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November 19, 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:

As required by the Hearing Officer's Order dated November 14, 2001, enclosed please find:

1. A redacted version of the direct testimony of Ronald Pate; and

2. A redacted version of the direct testimony of David Scollard.

Redacted testimony of Milton McElroy is not being filed because Mr. McElroy's testimony addressed the PWC report and attestation, both of which have been stricken from the record by the Hearing Officer.

BellSouth will be making additional filings in response to the Hearing Officer's November 14th Order, which BellSouth did not receive until late on the afternoon of Friday, November 16, 2001.

Very truly yours,

Guy M. Hicks

GMH/jej

Enclosure

421424

CERTIFICATE OF SERVICE

I hereby certify that on November 19, 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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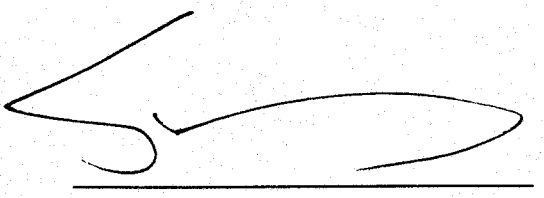

TENNESSEE BELLSOUTH TELECOMMUNICATIONS, INC.

DIRECT TESTIMONY OF RONALD M. PATE

BEFORE THE TENNESSEE REGULATORY AUTHORITY

DOCKET NO. 01-00362

OCTOBER 22, 2001

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

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

Q. PLEASE SUMMARIZE YOUR BACKGROUND AND EXPERIENCE.

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

Q. HAVE YOU TESTIFIED PREVIOUSLY?

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

Q. IS LOOP MAKEUP INFORMATION AVAILABLE TO CLECS IF IT HAS NOT YET BEEN ENTERED INTO IN LFACS?

A. Yes. In some instances, some of the LMU information listed above may not be entered in the LFACS database. In those instances, if a CLEC should determine that it needs additional information that is not available electronically, the CLEC would submit a manual LMU request. Similarly for BellSouth to serve its own customers, BellSouth must submit a manual service inquiry to obtain facility information for the requested retail service/product when the data is not available electronically.

Personnel in BellSouth's Outside Plant Engineering department must then utilize a combination of Engineering Work Orders, field visits and plats that contain records of BellSouth's Outside Plant Facilities to develop the LMU. The Outside Plant Facility information resides in the Corporate Facilities Database ("CFD"), a digitized version of the plats, in Georgia, North Carolina, South Carolina, Florida and thirteen (13) wire centers in Alabama. In the remaining BellSouth states and wire centers, this data is

stored on manual or paper plats. Regardless of how the plats are maintained, when insufficient data resides in LFACS for a CLEC to qualify a loop, and thus BellSouth obtains data from the plats (via CFD or paper plats), the LMU information that has been generated is populated in LFACS. This service inquiry process is accomplished in substantially the same time and manner (whether retrieved from CFD or paper plats) as would be a similar request (manual service inquiry) for a BellSouth customer as part of the order and provisioning process. Thus, CLECs are not at a disadvantage when compared to BellSouth's retail operations.

In other state 271 proceedings, the CLECs claim that the manual LMU request increases the standard interval for obtaining LMU information by three days. However, the CLEC's witness offered no supportive evidence to substantiate the claim that the standard interval for handling the manual LMU request is excessive. More important, for the period June 1, 2001 to September 17, 2001, CLECs throughout the BellSouth region submitted 831 manual LMU inquiries. Ninety-six percent (96%) of these inquiries were returned within three days. Eighty-five percent (85%) of these requests were returned on either day zero (day of receipt) or day one.

Q. HOW DO CLECS REQUEST LOOP MAKEUP INFORMATION?

A. CLECs may request LMU information using a telephone number or a circuit ID. In response, CLECs are provided with information on that particular loop. In addition, CLECs may request LMU information on

spare facilities that serve the end user. CLECs may request information on one to ten loops per transaction. If the CLEC request that the loop or loops meet certain specifications, BellSouth will return information on the loop or loops that meet those specifications. If the CLEC does not make such a request, BellSouth returns information on the spare loop or loops that would support POTS.

Q. DO CLECS HAVE ACCESS TO AN ADEQUATE DATA SOURCE FOR LOOP MAKEUP INFORMATION?

A. Yes. In other state 271 proceedings throughout the BellSouth region, the CLECs, specifically Sprint, allege that the LFACS database is an inadequate LMU data source because all BellSouth locations are not completely loaded into LFACS. The CLECs further claim that early in 2001 only 41% of loops with detailed LMU information were populated in LFACS. While 100% of BellSouth's loops are populated in LFACS, with certain basic information, not all will have the detailed LMU information necessary to qualify a loop. However, and more importantly, the LMU information available to CLECs in LFACS is the same LMU information available to BellSouth.

Historically, BellSouth has populated detailed LMU in LFACS based upon anticipated requests for its designed services that require special engineering and provisioning, and that are often served by more than one central office or wire center. Because there was previously no need for

detailed LMU information on non-designed services that required no special provisioning and that were served by one central office, BellSouth had not populated LFACS with detailed LMU information for these loops.

It is estimated that as much as 85% of loops with detailed LMU information are populated in LFACS in some major metropolitan areas, where the marketing efforts of CLECs are most concentrated. At the beginning of 2001, 41% of the total cable pairs had LMU data populated in LFACS region-wide. As of August 2001, that number is up to 50%. To put this in perspective, LMU information was populated on over 14.9 million cable pairs in LFACS in order for BellSouth to improve from 41% to 50% in this short time period. This effort was accomplished in part when BellSouth made modifications to its systems that compiled all relevant LMU data in the Corporate Facilities Database ("CFD"), by wire center, on a bulk basis for automatic update to the LFACS database, as will be described below.

BellSouth is continuously updating and/or populating LMU data in LFACS as Engineering Work Orders are issued. Each time the manual service inquiry process is used, BellSouth loads the resulting LMU information into LFACS for future queries. Thus, the LFACS database improves on a daily basis, and will continue to do so.

As stated above, BellSouth has recently made modifications to its systems that will compile relevant LMU data contained in the CFD, by wire center,

on a bulk basis for automatic update to the LFACS database. This process was completed for all collocation wire centers on July 18, 2001 and for all other wire centers on August 13, 2001. All LMU data that is mechanically generated in the CFD was automatically populated in LFACS at that time.

Further, in late September BellSouth implemented an enhancement that provides for an electronic query from LFACS to the CFD for loop qualification information. As a result of this enhancement, when a CLEC sends an electronic query to LFACS for loop qualification information, and all of the necessary information is not resident in LFACS, an electronic query will be automatically launched to the CFD to generate the required additional information. This additional loop qualification information resulting from the queried CFD will automatically be combined with the LFACS information and provided to the CLEC. Also, the information obtained from the query to the CFD will be populated in the LFACS database and thus, will be available going forward for future electronic loop qualification information queries.

Q. IS ACCESS TO CFD REQUIRED TO OBTAIN THE ASSIGNMENT INFORMATION TO QUALIFY A LOOP?

A. No. In other state 271 proceedings, CLECS have claimed that BellSouth should be required to provide CLECs access to the CFD. First, the assignment information that is required for loop qualification is located in

LFACS, and is not located in the CFD or the paper plats. A loop cannot be qualified through the CFD or the paper plats, therefore, direct access to the CFD is unnecessary for the provision of nondiscriminatory access to LMU information. Second, the CFD contains BellSouth's proprietary network information as well as certain information regarding BellSouth's end user customers. For example, the CFD provides detailed information on the exact location of cables serving military installations and financial institutions as well as police, fire, disaster recovery, and FAA locations, among others. Thus, the release of this information raises concerns not only about customer proprietary data, but also sensitive state and national security information. So, as explained herein, the information required for loop qualification is currently provided to the CLECs on a non-discriminatory basis without jeopardizing the integrity of BellSouth's proprietary data. Therefore, direct access to the CFD is unnecessary to accomplish such nondiscriminatory access. In summary, BellSouth is providing the CLECs with the same detailed information about the loop that is available to BellSouth, as required by the FCC's Interconnection Rules (at 51.319(g)), and the enhancements described above emphasize BellSouth's commitment to continue to improve the processes by which that information is provided.

The CLECs cite the North Carolina Utilities Commission's Recommended Order in Docket No. P-100, Sub 133d, at page 10 ("NCUC Order"), to assert that BellSouth is not providing non-discriminatory access to loop qualification (LMU) information, and as evidence that BellSouth should be

required to provide access to the CFD. BellSouth disagrees with the findings of the NCUC Order that directed BellSouth to permit CLECs to access directly BellSouth's Corporate Facilities Database, and has submitted Exceptions to the NCUC (BellSouth's Exceptions to Recommended Order filed July 6, 2001, Docket No. P-100, Sub 133d, at p. 7), requesting this conclusion be modified. Based upon the explanation provided herein, BellSouth is hopeful that the NCUC will agree with its reasonable modification to the NCUC UNE Order to allow BellSouth to make LFACS and LQS – or a functionally equivalent electronic system – available to CLECs on a permanent basis. (BellSouth's Exceptions to Recommended Order filed July 6, 2001, Docket No. P-100, Sub 133d, at p. 7). This modification will allow BellSouth the flexibility to upgrade, update or even replace, its electronic systems and platforms as it recognizes changes in requirements or technology.

