater service level or benefit than the other states in the nine-state region.

Comparability of DOE and SONGS

Direct Order Entry (DOE) and Service Order Negotiation and Generation System (SONGS) are two of the order entry systems used within the BellSouth Local Carrier Service Centers (LCSC) to create service orders for various types of customer requests. These systems use screens, menus, on-line access to back-end legacy systems and on-line editing to automatically generate common order data entries. DOE is used in the "old Southern Bell states" (GA, FL, NC & SC), while SONGS is used in the "old South Central states" (LA, MS, TN, AL, & KY).

1. **Comparability of "Functionality"**

   Both systems feed into Service Order Communications System (SOCS), an on-line system responsible for the collection, storage, and distribution of service orders to all user departments. SOCS accepts service orders from various input or negotiation systems. Pending orders and their associated history files are maintained and viewable in SOCS until they are cancelled, or the billing system notifies SOCS that a completed order has been posted. Once it is posted, the order is purged from the SOCS database.

   BellSouth asserts that there is no material difference in functionality between DOE and SONGS. This assertion is based upon the following criteria:

   - The same Local Service Requests (LSRs), created from a single set of business rules, are used for order entry
   - SOCS requires the same LSR screening and validating procedure

It should be noted that there are some input differences between DOE and SONGS. However, these differences are not considered to be material in nature. Examples of these differences are:

- Launch and log-on procedures
- Commands to navigate
- Function keys to initiate action
- Procedures for entering information, sending it to SOCS and clearing errors

2. Comparability of "Performance"

BellSouth utilizes a workforce modeling tool to capacity manage its LCSC transactions and personnel. Additionally, BellSouth measures performance of service for quantity and quality without regard to which system is used. The work force model utilizes standard work units of LSRs per hour per service representative as their basis regardless of whether the mode of entry for manual LSRs is through DOE or SONGS.

Regardless of state, service representatives use the same processes for LSR handling prior to order entry and processing of orders after they are submitted to SOCS from DOE or SONGS. The time spent inputting an LSR into DOE or SONGS represents a small component of the overall lifecycle of an LSR. Considering the above, BellSouth asserts that there is no material difference in performance of order entry between DOE and SONGS based on the following the criteria:

- Orders that are input through both DOE and SONGS are created in SOCS on a real-time basis upon submission.
- Similar orders from throughout the nine-state region can be input within reasonably similar timeframes, regardless of whether DOE or SONGS is used.
- Service Representatives are equally cross-trained on both DOE and SONGS and utilize both systems on a regular basis dependent upon the relative volume and type of transactions by state.

BellSouth Telecommunications, Inc.

Report on the Region-wide Comparability of BellSouth's Pre-Order and Order Operational Support Systems as of May 3, 2001

BellSouth Telecommunications, Inc.
Pre-Order/Order OSS Regional Comparability

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PRICEWATERHOUSECOOPERS

PricewaterhouseCoopers LLP
1100 Campanile Building
1155 Peachtree Street
Atlanta, GA 30309
(678) 419-1012
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Independent Accountant's Report

To Management of
BellSouth Telecommunications, Inc.

We have examined management's assertions, included in the accompanying Report of Management Assertions on BellSouth Telecommunication's Operational Support Systems that as of May 3, 2001,

- BellSouth Telecommunications (BST) utilizes the same Pre-Order and Order operational support systems (OSS) throughout BST's nine-state region to support wholesale competing local exchange carrier (CLEC) activity, based on the criteria established in the Report of Management Assertions and Assertion Criteria on BellSouth Telecommunication's Operational Support Systems; and that
- BST's DOE and SONGS systems have no material differences in the functionality or performance for service order entry by the Local Carrier Service Centers (LCSC), based on the criteria established in the Report of Management Assertions and Assertion Criteria on BellSouth Telecommunication's Operational Support Systems.

These assertions are the responsibility of BST's management. Our responsibility is to express an opinion on management's assertion based on our examination.

Our examination was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants and included such procedures as we considered necessary in the circumstances. We believe that our examination provides a reasonable basis for our opinion.

In our opinion, the above described management assertions are fairly stated, in all material respects, as of May 3, 2001, based on the criteria set forth in the Report of Management Assertions and Assertion Criteria on BellSouth Telecommunication's Operational Support Systems.

This report is intended solely for the information and use of BellSouth Corporation, BST and the Federal Communications Commission or any Public Service Commission within the BellSouth operation region and is not intended to be and should not be used by anyone other than these specified parties. Our examination was not directed toward establishing whether compliance with the aforementioned criteria would constitute legal compliance with Federal Communications Commission or any state Public Service Commission orders or regulations and, accordingly, we express no such opinion.

PricewaterhouseCoopers LLP

PricewaterhouseCoopers LLP
May 3, 2001

BellSouth Telecommunications, Inc.
675 West Peachtree Street, N.E.
Atlanta, GA 30375

Report of Management Assertions and Assertion Criteria on BellSouth Telecommunication's Operational Support Systems

May 3, 2001

Management of BellSouth Telecommunications (BST) asserts that:

- BellSouth Telecommunications (BST) utilizes the same Pre-order and Order operational support systems (OSS) throughout BST's nine-state region to support wholesale competing local exchange carrier (CLEC) activity, based on the following criteria below; and that
- BST's DOE and SONGS systems have no material differences in the functionality or performance for service order entry by the Local Carrier Service Centers (LCSC), based on the following criteria below.

The following describes the sameness and comparability criteria:

A. Region-wide Sameness of Pre-Order and Order OSS

With the exception of DOE and SONGS, discussed below, BST management asserts that BST utilized the same Pre-order and Order OSS throughout BST's nine-state region to support wholesale CLEC activity. As it relates to this assertion, "sameness" is defined as the following:

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- The processes, personnel and work center facilities are consistently available and employed across the nine-state region and there are no significant aspects to the processes, personnel or work center facilities that would provide one state a greater service level or benefit than the other states in the nine-state region.

B. Comparability of DOE and SONGS

Direct Order Entry (DOE) and Service Order Negotiation and Generation System (SONGS) are two of the order entry systems used within the BellSouth Local Carrier Service Centers (LCSC) to create service orders for various types of customer requests. These systems use screens, menus, on-line access to back-end legacy systems and on-line editing to automatically generate common order data entries. DOE is used in the "old Southern Bell states" (GA, FL, NC & SC), while SONGS is used in the "old South Central states" (LA, MS, TN, AL, & KY).

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Both systems feed into Service Order Communications System (SOCS), an on-line system responsible for the collection, storage, and distribution of service orders to all user departments. SOCS accepts service orders from various input or negotiation systems. Pending orders and their associated history files are maintained and viewable in SOCS until they are cancelled, or the billing system notifies SOCS that a completed order has been posted. Once it is posted, the order is purged from the SOCS database.

BellSouth asserts that there is no material difference in functionality between DOE and SONGS. This assertion is based upon the following criteria:

- The same Local Service Requests (LSRs), created from a single set of business rules, are used for order entry
- SOCS requires the same LSR screening and validating procedure
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- Launch and log-on procedures
- Commands to navigate
- Function keys to initiate action
- Procedures for entering information, sending it to SOCS and clearing errors

2. Comparability of "Performance"

BellSouth utilizes a workforce modeling tool to capacity manage its LCSC transactions and personnel. Additionally, BellSouth measures performance of service for quantity and quality without regard to which system is used. The work force model utilizes standard work units of LSRs per hour per service representative as their basis regardless of whether the mode of entry for manual LSRs is through DOE or SONGS.

Regardless of state, service representatives use the same processes for LSR handling prior to order entry and for processing of orders after they are submitted to SOCS from DOE or SONGS. The time spent inputting an LSR into DOE or SONGS represents a small component of the overall lifecycle of an LSR. Considering the above, BellSouth asserts that there is no material difference in performance of order entry between DOE and SONGS based on the following the criteria:

- Orders that are input through both DOE and SONGS are created in SOCS on a real-time basis upon submission.

- Similar orders from throughout the nine-state region can be input within reasonably similar timeframes, regardless of whether DOE or SONGS is used.
- Service Representatives are cross-trained on both DOE and SONGS and utilize both systems on a regular basis dependent upon the relative volume and type of transactions by state.

A description of each of these operational support systems is included in the attached supplemental information.

William Stacy
Network Vice President

Supplementary Information

SECTION III - EXECUTIVE OVERVIEW

A. Report Overview

In recognition of its requirements to enter the long distance market under the "14-point checklist" set-forth in Section 271 of the 1996 Telecom Act, BST and other third-parties have conducted compliance testing on BST's OSS in Georgia and Florida. The management of BST requested that PricewaterhouseCoopers LLP (PricewaterhouseCoopers) perform an independent examination surrounding BST's assertions that:

- BellSouth Telecommunications (BST) utilizes the same Pre-order and Order operational support systems (OSS) throughout BST's nine-state region to support wholesale competing local exchange carrier (CLEC) activity, based on the criteria established in the Report of Management Assertions and Assertion Criteria on BellSouth Telecommunication's Operational Support Systems; and that
- BST's DOE and SONGS systems have no material differences in the functionality or performance for service order entry by the Local Carrier Service Centers (LCSC), based on the criteria established in the Report of Management Assertions and Assertion Criteria on BellSouth Telecommunication's Operational Support Systems.

The management of BST has provided herein a description of the OSS as it relates to the Pre-Order and Order components, as well as the criteria surrounding its assertion that BST uses the same Pre-Order and Order OSS across its nine-state operating region ("region-wide sameness"), and that the DOE and SONGS system are, in all material respects, comparable in functionality and performance ("comparability of DOE and SONGS"). BST management is responsible for identification of the criteria underlying its assertions of region-wide comparability and material sameness of DOE and SONGS.

B. Objective of Supplementary Information

The objective of this information is to provide a description of the applications and processes specified by BST management to exist within the "Pre-Order and Order OSS".

SECTION IV - DESCRIPTION OF OSS SYSTEMS

A. Pre-Order Systems

The Pre-Order process includes such functions as address verifications, requests for telephone numbers, requests for customer service record, service availability inquiries, service appointment scheduling and facility availability inquiries. BST management has identified those OSS applications within the Pre-Order domain as the following:

- **Local Exchange Navigation System (LENS):**
  LENS is a front-end interface for CLECs to process service requests for Local Exchange telephone service, resale services, directory listings, port/loop combination UNEs, and loop UNE service (with or without Interim Local Number Portability). LENS may be used either to gather specific telecommunications information from BST's existing databases, or to place orders for telecommunications products and services.

- **Telecommunications Access Gateway (TAG):**
  TAG provides a means by which CLECs access BST's OSS electronically for purposes of performing various Pre-Order and Order functions. TAG enables the CLECs and BST to exchange information about current and future resale services, UNEs and combinations of network elements.

- **RoboTAG**
  RoboTAG is the BST developed graphical user interface (GUI) to TAG that is used on local PCs by CLEC personnel. With RoboTAG, end users perform Pre-Order functions and place and track orders in the LEO back-end system with a set of GUI interfaces that will provide the required functionality that is necessary to perform this transaction.

B. Order Systems

The Order process includes such functions as the submission of a service request by the CLEC, rejection of any service request with errors, confirmation that a valid service request has been received and a due date for the request assigned along with handling of CLEC service requests that automatically generate a service order on BST's service order creation system. BST management has identified those OSS applications within the Order domain as the following:

- **Local Exchange Navigation System (LENS):**
  LENS is a front-end interface for CLECs to process service requests for Local Exchange telephone service, resale services, directory listings, port/loop combination UNEs, and loop UNE service (with or without Interim Number Portability). LENS may be used either to gather specific telecommunications information from BellSouth's existing databases, or to place orders for telecommunications products and services.

- **Telecommunications Access Gateway (TAG)**
  TAG provides a means by which CLECs access BST's OSS electronically for purposes of performing various Pre-Order and Order functions. TAG enables the CLECs and BST to

exchange information about current and future resale services, UNEs and combinations of network elements.

- **RoboTAG**
  RoboTAG is the BST developed graphical user interface (GUI) to TAG that is used on local PCs by CLEC personnel. With RoboTAG, end users place and track orders in the LEO backend system with a set of GUI interfaces that will provide the required functionality that is necessary to perform this transaction.

- **Electronic Data Interchange (EDI)**
  EDI is a means for companies to electronically exchange batches of business documents using a standardized transmission format. Companies that exchange transactions using EDI are called trading partners. Trading partners must define the business information that is necessary to transact business and create a standard EDI transaction set exchange. EDI requires the use of industry standards that define the format and the data content of the business transaction. This allows each trading partner's system to clearly understand the transaction expected and the data necessary to conduct that transaction.

- **LSR Router (LSRR)**
  LSRR acts as the receiving point for CLEC data from LENS, EDI or TAG processed by LEO. LSRR will parse out and send any data directed for LNP and DSL applications to their appropriate systems. For application release and version control, LSRR is considered part of LEO.

- **Local Exchange Ordering System (LEO)**
  LEO receives & processes Local Service Requests (LSRs) from LENS, EDI, or TAG, which the CLEC may access using either their own GUI or a client supplied by BellSouth.

  LEO performs validations of the data within the LSR and provides feedback to the CLECs regarding problems encountered. LEO maintains a status for each LSR to track transactions as they move through the process. For each LSR received in error-free condition, data from the LSR is transmitted downstream to LESOG.

- **Local Exchange Service Order Generator (LESOG)**
  LESOG generates Service Orders from LSRs received from LEO and transmits the converted order to SOCS. Some complex transactions may not be convertible by LESOG and must be manually handled by LCSC personnel and input to SOCS through either DOE or SONGS.

- **Service Order Communication System (SOCS)**
  SOCS is responsible for the collection, storage, and distribution of service orders from all user departments, including service order-driven mechanized systems. SOCS is an online system used by many departments, including resale and retail to process service orders. SOCS accepts service orders from various input or negotiation systems, and it is also possible for LCSC personnel to directly initiate service orders in the SOCS system outside of any negotiation system. Pending orders and their associated history files are maintained and viewable in SOCS until they are cancelled or the billing system notifies SOCS that a completed order has been posted.

In addition to the SOCS online programs, the SOCS daily offline cycle performs database maintenance and report generation functions necessary to administer the pending order file.

- **LNP Gateway**
  The BellSouth LNP Gateway consists of a set of software applications that process LNP ordering and provisioning among:

  - The BellSouth Network;
  - The NPAC Service Management System; and
  - CLEC networks.

  The LNP Gateway has four main functions:

  1. Processing LSRs for porting telephone numbers (TNs)
  2. Transferring routing information about ported TNs from the NPAC to the BellSouth Advanced Intelligent Network (AIN) SMS
  3. Supporting LNP Trouble Administration
  4. Supporting interfaces to BellSouth Legacy Operational Support Systems and to remote terminals to support LNP

- **LNP Service Order Generator (SOG)**
  The LNP SOG system automatically generates LNP orders from the LNP Gateway and helps Service Representatives at the LCSC by automating the following tasks:

  - Retrieving information about LNP LSRs added to the LNP Gateway database
  - Performing second-level validation on LNP LSRs
  - Generating and tracking SOCS service orders for some LNP scenarios
  - Adding FOC data to the LNP database
  - Querying the LNP database and generating reports based on these queries
  - Updating the LNP database with service order information

- **LNP Graphical User Interface (GUI)**
  The LNP GUI is a user friendly front-end to LNP Gateway. It provides LCSC Service Representatives the ability to input LNP service requests and track service requests and orders within LNP.