The CLECs further cite the NCUC Order as evidence that BellSouth personnel have internal sources for LMU information that are not available to the CLECs. As corroborated in this testimony, BellSouth has no relevant information for LMU that is not provided to the CLECs. BellSouth is providing CLECs with the same detailed information about the loop that is available to BellSouth, as required by the FCC.

Q. DID BELLSOUTH BETA TEST ELECTRONIC ACCESS TO LOOP MAKEUP INFORMATION?

A. On July 29, 2000, when BellSouth released the functionality for electronic access to loop makeup information, interested CLECs were contacted in order to beta test the functionality before the general release into the production environment. Five CLECs signed agreements to beta test the loop makeup functionality and the ordering of xDSL compatible loops and UCLs, but four actually participated in the test. Please see my discussion of the beta test in the section below on ordering xDSL compatible loops and UCLs. After correcting defects found during beta testing, BellSouth released the loop makeup inquiry functionality to all CLECs on November 18, 2000.

THE REGIONALITY OF BELLSOUTH'S OSS

Q. HOW DOES THE FEDERAL COMMUNICATIONS COMMISSION ("FCC") SAY A BOC MAY DEMONSTRATE "SAMENESS" OF ITS OSS?

A. The FCC has determined that, as to electronic OSS processes, a BOC may demonstrate "sameness" by showing that CLECs either use the identical system across different states or that CLECs use separate systems that "reasonably can be expected to behave the same way." See Kansas/Oklahoma Order ¶ 111. As to manual processes, the FCC has emphasized evidence showing that those components operate pursuant to a common organizational structure, common methods and procedures, and common training. See id. ¶ 113.

In short, the FCC has defined "same" to mean that "competing carriers in [multiple states] share the use of a single OSS: a common set of processes, business rules, interfaces, systems, and in many instances, even personnel." See Kansas/Oklahoma Order ¶ 111.

Q. DOES BELLSOUTH PROVIDE ONE REGIONAL SET OF INTERFACES THAT CLECS USE TO REQUEST RESALE AND UNE SERVICES?

A. Yes. As described in this testimony and in the testimony of Ken Ainsworth, BellSouth provides CLECs with one set of electronic and manual interfaces for all CLEC resale and UNE service requests throughout BellSouth's nine-state region – all of which provide nondiscriminatory access to BellSouth's OSS. Very simply put, a CLEC in Tennessee uses the same interfaces for access to the same BellSouth OSS as a CLEC in any other state in BellSouth's region. There is only one Telecommunications Access Gateway ("TAG"), RoboTAG™, Electronic Data Interchange ("EDI"), Local Exchange Navigation System ("LENS"), Trouble Analysis and Facilitation Interface ("TAFI"), Electronic Communications Trouble Administration ("ECTA"), Optional Daily Usage File ("ODUF"), Enhanced Daily Usage File ("EODUF"), and Access Daily Usage File ("ADUF"). [1]

To the extent that there are separate servers for processing CLEC requests via these interfaces, the servers use the same programming

[1] Each interface, including an explanation of the acronym, is described in this testimony. For certain interfaces, i.e. TAG, there are multiple versions of regional software deployed. A CLEC uses a single version of the interface for placing orders within multiple states in the region.

code and are designed to operate in an indistinguishable manner. The servers use the same type of hardware running identical software. [2] Attached to this testimony is Exhibit OSS-69, which describes the electronic interfaces used by CLECs, the databases used exclusively by CLECs, the OSS shared by CLECs and BellSouth, the function of each, the location of the server or servers, and the geographical responsibility of each of these applications.

Additionally, service requests can be submitted manually (via fax machine) by CLECs throughout the BellSouth region, using the same national industry-standard OBF guidelines and business rules. (Note: In some cases, the OBF guidelines have been modified for BellSouth-specific situations. Regardless, such modifications themselves are regional in scope.)

Q. PLEASE BRIEFLY DESCRIBE THE ELECTRONIC INTERFACES YOU REFERENCED IN YOUR PREVIOUS ANSWER.

A. A complete overview of these interfaces in contained in Section I of this testimony; however, for ease of reference, I will again briefly describe the interfaces BellSouth provides to CLECs.

[2] [2] "Where SWBT has discernibly separate OSS, SWBT demonstrates that its OSS reasonably can be expected to behave the same way in all three states. As described below, for example, the use by SWBT of two different order processing systems (a SORD processor in Dallas for retail and wholesale orders in Texas, and a SORD processor in St. Louis for retail and wholesale orders in SWBT's other four in-region states) use the same programming code and, moreover, are designed to operate in an indistinguishable manner." See Kansas/Oklahoma Order ¶ 111.

Telecommunications Access Gateway ("TAG") – An electronic interface that provides a standard Application Programming Interface ("API") to BellSouth's pre-ordering and ordering OSS. Based upon industry-standard pre-ordering Common Object Request Broker Architecture ("CORBA") and, for ordering, the industry-standard OBF guidelines for CLEC LSRs. TAG pre-ordering can be integrated with TAG ordering, with the CLEC having the responsibility for the integration.

RoboTag™ - An electronic Web-based interface to TAG, offered by BellSouth as an alternative for CLECs who have made the decision not to hire programmers to develop and maintain their own interface to TAG. Resides on a CLEC's Local Area Network ("LAN") server.

Electronic Data Interchange ("EDI") – Electronic interface to BellSouth's ordering OSS, which follows an industry-standard data transmission protocol (EDI) for ordering, and the industry-standard OBF guidelines for LSR formatting. EDI can be integrated with TAG pre-ordering to create full pre-order/order functionality.

Local Exchange Navigation System ("LENS") – A non-integrateable Web-based electronic graphical user interface (GUI"), that requires software development only on BellSouth's side of the interface. Now a GUI to TAG, LENS, therefore, uses the TAG architecture and gateway for pre-ordering and ordering functionality. A LENS user must have, at a minimum, a

personal computer, Web browser software, an Internet connection and a password from BellSouth.

Trouble Analysis and Facilitation Interface ("TAFI") – Direct interface to BellSouth's systems for trouble reporting and tracking. For use with Plain Old Telephone Services ("POTS").

Electronic Communications Trouble Administration ("ECTA") – Interface to BellSouth's systems for trouble reporting and tracking. Unlike TAFI, a CLEC's representative interacts with the CLEC's own computer software, which, in turn, interacts with the BellSouth OSS. Also for use with POTS.

Optional Daily Usage File ("ODUF") – Provides CLECs with usage records for billable call events recorded by BellSouth's central offices. Includes details (e.g., directory assistance, intraLATA toll, billable feature activations) for resold lines, Interim Number Portability ("INP") accounts, and unbundled switch ports.

Enhanced Daily Usage File ("EODUF") – Provides CLECs with usage data for local calls originating from resold flat-rate business and residential lines. Usage data includes date of call, 'from' number, 'to' number, connect time, conversation time, rate class, message type, billing indicators and 'bill to' number.

Access Daily Usage File ("ADUF") – Provides CLECs with records for billing interstate access charges to interexchange carriers for calls originating from, and terminating to, unbundled ports. Arranged on a contractual basis.

Q. ARE CLEC REQUIREMENTS FOR USING BELLSOUTH'S ELECTRONIC AND MANUAL INTERFACES THE SAME THROUGHOUT THE NINE-STATE BELLSOUTH REGION?

A. Yes. BellSouth has produced and published a comprehensive set of business rules, guides, procedures, information and job aids for CLECs. This includes only one regional set of user guides for the electronic interface. This information is used by the CLECs – regardless of their locations – to educate, inform and assist in the configuration of CLEC systems that will interface with BellSouth's regional OSS. For example, business rules for pre-ordering and ordering are provided in BellSouth's regional *BellSouth Pre-Order Business Rules and BellSouth Business Rules for Local Ordering*. These documents serve as the basis for the CLEC's pre-ordering and ordering interactions with BellSouth, whether the CLECs serve end users in Tennessee or any of the other states in BellSouth's region. In other words, BellSouth does not provide separate documents for different states in its region, nor does it include separate sections or pages that apply to specific states within the business rules.

In addition to regional documentation, BellSouth provides regional training programs for CLECs. Training content is the same for all CLECs for all interfaces and forms, regardless of the states in which the CLECs serve end users.

Q. ARE CLECS REQUIRED TO BUILD AN ELECTRONIC INTERFACE FOR EACH STATE OF BELLSOUTH'S OPERATING REGION IN WHICH THE CLEC SERVES END USERS?

A. No. All of BellSouth's pre-ordering and ordering interfaces for CLECs are regional. If CLECs choose to use the machine-to-machine TAG or EDI interfaces, they do not build discreet TAG or EDI interfaces for each state in BellSouth's region. Once a CLEC has constructed its side of the ordering interface, or if the CLEC chooses to use the human-to-machine LENS interface, the CLEC can use it to submit LSRs for end users in any or all states in BellSouth's region. BellSouth's side of the gateway consists of a single system that receives LSRs for the CLECs' end users in any of BellSouth's nine states.

Q. CAN CLECS SUBMIT LSRS ORDERING SERVICE FOR END USERS IN MULTIPLE STATES WITHIN BELLSOUTH'S REGION THROUGH ANY OF BELLSOUTH'S INTERFACES?

A. Yes. Regardless of the CLEC's location, all transaction queries, such as the pre-ordering queries sent by the CLEC via the electronic interfaces,

result in BellSouth's OSS returning the same information for end users residing in any one of the nine states of BellSouth's region. When, for example, a CLEC retrieves a CSR for an end user in Tennessee, the CLEC follows the same process in BellSouth's pre-ordering interface that it would when retrieving a CSR for an end user in any other state. The result of any CSR request, moreover, is presented in identical format, regardless of the state in which the end user is located. If a CLEC submits LSRs for end users in Tennessee or Georgia for resale lines with features, the LSRs will be identical (assuming the features are the same) with the exception of customer-specific (not state-specific) fields such as "telephone number," "address," and "city/state/zip code," etc. Exhibit OSS-70 includes a CLEC's service requests for end users in Tennessee and Georgia and the resulting service orders, also from Tennessee and Georgia LSRs reflect the following identical fields:

- "ACT" or activity type of "N" for new
- "REQTYP" or requisition type of "EB" for resale.
- "TOS" or type of service
- the "CC" field or CLEC company code is identical.

The remaining fields are customer-specific such as the fields for addresses or features. The service orders, which result from clean and correct LSRs reaching BellSouth's service order processor, SOCS, contain the same Universal Service Order Codes ("USOCs") as those specified on the LSR (Exhibit OSS-70). For example, all appropriate

features listed in the "Feature detail" section of the LSR appear on the appropriate page of the related service order.

When obtaining provisioning information from CSOTS, CLECs use the same procedure for accessing a list of service orders for Tennessee-specific end-users that they would for end users in Georgia or any other state in the region. If the CLEC does business in several states in the region, it can retrieve a single list for its end users in those states.

Q. IS IT IMPORTANT THAT CLECS BE AWARE OF HOW TO CORRECTLY POPULATE BELLSOUTH'S INDUSTRY STANDARD LSR?

A. Yes. To ensure the highest degree of accuracy possible, CLECs must produce clean and correct LSRs by populating the correct data, for example, in the fields for area codes, addresses, and various tariffed services. The data contained in these fields is obviously different not only across state lines, but also for different customers, different customer locations and different cities. The selected interface for transmitting the information, as well as the rules governing the completion of the LSR, however, are identical, regardless of the state for which the request is submitted. BellSouth's business rules for pre-ordering and ordering are identical throughout the region. The selected interface for transmitting the information, as well as the Rules governing the completion of the LSR, are identical, regardless of the state for which the request is submitted. However, CLECs may have to populate different information on industry-

standard LSRs for end users in different parts of one state or in different states within BellSouth's region.

Q. DOES BELLSOUTH HAVE A SINGLE SET OF UNIVERSAL SERVICE ORDER CODES ("USOCS") THAT IS REQUIRED ACROSS ALL NINE STATES?

A. Yes. BellSouth utilizes a single set of USOCs across the nine-state region. "1FR" indicates a flat rate residential line in all nine states. "UNETW" indicates an Unbundled Network Terminating Wire in all nine states. "ESX" indicates call waiting in all nine states. However, state-specific USOCs or Field Identifiers ("FID") may arise as a result of regulatory differences. For example, CREXN indicates Customized Code Restriction, residence/business line, PBX trunk option #5 in four states only.

Q. ONCE A CLEC IS CERTIFIED TO DO BUSINESS IN ONE STATE WITHIN BELLSOUTH'S REGION, MUST THE CLEC BE "RE-CERTIFIED" IN PRODUCTION STATUS PRIOR TO SUBMITTING LSRS FOR THE ADDITIONAL STATES IN BELLSOUTH'S REGION?

A. No. BellSouth has no requirement that a CLEC be "re-certified" to submit LSRs in additional states after it has been is certified to do business in its first state in the nine-state region. CLECs, however, should not submit LSRs for end users in additional states without first doing their

"homework." Each CLEC is responsible for completely and accurately populating its LSRs, for knowing the product and regulatory differences that may apply in the "new" state, and for attaining the billing codes that are applicable to the "new" state.

Q. ARE INDIVIDUAL USER GUIDES FOR EACH BELLSOUTH ELECTRONIC INTERFACE AVAILABLE AND APPLICABLE ON A REGIONAL BASIS?

A. Yes. BellSouth provides only one regional set of User Guides for each electronic interface, and such guides are posted on BellSouth's online Website[3].

Q. DO ALL TRANSACTION QUERIES SEARCH AND RETURN THE SAME INFORMATION FOR END USERS RESIDING IN ALL NINE STATES IN BELLSOUTH'S REGION, REGARDLESS OF THE CLEC'S LOCATION?

A. Yes. Access to BellSouth's pre-order functionality providing access to Customer Service Records ("CSRs") is an example. A competing carrier retrieving a CSR for an end user in Tennessee follows the same process in BellSouth's pre-ordering interface as a CLEC retrieving a CSR for an end user in any other state. Moreover, the result of any CSR request is presented in identical format, regardless of the state location of the end user.

[3] www.interconnection.bellsouth.com.

Q. ARE THERE OTHER EXAMPLES TO DEMONSTRATE THAT BELLSOUTH'S ELECTRONIC INTERFACES PROVIDE THE SAME FUNCTIONALITY ACROSS THE NINE-STATE REGION?

A. Yes. For example, a CLEC desiring more information on retrieving service order lists for posted orders needs only to review BellSouth's Web-based *CLEC Service Order Tracking System* ("CSOTS") *User Guide*. The same procedure is used whether the CLEC is accessing service order lists for Tennessee or specific end-users in any other state. In fact, a CLEC serving end users in multiple BellSouth states can retrieve a service order list for the entire region. If a list is desired for one or more of the individual states, the CLEC can then request a separate service order list for each state by clicking the Web option for such a list.

Q. DOES BELLSOUTH PROVIDE CLECS ACCESS TO THE SAME PRE-ORDERING, ORDERING, AND PROVISIONING OSS ACCESSED BY BELLSOUTH'S TWO RETAIL MARKETING AND SALES SUPPORT SYSTEMS, REGIONAL ORDERING SYSTEM ("ROS") AND REGIONAL NEGOTIATION SYSTEM ("RNS")?

A. Yes. BellSouth provides CLECs with access to the same pre-ordering, ordering, and provisioning OSS accessed by RNS and ROS through the machine-to-machine TAG and EDI (EDI does not currently provide pre-ordering functionality, but CLECs using EDI may utilize TAG for the pre-ordering function). There are no separate OSS established for CLECs,

e.g., regional street and address database, customer service record database, local facility assignment systems, service order communications system, etc. The same OSS are used for both CLEC and BellSouth retail service requests.

Additionally, BellSouth provides CLECs with all the specifications necessary for integrating the BellSouth interfaces. A CLEC may integrate ordering with pre-ordering functions by integrating the TAG pre-ordering interface with EDI ordering interface, or by integrating TAG pre-ordering with TAG ordering. CLECs interested in integrating the pre-ordering and ordering systems with their own internal systems must, of course, have their own internal OSS, and have responsibility for that integration. By using the integrateable interfaces, CLECs can customize their own marketing and sales support systems to perform functions such as automatic telephone number selection, Primary Interexchange Carrier ("PIC")/Local Primary Interexchange Carrier ("LPIC") searches, and credit checks. Integrateable interfaces allow CLECs to design the appearance and "feel" of their marketing and sales support systems as they see fit, just as BellSouth designs its own retail systems for its "feel" and desired appearance. Because these CLEC's marketing and sales support systems integrate the electronic interfaces with the CLEC's own internal OSS, CLECs can use information obtained via the electronic interfaces to build their own databases, such as databases of their own customer service records.

Q. IS BELLSOUTH'S OSS VOLUME AND SYSTEM UTILIZATION MANAGED ON A NINE-STATE BASIS FOR CAPACITY PLANNING?

A. Yes. As part of its regionalized OSS operational management, BellSouth manages and tracks the OSS volume and system utilization for capacity management on a nine-state basis. BellSouth also manages its software development and overall capacity monitoring on a regional basis.

Thus, OSS design, development, modification and performance is supported on a nine-state regional basis. Support centers for the processing and oversight of CLEC service requests, including provisioning and repair, are regional centers, as confirmed in the testimony of Kenneth Ainsworth.

Q. DO BELLSOUTH PERFORMANCE MEASUREMENTS REFLECT THE REGIONALITY OF BELLSOUTH'S OSS?

A. Yes. BellSouth's interfaces and OSS are regional. The processes for extracting, calculating, and reporting performance measurements are the same for each state. The best indicator, therefore, of OSS performance in Tennessee is the measurements currently posted on BellSouth's Web site.

SUMMARY AND RECOMMENDATIONS FOR THE AUTHORITY

Q. PLEASE SUMMARIZE YOUR TESTIMONY?

A. In my testimony, I have described BellSouth's interfaces, processes, and procedures that provide CLECs access to the required OSS information and functions in substantially the same manner as BellSouth's access for its retail customers, and therefore conform to the FCC's definition of nondiscriminatory access. Further, I have shown that BellSouth's OSS provides CLECs with:

- region-wide electronic and manual ordering interfaces that provide uniform functionality;
- region-wide comprehensive set of user guides, procedures, information, and job aids for the use of the electronic and manual ordering interfaces; and
- region-wide business rules with extensive training.

Additionally, BellSouth's OSS are designed, developed, modified, and measured for performance on a region-wide basis to operate in an indistinguishable manner whether a CLEC is in Tennessee, Georgia or any of the other seven states in the BellSouth region.

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes.