- **Corporate Gateway (COG)**
  COG provides a flexible and expandable gateway for the CLEC DSL interconnection environment. COG receives LSR data from LENS, TAG and EDI. COG will provide security, logging and mapping capabilities needed by BellSouth to both receive and send DSL interconnection requests.

- **Delivery / Order Manager (D/OM)**
  D/OM provides the programmable sequence and control functionality necessary to manage BellSouth's creation of Designed UNE ADSL/HDSL/UCL Service Order Generation process. LSRs for DSL are received from COG, and validated within D/OM.

  Order Manager will:
  - Generate unique FRN (Facility Reservation Number) per instance of Order Manager.
  - Provide sequence and control for Loop Qualification Inquiry, Loop Reservation Request, and Loop Reservation Cancel Request.
  - Provide sequence and control for UNE ADSL/HDSL/UCL Firm Order Request.
  - Generate Firm Order Confirmation, Completion, Clarify, Auto Clarify, and Reject Notification.

- **Service Order Generator (SOG)**
  SOG converts customer data in D/OM into a format expected by the downstream systems in providing service. SOG completes the editing functions of the generated request to determine the accuracy and completeness of the data provided. SOG provides an open interface contract for D/OM.

- **Exchange Access Carrier Tracking (EXACT)**
  EXACT's main functionality is to process IXC ASRs directly into SOCS. It processes new orders, change/modifications and disconnections of DS1 and special switched orders. EXACT can also be used by LCSC service representatives to input designed loop requests that cannot be input via DOE or SONGS.

- **Access TaskMate Ordering Process System (ATOPS)**
  ATOPS automatically submits orders that have been input into EXACT. It copies all data into a SOCS readable format and submits the order to SOCS. ATOPS does not store data, it only submits the order data input into EXACT and therefore is considered part of EXACT for transaction testing purposes.

C. DOE & SONGS Systems

Direct Order Entry (DOE) and Service Order Negotiation and Generation System (SONGS) are two of the order entry systems used within the BellSouth Local Carrier Service Centers (LCSC) to create service orders for various types of customer requests. These systems use screens, menus, on-line access to back-end legacy systems and on-line editing to automatically generate common order data entries.

- **Direct Order Entry (DOE):**
  DOE is the front-end service order negotiation and generation system for Florida, Georgia, North Carolina and South Carolina accounts. It provides screens, fielded prompts, service order flows, menu selections, edits, error/informational messages, auto-typing/populating and order generation to facilitate generation of initial service orders and subsequent service order updates.

- **Service Order Negotiation System (SONGS):**
  SONGS is a front-end service order negotiation and generation system used for Alabama, Kentucky, Louisiana, Mississippi, and Tennessee. It provides screens, fielded prompts, service order flows, menu selections, edits, error/informational messages, auto-typing/populating and order generation to facilitate generation of initial service orders and subsequent service order updates.

D. Local Carrier Service Centers

Each of the Local Carrier Service Centers (LCSCs) are the Pre-Order and Order processing hubs for CLEC orders that require manual intervention. The Atlanta and Birmingham LCSCs are each dedicated to specific CLECs on a region-wide basis. In other words, CLECs that are assigned to the Atlanta LCSC will always work through that LCSC, regardless of the origin of the order, and the same is true with CLECs assigned to Birmingham. A third LCSC has been created in Jacksonville, Florida. However, the Jacksonville LCSC is not currently dedicated to specific CLECs, but instead is operating as a call center for inquiries and escalations for all CLECs on an overflow basis from the Atlanta and Birmingham LCSCs.

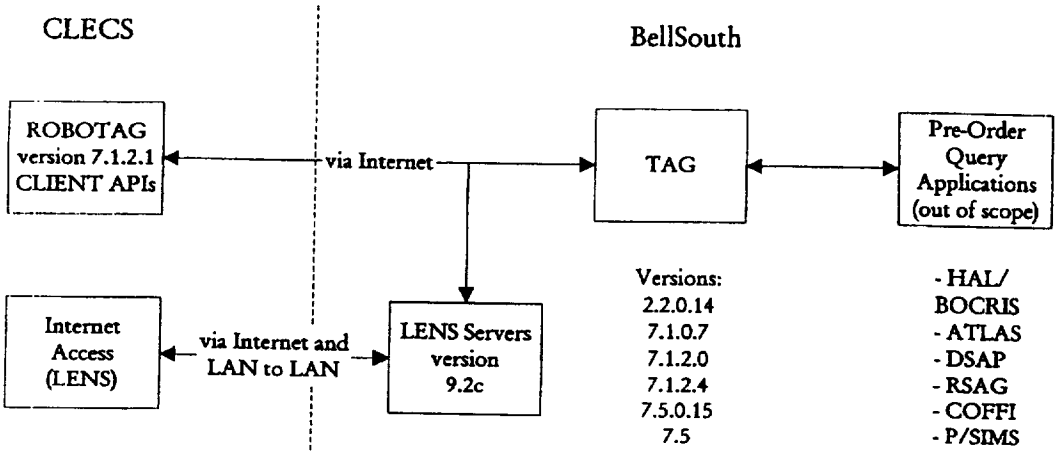
The LCSCs house the LCSC Project Management organization, which is responsible for coordinating large and/or complex provisioning and project implementation efforts for the CLECs. The Project Management staff is aligned to support the CLECs assigned to the Atlanta and Birmingham LCSCs.

There is also a Customer Support Management (CSM) organization responsible for creating efficiency throughout the order flow-through process. The CSM's work with internal and external resources to perform root-cause analysis of process problems, provide recommendations for solutions and work with the Account Teams and LCSC representatives to implement process improvement procedures.

A flowchart further detailing processes within the LCSC in included in Section V.

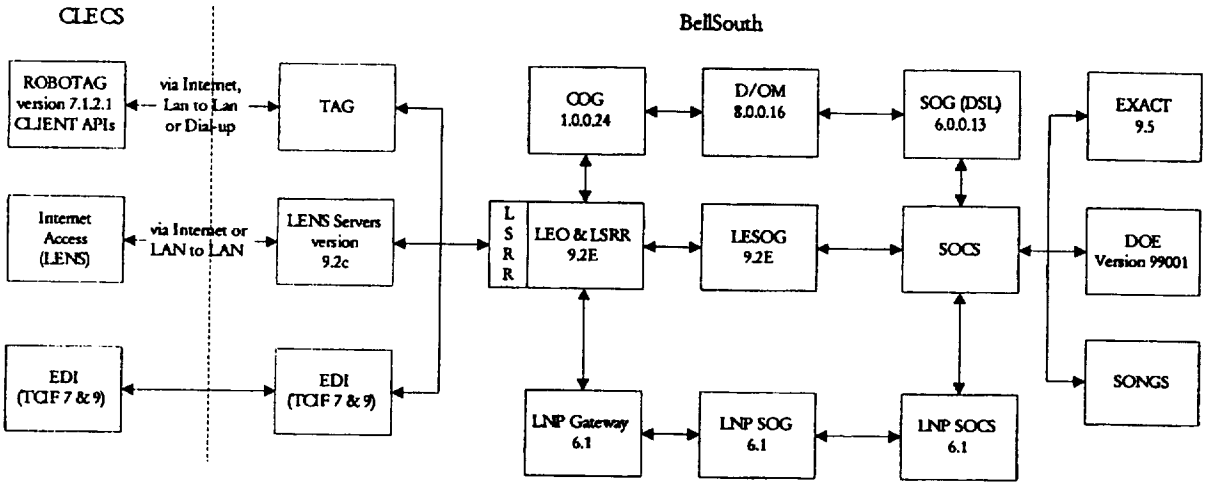
SECTION V – SYSTEM & PROCESS FLOWCHARTS

Pre-Order Systems Diagrams



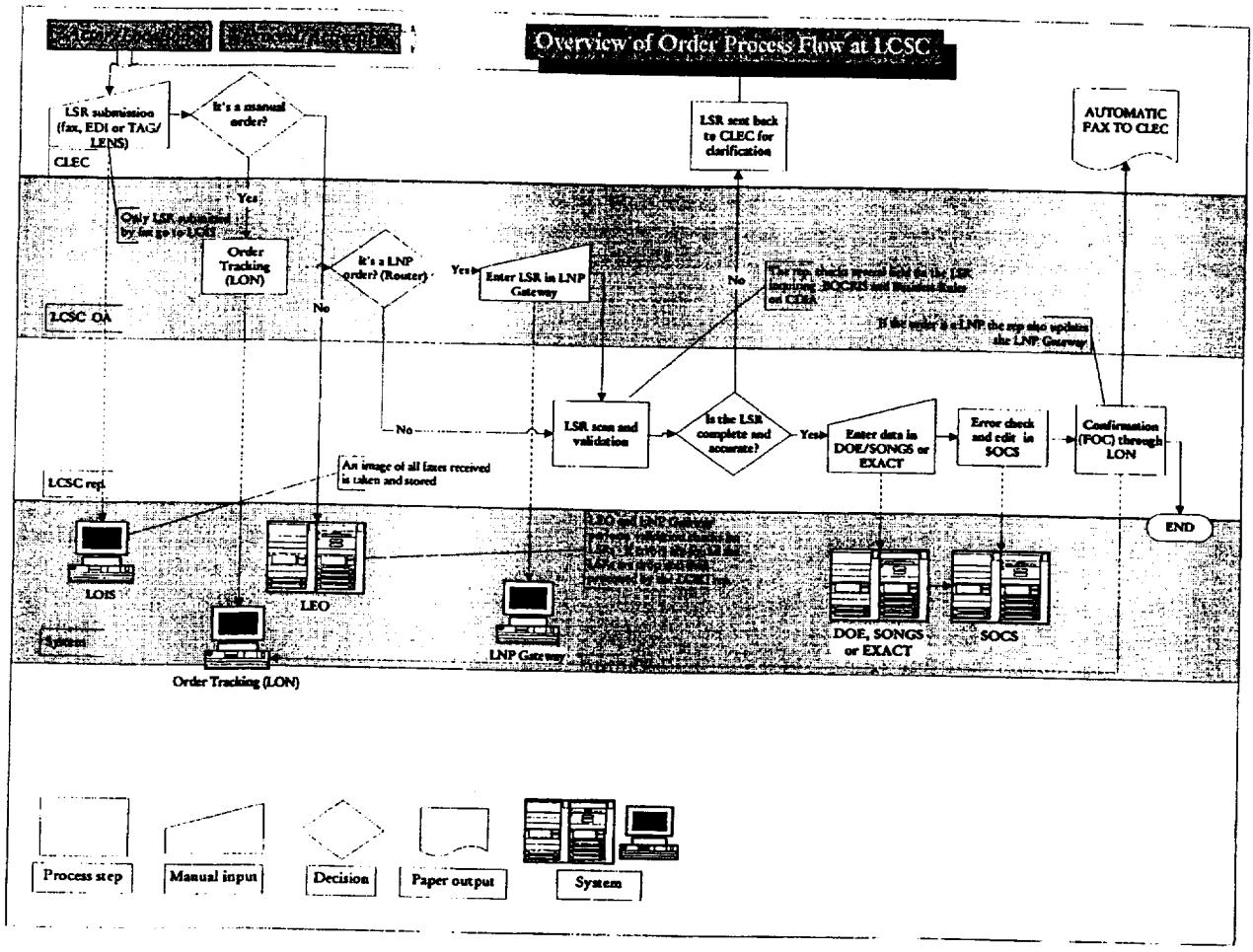
SECTION V - SYSTEM & PROCESS FLOWCHARTS *(continued)*

Order Systems Diagrams



SECTION V – SYSTEM & PROCESS FLOWCHARTS *(continued)*

LCSC Process Diagram



SECTION VI – GLOSSARY OF ACRONYMS

ADSL	Asynchronous Digital Subscriber Line
AICPA	American Institute of Certified Public Accountants.
AIN	Advanced Intelligent Network
BST	BellSouth Telecommunications, Inc.
CLEC	Competitive Local Exchange Carrier.
CMS	Customer Support Management.
COG	Corporate Gateway.
DOE	Direct Order Entry.
D/OM	Delivery / Order Manager.
DSL	Digital Subscriber Line.
EDI	Electronic Data Interface
EXACT	Exchange Access Carrier Tracking
FCC	Federal Communications Commission
FOC	Firm Order Confirmation.
GUI	Graphical User Interchange
HDSL	High Bit Rate Digital Subscriber Line
Instance	An installation of software on one computer server.
LAUTO	LNP Service Order Generator
LCSC	Local Carrier Service Center.
LENS	Local Exchange Navigation System
LEO	Local Exchange Order System
LESOG	Local Exchange Service Order Generator
LNP Gateway	Local Number Portability Gateway
LSR	Local Service Request
LSSR	LSR Router

NPAC	Number Portability Administration Center
RoboTAG	Allows CLEC to access BellSouth's Telecommunication Access Gateway
SMS	Service Management System
SOCS	Service Order Communication System
SOG	Service Order Generator.
SONGS	Service Order Negotiation System
SSAE	AICPA Statements on Standards for Attestation Engagements.
TAG	Telecommunication Access Gateway
TN	Telephone number.
UNE	Unbundled Network Element.
Version	One unique set of software coding and configuration.

Attachment B

Automated transactions traced by PwC

Table 1

Application	FL, GA, NC, SC Southern Bell States	LS, TN, MS, AL, KY South Central Bell States	Total
LENS version 9.2 into LEO version 9.2	12	13	25
TAG versions 7.1.24, 7.5, 7.5.15 into LEO version 9.2	31	48	79
TAG version 2.2.14 into LSRR version 4.10.01	61	39	100
EDI Version 4010 into LEO version 9.2	24	52	76
EDI Version 3050 into LEO version 9.2	50	0	50
LEO version 9.2 into LESOG version 9.2 and SOCS	48	52	100
LSRR version 4.10.01 into LEO version 9.2	46	54	100
LEO version 9.2 into LSRR version 4.10.01	31	48	79
LSSR into LNP Gateway version 6.1, LNP GUI version 6.1, LNP SOG version 6.1 & SOCS	34	16	50
COG, SOG, D/OM (DSL applications)	25	25	50
EXACT version 9.5 into SOCS	30	20	50
Totals	**392**	**367**	**759**

Manual transactions input into either DOE or SONGS that were observed by PwC:

Table 2

	# of Transactions
Southern Bell States – DOE	49
South Central Bell States – SONGS	30
Totals	**79**

Exhibit OSS – 74

July 20, 2001

AFFIDAVIT OF ROBERT L. LATTIMORE

State of Georgia)
)
County of Fulton)

Robert Lattimore, having first been duly sworn, hereby states as follows:

1. I am a Global Risk Management Solutions (GRMS) partner in PricewaterhouseCoopers LLP's (PwC's) Telecommunications Industry Practice. In this capacity, I am responsible for providing information technology assurance services to PwC's telecommunications clients. I am a Certified Public Accountant with over 16 years of relevant experience including performing audits of financial statements and attestations in a variety of industries. I also lead the data management practice for the PwC's Southeast Region which delivers data and transactional analysis, data quality and transformation services for new system implementations and stand-alone database development. I am a graduate of the University of Memphis.
2. I directed and coordinated PwC's performance of an attestation examination of the BellSouth Telecommunications, Inc. (BST) management assertions that: (1) the same pre-ordering and ordering operational support systems (OSS), processes and procedures are used to support competing local exchange carrier (CLEC) activity across BST's nine-state region, and that (2) there are no material differences in the functionality or performance of BST's Direct Order Entry (DOE) and Service Order Negotiation System (SONGS) systems. For more information on the nature and scope of this work, I would like to refer you to my Affidavit dated May 21, 2001.
3. This affidavit is being prepared to provide details of additional procedures PricewaterhouseCoopers performed regarding the timeliness and accuracy of transactions

input into DOE and SONGS as described within our report dated July 20, 2001. This affidavit supercedes my affidavit submitted June 21, 2001.