Exhibit OSS-69

Matrix showing regionality of systems

APPLICATIONS/SYSTEMS/DATABASES

Electronic Interface Applications	CLECs Databases	BellSouth OSS (shared by CLECs)	FUNCTION	SERVER Location(s)	STATE(s) Served
EDI			Electronic Data Interchange - Computer to Computer exchange, Industry Standard. Enables CLECs to process Local Service Requests (ordering).	Birmingham, AL	All states are served by this location.
LENS			Local Exchange Navigation System - WEB Based GUI used by CLECS for entering Local Service Requests (pre-order and firm order).	Charlotte, NC	All states are served by this location.
TAG			Telecommunications Access Gateway – Client application programming interface used by CLECs (pre-order and order).	Tucker, GA Charlotte, NC & Birmingham, AL	All states for Internet access All states are served by each of these locations for LAN to LAN access.
	LAUTO		Local Number Portability Service Order Generator – Service order generator for LNP.	Charlotte, NC	All states are served by this location.
	LSRR		Local Service Request Router – Routes service requests from EDI, TAG or LENS to the Corporate Gateway based on request type.	Birmingham, AL	All states are served by this location.
	LEO		Local Exchange Ordering – Stores, forwards and edits data for electronic processing.	Birmingham, AL	All states are served by this location.
	LESOG		Local Exchange Service Order Generator – translates LSR into SOCS acceptable service order format.	Jackson, MS & Birmingham, AL	All states are served by each of the locations.
		SOCS	Service Order Communication System – Collects, stores and distributes service orders to all user departments, including service order-driven mechanized systems.	Birmingham, AL Charlotte, NC	KY, TN, MS, AL, LA, GA NC, SC, FL
		DOE	Direct Order Entry – used by LCSC to input manual orders.	Miami, FL Charlotte, NC Atlanta, GA	FL NC, SC GA

APPLICATIONS/SYSTEMS/DATABASES

Electronic Interface Applications	CLECs Databases	BellSouth OSS (shared by CLECs)	FUNCTION	SERVER Location(s)	STATE(s) Served
					Users in all states have to access the DOE box which serves a particular state
		SONGS	Service Order Negotiation Generation System – used by LCSC to input manual orders.	Birmingham, AL	AL, KY, LA, MS, TN
		ATLAS	Application For Telephone Number Load Administration Selection – Provides telephone numbers to negotiation systems.	Birmingham, AL Charlotte, NC	AL, KY, LA, MS, GA, TN FL, NC, SC
		RSAG	Regional Street Address Guide – Provides address-related information for service negotiation and service provisioning.	Birmingham, AL Charlotte, NC	KY, TN, MS, AL, LA, GA NC, SC, FL
		P/SIMS	Product/Services Inventory Management System – Products and services are kept per switch and supplied downstream (through COFFI) to negotiation systems.	Birmingham, AL	All states are served by this location.
		DSAP	DOE Support Applications - Supports due date assignment information for region-wide systems.	Birmingham, AL Charlotte, NC	GA, KY, TN, MS, AL,, LA FL, NC, SC
		CRIS	Customer Record Information System – Provides end user and CLEC account information.	Birmingham, AL Charlotte, NC	KY, TN, MS, AL, LA, GA FL, SC, NC
		LFACS	Loop Facilities Assignment and Control System – Used to assign service orders and maintain the inventory of outside plant in BellSouth.	Charlotte, NC Birmingham, AL	GA, SC, FL KY, LA, NC, AL, TN, MS

APPLICATIONS/SYSTEMS/DATABASES

Electronic Interface Applications	CLECs Databases	BellSouth OSS (shared by CLECs)	FUNCTION	SERVER Location(s)	STATE(s) Served
		LMOS FE	Loop Maintenance Operation System Front End – provides the interfaces between the LMOS Host and various system and subsystems.	Nashville, TN Birmingham, AL Jackson, MS Charlotte, NC Miami, FL	TN, KY TN AL, LA, MS GA, NC, SC FL
		LMOS--HOST	Loop Maintenance Operation System Host – Stores and maintains customer records that are used to support maintenance operations.	Birmingham, AL Charlotte, NC	AL, LA, MS, KY, TN NC, SC, GA, FL
		MLT	Mechanized Loop Testing – uses operational software to make loop measurements and to provide interactive testing capability.	Birmingham, AL Charlotte, NC	TN, KY, AL, MS, LA NC, SC, GA, FL
		WFA	Work Force Administration System – WFA/C coordinates and tracks installation and maintenance activities. Provides ready access to detailed circuit records and circuit history.	Charlotte, NC Birmingham, AL	FL, NC, SC GA, AL, KY, LA, MS, TN
		MARCH	Memory Administration Recent Change – Memory administration system that translates line-related service order data into switch provisioning messages and automatically transmits the messages to targeted stored program control switches.	Charlotte, NC Birmingham, AL	FL, GA, NC, SC AL, LA, MS, KY, TN
		SOAC	Service Order Activation and Control – Receives orders from SOCS and routes them to all appropriate interfaces for assignment	Charlotte, NC Birmingham, AL	GA, SC, FL KY, LA, NC, AL, TN, MS

APPLICATIONS/SYSTEMS/DATABASES

Electronic Interface Applications	CLECs Databases	BellSouth OSS (shared by CLECs)	FUNCTION	SERVER Location(s)	STATE(s) Served
		COSMOS	Computer System for Mainframe Operations – assists the Line and Number Administration and Frame Control Centers in managing, controlling and utilizing main distribution frame and central office equipment, facilities and circuits.	Charlotte, NC Birmingham, AL	FL, GA, NC, SC LA, AL, MS, KY, TN
		SWITCH	COSMOS functional replacement	Charlotte, NC Birmingham, AL	FL, GA, NC, SC AL, KY, LA, MS, TN
		FOMS/FUSA		Charlotte, NC Birmingham, AL	FL, GA, NC, SC AL, KY, LA, MS, TN
		TIRKS	Trunk Integrated Record Keeping System – enables flowthrough provisioning within a single integrated operational environment while improving the management and use of interoffice facilities and related equipment.	Charlotte, NC Birmingham, AL	FL, NC, SC GA, AL, KY, LA, MS, TN

Currently, there are no projects in the planning or development stages to replace any of the applications, interfaces or databases listed; except, LMOS FE will be replaced by the LMOS Replacement project, and COSMOS will be replaced by SWITCH and FOMS/FUSA.

EXHIBIT OSS-70

Local Service Requests/Service Orders for Georgia and Tennessee

Local Service Requests/Service Orders for

Georgia

Service Order NP5JT1F4

Last Pass Received: 4/4/01 6:04:55 PM
Days in Current Status: 6

```
_PD_001_N5JT1F_ _ ___ 912264 _ AM _ ___-__-___Y______N
___-___ . : . _-__- __ BRUN 03 - 30-01_1551_03-30
NP5JT1F4_ _ 14R _ YAXQBZ0 _ 04- 05- 01_ L___
```

```
Number of times in this status: 001

ZRTI   S,QS,800 773-4967,DP,205321
ITTRA  912 264
ICENT  R0X
IQSN

---LIST
ILN
ILA                                         B*R*U*N*S*W*I*C*K, G*A
ISA                           BRUN, GA
IDZIP
ILOC
IFCTN

---DIR
IDDA                         CARPENTER/ STBRUN GA
IDEL   A1

---BILL
IBN1   BUDGET PHONE INC
IBA2   P O BOX 19630
IPO    SHREVEPORT LA 71149
ITAX   0NN0
IRTX   F S
IZPTX  Y
ITAR   236,863
ISS    000-00-0000;N
IRESH
IMAN
IBTN
IPON   274009

---S&E
I1     RESCN/TN              /ZRCI BUDGET PHONE INC,
I1     14R/TN               /PIC NONE/LPIC NONE/PCA OF, 03-30-01
       /LPCA OF, 03-30-01/NMC /TTRA 912 264/EXK 912 264/LRN 9122640000
       /TBE A/BLKD /RCU TWC
I1     CREX1/TN 912 262-6484/RMKR (A) 03-30-01
I1     BCR/TN
I1     BRD/TN
I1     AHB/TN
I1     9LM/TN
I1     LNPCX/TN
I1     SOMEC
```

DB09X085 IOA FOC/CN BROWSE SCREEN (FOC) PTRCBQR

JUMP TO: ____

X SEQ	FOC/CN	DDD	DATE/TIME CREATED CC	PON	VER TCIF	POST LENS
_ 0001	FOC	2001-04-02	2001-03-30-15.51.35.222329 8494	274009__________	00 ***9	01
_						
_						
_						
_						
_						
_						