4. Direct Order Entry (DOE) and Service Order Negotiation and Generation System (SONGS) are two of the order entry systems used within the BST Local Carrier Service Centers (LCSC) to create service orders for various types of customer requests. These systems use screens, menus, on-line access to back-end legacy systems and on-line editing to automatically generate common order data entries. DOE is used in the "original Southern Bell states" (GA, FL, NC & SC), while SONGS is used in the "original South Central Bell states" (LA, MS, TN, AL, & KY).

5. BellSouth has asked us to provide information around the timeliness and accuracy of the orders observed within DOE and SONGS. To complete this, PricewaterhouseCoopers performed the following types of procedures:

- BellSouth provided PricewaterhouseCoopers with DOE and SONGS volume processing statistics by activity type and product type for April 2001. Based upon this information, PricewaterhouseCoopers determined an appropriate sample size for DOE and SONGS using statistically based criteria.
- For the sample of transactions determined, PricewaterhouseCoopers independently observed and recorded the time it takes, using a stop watch, for Local Carrier Service Center (LCSC) service representatives to submit "live" orders, starting with the initial data input to successful submission into SOCS. We also recorded Purchase Order Number, date, CLEC number and the state for each transaction observed.

- For the orders observed, we documented whether the order was successfully completed or whether it erred due to inaccuracy of data input by the LCSC service representative or other reasons.
- We summarized the information accumulated for timeliness and accuracy, and provided BellSouth with our DOE and SONGS Comparability Accuracy and Timeliness – Version II report, dated July 20, 2001, see Attachment A.

6. The PwC declaration should be read solely in relation to the matter stated above. Our work was prepared for BellSouth for this filing and therefore we make no representation as to the sufficiency of our work for any other purpose. Any and all observation in this declaration are made based on the evaluation of documentation and system generated reports provided during the period of our fieldwork, from June 4, 2001 to July 17, 2001.
7. A total of 10 PwC professionals spent approximately 750 hours performing the work described in this affidavit. The PwC professionals included two partners, and two managers. Our partners and managers led all aspects of the fieldwork. All of the PwC partners and managers, and many of the staff, who worked on this engagement, have extensive telecommunications industry and telecommunications business process and/or systems experience.
8. This engagement has been performed under the Consulting Standards of the American Institute of Certified Public Accountants (AICPA). While this is not an audit and we provide no opinion or attestation with respect to our work, the AICPA's consulting standards require (as detailed in AICPA Standards for Consulting Services, 100, Paragraph .06):

- Professional competence: Undertake only those professional services that the member or the member's firm can reasonably expect to be completed with professional competence;
- Due professional care: Exercise due professional care in the performance of professional services;
- Planning and supervision: Adequately plan and supervise the performance of professional services;
- Sufficient relevant data: Obtain sufficient relevant data to afford a reasonable basis or conclusions or recommendations in relation to any professional services performed Planning and supervision.

In addition, the AICPA consulting standards require the application of professional "objectivity," which the AICPA defines as follows: "The principle of objectivity imposes the obligation to be impartial, intellectually honest, and free of conflicts of interest." (Article IV, AICPA Code of Professional Conduct).

Results:

9. Our observations found the average time to input an order in DOE and SONGS from initial data input to successful submission into SOCS was the following:

	DOE	SONGS
Average input time (min:sec)	0:08:22	0:05:25

Our observations found the percentage of orders input into DOE and SONGS that resulted in downstream system edit errors was the following:

	DOE	SONGS
Accuracy Percentage	19.7%	20.0%

Details of our observations have been included in our DOE and SONGS Comparability Accuracy and Timeliness report, dated July 20, 2001, see Attachment A.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on July 20, 2001

Robert L. Lattimore
Partner, PricewaterhouseCoopers LLP

Subscribed and sworn to before me this 20th day of July 2001.

Christine S. Hebert

Attachment A

(Our report dated July 20, 2001)

BellSouth Telecommunications, Inc.

DOE and SONGS Comparability
Accuracy and Timeliness - Version II
July 20, 2001

Table of Contents

I. EXECUTIVE SUMMARY

INTRODUCTION

BellSouth Telecommunications, Inc's (BellSouth) purpose for this engagement is to provide the federal and state regulatory bodies with additional information to base their decision on whether to approve the BellSouth's application to offer inter-lata long distance services in each state of the nine states within BellSouth's region. BellSouth has previously engaged PricewaterhouseCoopers to perform an attestation examination of the following assertions related to their Operational Support Systems, including the Direct Order Entry (DOE) and Service Order Negotiation System (SONGS) systems:

- BellSouth utilizes the same Pre-order and Order operational support systems (OSS) throughout BellSouth's nine-state region to support wholesale competing local exchange carrier (CLEC) activity, based on the criteria established in the Report of Management Assertions and Assertion Criteria on BellSouth Telecommunication's Operational Support Systems; and that
- BST's DOE and SONGS systems have no material differences in the functionality or performance for service order entry by the Local Carrier Service Centers (LCSC), based on the criteria established in the Report of Management Assertions and Assertion Criteria on BellSouth Telecommunication's Operational Support Systems.

BellSouth has obtained feedback related to our report, dated May 3, 2001 and has determined that additional information would be helpful in assessing the material differences in the DOE and SONGS systems. BellSouth has asked PricewaterhouseCoopers to accumulate time input information on entering orders into DOE and SONGS, based upon a statistically determined sample size. In addition, BellSouth has asked us to provide information around the accuracy of the orders observed with respect to DOE and SONGS input. To complete this, PricewaterhouseCoopers performed the following procedures:

1. BellSouth provided PricewaterhouseCoopers with DOE and SONGS volume processing statistics by activity type and product type for April 2001. Based upon this information, PricewaterhouseCoopers determined an appropriate sample size for DOE and SONGS using statistically based criteria. (section II)

2. For the sample of transactions determined in step #1, PricewaterhouseCoopers independently observed and recorded the time it takes for Local Carrier Service Center (LCSC) service representatives to submit orders, starting with the initial data input to

successful submission into SOCS. We also recorded Purchase Order Number (PON), date, CLEC number and the state for each transaction observed. (section III)

3. For the orders observed in step #2, we documented whether the order was successfully completed or whether it erred due to an edit in BellSouth's systems. (section IV)

4. We summarized the information accumulated from steps #2 and #3 above and provided this report.

We performed the above services in accordance with Standards for Consulting Services established by the American Institute of Certified Public Accountants (AICPA). Accordingly, we are not providing an attestation under AICPA guidelines.

SUMMARY OF FINDINGS

The following tables summarize the key findings of the overall timeliness of orders submitted by DOE and SONGS to Service Order Communication System (SOCS) and the accuracy of each order once accepted by SOCS. Further details on the source of the data, our methodology used to collect data may be found in the corresponding detail section of this report.

Average time to input an order in DOE and SONGS from initial data input to successful submission into SOCS

	DOE	SONGS
Average input time[1] (min:sec)	0:08:22	0:05:25 [2]

Percentage of accurate orders input into DOE and SONGS

	DOE	SONGS
Accuracy Percentage[3]	19.7%	20.0%

More detailed statistics have been included in sections III and IV. All detailed transactions that have been included in the computation of the statistics have been included in section V.

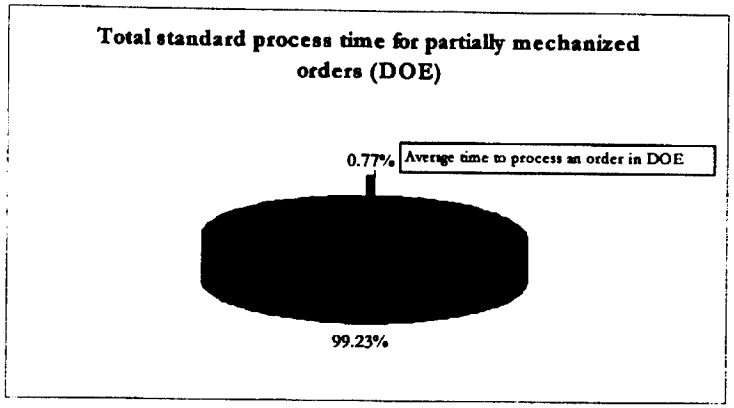
Explanatory Notes

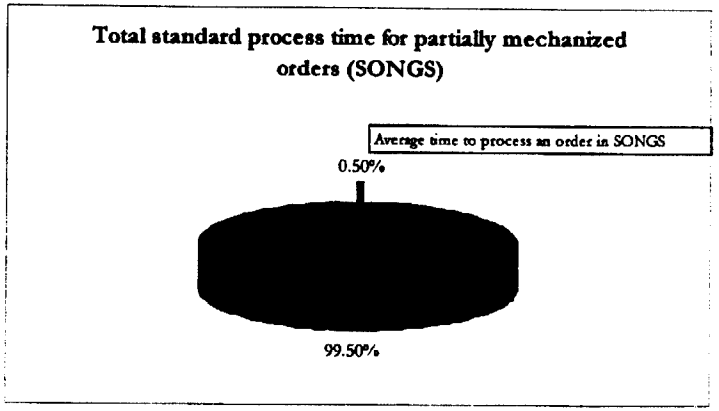
1 Total input time for all transactions/sample size

2 A duplicate SONGS UNE order was contained in our previous DOE and SONGS Comparability Accuracy and Timelines report, dated June 21, 2001. We observed another SONGS transaction, a resale order. This resulted in a change of the average time to input an order in SONGS of one second. Also as a consequence the request type distribution and the average input time for class of service have been modified accordingly.

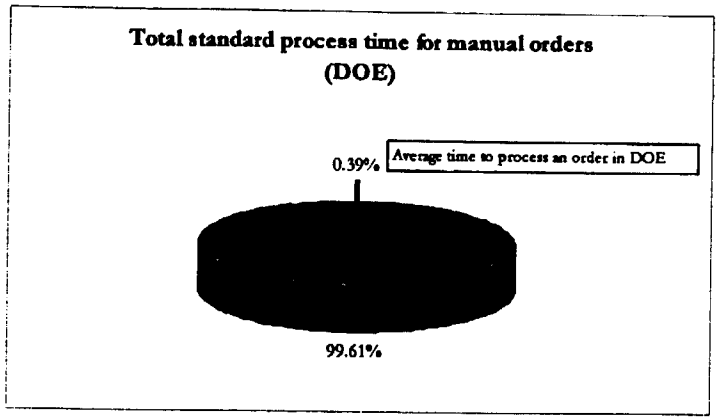
3 Total number of orders that contained downstream system edit errors/reviewed orders

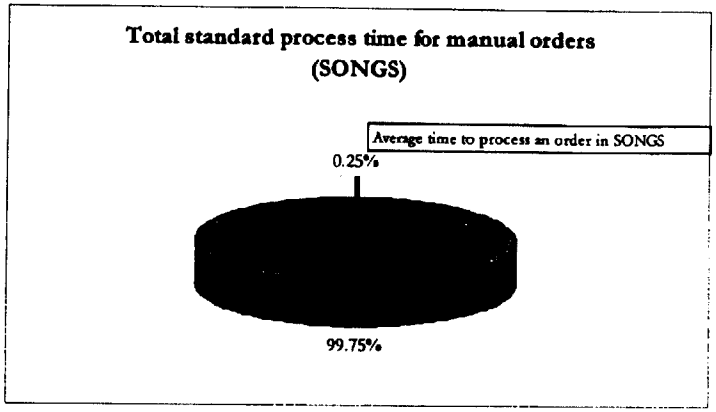
The following chart displays the relationship and the relative materiality of the time incurred inputting a order into DOE and SONGS compared to the Firm Order Completion (FOC) timeliness for Partially Mechanized orders standard (18 hours):





The following chart displays the relationship and the relative materiality of the time incurred inputting a order into DOE and SONGS compared to the FOC timeliness for manual orders standard (36 hours):





II. SAMPLE DETERMINATION

METHODOLOGY

BellSouth provided PricewaterhouseCoopers with summary statistics for the number of transactions that were processed by DOE and SONGS for April 2001. PricewaterhouseCoopers has not validated these statistics to actual transactions for the period. For the month of April 2001, the volume of manual orders processed through DOE and SONGS was 41,347.

From the statistics provided, we were able to determine a sample size for DOE and SONGS, as separate populations, based on statistical analysis that included the following parameters:

Defined Objective of Test:

To obtain a representative sample of service orders input into DOE and SONGS, and obtain input time information and accuracy information for each order selected and produce an average for each.

Confidence level:	95%
Tolerable Rate:	1%
Expected Rate	0%

Statistically determine minimum sample size: 300 transactions for each DOE and SONGS determined by Montgomery's Auditing, 12th Edition 1998, Appendix A: Table 4, Determination of Sample Size (Reliability = 95%, Tolerable Rate = 1% and Expected Rate = 0%).

Determinants for Sample Size

To plan a sampling application, an auditor must consider three factors: how much **risk** can be accepted that the sample results will be misleading (the acceptable level of sampling risk), how much of a **deviation** or misstatement can be accepted (tolerable deviation rate or misstatement amount), and how much of a **deviation** there might be in the population (expected deviation rate or misstatement amount). The auditor then determines an appropriate sample size, either by applying statistical sampling techniques that incorporates

those factors, or on a non-statistical basis by applying professional judgment in considering each factor's relative impact on sample size. The population size is sometimes important to the statistical computations, but when the population is large (e.g., over 2,000 items), the effect on the computations is often minimal.[1]

When the expected deviation rate approaches the tolerable deviation rate, very large sample sizes are often necessary. For example, if the auditor estimates the expected deviation rate at 1% for a particular test of controls and specifies a tolerable deviation rate of 5% at a 95% confidence level, the appropriate sample size is 95.[2] But if the expected deviation rate was 2% while all other variables are the same, the sample size would increase to 190. Our objective was to yield a **high** confidence level and reduce the sampling risk of the sample not being representative of the entire population. Relative to the FOC timeliness metric, the expected deviation rate was set to 0% while the tolerable rate was set to 1% with a 95% confidence level which yields a sample size of 300 deemed to be a **large** sample size using statistical sampling criteria.

[1] Montgomery's Auditing, 12th Edition 1998, Section 16.2.

[2] Montgomery's Auditing, 12th Edition 1998, Section 16.2(c)

Definition of terms:

The two populations for this project were defined as the service order transactions input into DOE and SONGS created for service order entry into SOCS.

Confidence level, also known as reliability level, is the balance of risks of incorrect acceptance of results with the desired level of assurance. The higher the confidence level, the higher the sample size to ensure that you achieve your desired level of assurance.

Tolerable rate is the rate of error defined in this case as any manual service order transactions that cause the FOC timeliness metric to be exceeded. The lower the deviation rate, the higher the sample size.

Expected rate is similar to the tolerable rate except that it reflects what you expect to find during the test. The gap between the tolerable rate and the expected rate is known as precision or the allowance for sampling risk. Generally expressed as a lower rate than your tolerable rate.

We observed approximately 300 transactions for DOE and SONGS during the fieldwork of June 4 to July 17, 2001. A true random sample would occur when a party is able to utilize a random number generator to select a data set from an existing data universe or population. Since we were reviewing live transactions, a true retrospective random sample could not be obtained. To make our observations and thus our review as random as possible, we:

- Observed in both centers (Atlanta and Birmingham)
- Observed multiple service representatives
- Observed multiple work groups (UNE, Resale and Complex)
- Observed input randomly throughout the centers
- Observed transactions across a broad range of work hours, on each day of the week and on multiple weeks.

Our selections were subject to the types of orders that the Local Carriers Service Center (LCSC) locations were processing while we were on-site. Based upon the April 2001 distribution of transaction types within Resale, UNE and Complex, we targeted percentages of orders by product type to observe being input. We observed orders input in the Atlanta and Birmingham LCSC locations. We observed the following transaction types:

Transaction Type	DOE [4]	SONGS	Sample %	Target % [5]
Resale	191	168	58%	55%
UNE	98	106	33%	36%
Complex	28	26	9%	9%
Total	317	300	100%	300

Explanatory Notes

[4] Number of transactions observed/total sample for DOE and SONGS

[5] Target percentage of transactions to be observed based on standard transaction volumes for the month of April 2001 supplied by BellSouth

Each transaction type (ie, resale) can be further classified based upon the request type of each order. The following table details the number of orders observed by request type for DOE and SONGS. We attempted to observe a similar number of transactions for DOE and SONGS for each request type below. However, we were unable to observe an identical number of transactions for each request type because we were subject to the orders that were submitted to the LCSC locations:

	DOE			SONGS		
Request Type	Resale	UNE	Complex	Resale	UNE	Complex
AB	-	2	-	-	2	-
BB	-	3	-	-	-	-
CB	-	35	15	-	52	15
EB	124	-	8	124	-	8
JB	3	58	3	2	52	1
MB	64	-	2	42	-	2
Total	191	98	28	168	106	26

The following is a description of each request type, which has been provided to us by BellSouth:

AB Loops. Loops are pairs of wires that serve as a transmission medium connecting BellSouth's Central Office to the end user location. Synonyms include local loop and user line. Disconnect orders are the only ones entered through DOE or SONGS for this request type.

BB Loop Service with Number Portability (LSNP). It combines the individual UNEs of Unbundled Loop Service (req. type AB) and Number Portability (req. type CB) for improved ordering ease for Competitive Local Exchange Carriers (CLECs). Disconnect and number portability orders are the only ones entered through DOE and SONGS for this request type.

CB Number Portability (NP). It is a part of local competition that provides end users with the ability to retain their phone numbers when they change service providers, change from one type of service to another, or move from one physical location to another.

EB Resale Services. They are those bundled services where the service provider is different from the network provider. Competitive Local Exchange Carriers (CLECs) can purchase telecommunications products, features and services from Local Exchange Carriers such as BellSouth, for resale to their customers. Resale products/services can either be complex or non-complex.

JB Directory listing and directory assistance. Standard Directory Listings include the name, address and telephone number of a customer. This listing appears alphabetically in the Directory Assistance (DA) records and the White Pages Directory for the area in which the telephone service is located. Directory listings are intended to be an aid in the use of the telephone service, so they are limited to information for the identification of the listed party.

MB Unbundled Network Element Switched Combinations. They are network combinations consisting of a port connected to a loop and /or an inter-office transport.

III. TIMELINESS ASSESSMENT

SCOPE AND METHODOLOGY

To determine the timeliness of the transactions input in DOE and SONGS, we observed a sample of orders being input into DOE and SONGS. We measured the amount of time it took LCSC service representatives to successfully submit orders into SOCS via DOE and SONGS, via stopwatch. We initiated our timing upon initial data input into DOE or SONGS for each order. We continued timing the orders until it was successfully accepted by SOCS. We included in our timings any front end submission errors to SOCS where the service representatives were required to correct any order entry errors. Front end submission errors that required immediate correction included the following:

- Due date not feasible
- Mis-typing
- Missing or incorrect information (address, product/service, etc.).

Our timings did not include any orders that required clarification from the CLECs since this decision is typically made prior to the start of input into DOE or SONGS.

We followed the following procedures for each order, we observed input into DOE and SONGS:

1. Observed service representatives inputting orders into DOE and SONGS (start stopwatch).

2. As the service representative was inputting order information, we noted the PON, service order number, CLEC code, due date and the order type on individual worksheets.

3. Viewed any front-end SOCS submission errors immediately corrected in DOE or SONGS and re-submitted to SOCS.

4. Observed the order successfully accepted into SOCS (stop stopwatch).

5. Recorded the duration of the input time on the individual worksheet.

6. Accumulated all transactions recorded on the individual spreadsheets into Excel on a daily basis.

7. Calculated statistics based on the transactions in the Excel spreadsheet, including average input time into DOE and SONGS, see details for each transaction observed in Section V.

STATISTICS

The following table depicts the number of orders we observed in DOE and SONGS by order type and the average input time:

Transaction Type	No. of orders input in DOE	Average input time DOE	No. of orders input in SONGS	Average input time SONGS
Resale	191	9 min. 9 sec.	168	5 min. 55 sec.
UNE	98	5 min. 46 sec.	106	3 min. 19 sec.
Complex	28	12 min. 15 sec.	26	10 min. 49 sec.
Total/Average	317	8 min. 22 sec.	300	5 min. 25 sec.

The following table depicts the number of orders we observed in DOE and SONGS by request type and the average input time:

Request Type	No. of orders input in DOE	Average input time DOE	No. of orders input in SONGS	Average input time SONGS
AB	2	7 min. 43 sec.	2	5 min. 15 sec.
BB	3	6 min. 33 sec.	0	-
CB	50	6 min. 22 sec.	67	3 min. 23 sec.
EB	132	10 min. 21 sec.	132	6 min. 42 sec.
JB	64	5 min. 58 sec.	55	4 min. 29 sec.
MB	66	8 min. 22 sec.	44	5 min. 51 sec.
Total/Average	317	8 min. 22 sec.	300	5 min. 25 sec.

The following table details the number of transactions input into DOE and SONGS by state:

State	Number of Transactions
Florida	137
Georgia	107
North Carolina	38
South Carolina	35
Alabama	96
Kentucky	31
Tennessee	63
Louisiana	64
Mississippi	46
Total	617

IV. ACCURACY ASSESSMENT

SCOPE AND METHODOLOGY

To determine the accuracy of the transactions input in DOE and SONGS, we reviewed the history log files maintained in SOCS. The history log files record actions taken for each order from submission into SOCS until the order is completed. The history log files were printed by BellSouth for each order.

PricewaterhouseCoopers did not audit the process taken to create and update the log files in SOCS. We reviewed the printed logs files as given to us by BellSouth, traced the PON and service order number to the transactions in our sample, and noted any downstream system edit errors per the log file.

To determine the accuracy of each order we observed input into DOE and SONGS, we utilized the following procedures:

1. While observing transactions being input into DOE and SONGS for the timeliness measure, we noted the PON, service order number and due date for each order. The due date was required to determine the date in which the SOCS history log files would reflect a completed order. To ensure that all downstream system edit errors were captured, we reviewed orders that have been completed, cancelled or pending.

2. We submitted a listing of orders that we observed to BellSouth.

3. BellSouth supplied a printout copy of each SOCS history log file on the due date.

4. We reviewed the SOCS history log file for each order and noted which orders had required error resolution based on downstream system edit error codes. These codes for each transaction identifies the type of errors that occurred prior to the order completing.

5. We recorded all downstream system edit errors noted per the SOCS history logs into an Excel spreadsheet.

6. We calculated statistics based on the transactions in the Excel spreadsheet, including percentage of transactions in our sample that contained downstream system edit errors in the SOCS history log file, see details for each transaction observed in Section V.

STATISTICS

We were unable to review SOCS history log files for all orders we observed for timeliness. This was due to orders that had due date changes subsequent to the time we observed the order input into DOE and SONGS and the time the order was actually completed. This caused some orders to complete prior to an attempt to print the SOCS history log file. A completed order is purged from SOCS the day after it is completed. Therefore, we were unable to view the SOCS history log files for any orders that completed prior to the initial due date that we had recorded. For these transactions, we observed the final status of the order, i.e., as completed, cancelled or pending within MOBI (Mechanized On-Line Billing Inquiry System). MOBI provides on-line access to customer billing data routinely archived onto microfiche and retains CRIS (Customer Record Information System) service orders. The use of MOBI and the SOCS history log files allowed us to account for all orders observed in the timeliness review.

The following table represents the summary of our observations:

	DOE				SONGS			
Source	Cancelled	Completed	Pending	Total	Cancelled	Completed	Pending	Total
SOCS history logs	10	229	-	239	8	212	-	220
MOBI	4	59	15	78	2	71	7	80
TOTAL	14	288	15	317	10	283	7	300

The following SOCS downstream system edit error types and descriptions were provided by BellSouth and used by PricewaterhouseCoopers to determine the downstream system edit error rate of transactions input into DOE and SONGS. The additional numerical results represent the total number of downstream system edit errors found for each error type (note that one order may have multiple errors):

Prefix	Error Type	Description	DOE Number	DOE Percentage	SONGS Number	SONGS Percentage
F	FACS	The address, LOC (location) standard or facility information does not match the RSAG (Regional Street and Address Guide) database. Example: TN not working in FACS (Facility Assignment Control System) or COSMOS (Computer System for Mainframe Operations). Possible Cause: CLEC provided invalid telephone number or number that belongs to another carrier. Example: Two assignable USOCs have the same Service Termination identifier. Possible Cause: BellSouth typed the identical line USOC going out twice.	12	3.6%	10	3.6%
E	SOER	Occurs when something is missing on the order; this may be anywhere on the order. Examples: DEL (Directory Delivery) is required on N (New) and T (Transfer) orders. Possible Cause: CLEC or BellSouth fail to format the directory delivery section on the order. Example: Carrier ID and AECN data must be valid OCN on CLEC Database Possible Cause: CLEC provided invalid company code (CC).	14	4.2%	12	4.3%

Reject Code	Error Type	Definition	DOE Number	DOE Percentage	SONGS Number	SONGS Percentage
O	OPEC	An error is in the S&E section of the service order; the S&E is edited against the CRIS master file, other pending orders, and the customer service records. Example: BTN TN has been disconnected. Possible Cause: CLEC provided incorrect billing account number (BAN). Example: N (New) order to account with same TN/CC. Possible Cause: BellSouth attempted to process the conversion order without changing the customer code.	29	8.6%	22	7.9%
L	LIST	An error in the IDENT (Unfielded) or Listing section of the service order; error disagrees with the LIST (Listing Information System) database records. Example: Account is already active on file. Possible Cause: CLEC provided a working telephone number. Example: All listings are not removed Possible Cause: BellSouth failed to remove an additional listing.	10	3.0%	9	3.2%
B	BARS	The account has an error that affects billing; edits service orders and accounts after they post to master file.	0	0.0%	3	1.1%

Prefix	Error Message	Description	DOE Number	DOE Percentage	SONGS Number	SONGS Percentage
		Example: Sequenced to order with past due date. Possible Cause: BellSouth failed to sequence D & N orders on the same account. Example: N (New) order that was sequenced on the C (Change) order has an error. Possible Cause: CLEC requested a C (change) order before the N (new) order was completed.				
P	PEGASUS	An error on a Designed service order which prevents the mechanized completion; receipt of PEGASUS (Programmed Entry GOC Service Order User Input System) errors are infrequent. Example: Objective dates are out of sequence. Possible Cause: CLEC request due date change and BellSouth failed to change critical dates on service order. Example: Circuit ID not found. Possible Cause: CLEC requested to disconnect a circuit that was already disconnected.	1	0.3%	0	0.0%
		Totals	66	19.7%	56	20.0%

If a transaction contained any of the downstream system edit errors above, we noted the number of errors in each transaction. If, upon submission to SOCS, a transaction experiences an immediate front-end error, forcing the service representative to re-input data immediately, it was not included as an erred transaction. In these cases, the re-input of data was included in the timing of transactions being input into SOCS (see section III).

The following table depicts the percentage of orders in our sample that contained downstream system edit errors in the SOCS history log file:

	Number of orders containing downstream system edit errors		Total reviewed orders for downstream system edit errors	
	DOE	SONGS	DOE	SONGS
Complex	8	8	20	16
Resale	32	27	151	125
UNE	7	9	68	79
Total	47	44	239	220
Percentage on total orders reviewed			19.7%	20.0%

The following table represents the average number of downstream system edit errors contained in each order where an error was found and how the downstream system edit errors are distributed among the three classes of products (complex, resale and UNE):

	DOE	SONGS
Number of Erred orders	47	44
Complex	16	15
Resale	39	32
UNE	11	9
Total number of downstream system edit errors	66	56
Avg. number of downstream system edit errors per erred order	1.4	1.3

V. DETAILED TRANSACTIONS

The following table contains each of the detailed transactions that were observed by PricewaterhouseCoopers. These transactions are the basis for the statistics provided in this report.

DOE Transactions

Ref. number	PON	Service Order No.	Order Type	Req Type	State	Due Date	Duration	Error type F	Error type O	Error type P	Error type L	Error type B	Error type E
1	B198334600PL	NXL6L614	UNE	JB	NC	06/05/2001	0:07:11						
2	9546893542PL	NRP70102	UNE	JB	FL	06/05/2001	0:06:45						
3	RAMOS4806D	DQGV2436	UNE	JB	FL	06/08/2001	0:04:15						
5	FL030000023954B	CYX16561	Complex	CB	FL		0:04:41						
6	FL030000023954B	CYLM4991	Complex	CB	FL		0:14:41						
7	FL030000023954B	NYT8P867	Complex	CB	FL		0:06:57						
8	S003121178BSGAPR	DOPQH215	Resale	MB	GA	06/08/2001	0:02:04						
9	S003121178BSGAPR	NO098WNI	Resale	MB	GA	06/08/2001	0:04:01						
11	337532	CYJOT815	Resale	MB	FL	06/05/2001	0:07:08						
12	S003119393BSGAPR	NO4V8F77	Resale	MB	GA	06/12/2001	0:01:25						
13	S003119393BSGAPR	DOGF5W62	Resale	MB	GA	06/12/2001	0:01:25						
16	STICVB100414	CQ4R7HY7	Resale	EB	FL	06/07/2001	0:01:47		1				
17	STICHRJD5708	CRNCP834	Resale	EB	FL	06/05/2001	0:04:00						
18	333372ED	DOHJM978	Resale	MB	GA	06/07/2001	0:09:50						
19	333372ED	NO23R7R8	Resale	MB	GA	06/07/2001	0:09:50						
20	M9916SM	COL38971	Resale	MB	GA	06/07/2001	0:03:53						
23	334445ED	DOWCQ155	Resale	MB	GA	06/07/2001	0:08:51						
25	5550101634	NOWW1287	Resale	EB	GA	06/05/2001	0:06:15						
26	337115	CY2XR017	Resale	EB	FL	06/08/2001	0:01:42		1				
27	4000030068B	RQHFF627	UNE	JB	FL	06/05/2001	0:14:10						
28	4000032105B	RQJHN775	UNE	JB	FL	06/05/2001	0:09:02						
29	11409	CXN2Y179	Resale	EB	NC	06/06/2001	0:11:23		1				