PF1=>MAIN MENU PF2=>VIEW FOC/CN PF3=>SEND PF8=>JUMP

PF22=>FWD PAGE PF23=>BKWD PAGE LAST PAGE OF SECTION

```
DB09XM01 I0A              LOCAL SERVICE REQUEST (ADM)                  PTRCBQR
TCIF: ***9                                                    JUMP TO: ____
  AN:                  RESH/CC:      PON: 274009          VER: 00 SUP:
 ATN:                LSRNO: 849420010330000459          THIS LSR:   NEXT LSR:
================================ EDI SECTION ================================
ISA SEQ:           ISA DT: 010330     ISA TM: 1650
                   BST DT:            BST TM:
============================ ADMINISTRATION SECTION ============================
LOCQTY: 001 HTQTY: 00 SC: LCSC D/TSENT: 03/30/2001
DDD: 04/02/2001 CALC DD: 03/30/2001 DD: 04/05/2001 AP: L APPTIME:
DDDO:             DFDT:            PROJECT:                    CHC:
REQTYP: EB ACT: N TOS: 2BF
BCS:        EXP: N ALBR:    SCA:
AGAUTH: N D/AGAUTH:              AUTHNM:                   PORTTYP:
ACTL:              AI:    APOT:              LST:             LSO:
SPEC:           NC:       PBT:    NCI:
SECNCI:               RPON:                    RORD:
LSPAUTH:       LSPAUTHDT:             LSPAUTHNA:
CIC: 0000 RESID:
CUST: BUDGET PHONE INC           CCNA: CUS

 PF5=>BROWSE LIST  PF8=>JUMP     PF9=>CLAIM       PF10=>FWD SECT
                                                   LAST PAGE OF SECTION
 MSG164: FOR BELLSOUTH INTERNAL VIEW ONLY. NOT FOR OUTSIDE DISCLOSURE.
```

```
DB09XM03 I0A              LOCAL SERVICE REQUEST (INIT)                    PTRCBQR
TCIF: ***9                                                             JUMP TO: ____
  AN:                   RESH/CC:      PON: 274009              VER: 00 SUP:
 ATN:               LSRNO: 849420010330000459              THIS LSR:    NEXT LSR:
====================== INITIATOR CONTACT SECTION ===========================
INIT:                     TELNO:                        FAXNO:
STREET:
FLOOR:              ROOM/MAIL STOP:
CITY: SHREVEPORT                  ST: LA ZIP:

====================== IMPLEMENTATION CONTACT SECTION ======================
                              TEL:                   PAGER:
   IMPCON:
ALTIMPCON:

========================== DESIGN CONTACT  SECTION =========================
DSGCON:                     DRC:     TELNO:                        FAXNO:
STREET:
FLOOR:              ROOM/MAIL STOP:
CITY: SHREVEPORT                  ST: LA ZIP:

 PF5=>BROWSE LIST  PF8=>JUMP  PF9=>CLAIM     PF10=>FWD SECT  PF11=>BKWD SECT
                                                LAST PAGE OF SECTION
```

```
DB09XM02 I0A              LOCAL SERVICE REQUEST (BILL)                  PTRCBQR
TCIF: ***9                                                    JUMP TO: ____
  AN:                   RESH/CC:      PON: 274009          VER: 00 SUP:
 ATN:                LSRNO: 849420010330000459          THIS LSR:   NEXT LSR:
================================ BILL SECTION ================================
BI1: R BAN1: E                  BI2:   BAN2:
ACNA:   CUS IEBD:
BILLNM: BUDGET PHONE INC      SBILLNM:
STREET:                            FLOOR:              ROOM:
CITY: SHREVEPORT  STATE: LA ZIP:
BILLCON:                  TELNO:                   VTA:



============================== REMARKS  SECTION ==============================



 PF5=>BROWSE LIST  PF8=>JUMP     PF9=>CLAIM      PF10=>FWD SECT  PF11=>BKWD SECT
                                                  LAST PAGE OF SECTION
```

```
DB9XM041 I0A                        END USER (EU)                          PTRCBQR
TCIF: ***9                                                          JUMP TO: ____
  AN:                    RESH/CC:       PON: 274009          VER: 00 SUP:
 ATN:                  LSRNO: 849420010330000459          THIS LSR:   NEXT LSR:
========================= END USER FINAL BILL SECTION ==========================
EAN:                      EATN:                  BILLNM:
FBI: E SBILLNM:                                  STREET:
FLOOR:                 ROOM:           CITY:                                STATE:
ZIP CODE:               BILLCON:                  TEL NO:
======================== LOCATION AND ACCESS SECTION ==========================
LOCNUM: 000 LOCACT:    AACT:    LCON:                    TEL NO-LCON:
IWO:    IWCON:                                  IWCON TELNO:
NAME:                                SANO:           SASF:        SASD:
SASN:
SATH:              SASS:
FLOOR:                 ROOM:                    BLDG:
CITY: BRUN                           STATE: GA ZIP CODE:
SADLO:

ACCESS:
                                                 EUMI:    WSOP:    ERL:    IBT:
 PF5=>BROWSE LIST  PF8=>JUMP     PF9=>CLAIM       PF10=>FWD SECT  PF11=>BKWD SECT
 PF22=>FWD PAGE    PF23=>BKWD PAGE                 LAST PAGE OF SECTION
```

```
DB9XM191 I0A                    DIRECTORY LISTING (DIR)                    PTRCBQR
TCIF: ***9                                                          JUMP TO: ____
  AN:                      RESH/CC:       PON: 274009          VER: 00 SUP:
 ATN:                  LSRNO: 849420010330000459            THIS LSR:    NEXT LSR:
==================LISTING CONTROL/INDICATORS/INSTRUCTION SECTION================
LACT: N ALI:      RTY: LML LTY: 1 TT:    STYC: SL TOA: R  DOI: 0 WPP:
DLNUM: 0001 DIRNAME:
DIRSUB:                                          DML:    DLNM:    BRO:    ADV:
LTN:                NSTN:                         LNPL:    LNLN:
                                  LNFN:

TL:                 TITLE1:                TITLE2:                NICK:
DES:                               PLA:

                                ADI:    LAPR:        LANO:
LASF:        LASD:     LASN:
LATH:              LASS:     LALOC: BRUNSWICK                              LAST: GA
YPH:           SIC:


 PF5=>BROWSE LIST  PF8=>JUMP     PF9=>CLAIM       PF10=>FWD SECT  PF11=>BKWD SECT
 PF22=>FWD PAGE  PF23=>BKWD PAGE                   LAST PAGE OF SECTION
```

```
DB9XM151 I0A                    RESALE SERVICE (ACT)                    PTRCBQR
TCIF: ***9                                                          JUMP TO: ____
  AN:                     RESH/CC:       PON: 274009          VER: 00 SUP:
 ATN:                  LSRNO: 849420010330000459           THIS LSR:    NEXT LSR:
 ============================== SERVICE DETAIL ================================
RSQTY: 001 LOCNUM: 000 LNUM: 00001 LNEX:        NPI:    LNA: N LNECLSSVC: 14R
TNS:                    ORD: NP5JT1F4           OTN:
ISPID:                   PTKTYP:    TLI:          PTKCON:
SAN:                                    LEAN:                   LEATN:
CKR:                                              TSP:
ECCKT:                                          TERS:
FPI: B PIC: NONE LPIC: NONE SDI:    MATN:
CFA:                                               CNAME:
SGNL:     SSIG:     PULSE:       BA: A BLOCK: AH BA:    BLOCK:
JK-CODE:        JK-NUM:     JK-POS:     JR:    NIDR:
 ============================INSIDE WIRE  OPTIONS ==============================
IWJK:        IWJQ:     IWJK:        IWJQ:     IWJK:        IWJQ:
IWJK:        IWJQ:     IWJK:        IWJQ:     IWJK:        IWJQ:
IWJK:        IWJQ:     IWJK:        IWJQ:     IWJK:        IWJQ:

 TCOPT: N
 PF5=>BROWSE LIST   PF8=>JUMP     PF9=>CLAIM       PF10=>FWD SECT   PF11=>BKWD SECT
 PF22=>FWD PAGE     PF23=>BKWD PAGE                          MORE PAGES OF SECTION
```

```
DB9AM152 IOA                     RESALE                              PTRCBQR
TCIF: ***9                                                       JUMP TO: ____
 AN:                        RESH/CC:      PON: 274009          VER: 00 SUP:
 ATN:                   LSRNO: 849420010330000459          THIS LSR:   NEXT LSR:
============================== SERVICE SECTION ==============================
FA: USOC: FEATURE DETAIL:                                      SOFC:  FEATURE TAG:
N   AH8                                                         AH8         SC
N   BCR                                                         BCR         SC
N   BRD                                                         BRD         SC
N   CREX1                                                       CREX1       SC
N   14R    /RCU TWC/BLKD                                        14R         SC

TCOPT: N
PF5=>BROWSE LIST   PF8=>JUMP    PF9=>CLAIM       PF10=>FWD SECT  PF11=>BKWD SECT
PF22=>FWD PAGE     PF23=>BKWD PAGE                      LAST PAGE OF SECTION
```

Local Service Requests/Service Orders for

Tennessee

Service Order N9CV5NX9

Last Pass Received: 5/9/01 6:05:00 PM
Days in Current Status: 1

```
PD 001 NCV5NX           423622    AM      -  -   Y        N
                    - -   CHAT    05 - 09-01 0922 05-09
N9CV5NX9   1FR  YAXQBZ0   05-     10- 01  L
```

```
Number of times in this status: 001

ZRTI   S,QS,800 773-4967,DP,205321
ITTRA  423 622
ICENT  ROX
IQSN   423 493-1881

---LIST
ILN
ILA                        EAST\RIDGE/, T*N
ISA                       EAST\RIDGE,/ TN
IDZIP
IFCTN

---DIR
IDDA                                 EAST RIDGE TN
IDEL   A1

---BILL
IBN1   BUDGET PHONE INC
IBA2   P O BOX 19630
IPO    SHREVEPORT LA 71149
ITAX   0010
IRTX   F S C T
IZPTX  Y
ITAR   127,704
ISS    000-00-0000;N
IRESH
IMAN
IBTN
IPON   267144T05081

---S&E
I1     RESCN/TN                ./ZRCI BUDGET PHONE INC,
I1     1FR/TN                 ./PIC NONE/LPIC NONE/PCA OF, 05-09-01
       /LPCA OF, 05-09-01/NMC /TTRA 423 622/EXK 423 622/LRN 4236220000
       /TBE A/BLKD /RCU TWC
I1     ESX/TN
I1     CREX1/TN                ./RMKR (A) 05-09-01
I1     BCR/TN
I1     BRD/TN
I1     TTR/TN
I1     9LM/TN
I1     LNPCX/
I1     SOMEC
```

```
DB09X085                IOA FOC/CN BROWSE SCREEN (FOC)              PTRCBQR
                                                                JUMP TO:____

X  FOC/CN    DDD                DATE/TIME CREATED         PON              VER POST
SEQ                                     CC                           TYPE  TCIF LENS
_    FOC    2001-05-10   2001-05-09-09.25.15.455180  267144T05081____    00    01
0001                                                                  M    ***9
_

_

_

_

_

_

 SUBSEQUENT FOC REASON: ________________________________________________
PF1=>MAIN MENU   PF2=>VIEW FOC/CN   PF3=>SEND   PF7=>BUILD SUBSEQUENT FOC
PF8=>JUMP   PF22=>FWD PAGE   PF23=>BKWD PAGE                LAST PAGE OF SECTION
```

```
DB09XM01 I0A              LOCAL SERVICE REQUEST (ADM)                PTRCBQR
TCIF: ***9                                                    JUMP TO: _____
  AN:                  RESH/CC:      PON: 267144T05081     VER: 00 SUP:
 ATN:                LSRNO: 849420010509000032          THIS LSR:   NEXT LSR:
================================== EDI SECTION ================================
ISA SEQ:             ISA DT: 010509     ISA TM: 1024
                     BST DT:            BST TM:
============================== ADMINISTRATION SECTION ==========================
LOCQTY: 001 HTQTY: 00 SC: LCSC D/TSENT: 05/09/2001
DDD: 05/10/2001 CALC DD: 05/09/2001 DD: 05/10/2001 AP: L APPTIME:
DDDO:            DFDT:           PROJECT:                    CHC:
REQTYP: EB ACT: N TOS: 2BF
BCS:       EXP: N ALBR:    SCA:
AGAUTH: N D/AGAUTH:             AUTHNM:                  PORTTYP:
ACTL:              AI:   APOT:              LST:             LSO:
SPEC:          NC:       PBT:   NCI:
SECNCI:               RPON:                   RORD:
LSPAUTH:      LSPAUTHDT:            LSPAUTHNA:
CIC: 0000 RESID:
CUST: BUDGET PHONE INC          CCNA: CUS

 PF5=>BROWSE LIST  PF8=>JUMP    PF9=>CLAIM      PF10=>FWD SECT
                                                 LAST PAGE OF SECTION
 MSG164: FOR BELLSOUTH INTERNAL VIEW ONLY. NOT FOR OUTSIDE DISCLOSURE.
```

```
DB09XM03 I0A              LOCAL SERVICE REQUEST (INIT)                PTRCBQR
TCIF: ***9                                                    JUMP TO: _____
  AN:                  RESH/CC: 8494 PON: 267144T05081     VER: 00 SUP:
 ATN:                LSRNO: 849420010509000032          THIS LSR:   NEXT LSR:
====================== INITIATOR CONTACT SECTION ============================
INIT:                  TELNO:                    FAXNO:
STREET:
FLOOR:              ROOM/MAIL STOP:
CITY: SHREVEPORT                ST: LA ZIP:

====================== IMPLEMENTATION CONTACT SECTION =======================
                             TEL:                 PAGER:
   IMPCON:
ALTIMPCON:


============================ DESIGN CONTACT  SECTION ========================
DSGCON:                 DRC:     TELNO:                  FAXNO:
STREET:
FLOOR:              ROOM/MAIL STOP:
CITY: SHREVEPORT                ST: LA ZIP:

 PF5=>BROWSE LIST  PF8=>JUMP  PF9=>CLAIM     PF10=>FWD SECT  PF11=>BKWD SECT
                                                LAST PAGE OF SECTION
```

```
DB09XM02 I0A              LOCAL SERVICE REQUEST (BILL)                PTRCBQR
TCIF: ***9                                                      JUMP TO: ____
  AN:                   RESH/CC:      PON: 267144T05081     VER: 00 SUP:
 ATN:                LSRNO: 849420010509000032          THIS LSR:   NEXT LSR:
================================== BILL SECTION ================================
BI1: R BAN1: E                  BI2:    BAN2:
ACNA:    CUS IEBD:
BILLNM: BUDGET PHONE INC      SBILLNM:
STREET:                              FLOOR:              ROOM:
CITY: SHREVEPORT  STATE: LA ZIP:
BILLCON: RON MUNN          TELNO:                    VTA:



============================== REMARKS  SECTION ================================


 PF5=>BROWSE LIST  PF8=>JUMP     PF9=>CLAIM      PF10=>FWD SECT  PF11=>BKWD SECT
                                                  LAST PAGE OF SECTION
```

```
DB9XM041 I0A                        END USER (EU)                          PTRCBQR
TCIF: ***9                                                          JUMP TO: ____
  AN:                    RESH/CC:      PON: 267144T05081     VER: 00 SUP:
 ATN:                  LSRNO: 849420010509000032          THIS LSR:   NEXT LSR:
========================== END USER FINAL BILL SECTION ==========================
EAN:                     EATN:                  BILLNM:
FBI: E SBILLNM:                                 STREET:
FLOOR:                ROOM:           CITY:                              STATE:
ZIP CODE:              BILLCON:                    TEL NO:
========================== LOCATION AND ACCESS SECTION ==========================
LOCNUM: 000 LOCACT:    AACT:    LCON:                  TEL NO-LCON:
IWO:    IWCON:                                IWCON TELNO:
NAME:                              SANO:        SASF:        SASD:
SASN:
SATH:              SASS:
FLOOR:                ROOM:                   BLDG:
CITY: EAST RIDGE                  STATE: TN ZIP CODE:
SADLO:

ACCESS:
                                                EUMI:    WSOP:    ERL:    IBT:
 PF5=>BROWSE LIST   PF8=>JUMP     PF9=>CLAIM       PF10=>FWD SECT   PF11=>BKWD SECT
 PF22=>FWD PAGE     PF23=>BKWD PAGE                  LAST PAGE OF SECTION
```

```
DB9XM191 I0A                DIRECTORY LISTING (DIR)                    PTRCBQR
TCIF: ***9                                                        JUMP TO: ____
  AN:                  RESH/CC:      PON: 267144T05081     VER: 00 SUP:
 ATN:               LSRNO: 849420010509000032           THIS LSR:   NEXT LSR:
==========-=====LISTING CONTROL/INDICATORS/INSTRUCTION SECTION==============
LACT: N ALI:     RTY: LML LTY: 1 TT:   STYC: SL TOA: R  DOI: 0 WPP:
DLNUM: 0001 DIRNAME:
DIRSUB:                                          DML:   DLNM:   BRO:   ADV:
LTN:              NSTN:                          LNPL:  LNLN:
                                  LNFN:

TL:               TITLE1:              TITLE2:              NICK:
DES:                              PLA:

                              ADI:   LAPR:       LANO:
LASF:       LASD:    LASN:
LATH: DR          LASS:    LALOC: East Ridge                        LAST: TN
YPH:         SIC:


 PF5=>BROWSE LIST  PF8=>JUMP     PF9=>CLAIM      PF10=>FWD SECT  PF11=>BKWD SECT
 PF22=>FWD PAGE  PF23=>BKWD PAGE                  LAST PAGE OF SECTION
```

```
DB9XM151 I0A                    RESALE SERVICE (ACT)                    PTRCBQR
TCIF: ***9                                                        JUMP TO: ____
  AN:                    RESH/CC:      PON: 267144T05081     VER: 00 SUP:
 ATN:                  LSRNO: 849420010509000032          THIS LSR:   NEXT LSR:
 ============================== SERVICE DETAIL ================================
RSQTY: 001 LOCNUM: 000 LNUM: 00001 LNEX:       NPI:   LNA: N LNECLSSVC: 1FR
TNS:                   ORD: N9CV5NX9           OTN:
ISPID:                  PTKTYP:   TLI:          PTKCON:
SAN:                                  LEAN:                  LEATN:
CKR:                                              TSP:
ECCKT:                                          TERS:
FPI: B PIC: NONE LPIC: NONE SDI:   MATN:
CFA:                                               CNAME:
SGNL:    SSIG:    PULSE:      BA: A BLOCK: AH BA:   BLOCK:
JK-CODE:       JK-NUM:    JK-POS:    JR:   NIDR:
 ============================INSIDE WIRE  OPTIONS ================================
IWJK:       IWJQ:    IWJK:       IWJQ:    IWJK:       IWJQ:
IWJK:       IWJQ:    IWJK:       IWJQ:    IWJK:       IWJQ:
IWJK:       IWJQ:    IWJK:       IWJQ:    IWJK:       IWJQ:

 TCOPT: N
 PF5=>BROWSE LIST  PF8=>JUMP    PF9=>CLAIM      PF10=>FWD SECT  PF11=>BKWD SECT
 PF22=>FWD PAGE    PF23=>BKWD PAGE                  MORE PAGES OF SECTION
```

```
DB9AM152 I0A                          RESALE                          PTRCBQR
TCIF: ***9                                                          JUMP TO: ____
  AN:                      RESH/CC:       PON: 267144T05081     VER: 00 SUP:
 ATN:                   LSRNO: 849420010509000032            THIS LSR:    NEXT LSR:
================================ SERVICE SECTION ================================
FA: USOC: FEATURE DETAIL:                                    SOFC:   FEATURE TAG:
N  BCR                                                        BCR         SC
N  BRD                                                        BRD         SC
N  CREX1                                                      CREX1       SC
N  ESX                                                        ESX         SC
N  TTR                                                        TTR         SC
N  1FR    /RCU TWC/BLKD                                       1FR         SC


TCOPT: N
PF5=>BROWSE LIST  PF8=>JUMP    PF9=>CLAIM      PF10=>FWD SECT  PF11=>BKWD SECT
PF22=>FWD PAGE    PF23=>BKWD PAGE                          LAST PAGE OF SECTION
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BELLSOUTH TELECOMMUNICATIONS, INC.

DIRECT TESTIMONY OF DAVID P. SCOLLARD

BEFORE THE TENNESSEE REGULATORY AUTHORITY

DOCKET NO. 01-00362

OCTOBER 22, 2001

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

A. I am David P. Scollard, Room 28A1, 600 N. 19th St., Birmingham, AL 35203. My current title is Manager, Wholesale Billing at BellSouth Billing, Inc. (BBI), a wholly owned subsidiary of BellSouth Telecommunications, Inc. ("BellSouth"). In that role, I am responsible for overseeing the implementation of various changes to BellSouth's Customer Records Information System (CRIS) and Carrier Access Billing System (CABS).

Q. PLEASE SUMMARIZE YOUR BACKGROUND AND EXPERIENCE.