30	STICVR123138	CRWWJ470	Resale	EB	FL	06/05/2001	0:35:17	1	1				1
31	211430605CONLNA	DYH2Y296	Resale	EB	FL	06/05/2001	0:02:10						
32	211430605CONLNA	NY8M9527	Resale	EB	FL	06/05/2001	0:05:45						
33	338741	CYKG1400	Resale	MB	FL	06/06/2001	0:04:01						
34	MIAY0106962	DQHQQ201	Resale	MB	FL	06/08/2001	0:11:10						
35	MIAY0106962	NQ088693	Resale	MB	FL	06/08/2001	0:11:10						
36	S603127477BSGAPR	NODG7766	Resale	MB	GA	06/07/2001	0:04:10						
40	S10000081987	COWCD948	Resale	EB	GA	06/07/2001	0:04:30						
41	101202481V000001	DPYMM155	Resale	MB	GA	06/06/2001	0:02:16						
42	MIAY0106961	DRQHD198	Resale	MB	FL	06/08/2001	0:09:40						
43	MIAY0106961	NR57TDW1	Resale	MB	FL	06/08/2001	0:09:40						
44	GTS1006940	CPKJG727	Resale	EB	GA	06/06/2001	0:15:39						
45	101512619V000000	DYL6Q981	Resale	MB	FL	06/06/2001	0:04:39						
46	101512619V000000	NY81XH41	Resale	MB	FL	06/06/2001	0:04:39						
47	49071	CWRPD598	Resale	EB	SC	06/06/2001	0:28:12						
48	11409	CXX53172	Resale	EB	NC		0:18:45						
49	4000043390	DRRXQ557	UNE	JB	FL	06/11/2001	0:06:11						
50	2000113359	DOTK6508	UNE	AB	GA	06/07/2001	0:07:12						
51	2000111665	DOM1Q512	UNE	AB	GA	06/08/2001	0:08:13						
52	SCIT34121SCR2	CWTD2747	UNE	CB	SC	06/05/2001	0:02:21						
53	WHITECJ	NXNMH733	UNE	JB	NC	06/05/2001	0:12:52				3		
54	50897231-B	CRHY3786	UNE	CB	FL	06/12/2001	0:01:20						
55	JAXHENDERSON	CYNK3699	UNE	CB	FL	06/06/2001	0:03:48						
56	0000-49984CA11001	DYM17988	UNE	CB	FL	05/16/2001	0:05:38						
58	N10000073406	NOW39264	Resale	EB	GA	06/06/2001	0:05:01						
59	S003132352BSGAPR	DONKT463	Resale	MB	GA	06/07/2001	0:02:27						
60	4783283292VSVM	DPTW8887	Resale	MB	GA	06/07/2001	0:02:02						
61	FL040000026747-1	DYW1W344	Complex	CB	FL	06/08/2001	0:10:38	1		1			1
62	B0102DSSC-A12720	CXT5Y684	Complex	CB	NC	06/06/2001	0:02:30						
63	B0102DSSC-A12720	CXRVN038	Complex	CB	NC	06/15/2001	0:04:11						
64	B0102DSSC-A12720	NXXRQ614	Complex	CB	NC	06/06/2001	0:07:37						

65	C0102DSSC-A12721	CXJP5359	Complex	CB	NC	06/15/2001	0:06:36						1
66	M9824MCTNF	TONDH360	Resale	MB	GA	06/06/2001	0:04:57						
67	M9824MCTNF	FONDH360	Resale	MB	GA	06/06/2001	0:04:57						
68	2305COFOFER	DYM19177	Resale	EB	FL	06/06/2001	0:01:58						
69	2305COFOFER	NYQW7984	Resale	EB	FL	06/08/2001	0:11:28						
70	N10000082386	NXKYR184	Resale	EB	NC	06/08/2001	0:12:50						
71	211450605NEWLNA	NYQ4H139	Resale	EB	FL	06/06/2001	0:19:25						
75	4048766197MV	DOQWV764	Resale	MB	GA	06/13/2001	0:06:01						
76	4048766197MV	NOCJ7PX6	Resale	MB	GA	06/13/2001	0:06:01						
77	338473A	DYMDW704	Resale	MB	FL	06/06/2001	0:02:14						
78	338473B	NYQNT947	Resale	EB	FL	06/11/2001	0:19:22						
79	50042626	NXJQ4832	Resale	EB	NC	06/12/2001	0:09:09						
80	BA1189284	DXKCT276	Resale	EB	NC	06/07/2001	0:02:26						
81	3N0606W00	NOXJ2678	Resale	EB	GA	06/01/2001	0:15:53						
82	4000043541	DRWQG250	UNE	BB	FL	06/14/2001	0:02:34	1					
83	Hometown Reality	CYJ5G953	UNE	CB	FL	06/11/2001	0:18:18						
84	50897231-C	CRYF9977	UNE	CB	FL	06/12/2001	0:10:43						
85	FL040000028561	CYR2V554	UNE	CB	FL	06/08/2001	0:03:33						
86	KEE29386	CXR9H501	UNE	CB	NC	06/08/2001	0:04:47						
87	WPBHS0001607j	CRWL8733	Resale	EB	FL	06/06/2001	0:19:51						
89	435660N1156	NOXC5751	Resale	EB	GA	06/06/2001	0:09:28						
90	288149	NXP1ND297	Resale	EB	NC	06/06/2001	0:07:21						
91	339177	CRJVX793	Resale	MB	FL	06/11/2001	0:19:56		1				2
92	STICVR126998	CRWFN354	Resale	EB	FL	06/07/2001	0:13:23						
94	337514ED	COVGJ166	Resale	EB	GA	06/11/2001	0:16:34						
95	247507D0601	DWHNP477	Resale	EB	SC	06/07/2001	0:01:50						
96	231434N06061	NXYV0004	Resale	EB	NC	06/07/2001	0:08:21						
97	FL01151-267516	CYJ75246	Resale	EB	FL	06/07/2001	0:13:19						
98	DISC419693	DYRBW764	Resale	EB	FL	06/06/2001	0:01:31						
99	252334N1136	NOPMG220	Resale	EB	GA	06/15/2001	0:09:38	1					
100	247152D0601	DXP4N785	Resale	EB	NC	06/06/2001	0:01:34						

101	263655D0601	DYN5W302	Resale	EB	FL	06/06/2001	0:01:25						
104	TRA6051413P	FYW3M486	Resale	EB	FL	06/07/2001	0:24:58						
106	7704659109TBRE	DOYBC607	Resale	MB	GA	06/14/2001	0:08:49						
107	STICVR135675	CRXY6428	RESALE	EB	FL	06/12/2001	0:18:06						
108	STICHR65970	CRL26760	RESALE	EB	FL	06/09/2001	0:07:02		1				
109	STICVR128399	CRPWR397	RESALE	EB	FL	06/07/2001	0:13:38						
110	S003155000BSGAPR	DOYG2433	RESALE	MB	GA	06/07/2001	0:20:23						
111	S003153554BSGAPR	NPBPW3J5	RESALE	MB	GA	06/07/2001	0:16:15						
112	3523781319MH	NY1F45KO	RESALE	MB	FL	06/21/2001	0:15:45						
113	GVWES0613	CO9TRK43	RESALE	EB	GA	06/07/2001	0:02:32						
114	GVWEST97905	COW4V763	RESALE	EB	GA	06/07/2001	0:01:33						
115	101159056DIS	DPKMP583	Resale	MB	GA	06/14/2001	0:02:54						
116	5044561	NWNMJ678	Resale	EB	SC	06/14/2001	0:12:26						
119	S003150219BSGAPR	DOLKC381	Resale	MB	GA	06/08/2001	0:04:46						
120	S003150219BSGAPR	NO390037	Resale	MB	GA	06/08/2001	0:04:46	1					
121	S003150943BSGAPR	DPTNH882	Resale	MB	GA	06/08/2001	0:05:48						
122	S003150943BSGAPR	NP4DN6V0	Resale	MB	GA	06/08/2001	0:05:48		1				
123	STICVR128554	CRX12829	Resale	EB	FL	06/09/2001	0:11:51						
124	M8833AMMOV	TPTBD487	Resale	MB	GA	06/08/2001	0:18:11		1				
125	STICVR127598	CQLL6662	Resale	EB	FL	06/07/2001	0:14:11						
126	SEN060706	NWGLM528	Resale	EB	SC	06/13/2001	0:09:45						
127	SEN060706	DWVOX594	Resale	EB	SC	06/13/2001	0:09:45						
128	N515845ST	CORO5909	UNE	CB	GA	06/07/2001	0:02:42						
129	1705216536LSR	RPV84525	UNE	JB	GA	06/08/2001	0:02:24						
130	EZTBST0284238	CWWFV055	Resale	EB	SC	06/07/2001	0:30:11						
131	SC01157-254361	NWQDT110	Resale	EB	SC	06/07/2001	0:14:52						
132	SOUTH7678DIR	NWQ4X100	UNE	JB	SC	06/07/2001	0:05:56						
133	446553-DL	DQKXH281	UNE	JB	FL	06/07/2001	0:04:40						
134	R16508-MM	RXXR5514	UNE	JB	NC	06/07/2001	0:04:16				1		
135	JCVLS0000	NYPF4826	UNE	JB	FL	06/08/2001	0:08:52						
136	45254-SMLNP	CXM97912	UNE	CB	NC	06/08/2001	0:01:29						

137	14916R	CRX4Y851	Resale	EB	FL	06/07/2001	0:10:49						
139	R9290224-NH	DXKW5458	Resale	EB	NC	06/07/2001	0:02:44						
140	2001060607	TYY98366	Resale	EB	FL	06/07/2001	0:10:48						
141	HCHLTS5561078JA	CXY2K147	UNE	CB	NC	06/22/2001	0:11:39						
142	NS16117	RWXCF676	UNE	JB	SC	06/08/2001	0:02:36						
144	1902492109DLR	NYJW6886	UNE	JB	FL	06/07/2001	0:09:07						
145	STICHR697	CQGH2533	Resale	EB	FL	06/12/2001	0:04:43						
146	GTS10026478	DPTOG809	Resale	EB	GA	06/13/2001	0:05:14						
147	GTS1002647B	NPRPH532	Resale	EB	GA	06/13/2001	0:11:53	1					
148	7708600618TB	DORVF142	Resale	EB	GA	06/14/2001	0:05:46						
149	GV09802786CJ	CWMRW725	Complex	EB	SC	06/12/2001	0:04:02						
150	GV09802786CJ	DWW5P673	Complex	EB	SC	06/12/2001	0:05:05						
151	GA374049	NOCMHF68	Resale	EB	GA	06/11/2001	0:10:14		1				1
152	GA374049	COPHD908	Resale	EB	GA	06/11/2001	0:05:55						
153	FL362403	CQP14017	Resale	EB	FL	06/08/2001	0:12:46						
154	M337751	CW6FH5F4	Resale	EB	SC	06/07/2001	0:01:46						
155	STICV1306058	CRQC4055	Resale	EB	FL	06/09/2001	0:16:51						
156	340712KD	CYPRK920	Resale	EB	FL	06/08/2001	0:04:10						
159	340698	DOHPF681	Complex	EB	GA		0:02:48						
160	011588437226337	RWVH9827	Complex	JB	SC	06/08/2001	0:09:56						
161	STICHR132996	CRVJ3201	Resale	EB	FL	06/08/2001	0:05:06						
162	STICHR116211	CRP87962	Resale	EB	FL	06/08/2001	0:03:58						
163	STICVR134816	CRMD7863	Resale	EB	FL	06/08/2001	0:06:15						
164	STICVR136242	CRJP3245	Resale	EB	FL	06/08/2001	0:08:58		1				
165	D300607	DOM1P500	Resale	EB	GA	06/08/2001	0:03:01	1					
166	STICVR136693	CRVWN110	Resale	EB	FL	06/08/2001	0:13:02						
167	STICVR139284	CQR4C631	Resale	EB	FL	06/08/2001	0:11:12						
168	STINQAL3867	NQYKG946	Resale	EB	FL	06/11/2001	0:17:27						
169	STICVR137073	CQR2C664	Resale	EB	FL	06/08/2001	0:10:10						
170	STICVR137458	CRPP0133	Resale	EB	FL	06/08/2001	0:10:42						
172	STICVR137700	CQHJX224	Resale	EB	FL	06/07/2001	0:10:05						

173	STICVR136511	CQLB7832	Resale	EB	FL	06/12/2001	0:11:32		1				
174	STICVR136669	CRTG5992	Resale	EB	FL	06/12/2001	0:12:17		1				
175	417806	CYGNL374	Resale	EB	FL	06/09/2001	0:09:53						
176	STICVR136894	CQTF3141	Resale	EB	FL	06/12/2001	0:11:28						
177	STICVR137014	CQMW3572	Resale	EB	FL	06/12/2001	0:10:57		1				
178	1652070738LSR	CWR61455	UNE	CB	SC	06/14/2001	0:01:36						
179	1658211508LSR	CWHYB948	UNE	CB	SC	06/08/2001	0:01:16						
180	1655528497LSR	CWNT4769	UNE	CB	SC	06/14/2001	0:01:07						
181	38373-SMLNP	CXNTF138	UNE	CB	NC	06/14/2001	0:06:01						
182	HCHLTS5043900JA	CXMFF756	UNE	CB	NC	06/08/2001	0:27:10		1				1
183	165547480LSR	CWHV6561	UNE	CB	SC	06/08/2001	0:03:49						
184	1658217854LSR	CWH7Y141	UNE	CB	SC	06/08/2001	0:04:40						
185	CTCEX3664A	RXJH8471	UNE	JB	NC	06/08/2001	0:16:32						
186	LST6701238P	CRT6R806	UNE	CB	FL	06/08/2001	0:08:18						
187	010607549-FLWA2	CYX0M604	UNE	CB	FL	06/08/2001	0:06:05						
188	438983ATL	ROV68733	UNE	CB	GA	06/11/2001	0:06:45						
189	7001450251005T	TYJRW544	Resale	EB	FL	06/08/2001	0:06:11						
190	7001450251005T	FYJRW544	Resale	EB	FL	06/08/2001	0:04:50						
191	289309	NXQ61392	Resale	EB	NC	06/08/2001	0:06:52						
192	1706074406LSR	RPQ62070	UNE	JB	GA	06/11/2001	0:03:01						
193	1658738662LSR	CWWHB836	UNE	CB	SC	06/13/2001	0:01:32						
194	0605KS01	NPVCT320	Resale	EB	GA	06/08/2001	0:13:41						
195	LYTT0066	CP4PY248	Resale	MB	GA	06/08/2001	0:00:58						
196	288955	CPLYC704	Resale	EB	GA	06/08/2001	0:12:40						
197	261973N06081	NWYCG410	Resale	EB	SC	06/08/2001	0:07:39						
198	STICVR139104	CRROB079	Resale	EB	FL	06/08/2001	0:06:37						
199	STICVR139179	CQN6N501	Resale	EB	FL	06/12/2001	0:07:26		1				
200	STICVR131020	CRYFF193	Resale	EB	FL	06/12/2001	0:08:11						
201	STICVR139380	CQGVB629	Resale	EB	FL	06/12/2001	0:12:46		1				1
202	4000044010	CR5Q1489	UNE	CB	FL	06/11/2001	0:04:32						
203	STICVR139968	CQKMG398	Resale	EB	FL	06/11/2001	0:07:15						

204	50042742	CXYG2818	Resale	EB	NC	06/12/2001	0:10:42						
205	610867	NYRF0730	Resale	EB	FL	06/11/2001	0:06:43						
206	STICHR135442	CRRWQ619	Resale	EB	FL	06/11/2001	0:04:05						
207	TFJUN903	NO5KQQ82	Resale	EB	GA	06/18/2001	0:06:50						
208	TFJUN904	NPCT8738	Resale	EB	GA	06/11/2001	0:08:40						
209	TFJUN905	NO7MJVP8	Resale	EB	GA	06/18/2001	0:06:33						
210	TFJUN906	NOPN6878	Resale	EB	GA	06/18/2001	0:16:58	1					
211	2898795	NPM8J149	Resale	EB	GA	06/15/2001	0:12:04						
212	GA397664	DPTV1865	Resale	MB	GA	06/13/2001	0:03:08	1					
213	GA397664	NPFX0J45	Resale	MB	GA	06/13/2001	0:14:33						
214	ORLDS10012	DYHBL384	Resale	EB	FL	06/13/2001	0:02:26						
215	N159126CM	NWYRP516	Resale	EB	SC	06/15/2001	0:15:50						
216	0608RK1	DWPWJ498	Resale	EB	SC	06/11/2001	0:02:30						
217	NC060995313	DXVM5123	Resale	MB	NC	06/14/2001	0:01:42	1					
218	CN010609020	CQHY2872	Resale	EB	FL	06/11/2001	0:13:13						
219	CRF49126	NPPV1495	Resale	MB	GA	06/11/2001	0:15:17						
220	ACH7068698940	CPR9P530	Resale	EB	GA	06/01/2001	0:12:47						
221	7649	NRM3F530	Resale	EB	FL	06/14/2001	0:17:12						
222	SKY10406	CPVRM295	Resale	MB	GA	06/14/2001	0:05:52						
223	NS16140KC	DWPM2815	Complex	CB	SC	06/18/2001	0:10:08	1					
224	NS16140KC	NWW8H526	Complex	CB	SC	12/28/2001	0:11:35						
225	WER611141P01	CXH44789	Resale	EB	NC	06/12/2001	0:06:26						
226	010611580-03	CYYFG281	Resale	EB	FL	06/11/2001	0:02:46						
227	4073132634	NYH7K551	UNE	JB	FL	06/13/2001	0:07:45						
228	289285	NXM1L506	Resale	EB	NC	06/11/2001	0:07:22						
229	1657632496LSR	CWQWJ314	UNE	CB	SC	06/15/2001	0:01:49						
230	1655563717LSR	CWR61691	UNE	CB	SC	06/15/2001	0:05:12						
231	1219531231	CXXC8308	UNE	CB	NC	06/11/2001	0:10:46						
232	0016839646LSR	NPRC5710	UNE	JB	GA	06/11/2001	0:04:45						
233	8504754292SFREL	NYBTNKL7	Resale	MB	FL	06/15/2001	0:07:16						
234	8504754292SFREL	DYP7W583	Resale	MB	FL	06/15/2001	0:07:16						

235	7067246962CKVM	NPFGDLK7	Resale	MB	GA	06/15/2001	0:06:51						
236	7067246962CKVM	DPX8N280	Resale	MB	NC	06/15/2001	0:06:51						
237	342424	COQG8419	Complex	EB	GA	06/13/2001	0:18:12						
238	SANTELICE	RQ6Q31G2	Complex	JB	FL	06/12/2001	0:04:33						
239	LEXUSDEL1	RRG6NWL9	Complex	JB	FL	06/12/2001	0:03:30						
240	B01O6DSSC-A12850	NO5N11G3	Complex	CB	GA	12/27/2001	0:07:23						
241	LZA035P3MAJ	COW9P23	Complex	CB	GA	12/27/2001	0:17:17		1				
242	MO1GAL1119	COCXD1B3	UNE	BB	GA	06/12/2001	0:08:32						
243	MO1GAL1119	DO0TMJ05	UNE	BB	GA	06/18/2001	0:08:32						
244	STICVR140475	CQGT4680	Resale	EB	FL	06/14/2001	0:10:32		1				
245	STICVR14530	CRKD5405	Resale	EB	FL	06/12/2001	0:16:03						
246	STICVR140790	CQKDQ535	Resale	EB	FL	06/14/2001	0:09:55		1				
247	STICVR140191	CQYOQ701	Resale	EB	FL	06/12/2001	0:09:54						
248	UA5616420152	DRHP7228	Resale	MB	FL	06/12/2001	0:07:41						
249	UA5616420152	NRCJXFO6	Resale	MB	FL	06/12/2001	0:07:41				1		
250	7862933555BAVM	DQK3W466	Resale	MB	FL	06/13/2001	0:07:44						
251	7862933555BAVM	NQG6Y190	Resale	MB	FL	06/13/2001	0:07:44						
252	M0557NCCONV	DRMJX496	Resale	MB	FL	06/12/2001	0:06:56						
253	M0557NCCONV	NR4X1856	Resale	MB	FL	06/12/2001	0:06:56						
254	339858ED	DYX10428	Resale	MB	FL	06/14/2001	0:30:01						
255	339858ED	NY540YHO	Resale	MB	FL	06/14/2001	0:30:01		1				
256	5700011996	CYP30723	Resale	EB	FL	06/12/2001	0:04:52		1				
257	14972R	NQLNQ002	Resale	EB	FL	06/12/2001	0:05:57						
258	289641	NXWPN927	Resale	EB	NC	06/12/2001	0:06:41						
259	IMM1461	DYK4M570	Resale	MB	FL	06/12/2001	0:06:27						
260	4079960778	NYTFV884	UNE	JB	FL	06/13/2001	0:05:40						
261	0016833419LSR	NPWYL528	UNE	JB	GA	06/12/2001	0:05:15						
262	441759ATL	NOHWT436	UNE	JB	GA	06/12/2001	0:05:36						
263	1702214697LSR	RPK34906	UNE	JB	GA	06/15/2001	0:06:50						
264	1702213842LSR	RPFTYTF1	UNE	JB	GA	06/15/2001	0:03:20						
265	NS16188	NXM2J640	UNE	JB	NC	06/13/2001	0:08:35						

266	1702215907LSR	RPXQM607	UNE	JB	GA	06/15/2001	0:08:00						
267	432178	RQRQK859	UNE	JB	FL	06/12/2001	0:07:14						
268	1702215966LSR	RPMM7633	UNE	JB	GA	06/15/2001	0:04:14						
269	289750-A	CWHYX462	Resale	EB	SC	06/13/2001	0:07:26		1				
270	289755	NXKLJ521	Resale	EB	NC	06/18/2001	0:07:06						
271	LSRDLK585898GA1004	FOXGP107	Resale	MB	GA	06/21/2001	0:11:09						
272	LSRDLK585898GA1004	TOXGP107	Resale	MB	GA	06/21/2001	0:11:09						
273	4079962818	NYYVC361	UNE	JB	FL	06/13/2001	0:05:30						
274	1658736632DLR	RWLYX858	UNE	JB	SC	06/13/2001	0:03:50						
275	1702213978LSR	RPW4L597	UNE	JB	GA	06/15/2001	0:03:27						
276	DLT01UNP0200N	CWH56338	UNE	CB	SC	06/12/2001	0:04:51						
277	1706601423LSR	CPVLC135	UNE	CB	GA	06/18/2001	0:02:38						
278	StrobelTire	RWKQ9547	UNE	JB	SC	06/12/2001	0:02:54						
279	1703240602LSR	RPPWM348	UNE	JB	GA	06/15/2001	0:02:48						
280	STICHR136928	CRJM5823	Resale	EB	FL	06/12/2001	0:06:22						
281	STICHR137359	CRR3T773	Resale	EB	FL	06/12/2001	0:06:15						
282	7707167706BBV	DO52Q2M0	Resale	MB	GA	06/13/2001	0:04:43						
283		RRGXB048	Resale	EB	FL	06/12/2001	0:01:48						
284	9549810340BB	DRM7C369	Resale	MB	FL	06/13/2001	0:03:47		1				
285	101515339V000000	DPKCD601	Resale	EB	GA	06/15/2001	0:09:42						
286	101515339V000000	NPFJ2QC3	Resale	EB	GA	06/15/2001	0:09:42						
287	STICVR141025	CQVWJ445	Resale	EB	FL	06/12/2001	0:12:12						
288	7709833127CN	DPKTD134	Resale	MB	GA	06/21/2001	0:11:14						
289	7709833127CN	NPDVRV55	Resale	MB	GA	06/21/2001	0:05:37						
290	7065473711NPLA	DPXTW318	Resale	MB	GA	06/12/2001	0:09:30						
291	7065473711NPLA	NP2FV6J7	Resale	MB	GA	06/12/2001	0:09:30						
292	STICVR140710	CQH45055	Resale	EB	FL	06/13/2001	0:05:57						
293	STICVR141067	CRJVF700	Resale	EB	FL	06/13/2001	0:06:58						
294	HCHLTS537011JA	CXHYT930	Complex	CB	NC	06/12/2001	0:11:10						
295	HCHLTS537011JA	DX9XJK00	Complex	CB	NC	12/28/2001	0:11:10						
296	HCHLTS537011JA	NXTY6355	Complex	CB	NC	12/28/2001	0:11:10						

297	JCVLSCB3900932	CY9KXHB4	UNE	CB	FL	06/12/2001	0:01:11						
298	252100ATL	DOKQ8175	UNE	JB	GA	06/12/2001	0:03:20						
299	252100ATL	NOMF1027	UNE	JB	GA	06/12/2001	0:10:04						
300	1703279015LSR	RPQ4W533	UNE	JB	GA	06/15/2001	0:04:18						1
301	250121ATL	DOT7B245	UNE	JB	GA	06/12/2001	0:02:42						
302	250121ATL	NOTVF660	UNE	JB	GA	06/13/2001	0:05:57						
303	253992ATL	NONY4660	UNE	JB	GA	06/13/2001	0:06:01				1		1
304	4073134815	NYP69451	UNE	JB	FL	06/14/2001	0:04:39						
305	4073132632	NYV52068	UNE	JB	FL	06/14/2001	0:05:10						
306	DLT01UNP02328N	COVLN504	UNE	CB	GA	06/12/2001	0:04:36						
307	4073138968	NYWLJ442	UNE	JB	FL	06/14/2001	0:08:40				1		
308	4079968695	NYKD6658	UNE	JB	FL	06/14/2001	0:08:31						
309	R160287CM	CWJDR588	Complex	EB	SC	06/15/2001	0:05:17						
310	KWH2640	CPP9C895	Complex	EB	GA	06/15/2001	0:21:23						
311	335783ED	CRY9Y028	Complex	EB	FL	06/15/2001	1:07:00		1		1		1
312	304200ED	COTTP326	Complex	MB	GA	06/14/2001	0:28:12		1		1		2
313	MIAY0106906	DQHD8742	Complex	MB	FL	06/18/2001	0:06:13	1					
314	1705639276LSR	RPXFD380	UNE	JB	GA	06/15/2001	0:08:07						
315	1705254728LSR	RPJF5461	UNE	JB	GA	06/18/2001	0:06:20						
316	1705255007LSR	RPRR0245	UNE	JB	GA	06/18/2001	0:03:20						
317	4073136445	NYJRH338	UNE	JB	FL	06/15/2001	0:04:01						
318	1705256297LSR	RPMTQ167	UNE	JB	GA	06/18/2001	0:02:31						
319	1702219551LSR	NPQ7W024	UNE	JB	GA	06/18/2001	0:05:28						
320	CHARSPINE	NXN0V697	UNE	JB	NC	06/13/2001	0:12:04						
321	339840ED	CYR9V555	Complex	EB	FL	06/14/2001	0:28:52		1		1		
322	STICVR142531	CRPL2129	Resale	EB	FL	06/13/2001	0:17:57						
323	M7146SLAFI	CPVYD514	Resale	MB	GA	06/14/2001	0:08:34						
324	STIHR133754	CQN9F154	Resale	EB	FL	06/13/2001	0:14:01		1				
325	3NO612COR	NONBX126	Resale	EB	GA	06/13/2001	0:14:29						
326	STICVR143325	CRLM6318	Resale	EB	FL	06/14/2001	0:14:34		1				
327	GV09805434E	RWTV2830	Resale	JB	SC	06/13/2001	0:05:01						

328	HARPSMILL	NXT4N430	UNE	JB	NC	06/21/2001	0:04:02							
329	DLT01UNP02155N	CXJNQ126	UNE	CB	NC	06/13/2001	0:02:02							
330	4073132755	NYPGP592	UNE	JB	FL	06/15/2001	0:09:58							
331	1706151155LSR	RPKLT231	UNE	JB	GA	06/15/2001	0:05:29							
332	4079960776	NYXJV156	UNE	JB	FL	06/06/2001	0:07:57							
333	4072992036	CYPVB240	UNE	JB	FL	06/13/2001	0:02:44							
334	1655527592LSR	CWY0X317	UNE	CB	SC	06/13/2001	0:01:26							
335	1655527953LSR	CWPYC826	UNE	CB	SC	06/13/2001	0:01:05							
336	1702218294LSB	DPPVR202	UNE	JB	GA	06/20/2001	0:01:29							
337	1705969220LSB	PPQ3J844	UNE	JB	GA	06/20/2001	0:00:59							
338	DLT01UNP02014N	CYHCX443	UNE	CB	FL	06/13/2001	0:01:06							
339	DLT01UNP02012N	CYQPF718	UNE	CB	FL	06/13/2001	0:04:39							
340	1706151417LSR	RPYXK889	UNE	JB	GA	06/15/2001	0:02:42							
341	C06130ET09	ROR67950	Resale	JB	GA	06/14/2001	0:03:21							
342	11540I72DL1G	RRVB1519	Resale	JB	FL	06/15/2001	0:07:02		1					1
343	COSTACRUISE	NRHQ1382	UNE	JB	FL	06/13/2001	0:08:45							

SONGS Transactions

Ref. number	PON	Service Order No.	Order Type	Req Type	State	Due Date	Duration	Error type F	Error type O	Error type L	Error type P	Error type B	Error type E
1	6152422811ATT	D9T3L372	UNE	JB	TN	06/05/2001	0:01:52						
5	LA030000028708	C5LC7654	UNE	CB	LA	06/07/2001	0:06:10						
6	02057919CAB11001	C1QXJ532	UNE	CB	AL	06/13/2001	0:03:50						
7	30100863R1	C4T5R886	Resale	EB	KY	06/07/2001	0:08:16		1				
8	AL010000026836B	C1P3V990	UNE	CB	AL	06/05/2001	0:03:05						
9	6220601008.v	C4WF3444	Resale	EB	KY	06/06/2001	0:10:34		1				
10	060501RP8491	C1PKC886	Resale	EB	AL	06/11/2001	0:03:30		1				
11	0605AT223	C5NN7354	Resale	EB	LA	06/11/2001	0:02:48						
12	6-05-01-05	C9QC9342	Resale	EB	TN	06/05/2001	0:11:25						
13	N10000083080	N4MYN003	Resale	EB	KY	06/12/2001	0:04:38						

14	D10000082751	D5QKG983	Resale	EB	LA	06/06/2001	0:01:25						
15	5024486039VMPQ	D4KV1025	Resale	MB	KY	06/06/2001	0:04:58						
16	5024486039VMPW	N43MP8H4	Resale	MB	KY	06/06/2001	0:04:58						
17	DLT01RUP04808C	C9XFC752	Resale	MB	TN	06/06/2001	0:02:25						
18	288075	D5WWG302	Resale	EB	LA	06/06/2001	0:01:46						
19	288075	N5T7W228	Resale	EB	LA	06/06/2001	0:10:47						
21	SO4JH06060111	C9X3L551	Resale	EB	TN		0:01:14						
22	EZTBST0283786	D5GQ4173	Resale	EB	LA	06/06/2001	0:01:37						
23	CLA001544	C5N36286	Resale	EB	LA	06/14/2001	0:02:50						
24	EZTBST0283786	CSXQM770	Resale	MB	AL	06/07/2001	0:10:00						
27	010606-02	C9RB6352	Resale	EB	TN	06/08/2001	0:06:52						
28	1165-BLX1	C6Q4G679	Resale	EB	MS		0:05:41						
29	1165-BLX1	C6KY1912	Resale	EB	MS		0:05:41						
30	416118	C5WHN329	Resale	EB	LA	06/07/2001	0:11:35						
32	FP18057	T1HQV500	Resale	EB	AL	06/06/2001	0:06:13						
33	FP18057	F1HQV500	Resale	EB	AL	06/06/2001	0:01:00						
35	FP18068	F1QKN101	Resale	EB	AL	06/12/2001	0:05:23						
36	FP18068	F1QKN101	Resale	EB	AL	06/12/2001	0:00:47						
37	FP18067	T1PY1546	Resale	EB	AL	06/06/2001	0:04:42						
38	FP18067	F1PY1546	Resale	EB	AL	06/06/2001	0:00:35						
39	FP18056	T1WNY867	Resale	EB	AL	06/06/2001	0:05:06						
40	FP18056	F1WNY867	Resale	EB	AL	06/06/2001	0:00:31						
42	270084D0601	D1XJT510	Resale	EB	AL	06/12/2001	0:01:00						
43	8103400029t1	T9Q34152	Resale	EB	TN	06/07/2001	0:04:11						
44	8103400029t1	F9Q34152	Resale	EB	TN	06/07/2001	0:04:11						
45	263348D0601	D9GPP331	Resale	EB	TN	06/06/2001	0:01:03						
46	263656D0601	D5MOT664	Resale	EB	LA	06/12/2001	0:01:01						
47	271012D0601	D5R74456	Resale	EB	LA	06/12/2001	0:01:07						
48	4549A-MET	N5Y8N319	Resale	EB	LA	06/12/2001	0:05:22						
49	288487	N5PGK858	Resale	EB	LA	06/15/2001	0:04:59						
50	435166N1155AM	N6J9Y089	Resale	EB	MS	06/12/2001	0:05:52						

51	288600	N6H42559	Resale	EB	MS	06/13/2001	0:05:21						
52	270634D0601	D6JN8820	Resale	EB	MS	06/07/2001	0:00:27						
53	246307D0601	D5VBL947	Resale	EB	LA	06/06/2001	0:00:23						
54	7001342415001T	F1WQ6881	Resale	EB	AL	06/07/2001	0:06:23						
55	7001342415001T	T1WQ6881	Resale	EB	AL	06/07/2001	0:06:23						
56	0606AT207	N5R07960	Resale	EB	LA	06/08/2001	0:16:22						
57	AL1CM042301028A	C188F2Q6	Complex	EB	AL	06/12/2001	0:03:15		1				
58	1802608888ISR	C1NTF545	UNE	CB	AL	06/07/2001	0:01:11						
59	DLT01UNP01398N	C1N2P169	UNE	CB	AL	06/07/2001	0:00:26						
60	LSVLS24523	N4HM1638	UNE	JB	KY	06/07/2001	0:04:58						
61	NS0606TL	C5RFY159	UNE	CB	LA	06/07/2001	0:02:51						
62	FRH0087	R1JBB454	UNE	JB	AL	06/07/2001	0:01:16						
63	NS1618TL	C5Y1Q947	UNE	CB	LA	06/07/2001	0:00:44						
64	1806122202	C1QNT847	UNE	CB	AL	06/07/2001	0:01:09						
65	NWORSJ25	R5K05449	Resale	JB	LA		0:02:40						
66	JLW010606001P	C5V93088	Resale	EB	LA		0:49:50						
68	RAFAX66-8	T5N1M863	Resale	EB	LA	06/10/2001	0:06:44						
69	LSVLS2394JB	C4VP9199	UNE	CB	KY	06/22/2001	0:02:43						
70	390295B	C9T8P060	UNE	CB	TN	06/18/2001	0:01:45						
71	428968AA	R9WCM120	UNE	JB	TN	06/07/2001	0:01:30						
72	437629DLR	N9KN2532	UNE	JB	TN	06/11/2001	0:05:59			1			
73	C1VT2046	C1VT2046	UNE	CB	AL	06/18/2001	0:01:42						
74	01060629203A	T6WFJ520	Resale	EB	MS	06/14/2001	0:23:22		1				1
75	100176C	C4QGP179	Resale	EB	KY	06/08/2001	0:13:46						
76	6070108	N4JQ3632	Resale	EB	KY	06/07/2001	0:10:49						
77	FP18092	C1L7X407	Resale	EB	AL	06/07/2001	0:06:42						
78	607DM2	D1TG4610	Resale	EB	AL	06/13/2001	0:03:10						
79	607DM2	N1TN6098	Resale	EB	AL	06/13/2001	0:07:24	1					
80	5292	C5GMK524	Resale	EB	LA	06/07/2001	0:07:11						
81	288763	D5LNJ241	Resale	EB	LA	06/07/2001	0:01:12						
82	288763	N5KRL490	Resale	EB	LA	06/07/2001	0:07:48						

83	030701MF3JJ	D48PCD79	Resale	MB	KY	06/11/2001	0:00:30						
84	030701MF3JJ	N4GBVB41	Resale	MB	KY	06/11/2001	0:05:55						
85	2569743875KL	D1NTJ911	Resale	MB	AL	06/15/2001	0:05:12						
86	2569743875KL	N150HK11	Resale	MB	AL	06/15/2001	0:05:12						
88	50043938	N1YK9243	Resale	EB	AL	06/08/2001	0:08:47						
89	413155	N5YBN195	Resale	EB	LA	06/13/2001	0:04:24						
90	417801	C5M19743	Resale	EB	LA	06/18/2001	0:05:54						
91	417835	C6TKF288	Resale	EB	MS	06/12/2001	0:04:11						
92	L1ST3950	N5LK4613	UNE	JB	LA	06/11/2001	0:13:08						
93	DLT01UNPO1734N	C1VRV493	UNE	CB	AL	06/08/2001	0:01:49						
94	7040047769003T	T4QT1027	Resale	EB	KY	06/15/2001	0:02:26						
95	7040047769003T	F4QT1027	Resale	EB	KY	06/15/2001	0:02:26						
96	DLP01UNP02130N	C1K43971	UNE	CB	AL	06/18/2001	0:00:53						
97	DLT01UNP02131N	C1Q02551	UNE	CB	MS	06/18/2001	0:03:12						
98	NS16151TL	C7MC2294	UNE	CB	MS	06/11/2001	0:01:39						
99	DLT01UNP02148W	C1FW9910	UNE	CB	AL	06/20/2001	0:04:15						
100	NS16165	N9XPF288	UNE	JB	TN	06/09/2001	0:04:58						
101	1802419930LSR	C1RX8333	UNE	CB	AL	06/11/2001	0:00:45						
102	FBC010608001P	C5TDN203	UNE	CB	LA	06/08/2001	0:00:56						
103	STOUTH	N5MN1544	UNE	JB	LA	06/11/2001	0:03:28						
104	NS16168TL	C1TC6402	UNE	CB	AL	06/19/2001	0:00:28						
105	DLT01UNP01735N	C1TCN097	UNE	CB	AL	06/19/2001	0:01:51						
106	MH0106081	D6V5Y336	UNE	JB	MS	06/11/2001	0:00:53						
107	7493631046003T	T5JDP219	Resale	EB	LA	06/08/2001	0:04:02						
108	7493631046003T	F5JDP219	Resale	EB	LA	06/08/2001	0:01:56		1				
109	7420083947003F	C1XQR360	Resale	EB	AL	06/14/2001	0:01:06						
111	74925311279	NINTT366	Resale	EB	KY		0:04:52						
112	LA010000027392-1	C5BG5PD5	UNE	CB	LA	06/11/2001	0:03:19						
113	LA030000028734B	C5637KK9	UNE	CB	LA	06/11/2001	0:04:43						
114	LA030000028734D	C576P014	UNE	CB	LA	06/11/2001	0:01:15						
115	419150	C5JBVG39	Resale	EB	LA	06/19/2001	0:07:52						

116	418537	C5KXR581	Resale	EB	LA	06/15/2001	0:07:30						
117	1060924900	C6TWX155	Resale	EB	MS	06/11/2001	0:03:46						
118	1060924902	C1NWH031	Resale	EB	AL	06/18/2001	0:05:25						
119	78980608-AF	C9VK8562	Resale	EB	TN	06/11/2001	0:01:10						
120	ATICB0508525	C5YXQ615	Resale	EB	LA	06/11/2001	0:10:21						
121	EXE0000333	C6JFV673	Resale	EB	MS	06/11/2001	0:12:42		1				
122	411573	D9VX5426	Complex	CB	TN	06/11/2001	0:10:46						
123	411573	C9Q3H737	Complex	CB	TN	06/11/2001	0:01:01						
124	7491363835002D1	D1PR4360	Resale	EB	AL	06/11/2001	0:03:31						
125	1858813240LSR	C1XMR565	UNE	CB	AL	06/11/2001	0:00:58						
126	1184789DLIG	C5GKN282	Complex	JB	LA	06/12/2001	0:09:54						
127	EXE0000326	C6GTY226	Complex	EB	MS	06/15/2001	0:22:25	1				1	1
128	LCIKF061101-10	N5JGY645	Resale	EB	LA	06/19/2001	0:03:47						
129	060601TJK10A	D4KD6131	Resale	MB	KY	06/15/2001	0:03:00		1				1
130	1858829115LSR	C1J8Y353	UNE	CB	AL	06/12/2001	0:01:51						
131	MH0106113	N6H2K325	UNE	JB	MS	06/12/2001	0:03:43			1			
132	EXE00003277	C6THX301	Complex	EB	MS	06/15/2001	0:19:39		1			1	
133	EXE00000328	C6QGF049	Complex	EB	MS	06/15/2001	0:21:56		1			1	
134	DLT01RUP05555C	T5T28506	Resale	MB	LA	06/15/2001	0:02:54						1
135	DLT01RUP05555C	F5T28506	Resale	MB	LA	06/15/2001	0:02:53						
136	3565-GULF	N6JG3995	Resale	EB	MS	06/12/2001	0:02:14						
137	3565-GULF	N6JG3995	Resale	EB	MS	06/12/2001	0:02:15						
138	MH0106111	D6GLQ868	UNE	JB	MS	06/12/2001	0:01:37						
139	1858304467LSR	C1XJY930	UNE	CB	AL	06/27/2001	0:01:03						
140	DLT01UNP02170N	C1XVQ373	UNE	CB	AL	06/28/2001	0:02:50						
141	HCHLTS537011JA	CKHP1301	Complex	CB	KY	06/27/2001	0:11:10						
142	KP06120102	R5TM5830	UNE	JB	LA	06/15/2001	0:01:23						
143	MAG010612001P	C5PT8132	Complex	EB	LA	06/20/2001	0:09:07						
144	VN1968B	D6J2K092	Complex	CB	MS	06/12/2001	0:04:05						
145	VN1968B	R6J1D492	Complex	CB	MS	06/12/2001	0:04:05						
146	VN1968B	R6X67716	Complex	CB	MS	06/12/2001	0:04:05						

147	VN1968B	C6CDHWM1	Complex	CB	MS	06/12/2001	0:04:05						
148	VN1968B	N66M6DQZ	Complex	CB	MS	06/12/2001	0:04:05						
149	ANV0608	N93DJ2X7	Complex	EB	TN	07/05/2001	0:28:15						1
150	RESALE334271	C1VDK582	Complex	EB	AL	06/19/2001	0:12:41						
151	290381	N1HFP523	Resale	EB	AL	06/20/2001	0:03:43						
152	7679	D6P78305	Resale	MB	MS	06/13/2001	0:05:42						
153	7679	N68RWR04	Resale	MB	MS	06/13/2001	0:17:58		1				
154	108306C1163	C6GVQ238	Resale	EB	MS	06/13/2001	0:01:18						
155	010611-119	D6V89402	Resale	MB	MS	06/13/2001	0:06:41						
156	010611-119	N6B8C544	Resale	MB	MS	06/13/2001	0:06:41						
157	LSVLS18282S	N4PFX681	UNE	JB	KY	06/13/2001	0:16:57						
158	KP06120103	R5PFP275	UNE	JB	LA	06/13/2001	0:03:09						
159	DLT01DL2372	D1PRG179	UNE	JB	AL	06/13/2001	0:02:41						
160	224794DLR	N9QTB845	UNE	JB	TN	06/13/2001	0:14:19						
161	DLT01UNP02207N	C1XTP452	UNE	CB	AL	06/13/2001	0:01:16						
162	S0030BQH	N5JPG514	UNE	JB	LA	06/14/2001	0:05:29						
163	441969NAS	R9RY9683	UNE	JB	TN	06/12/2001	0:02:17						
164	440172	R9XD1636	UNE	JB	TN	06/13/2001	0:02:17						
165	440172	R9H14102	UNE	JB	TN	06/15/2001	0:02:09						
166	1802158394LSR	C1XD0460	UNE	CB	AL	06/19/2001	0:01:38						
167	1802693288LSR	C1YGT618	UNE	CB	AL	06/18/2001	0:01:37						
168	DLT01UNP02171N	C1XFR240	UNE	CB	AL	06/13/2001	0:01:24						
169	LSVLS23285G	C4MYN760	UNE	CB	KY	06/27/2001	0:00:46						
170	DLT01DL3511	R1TBK259	UNE	JB	AL	06/14/2001	0:01:07						
171	DOGWOOD3	C1WWH758	UNE	CB	AL	06/13/2001	0:02:19						
172	DLT01UNP02206N	C1PXT333	UNE	CB	AL	06/13/2001	0:01:43						
173	N516145JH	C5RL6457	Complex	CB	LA	06/13/2001	0:07:00						
174	N516145JH	C5H6XB52	Complex	CB	LA	06/20/2001	0:06:21						
175	N515743KC	D1YFX010	Complex	CB	AL	06/15/2001	0:10:00	1					
176	N515743KC	C16WT089	Complex	CB	AL	06/15/2001	0:10:00						
177	NS15743KC	NIK22400	Complex	CB	KY	12/28/2001	0:10:00						

178	L156155-PM	C9JLP611	Complex	EB	TN	06/18/2001	0:15:53						
179	19400ACH	N9WQQ146	Resale	EB	TN	06/18/2001	0:15:21	1					
180	010611-016	D6L0Y219	Resale	MB	MS	06/20/2001	0:08:36						
181	010611-016	N65WCV72	Resale	MB	MS	06/13/2001	0:09:00		1				
183	29108AA	C9YY7033	Complex	CB	TN	06/13/2001	0:15:37						
184	29108AA	C9Q6F547	Complex	CB	TN	06/14/2001	0:15:37		1	1			2
185	FP18170	N1HMM992	Resale	EB	AL	06/13/2001	0:05:55						
186	SCITJS01653	T9HF1237	Resale	EB	TN	06/14/2001	0:08:56						
187	SCITJS01653	F9HF1237	Resale	EB	TN	06/14/2001	0:08:56						
188	FP18103	F1X7T908	Resale	EB	AL	06/12/2001	0:09:02						
189	FP18152	N1XP9617	Resale	EB	AL	06/12/2001	0:09:26						
190	422311	N6VJV688	Resale	EB	MS	06/13/2001	0:06:33						
191	SCITJS01652	T1WQ3172	Resale	EB	AL	06/15/2001	0:07:10						1
192	NLORDIX0606G	N6KRG998	Resale	EB	MS	06/19/2001	0:08:40						
193	443751NAS	D9TXC902	UNE	JB	TN	06/14/2001	0:01:04						
194	16346532037	C9YDR291	UNE	CB	TN	06/13/2001	0:01:13						
195	419975	R9LD1633	UNE	JB	TN	06/13/2001	0:02:33						
196	DLT01DL3513	C1FBG2R9	UNE	JB	AL	06/14/2001	0:01:36						
197	101611-650	D5L68475	Resale	MB	LA	06/13/2001	0:13:03						
198	101611-650	N5C5M6V5	Resale	MB	LA	06/13/2001	0:13:04						
199	NPETFRA0613F	N1TT0708	Resale	EB	AL	06/13/2001	0:04:45						
200	TN401128	D9ND4113	Resale	MB	TN	06/15/2001	0:05:09						
201	TN401128	N91XT539	Resale	MB	TN	06/13/2001	0:04:06						
202	DLT01UNP02181N	C1X9J698	UNE	CB	AL	06/13/2001	0:01:27						
203	DLT01UNP02274N	C1GLB807	UNE	CB	AL	06/13/2001	0:01:58						
204	BTRGS4321	C5RR5738	UNE	CB	LA	06/19/2001	0:03:06						
205	LSVLS26551K	C4RPC656	UNE	CB	KY	06/13/2001	0:00:55						
206	CHEVALIER	C5JJ4496	Resale	EB	LA	06/25/2001	0:04:18	1					
207	PALEALA613L	N1TVY350	Resale	EB	AL	06/20/2001	0:07:36						
208	PBOBSIM61L	N1H7X286	Resale	EB	AL	06/21/2001	0:06:34						
209	VEVOMAR0612F	C1LDM840	Resale	EB	AL	06/14/2001	0:07:49						

210	061101LJ6	F4Q3B601	Resale	EB	KY	06/14/2001	0:04:15						
211	061101LJ6	T4Q3B601	Resale	EB	KY	06/14/2001	0:04:18						
212	061101AV9	C4M0M343	Resale	MB	KY	06/15/2001	0:04:21						
213	223345DO601	D5PYB679	Resale	EB	LA	06/20/2001	0:00:56						
214	MAG010613002L	C5VC2137	Resale	EB	LA	06/15/2001	0:07:45		1				
215	7492462110	N1MRY760	Resale	EB	AL	06/15/2001	0:04:18						
216	7670D06	D6NPB243	Resale	EB	MS	06/14/2001	0:00:30						
217	2186D06	D6N3R929	Resale	EB	MS	06/14/2001	0:00:20						
218	LG74	N4TL2637	Resale	EB	KY	06/21/2001	0:04:28						
219	NELIZMCN0611F	C1YMD712	Resale	EB	AL	06/20/2001	0:08:30						1
220	L160393-LK	C9K5V576	Resale	EB	TN	06/14/2001	0:08:18						
221	DLT01BRS04246C	C5M35811	Resale	EB	LA	06/15/2001	0:11:33						
222	TTS33106120101	C9JG2401	RESALE	EB	TN	06/14/2001	0:08:37		1				
223	290535-AS	D9GVN088	RESALE	EB	TN	06/14/2001	0:00:50						
224	290535	N9RT8873	RESALE	EB	TN	06/18/2001	0:08:50						
225	290659	C9H9R547	RESALE	EB	TN	06/14/2001	0:06:45						
226	286759C0613	C9PFF363	RESALE	EB	TN	06/19/2001	0:02:37						
227	290174	N5T28179	RESALE	EB	LA	06/14/2001	0:08:11						
228	290306	D6NMW089	RESALE	EB	MS	06/14/2001	0:01:50						
229	290306	N64YMCR3	RESALE	EB	MS	06/14/2001	0:07:14						
230	241827D0601	D1K6J204	RESALE	EB	AL	06/14/2001	0:00:48						
231	290737	N9W92257	RESALE	EB	TN	06/19/2001	0:05:32						
232	VKENCRO613L	C1WCP391	Resale	EB	AL	06/14/2001	0:15:35		1				
233	227903T1160	T6V2X066	Resale	EB	MS	06/14/2001	0:07:24		1				
234	227903T1160	F6V2X066	Resale	EB	MS	06/14/2001	0:00:47						
235	R613018	D5PRV792	Resale	EB	LA	06/14/2001	0:00:33						
236	PRO	N1T8F121	Resale	EB	AL	06/28/2001	0:26:53		1	1			2
237	TN371553	D9XTD835	Resale	MB	TN	06/14/2001	0:00:36						
238	TN366701	D9J0C989	Resale	MB	TN	06/14/2001	0:01:04						
239	TN368512	D9HON734	Resale	MB	TN	06/14/2001	0:01:41	1					
240	TN368960	D9YF9201	Resale	MB	TN	06/14/2001	0:00:55						

241	TN379755	D9MW0581	Resale	MB	TN	06/14/2001	0:01:05						
242	FP18190	T1TTXA82	Resale	EB	AL	06/14/2001	0:06:22		1				
243	FP18190	F1TTXA82	Resale	EB	AL	06/14/2001	0:06:22						
244	5029332124	D4RPV461	Resale	MB	KY	06/14/2001	0:08:19						
245	5029332124	N4DMT0Q9	Resale	MB	KY	06/14/2001	0:08:19						
246	9017546121MH	D9WLC200	Resale	MB	TN	06/14/2001	0:08:18						
247	9017546121MH	N92PNVK4	Resale	MB	TN	06/14/2001	0:08:18						
248	SCITJS01649	C9VG0668	Resale	EB	TN	06/14/2001	0:02:40						
249	LA010000027658D	C5W0N515	UNE	CB	LA	06/15/2001	0:08:40						
250	CH9722	R4NJQ303	Resale	JB	KY	06/14/2001	0:01:36						
251	9313635778SF	D9ROD628	Resale	MB	TN	06/14/2001	0:09:17						
252	9313635778SF	N9382VJ7	Resale	MB	TN	06/14/2001	0:09:17			1			
253	6157316612JT	D9T29462	Resale	MB	TN	06/14/2001	0:07:36						
254	6157316612JT	N9BYDBJ1	Resale	MB	TN	06/14/2001	0:07:36						
255	2567667912CK	D1JTX132	Resale	MB	AL	06/14/2001	0:06:34						
256	2567667912CK	N17H1B73	Resale	MB	AL	06/14/2001	0:06:34						
257	FP18193	N1KCH970	Resale	EB	AL	06/14/2001	0:08:19	1					
258	GA3CM009401001	C1JHQ800	Resale	EB	AL	06/14/2001	0:16:15	1					
259	CFP1389	C1WH1018	Resale	EB	AL	06/14/2001	0:05:45						
260	TN379150	D9Q03617	Resale	MB	TN	06/14/2001	0:01:27						
261	AL401455	D1HBJ914	Resale	MB	AL	06/14/2001	0:00:44						
262	PWEDNA	R1YYB708	UNE	JB	AL	06/14/2001	0:08:33			1			
263	DSRNO	R9V78397	UNE	JB	TN	06/14/2001	0:02:09		1				
264	DLT01DL3054	R1V09173	UNE	JB	AL	06/14/2001	0:02:24						
265	DCM06140102	C5NHT815	UNE	CB	LA	06/26/2001	0:01:28						
266	JWB0984	T6N4Y901	Resale	MB	MS	06/15/2001	0:05:32						
267	JWB0984	F6N4Y901	Resale	MB	MS	06/15/2001	0:01:02						
268	051601MF5A	D9W4H453	Resale	MB	TN	06/14/2001	0:00:42						
269	L158154-JM	D9YRD693	Resale	EB	TN	06/15/2001	0:00:39						
270	DCM06140104	C5L07758	UNE	CB	LA	06/14/2001	0:01:24						
271	289981	D6MN4168	Resale	EB	MS	06/21/2001	0:00:49	1					

272	289981	N6LW4729	Resale	EB	MS	06/20/2001	0:05:56						
273	290842	C1W96002	Resale	EB	AL	06/15/2001	0:05:42		1				
274	LA010000029906	N5XX6177	UNE	JB	LA	06/18/2001	0:06:12						
275	N516281	R1QD8027	UNE	JB	AL	06/16/2001	0:07:04						
276	8994700AA	R4W67067	UNE	JB	KY	06/18/2001	0:01:47						
277	1858300809LSB	C10NYKW8	UNE	CB	AL	06/15/2001	0:02:54						
278	1802642451LSR	C1H23670	UNE	CB	AL	06/15/2001	0:03:35						
279	1802798965LSR	C1FTHV73	UNE	CB	AL	06/15/2001	0:04:39						
280	MH0106142	N6K34613	UNE	JB	MS	06/15/2001	0:05:50						
281	1808349129LSR	C1K9P091	UNE	CB	AL	06/15/2001	0:00:40						
282	DLT01UNP02293N	C1Q7P498	UNE	CB	AL	06/19/2001	0:01:06						
283	444967NAS	R9NV9997	UNE	JB	TN	06/15/2001	0:05:22						
284	139691RW	R4X37694	UNE	JB	KY	06/17/2001	0:14:45						
285	1858370570LSR	C1V2W910	UNE	CB	AL	06/15/2001	0:00:43						
286	MH0106141	N6TRC589	UNE	JB	MS	06/15/2001	0:10:12						
287	419975	R9NN8595	UNE	JB	TN	06/15/2001	0:01:56						
288	KP06150101	D5HL4806	UNE	JB	LA	06/27/2001	0:01:37						
289	KP06150101	N5JHP658	UNE	JB	LA	06/27/2001	0:04:45		1				
290	DLT01DL3520	D1M20286	UNE	JB	AL	06/15/2001	0:01:04						
291	DLT01DL3520	N1MRX004	UNE	JB	AL	06/15/2001	0:03:04						
292	DD2001061301A	D94VHFL4	Complex	MB	TN	06/27/2001	0:05:36						
293	DD2001061301A	N9G82F44	Complex	MB	TN		0:14:48			1			
294	BTRGS4329	C5X9R066	UNE	CB	LA	06/15/2001	0:02:28						
295	DLT01DL2374	N1RBT941	UNE	JB	AL	06/21/2001	0:08:07						
296	2803577300LSR	N9T5R962	UNE	JB	TN	06/28/2001	0:05:34						
297	DLT01DL3056	R6Q8W718	UNE	JB	MS	06/16/2001	0:01:12						
298	PWFEIN	R1H26622	UNE	JB	AL	06/20/2001	0:03:31						
299	DLT01DL3520	N1NN3145	UNE	JB	AL	06/18/2001	0:04:17			1			
300	KP06150102	D5TF8017	UNE	JB	LA	06/18/2001	0:03:36						
301	KP06150102	N5WBL384	UNE	JB	LA	06/29/2001	0:03:36						
302	NS16022	N4K1F490	UNE	JB	KY	06/20/2001	0:06:00						

303	431843NAS	N9LK8534	UNE	JB	TN	06/19/2001	0:05:00			1			
304	431843NAS	D9P5Q836	UNE	JB	TN	06/18/2001	0:05:00	1					
305	DCM06180102	C5V30164	UNE	CB	LA	06/18/2001	0:02:59						
306	431843NAS	C4GJ0060	UNE	AB	KY	06/20/2001	0:05:07						
307	16346-53203-6	C9VPP901	UNE	CB	TN	06/18/2001	0:00:37						
308	1802449421LSR	C1MJ8358	UNE	CB	AL	06/18/2001	0:00:28						
309	430834DLR	N9MBV805	UNE	JB	TN	06/18/2001	0:03:09						
310	1127623	R1GFB3K8	UNE	AB	AL	06/19/2001	0:05:24						1
311	D10000101517	D1GWAO746	Resale	EB	AL	07/07/2001	0:01:29						
312	DLT01DL3059	C1XG5144	UNE	JB	AL	06/25/2001	0:04:27						
313	1853250301LSR	D1HV1613	UNE	JB	AL	06/19/2001	0:01:34						

REQUEST: Identify the OSS performance measures that relate to: (a) testing of advanced services; and (b) the resale of advance services.

RESPONSE: BellSouth is responding to this interrogatory assuming that AT&T, TCG and SECCA are referring to BellSouth's wholesale DSL service offered in BellSouth's FCC Tariff No. 1 (Access). This service is an interstate access service and, as such, is not subject to the Section 251 obligations under the Act relative to performance measures or OSS testing. Therefore, BellSouth's wholesale DSL service is not required to be included in OSS testing or performance measures.

BellSouth's deregulated Internet retail service, known as BellSouth® FastAccess®, is included in OSS testing, but only as a retail analog against which we measure the provisioning of unbundled xDSL capable loops. This retail analog is included pursuant to requirements of the Georgia, Florida and Louisiana Public Service Commissions. BellSouth® FastAccess® service itself is not subject to OSS testing. BellSouth® FastAccess® service is an enhanced, nonregulated, non-telecommunications service, and, therefore, is not required to be resold.

REQUEST: State whether OSS testing should include the testing of advanced services resale? If no, explain how BellSouth intends to demonstrate compliance with the D.C. court of Appeals "ASCENT Decision" in the absence of any demonstration that its OSS are capable of making advanced services available for resale?

RESPONSE: BellSouth is responding to this interrogatory assuming that AT&T, TCG and SECCA are referring to BellSouth's wholesale DSL service offered in BellSouth's FCC Tariff No. 1 (Access). This service, unlike BellSouth's deregulated Internet service, known as BellSouth® FastAccess®, is offered for resale. BellSouth, however, is not required to offer its federally-tariffed DSL service for resale at the wholesale discount. Section 251(c)(4) of the 1996 Act requires BellSouth to "offer for resale at wholesale rates any telecommunications service that [it] provides *at retail* to subscribers who are not telecommunications carriers." Earlier this summer, the D.C. Circuit Court of Appeals affirmed the FCC's decision that:

> *[W]hile an incumbent LEC DSL offering to residential and business end-users is clearly a retail offering designed for and sold to the ultimate end-user, an incumbent LEC offering of DSL services to Internet Service Providers as an input component to the Internet Service Provider's high-speed Internet service offering is not a retail offering. Accordingly, . . . DSL services designed for and sold to residential and business end-users are subject to the discounted resale obligations of section 251(c)(4) . . . . [H]owever, . . . section 251(c)(4) does not apply where the incumbent LEC offers DSL services as an input component to Internet Service Providers who combine the DSL service with their own Internet Service.*

See Association of Communications Enterprises v. FCC, 253 F.3d 29, 31 (D.C. Cir. 2001)(Decided 6/26/01)("*ASCENT II*"). BellSouth's federally-tariffed DSL service is offered only on a wholesale basis, and a customer that wants to obtain high-speed Internet access from an Internet service provider other than BellSouth cannot order the DSL service on a stand-

alone basis. Under the *ASCENT II* decision, therefore, BellSouth is not required to offer its DSL service for resale at the wholesale discount.

In another decision involving ASCENT, the D.C. Circuit held that an ILEC may not "sideslip §251(c)'s [resale] requirements by simply offering telecommunications services through a wholly owned affiliate." *See Association of Communications Enterprises v. FCC*, 235 F.3d 662, 666 (D.C. Cir. 2001)(Decided 1/9/01)(*ASCENT I*). This decision simply does not apply to BellSouth, because BellSouth has no separate affiliate for the resale of advanced services.