A. I graduated from Auburn University with a Bachelor of Science Degree in Mathematics in 1983. I began my career at BellSouth as a Systems Analyst within the Information Technology Department with responsibility for developing applications supporting the Finance organization. I have served in a number of billing system design and billing operations roles within the billing organization. Since I assumed my present responsibilities, I have overseen the progress of a number of billing system revision projects such as the billing of

unbundled network elements (UNEs), as well as the development of billing solutions in support of new products offered to end user customers. I am familiar with the billing services provided by BellSouth to local competitors, interexchange carriers (IXCs) and retail end user customers.

Q. HAVE YOU TESTIFIED PREVIOUSLY BEFORE ANY STATE PUBLIC SERVICE COMMISSION? IF SO, BRIEFLY DESCRIBE THE SUBJECT OF YOUR TESTIMONY.

A. I have testified before the state public service commissions in South Carolina, Florida, Georgia, Kentucky, Louisiana, Mississippi, the Tennessee Regulatory Authority, and the Utilities Commission in North Carolina on issues regarding the capabilities of the systems used by BellSouth to bill for services provided to retail customers, IXCs and Competitive Local Exchange Carriers (CLECs).

Q. WHAT SYSTEMS DOES BELLSOUTH USE TO PROVIDE BILLING TO CLECS FOR SERVICES ORDERED FROM BELLSOUTH?

A. BellSouth uses three systems to provide CLECs with bills for services ordered from BellSouth. These systems are CRIS, CABS and the BellSouth Industrial Billing System (BIBS). CRIS is used to provide billing for resale service requests, resale usage events, UNE service requests and UNE billing transactions for unbundled switched ports and unbundled Service Level 1 loops. Billing for all other UNEs and interconnection services are channeled

through CABS. BIBS processes the usage events associated with unbundled switch ports.

Q. DESCRIBE THE TYPES OF BILLING INFORMATION THAT BELLSOUTH PROVIDES TO CLECS.

A. BellSouth provides CLECs with two types of billing information. First, the Daily Usage Files (DUF) provide CLECs with usage records for call events that are recorded by BellSouth's central offices. CLECs may use DUF records in billing their end users or access customers. BellSouth also provides detail records to enable CLECs to bill other telecommunications providers for services jointly provided by BellSouth and the CLEC. These records are provided in accordance with the Meet-Point Billing guidelines established by the industry and these same standards are used in all states in BellSouth's region.

Second, BellSouth provides CLECs a wide range of choices for receiving invoices for the services they order. BellSouth offers its customers ordering retail services the option of receiving paper or electronic bills using the capabilities provided by CRIS. Billing records can be delivered via a number of output media such as diskette, magnetic tape, and CD-ROM. Customers may also receive billing records via direct data transmission. Through the capabilities provided by CABS, BellSouth provides bills to its IXC and retail customers in either an industry-developed print image format or in the Ordering and Billing Forum (OBF) -developed Billing Data Tape (BDT)

format. Print image bills can be obtained on paper, diskette or CD-ROM. BDT records can be delivered via magnetic tape (tape reels or cartridges) or Connect:direct transmission (point-to-point dedicated line data transfer). BellSouth provides any CLEC with the same bill formats it provides to its own retail customers. In addition, BellSouth provides the CLECs the option to have all of their resale services, UNE services and interconnection services billed on CABS formatted bills.

Q. PLEASE SUMMARIZE HOW THE BELLSOUTH BILLING PROCESSES WHICH SUPPORT CLECS HAVE CHANGED OVER TIME?

A. The billing systems are revised to implement new guidelines. The following is an example of the changes that impact the billing systems. In the fall of 1998, the OBF completed its work on the new guidelines for the bill formats to be used in billing UNEs. The guidelines called for an implementation timeframe that extended into the middle of 1999. BellSouth completed the massive amount of work required to provide these new formats and implemented the new capability in September 1999.

Q. IDENTIFY THE SYSTEMS BELLSOUTH USES TO PROVIDE BILLING TO CLECS FOR SERVICES ORDERED FROM BELLSOUTH.

A. The systems BellSouth uses to provide bills to CLECs are essentially the same as those used to provide bills to its retail and IXC customers. However, an additional enhancement has been added to provide CLECs with switch port

usage. This additional enhancement is called BIBS. The actual systems used to accumulate, rate and format billing transactions vary depending on the services being ordered. If a CLEC orders a service for resale, the service request is channeled to CRIS to maintain a record for the CLEC of the services that BellSouth has provided. Likewise, usage events (toll calls, local calls, vertical service activations that are billed on a per use basis, etc.) associated with the resold services are also sent through CRIS.

For facilities-based CLECs, CRIS is used to maintain a record of service requests and resulting billing transactions for unbundled switch ports and unbundled loops (Service Level 1 loops). Service requests for all other UNEs and interconnection services are channeled through CABS. Therefore, all of the billing transactions related to all other UNEs and interconnection services are accumulated in CABS for preparing bills to the CLEC.

These two systems (CRIS and CABS) are the same systems used to bill BellSouth retail customers and IXCs for the services provided by BellSouth. Regardless of which of the two systems is being used, BellSouth performs the same billing processes to prepare an invoice for a CLEC as it does for a retail customer or IXC.

Q. GENERALLY, HOW DOES THE BILLING PROCESS WORK?

A. Any billing process is designed to perform two basic functions. First, there are the daily processes that are performed to input customer transactions, edit them

and prepare them as much as possible for creation of the bill. The types of daily transactions accumulated and processed in CRIS and CABS are quite numerous but generally include service orders (which provide information about customer order activity), switch recordings (which provide records of billable call events), payments received from customers, and other miscellaneous types of transactions such as adjustments for previously billed amounts. Second, at the end of each bill period (generally each month), the events for a given customer are extracted, formatted in a manner that is expected by the customer and distributed either via some type of postal carrier or sent electronically to the customer. The systems used to process CLEC billing transactions are essentially the same systems used to create bills for BellSouth's retail and IXC customers. Therefore, the individual transactions for CLECs are handled in the same manner as those for BellSouth's retail and IXC customers.

Q. DESCRIBE HOW THE BILLING SYSTEMS PROCESS SERVICE ORDER INFORMATION FOR RETAIL CUSTOMERS AND CLECS.

A. Each day, service order information from the ordering systems is received into either CRIS or CABS depending on the type of service being ordered. The service order information is not separated between CLEC orders and retail or IXC orders. The data comes to the billing systems together. The information is edited to insure that all of the information needed for billing purposes is complete and accurate. Any errors found are investigated, corrected and the service orders are sent back to CRIS or CABS for processing. Again, the data

being edited and corrected is not separated between CLEC data and retail or IXC data. The editing and investigation operations are performed on both sets of data together. Once the service orders have passed the various edits, the rating process begins. Services being ordered by a customer (both CLEC and retail customers) are encoded on service orders using Universal Service Order Codes (USOCs). The USOCs indicate to the billing system which type of service is included on each of the orders. The rating tables in the billing systems contain the rates for each of the USOCs that should be billed. For retail and IXC customers, the rates are normally defined in the various tariffs filed with this Authority. Rates for individual services ordered by CLECs are generally defined in the interconnection agreements negotiated between the CLEC and BellSouth. The rating process in CRIS and CABS matches the USOCs on the service orders with the rates in the rating tables and determines how much should be charged to the customers. Again, the rating process performs this function for both CLEC orders and retail customers at the same time. Finally, the rated service order information is updated to the customer's account records in either CRIS or CABS to await the end of the month and inclusion on the customer's invoice. This final step, like the proceeding steps, is performed on both CLEC and retail service orders at the same time.

Q. HOW ARE USAGE RECORDS PROCESSED FOR CLECS AND BELLSOUTH RETAIL CUSTOMERS?

A. Usage records for both CLEC customers and BellSouth's retail customers are generated in the switches and other database elements incorporated into the

BellSouth network. Several times each day, these usage records are transmitted from the network to a collection system that is used by the billing system. At the time the data is collected, nothing on the usage records themselves distinguishes a CLEC record from a BellSouth record. Therefore, all of the data is collected together. The collection system then sends the records to a process that identifies where each record should be sent for billing the customer. If the record is associated with an access call or a call associated with a CLEC's interconnection service, it is sent to CABS. If the record is associated with a retail service or a resale service, it is sent to CRIS for handling. Records associated with unbundled switch ports are sent to BIBS. The invoice formats developed by the industry at the OBF did not allow switch port usage to be billed with call-by-call detail as is done for end users in CRIS, nor did the invoice call for the usage to be summarized in the way that access usage is billed in CABS. Therefore, BIBS was developed to meet the unique billing requirements for UNE usage.

In each case, the usage records are directed to the appropriate process dependent on the type of service the record represents rather than on whether or not the customer is a CLEC. For example, usage records destined for CRIS contain both retail records to be billed to BellSouth's customers as well as resale records of the CLECs.

Once in CRIS, CABS or BIBS, the usage records are edited, rated and stored until the close of the customer's billing period. These steps are performed for CLECs in the same manner as they are for BellSouth's retail or IXC

customers. In addition, each day, the usage records for those CLECs which have elected to receive daily usage information via the Optional Daily Usage File (ODUF) or the Access Daily Usage File (ADUF) are copied and included on the files and transmitted to the CLEC. Finally, at the appropriate time, the edited and rated usage is placed on the customers invoice in the format that the customer has selected in the same manner as usage is included on the invoices BellSouth provides to its retail customers and IXC customers.

Q. HOW ARE THE RATE TABLES DESCRIBED ABOVE UPDATED FOR CLECS?

A. Once an interconnection agreement with a particular CLEC has been negotiated and approved, the various sections are sent to the billing group for updating in the CRIS and CABS rate tables. For UNE services and interconnection services, the various USOC rates and usage rates are added to the tables with a rate for each element to be billed. Because the resale rates to be charged to a given customer are based on the General Subscriber Services Tariff (GSST) and the Private Line Tariff, the only information updated for the CLEC is the resale discount to be applied. Once the CLEC's rates have been added to the tables, then service orders sent from the CLEC and usage events generated from the provisioned services can be rated in an accurate and timely manner. Service order edits are in place to prevent a CLEC from ordering services until this process is completed.

Q. IF A BELLSOUTH END USER ELECTS TO BE SERVED BY A CLEC, HOW IS THIS EVENT UPDATED IN THE BELLSOUTH BILLING SYSTEMS?

A. The CLEC will send to BellSouth information identifying the customer which has selected the CLEC to be its local provider and also indicating what type of service the CLEC is requesting from BellSouth to serve that end user (resale service, UNE, LNP, etc.). That information will generate service orders, which will be sent to the appropriate billing system as I have described above. The service orders will disconnect the end user's BellSouth account and will establish an account for the CLEC reflecting the services it has ordered from BellSouth to serve the end user. The end user will receive a final bill from BellSouth reflecting the fact that it has left BellSouth on whatever date was appropriate for this transaction. This final bill will include a pro rata credit for all services billed in advance on the end users previous bill from the day the customer left BellSouth through the end of the billing period. The CLEC's first bill for its new account will include charges beginning on the day after the end user stopped being provided service from BellSouth. In this manner, there is no overlap between the time BellSouth stops billing the end user and begins billing the CLEC.

Q. DESCRIBE THE PROCESS BY WHICH THE INVOICES ARE CREATED AT THE END OF EACH BILL PERIOD.

A. In both CRIS and CABS, there are databases which keep up with the dates on which each account has been scheduled to be billed. On the appropriate date, all of the transactions that have been accumulated for a given account are sent to the bill calculation process for totaling up all of the charges the customer owes. The system then takes the calculated charges and formats them as requested by the customer and creates the actual invoice either on paper or in an electronic format.

Q. WHAT TYPES OF USAGE DATA CAN CLECS OBTAIN FROM BELLSOUTH?

A. As I mentioned previously, BellSouth has developed a family of products collectively known as the Daily Usage Files (DUF) that provide CLECs with usage records for call events that are recorded by BellSouth's central offices. These products are identical in all of the states in BellSouth's region. Two separate interfaces are available from which this information can be obtained.

First, ODUF contains information on billable transactions for resold lines, interim number portability accounts and unbundled switch ports. A CLEC can use the ODUF to bill its end users who are served by resold lines, interim number portability or unbundled switch ports for usage events associated with calls placed by those end users. Beginning in December 1998, BellSouth enhanced ODUF to include usage records for local calls originating from a CLEC's flat-rate lines ordered as resale. BellSouth refers to this ODUF option

as the Enhanced ODUF, or EODUF. BellSouth developed the EODUF specifically to respond to CLEC complaints that such data was not available.

Second, ADUF provides the CLEC with records for billing IXCs interstate and intrastate access charges (whether the call was handled by BellSouth or an IXC) or reciprocal compensation charges to other LECs for calls originating from and terminating to unbundled switch ports. The BellSouth network does not have the capability to record a terminating call record when an end user served out of a BellSouth switch has placed a call to a CLEC's unbundled switch port. Because the UNE charges that would be paid by the CLEC to BellSouth for these calls offsets the reciprocal compensation charges that would be collected for the same calls, the need for the call records is obviated. This process, in effect, represents a surrogate for the records which is offered to all CLECs obviating the need for the data.

The capabilities of the EODUF and ADUF that are made available to CLECs fully answer the questions that the FCC raised in the Second Louisiana Order, 13 FCC Rcd at 20734, ¶¶160, 230, 232 concerning usage records.

Q. BESIDES THE USAGE RECORDS PROVIDED TO CLECS VIA DUF, WHAT OTHER TYPES OF USAGE RECORDS DOES BELLSOUTH MAKE AVAILABLE TO CLECS?

A. In addition to the DUF records, BellSouth provides detail records to enable CLECs to bill other telecommunications providers for services jointly provided

by BellSouth and the CLEC. These records are provided in accordance with the Meet-Point Billing guidelines established by the industry and these same standards are used in all states in BellSouth's region.

Q. ARE THE PROCESSES AND EQUIPMENT USED FOR BILLING IN TENNESSEE THE SAME AS THE PROCESSES AND EQUIPMENT USED IN GEORGIA AND THE REMAINING STATES IN BELLSOUTH'S REGION?

A. Yes. For CRIS, CABS and BIBS, the same physical software that processes transactions and creates invoices in Georgia also performs these same functions in Tennessee and all other states in the BellSouth region. The same group performs the control functions described previously for all of the states in the BellSouth region, including Tennessee. A central staff supporting all states develops methods and procedures required to perform all of the steps to accurately produce bills for CLECs. The maintenance of the various reference tables (such as product rates, etc.) used by the billing system is handled for all states by one group. The systems, processes and procedures are the same for all states and are created, maintained and executed by the same group of employees regardless of the state being processed.[1]

[1] During November and December, 2001, BellSouth plans to upgrade portions of the billing systems used to bill CLECs for unbundled switch ports and port / loop combinations (including the UNE-P). This effort has been referred to in certain venues as the "Tapestry" project. BellSouth refers to this initiative as the "Integrated Billing Solution" (IBS). The changes will involve usage processing functions currently being performed by BIBS, the calculation of charges for these products currently provided within CRIS today, and accounts receivable and financial tracking internal to BellSouth. The upgrade will also provide a flexible bill formatting tool for BellSouth to use in implementing OBF-directed changes to the bill formats for switch ports as well as different tools for the Service Reps to use in better serving the CLECs. Billing information currently provided to CLECs, i.e. Daily Usage Files, OBF compliant bill formats, CSR data and Billing Data Transmissions, will continue to be provided in

To effectively manage the massive amounts of data processing required to keep the daily billing cycles running, customer accounts are segregated into separate sets of databases depending on the state in which that account resides. Because of this, multiple occurrences of CRIS, BIBS and CABS run in parallel at the same time utilizing all of these databases. However, all of the software versions of CRIS, CABS and BIBS are identical to each other and they are run on the same type of hardware for all states. These separate processing streams are running in two data centers in Birmingham, Alabama and Charlotte, North Carolina. However, regardless of which processing stream is running, the software, controls, procedures and processing steps required to create invoices for customers (CLEC and retail) are the same.

Q. DOES THIS MEAN THAT THERE ARE NO DIFFERENCES AT ALL BETWEEN INVOICES PROVIDED TO CUSTOMERS IN TENNESSEE FROM INVOICES PROVIDED TO CUSTOMERS IN OTHER STATES SERVED BY BELLSOUTH?

A. No. Obviously because the products and services offered by BellSouth to customers in Tennessee may differ from those offered in other states, the invoices themselves will not be identical. While the underlying logic for CRIS, CABS and BIBS is the same throughout the nine states served by BellSouth,

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compliance with industry formats and standards.The current schedule (subject to change driven by the results of system testing or other implementation concerns) calls for IBS to be implemented in Mississippi, Georgia and Florida by the end of 2001. Implementation in the remaining states in BellSouth's region is scheduled to be completed in 2002.

state-specific and CLEC-specific differences within the systems are necessary due to account for such things as:

- different rates for products between states;
- varying tax rules that may be adopted by state and local governments;
- differences in the tariffs that have been approved by the Commissions;
- CLEC-specific differences in product rates or resale discounts.

To account for these differences, the reference tables BellSouth uses in its billing systems must carry state-specific and CLEC-specific information. However, the systems and processes used to maintain these tables, regardless of the state, are the same as those successfully tested in Georgia.

Q. WOULD YOU PLEASE SUMMARIZE YOUR TESTIMONY?

A. Yes. I have shown that the billing systems and processes used in Tennessee are the same as those used in Georgia and all other states in the BellSouth region.

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes.