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REGULATORY AUTH.

 **BELLSOUTH**

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Guy M. Hicks
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OFFICE OF THE
October 22, 2001 SECRETARY

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VIA HAND DELIVERY

RECEIVED
MELVIN MALONE

OCT 22 2001

TN REGULATORY AUTHORITY

David Waddell, Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37238

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:

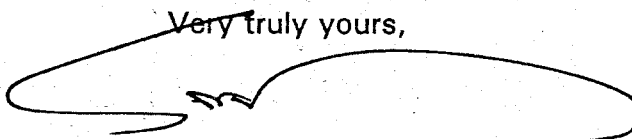
Enclosed are five paper copies and one CD version of the pre-filed Direct
Testimony and Exhibits of the following witnesses:

Ken Ainsworth
Alfred Heartley
Milton McElroy

Alphonso Varner
Ronald Pate
David Scollard

CD versions of the attached testimony and exhibits have been provided to counsel
of record.

Very truly yours,



Guy M. Hicks

GMH:ch
Enclosure

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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

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

5

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

9

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

15

16 Q. HOW IS YOUR TESTIMONY ARRANGED?

17

18 A. My testimony is divided into the following sections:

19

20 Part A: Executive Summary: Pages 3 to 8.

21 The Executive Summary contains an overview of how BellSouth is providing
22 billing to local competitors on a non-discriminatory basis.

23 Part B: Comprehensive Discussion of the Issues: Pages 8 to 32.

24

25

1 Part B contains a more extensive discussion of how BellSouth is providing
2 billing to local competitors on a non-discriminatory basis as well as discussion
3 on how BellSouth has continued to improve its billing process.

4
5 PART A: EXECUTIVE SUMMARY

6
7 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS
8 PROCEEDING?

9
10 A. The purpose of my testimony is to describe how BellSouth is providing billing
11 to local competitors on a non-discriminatory basis in accordance with the
12 Telecommunications Act of 1996 (“the Act”) and Federal Communications
13 Commission (FCC) requirements, and to describe how BellSouth has
14 continued to improve its billing processes since the 1998 proceedings on inter-
15 LATA long distance relief before this Authority. My testimony will also
16 specifically address several issues related to BellSouth’s billing system
17 capabilities that have been raised by CLECs in recent months. As my testimony
18 will demonstrate, BellSouth does not discriminate in its provision of wholesale
19 bills or usage information to competing carriers.

20
21 Q. WHAT SYSTEMS DOES BELL SOUTH USE TO PROVIDE BILLING TO
22 CLECS FOR SERVICES ORDERED FROM BELL SOUTH?

23
24 A. BellSouth uses three systems to provide CLECs with bills for services ordered
25 from BellSouth. These systems are CRIS, CABS and the BellSouth Industrial

1 Billing System (BIBS). CRIS is used to provide billing for resale service
2 requests, resale usage events, UNE service requests and UNE billing
3 transactions for unbundled switched ports and unbundled Service Level 1
4 loops. Billing for all other UNEs and interconnection services are channeled
5 through CABS. BIBS processes the usage events associated with unbundled
6 switch ports.

7

8 Q. HOW DO THE PROCESSES USED TO BILL CLECS COMPARE TO
9 THOSE USED TO BILL BELL SOUTH'S RETAIL AND IXC
10 CUSTOMERS?

11

12 A. The systems and billing processes BellSouth uses to provide bills to CLECs are
13 essentially the same as those used by BellSouth to provide bills to its retail and
14 IXC customers. However, BIBS was added as an additional enhancement to
15 provide CLECs with switch port usage. The billing process performs two basic
16 functions. First, it performs the daily processes that input, edit and prepare
17 customer transactions. These transactions generally include service orders,
18 switch recordings or usage records, payments, and adjustments. Second, it
19 performs the monthly processes that extract, format and distribute billable
20 events to the customer. BellSouth retail, IXC and CLEC data comes to the
21 billing systems together and is processed together. Whether the inputs being
22 collected are usage records, payments, adjustments or service orders, the
23 systems used to collect and send them to the billing systems are the same for
24 all customers. Also, all of the bills marked for a specific bill period in both

25

1 CRIS and CABS are created together. No separate processing is done to create
2 a bill for a CLEC.

3

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

6

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

16

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

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

8

9 Q. PLEASE SUMMARIZE THE TYPES OF CONTROLS THAT ARE IN
10 PLACE TO INSURE BELL SOUTH'S BILLING SYSTEMS ARE
11 PROCESSING BILLING TRANSACTIONS CORRECTLY.

12

13 A. The billing quality assurance efforts of BellSouth can be divided into three
14 broad categories. First, myriad controls, exception checks and error correction
15 activities are performed each day on the inputs that make up "billing". Second,
16 a great deal of emphasis is placed on control of the numerous tasks that must
17 take place as a "bill period" is pulled, or readied, for creation. The final area
18 involves bill distribution and post-billing. Here, the billing transactions are
19 printed on paper or, alternatively, formatted into electronic billing records and
20 mailed (or transmitted) to the customers. Each of these quality assurance
21 measures is identical for CLEC bills and retail or IXC bills.

22

23 Q. PLEASE SUMMARIZE THE ASSURANCES THE AUTHORITY HAS
24 THAT BELL SOUTH'S BILLING PROCESSES PROVIDE USAGE AND

25

1 BILLING DATA TO CLECS IN SUBSTANTIALLY THE SAME TIME AND
2 MANNER THAT BELL SOUTH PROVIDES TO ITSELF.

3

4 A. BellSouth produces a number of performance measures that track how well
5 BellSouth's (OSS) are performing. The billing measures include comparisons
6 of CLEC billing and usage accuracy and timeliness results with the same
7 information provided to BellSouth's own customers. So, regardless of the
8 system being used (CRIS, CABS or BIBS) to provide a CLEC with a bill, these
9 measures will show how well BellSouth's CLEC billing operations are
10 performing in relation to its own retail operations. Additionally, the third party
11 testing that has been ordered by the Public Service Commission in Georgia has
12 tested all of these processes. The test reports from this review will provide this
13 Authority with a full appreciation for how well the systems used by BellSouth
14 to provide CLECs with billing information are performing for CLECs in
15 Tennessee.

16

17 Q. PLEASE SUMMARIZE HOW THE BELL SOUTH BILLING PROCESSES
18 WHICH SUPPORT CLECS HAVE CHANGED OVER TIME?

19

20 A. The billing systems are revised to implement new guidelines. The following is
21 an example of the changes that impact the billing systems. In the fall of 1998,
22 the OBF completed its work on the new guidelines for the bill formats to be
23 used in billing UNEs. The guidelines called for an implementation timeframe
24 that extended into the middle of 1999. BellSouth completed the massive

25

1 amount of work required to provide these new formats and implemented the
2 new capability in September 1999.

3

4 **PART B:** **COMPREHENSIVE DISCUSSION OF THE ISSUES**

5

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

8

9 A. The systems BellSouth uses to provide bills to CLECs are essentially the same
10 as those used to provide bills to its retail and IXC customers. However, an
11 additional enhancement has been added to provide CLECs with switch port
12 usage. This additional enhancement is called BIBS. The actual systems used to
13 accumulate, rate and format billing transactions vary depending on the services
14 being ordered. If a CLEC orders a service for resale, the service request is
15 channeled to CRIS to maintain a record for the CLEC of the services that
16 BellSouth has provided. Likewise, usage events (toll calls, local calls, vertical
17 service activations that are billed on a per use basis, etc.) associated with the
18 resold services are also sent through CRIS.

19

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

1

2

These two systems (CRIS and CABS) are the same systems used to bill

3

BellSouth retail customers and IXC's for the services provided by BellSouth.

4

Regardless of which of the two systems is being used, BellSouth performs the

5

same billing processes to prepare an invoice for a CLEC as it does for a retail

6

customer or IXC.

7

8 Q. GENERALLY, HOW DOES THE BILLING PROCESS WORK?

9

10 A. Any billing process is designed to perform two basic functions. First, there are
11 the daily processes that are performed to input customer transactions, edit them
12 and prepare them as much as possible for creation of the bill. The types of daily
13 transactions accumulated and processed in CRIS and CABS are quite
14 numerous but generally include service orders (which provide information
15 about customer order activity), switch recordings (which provide records of
16 billable call events), payments received from customers, and other
17 miscellaneous types of transactions such as adjustments for previously billed
18 amounts. Second, at the end of each bill period (generally each month), the
19 events for a given customer are extracted, formatted in a manner that is
20 expected by the customer and distributed either via some type of postal carrier
21 or sent electronically to the customer. The systems used to process CLEC
22 billing transactions are essentially the same systems used to create bills for
23 BellSouth's retail and IXC customers. Therefore, the individual transactions
24 for CLECs are handled in the same manner as those for BellSouth's retail and
25 IXC customers.

1

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

4

5 A. Each day, service order information from the ordering systems is received into
6 either CRIS or CABS depending on the type of service being ordered. The
7 service order information is not separated between CLEC orders and retail or
8 IXC orders. The data comes to the billing systems together. The information is
9 edited to insure that all of the information needed for billing purposes is
10 complete and accurate. Any errors found are investigated, corrected and the
11 service orders are sent back to CRIS or CABS for processing. Again, the data
12 being edited and corrected is not separated between CLEC data and retail or
13 IXC data. The editing and investigation operations are performed on both sets
14 of data together. Once the service orders have passed the various edits, the
15 rating process begins. Services being ordered by a customer (both CLEC and
16 retail customers) are encoded on service orders using Universal Service Order
17 Codes (USOCs). The USOCs indicate to the billing system which type of
18 service is included on each of the orders. The rating tables in the billing
19 systems contain the rates for each of the USOCs that should be billed. For
20 retail and IXC customers, the rates are normally defined in the various tariffs
21 filed with this Authority. Rates for individual services ordered by CLECs are
22 generally defined in the interconnection agreements negotiated between the
23 CLEC and BellSouth. The rating process in CRIS and CABS matches the
24 USOCs on the service orders with the rates in the rating tables and determines
25 how much should be charged to the customers. Again, the rating process

1 performs this function for both CLEC orders and retail customers at the same
2 time. Finally, the rated service order information is updated to the customer's
3 account records in either CRIS or CABS to await the end of the month and
4 inclusion on the customer's invoice. This final step, like the proceeding steps,
5 is performed on both CLEC and retail service orders at the same time.

6

7 Q. HOW ARE USAGE RECORDS PROCESSED FOR CLECS AND
8 BELL SOUTH RETAIL CUSTOMERS?

9

10 A. Usage records for both CLEC customers and BellSouth's retail customers are
11 generated in the switches and other database elements incorporated into the
12 BellSouth network. Several times each day, these usage records are transmitted
13 from the network to a collection system that is used by the billing system. At
14 the time the data is collected, nothing on the usage records themselves
15 distinguishes a CLEC record from a BellSouth record. Therefore, all of the data
16 is collected together. The collection system then sends the records to a process
17 that identifies where each record should be sent for billing the customer. If the
18 record is associated with an access call or a call associated with a CLEC's
19 interconnection service, it is sent to CABS. If the record is associated with a
20 retail service or a resale service, it is sent to CRIS for handling. Records
21 associated with unbundled switch ports are sent to BIBS. The invoice formats
22 developed by the industry at the OBF did not allow switch port usage to be
23 billed with call-by-call detail as is done for end users in CRIS, nor did the
24 invoice call for the usage to be summarized in the way that access usage is

25

1 billed in CABS. Therefore, BIBS was developed to meet the unique billing
2 requirements for UNE usage.

3

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

9

10 Once in CRIS, CABS or BIBS, the usage records are edited, rated and stored
11 until the close of the customer's billing period. These steps are performed for
12 CLECs in the same manner as they are for BellSouth's retail or IXC customers.
13 In addition, each day, the usage records for those CLECs which have elected to
14 receive daily usage information via the Optional Daily Usage File (ODUF) or
15 the Access Daily Usage File (ADUF) are copied and included on the files and
16 transmitted to the CLEC. Finally, at the appropriate time, the edited and rated
17 usage is placed on the customers invoice in the format that the customer has
18 selected in the same manner as usage is included on the invoices BellSouth
19 provides to its retail customers and IXC customers.

20

21 Q. IS THE OPERATION OF THE BILLING SYSTEM FOR EACH OF THE
22 INPUTS THAT YOU DESCRIBED ABOVE "BLIND" TO WHETHER
23 THOSE INPUTS ARE FOR A CLEC OR FOR A BELL SOUTH RETAIL OR
24 IXC CUSTOMER?

25

1 A. Yes. Whether the inputs being collected are usage records, payments,
2 adjustments or service orders, the systems used to collect and send them to the
3 billing systems are the same for all customers.

4
5 Q. HOW ARE THE RATE TABLES DESCRIBED ABOVE UPDATED FOR
6 CLECS?

7
8 A. Once an interconnection agreement with a particular CLEC has been
9 negotiated and approved, the various sections are sent to the billing group for
10 updating in the CRIS and CABS rate tables. For UNE services and
11 interconnection services, the various USOC rates and usage rates are added to
12 the tables with a rate for each element to be billed. Because the resale rates to
13 be charged to a given customer are based on the General Subscriber Services
14 Tariff (GSST) and the Private Line Tariff, the only information updated for the
15 CLEC is the resale discount to be applied. Once the CLEC's rates have been
16 added to the tables, then service orders sent from the CLEC and usage events
17 generated from the provisioned services can be rated in an accurate and timely
18 manner. Service order edits are in place to prevent a CLEC from ordering
19 services until this process is completed.

20
21 Q. IF A BELLSOUTH END USER ELECTS TO BE SERVED BY A CLEC,
22 HOW IS THIS EVENT UPDATED IN THE BELLSOUTH BILLING
23 SYSTEMS?

24
25

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

17
18 Q. PLEASE DESCRIBE WHAT IS GENERALLY KNOWN IN THE
19 INDUSTRY AS "DOUBLE BILLING".

20
21 A. Double billing is an error situation whereby two local exchange carriers are
22 billing the same retail end user local service for the same facility. When it
23 occurs, it is generally immediately after an end user has changed local service
24 providers. For example, an end user being provided 10 business lines by
25 BellSouth decides to switch 5 of the lines to a CLEC provider. The end user

1 calls the CLEC and initiates an order for the CLEC to begin providing service
2 for the 5 lines. The CLEC must initiate two activities. First, the CLEC sends an
3 order to BellSouth to begin serving the customer either through resale, UNEs,
4 local number portability, etc. Second, the CLEC must update its own billing
5 processes to begin billing the end user for the 5 lines. BellSouth's billing
6 records must be changed to discontinue billing the end user for the 5 lines and
7 begin billing the CLEC for the services it has ordered from BellSouth to serve
8 the end user. Double billing occurs when either the CLEC has begun to bill the
9 end user too soon for the 5 lines or BellSouth has continued to bill the end user
10 too long. The fault could be on either the CLEC side or the BellSouth side.

11

12 Q. WHAT SAFEGUARDS DOES BELL SOUTH EMPLOY TO MINIMIZE THE
13 RISK OF DOUBLE BILLING?

14

15 A. First, BellSouth provides the CLEC with access to a mechanized order
16 completion notice, which indicates when the service orders initiated by the
17 CLEC to convert a customer from BellSouth to the CLEC have completed.
18 This notification is provided to the CLEC at the same time it is provided to
19 BellSouth's billing system. This gives both companies the same opportunity to
20 establish (or discontinue) billing the end user for the converted facilities at the
21 appropriate time. Second, in the case of resale facilities, BellSouth has the
22 capability to convert a customer from BellSouth to a CLEC using a single
23 service order. For these conversions, the simplicity of processing one order
24 minimizes the risk that the order to discontinue billing the end user will be
25 delayed. Third, as stated above, BellSouth provides end users with pro-rata

1 credits for any facility that has been billed in advance back to the date on which
2 that end user was converted to a CLEC. Therefore, any delays in disconnecting
3 the end user from BellSouth's billing system will automatically be negated as
4 the service orders are processed.

5

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

8

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

16

17 Q. IS THE INVOICE CREATION PROCESS DONE SEPARATELY FOR
18 CLEC BILLS AND BELL SOUTH RETAIL AND IXC BILLS?

19

20 A. No. All of the bills marked for a specific bill period in both CRIS and CABS
21 are created together. No separate processing is done to create a bill for a CLEC.
22 The only differentiation is the format on which a customer has elected to
23 receive his bill. For example, all of the CRIS Customized Large User Bills
24 (CLUB) will be created with a different process from that used to create a

25

1 CABS access bill or a bill for unbundled switch ports. However, all CLUB
2 bills, whether for a retail customer or a CLEC, will be created together.

3

4 Q. DESCRIBE THE TYPES OF BILL INVOICE CHOICES AVAILABLE TO
5 RETAIL CUSTOMERS AND IXCS THAT BELLSOUTH BILLS?

6

7 A. BellSouth offers its customers ordering retail services the option of receiving
8 paper or electronic bills using the capabilities provided by CRIS. Billing
9 products, such as the CLUB and the Diskette Analyzer Bill (DAB), provide a
10 wide range of options for sorting billing data for use in financial applications or
11 other uses. These products also provide the customer the ability to produce
12 customized reports and to integrate billing information with other computer
13 applications. CRIS billing can also be provided in national standard record
14 formats such as Electronic Data Interexchange (EDI) records developed by the
15 American National Standards Institute (ANSI). These records can be delivered
16 via a number of output media such as diskette, magnetic tape, and CD-ROM.
17 Finally, customers can also receive billing records via direct data transmission.

18

19 Through the capabilities provided by CABS, BellSouth provides bills to its
20 IXC and retail customers in either an industry-developed print image format or
21 in the OBF-developed Billing Data Tape (BDT) format. Print image bills can
22 be obtained on paper, diskette or CD-ROM. BDT records can be delivered via
23 magnetic tape (tape reels or cartridges) or Connect:direct transmission (point-
24 to-point dedicated line data transfer).

25

1 Q. HOW DO THE INVOICE CHOICES BELLSOUTH OFFERS TO RETAIL
2 CUSTOMERS AND IXC_s COMPARE TO THOSE OFFERED TO CLECS?

3

4 A. One thing that BellSouth has strived to accomplish is to provide CLECs with
5 the bill formats that are most beneficial to them without regard to the system
6 that is being used to process the billing transactions. For resold services,
7 BellSouth offers the same bill formats that are available to its retail customers.
8 This includes the CLUB, the DAB, as well as the standard paper bill.
9 BellSouth also provides CLECs with the option of having their resale bills
10 provided in a CABS format using the specifications devised by the industry at
11 the OBF. In that way, a CLEC accustomed to using the CABS formats for
12 interexchange access can have these types of bills created for its resale business
13 as well.

14

15 For unbundled services (including those services for which billing transactions
16 are being processed in CRIS) and interconnection services, BellSouth provides
17 CLECs with the CABS formats developed at OBF specifically for those
18 services. In particular, the OBF has expended a great deal of effort to create
19 guidelines for use in billing unbundled switch ports and unbundled loops.
20 BellSouth implemented these guidelines in the timeframes specified by the
21 industry in the summer of 1999. In summary, BellSouth provides any CLEC
22 with the same bill formats it provides to its own retail customers. In addition,
23 BellSouth provides the CLECs the option to have all of their resale services,
24 UNE services and interconnection services billed on CABS formatted bills.

25

1 Q. HOW MANY CLECS DOES BELL SOUTH BILL EACH MONTH?

2

3 A. Exhibit DPS-1 provides a summary of the CLECs that currently have billing
4 accounts with BellSouth along with a total of the different types of bills that
5 BellSouth produces. In its nine-state region, BellSouth produces
6 approximately 5,900 bills each month for approximately 349 different CLECs
7 using the various billing options available to them. In Tennessee, BellSouth
8 produces 620 bills each month for approximately 106 CLECs operating in the
9 state.

10

11 Q. WHAT TYPES OF USAGE DATA CAN CLECS OBTAIN FROM
12 BELL SOUTH?

13

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

19

20 First, ODUF contains information on billable transactions for resold lines,
21 interim number portability accounts and unbundled switch ports. A CLEC can
22 use the ODUF to bill its end users who are served by resold lines, interim
23 number portability or unbundled switch ports for usage events associated with
24 calls placed by those end users. Beginning in December 1998, BellSouth
25 enhanced ODUF to include usage records for local calls originating from a

1 CLEC's flat-rate lines ordered as resale. BellSouth refers to this ODUF option
2 as the Enhanced ODUF, or EODUF. BellSouth developed the EODUF
3 specifically to respond to CLEC complaints that such data was not available.
4

5 Second, ADUF provides the CLEC with records for billing IXC's interstate and
6 intrastate access charges (whether the call was handled by BellSouth or an
7 IXC) or reciprocal compensation charges to other LECs for calls originating
8 from and terminating to unbundled switch ports. The BellSouth network does
9 not have the capability to record a terminating call record when an end user
10 served out of a BellSouth switch has placed a call to a CLEC's unbundled
11 switch port. Because the UNE charges that would be paid by the CLEC to
12 BellSouth for these calls offsets the reciprocal compensation charges that
13 would be collected for the same calls, the need for the call records is obviated.
14 This process, in effect, represents a surrogate for the records which is offered
15 to all CLECs obviating the need for the data.
16

17 The capabilities of the EODUF and ADUF that are made available to CLECs
18 fully answer the questions that the FCC raised in the Second Louisiana Order,
19 13 FCC Rcd at 20734, ¶¶160, 230, 232 concerning usage records.
20

21 Q. HOW MANY DUF RECORDS HAS BELL SOUTH PROVIDED TO CLECS?
22

23 A. During July, 2001, BellSouth provided over 220 million DUF records to
24 approximately 247 different CLECs in its region with approximately 18
25 million of those records going to 56 CLECs in Tennessee. Exhibit DPS-2

1 provides a spreadsheet that summarizes the types of records that are provided
2 to CLECs. The DUF interfaces allow a CLEC to process call records in its
3 billing systems in substantially the same manner and timeframes as BellSouth
4 processes these types of records in its own systems. Exhibit DPS-3 provides a
5 small sample of the DUF records that were provided to a CLEC in Tennessee.

6

7 Q. BESIDES THE USAGE RECORDS PROVIDED TO CLECS VIA DUF,
8 WHAT OTHER TYPES OF USAGE RECORDS DOES BELL SOUTH
9 MAKE AVAILABLE TO CLECS?

10

11 A. In addition to the DUF records, BellSouth provides detail records to enable
12 CLECs to bill other telecommunications providers for services jointly provided
13 by BellSouth and the CLEC. These records are provided in accordance with the
14 Meet-Point Billing guidelines established by the industry and these same
15 standards are used in all states in BellSouth's region.

16

17 Q. WHAT IS MEET-POINT BILLING?

18

19 A. On occasion, two local exchange companies will jointly provide a
20 telecommunications service to a third company. For example, suppose a CLEC
21 and an IXC are both interconnected with BellSouth at an access tandem in
22 Columbia, SC. If a customer of the IXC places a call to an end user of the
23 CLEC, then BellSouth and the CLEC have jointly provided terminating access
24 to the IXC. In this example, BellSouth is providing the tandem switching and
25 perhaps some portion of interoffice transport and the CLEC is providing the

1 end office switching and perhaps some portion of the transport. Meet-point
2 billing is the set of guidelines that BellSouth and the CLEC will use to bill the
3 IXC for the portion of the access service that each has provided to the IXC.
4 These guidelines have been developed and are maintained by the industry at
5 the OBF, and cover such topics as which provider is to record for the calls,
6 which provider is responsible for sending to the other the call records, etc.

7

8 Q. HOW IS MEET-POINT BILLING USAGE SENT BETWEEN CARRIERS?

9

10 A. In the example stated above, BellSouth, as the tandem provider, would send to
11 the CLEC a call detail record the CLEC would use to bill the IXC. The CLEC
12 would need to select a vendor to act as its intermediary with all industry
13 participants for collecting the usage data needed by the CLEC to perform the
14 meet-point billing functions. The company so selected as its intermediary is
15 termed the "Revenue Accounting Office (RAO) Host". Sometimes a CLEC
16 chooses BellSouth as its RAO Host and sometimes they do not. All local
17 exchange carriers (ILECs and CLECs alike) will send data bound for another
18 local exchange carrier via the RAO Host selected by that LEC. In March 2001,
19 BellSouth provided over 139 million meet-point billing usage records to
20 CLECs in the region either directly as an RAO Host company or to CLECs
21 through the RAO Host selected by those CLECs.

22

23 Q. WHAT TYPES OF CONTROLS ARE IN PLACE TO INSURE
24 BELL SOUTH'S BILLING SYSTEMS ARE PROCESSING BILLING
25 TRANSACTIONS CORRECTLY?

1

2 A. The billing quality assurance efforts of BellSouth can be divided into two
3 broad categories. Together, those categories cover the entire billing process
4 whether that billing is done in CRIS, CABS, BIBS, or a billing system to be
5 developed in the future. All of these measures, when taken as a whole, are
6 targeted towards insuring that the information on the bills sent to any customer
7 is accurate, complete and timely.

8

9 First, myriad controls, exception checks and error correction activities are
10 performed each day on the inputs that make up "billing". Second, a great deal
11 of emphasis is placed on control of the numerous tasks that must take place as
12 a "bill period" is pulled, or readied, for creation. The final area involves bill
13 distribution and post-billing. Here, the billing transactions are printed on paper
14 or, alternatively, formatted into electronic billing records and mailed (or
15 transmitted) to the customers, with the emphasis being on the accuracy of the
16 overall bill and the timeliness of getting the bills to their respective distribution
17 centers (U. S. Post Office, or third party vendor). Each of these quality
18 assurance measures is identical for CLEC bills and retail or IXC bills.

19

20 Q. WOULD YOU DESCRIBE SOME OF THE MEASURES USED TO
21 CONTROL THE DAILY PROCESSING OF TRANSACTIONS INPUT TO
22 THE BILLING SYSTEMS?

23

24 A. As described above, daily processes are executed in the billing systems to
25 collect the numerous inputs that represent the billing events of customers. Each

1 of the inputs has its own set of control measures to insure that data needed for
2 billing is accurate, complete and timely. As an example, the quality assurance
3 measures incorporated in the handling of switch usage data are typical of the
4 manner in which the systems process billing inputs. As usage information is
5 collected from the network, the billing system is designed to set alarms and
6 reports to indicate when a particular switch or other collection point has not
7 transmitted data or to identify when a data path from the switch is not operable
8 so that corrective measures can be taken to bring this data source "back on
9 line". As the usage data are entered into the front end of the billing system,
10 control software is run to perform analysis of the types of data recorded.
11 Control limits are applied to identify any anomalies that may exist in the
12 volumes being processed for a particular switch, type of call, day of the week,
13 hour of the day or even the NPA-NXX being seen on the records. As the usage
14 information is readied to be sent to the CRIS, CABS and BIBS billing
15 applications, a number of format edits are done to check for errors that may
16 have arisen due to switch problems. Because, at this point in the process, there
17 is no indication whether the usage is for a CLEC's retail end user or a
18 BellSouth retail end user, all of the controls over this processing are applied
19 equally to BellSouth and CLEC usage.

20

21 As the usage information is processed further, additional edits and checks are
22 done to insure that the correct customer (CLEC or BellSouth end user) has
23 been charged for the calls represented by the usage records. For example, the
24 customer's records are accessed to make sure that a local measured call
25 matches the local calling plan that the customer has ordered. Again, these

1 additional edits are done on all end user data whether associated with a CLEC
2 or with a BellSouth retail customer.

3

4 Q. WHAT ARE SOME EXAMPLES OF CONTROLS IN PLACE FOR
5 CREATING THE BILLS AT THE END OF EACH BILL PERIOD?

6

7 A. First, BellSouth uses a bill verification process to monitor those areas of the
8 billing system most at risk. These areas include new products or services being
9 implemented or services with a change in billing structure. Usage-based
10 services, which may include volume-sensitive or discounted calling plans, are
11 included in the bills that are verified each day. For each bill period, a variety
12 of bills are drawn from a mix of different customer types (e.g., residence,
13 simple business, complex business, IXC) and types of services. Monthly
14 service, other charges and credits, usage charges, adjustments and taxes are
15 verified. As part of this review, CLEC bills are sampled each day and a full
16 verification of the sample is done so that any general issues with applying
17 resale discounts or other CLEC-specific issues can be identified and corrected
18 prior to releasing the bills for mailing. Additional samples are created each
19 month to review CLEC unbundled switching bills to insure that the usage
20 being processed from BIBS has been accurately processed to the bill and that
21 the bill formats for these services are correct.

22

23 Q. WHAT ASSURANCES DOES THE AUTHORITY HAVE THAT
24 BELL SOUTH'S BILLING PROCESSES PROVIDE USAGE AND BILLING

25

1 DATA TO CLECS IN SUBSTANTIALLY THE SAME TIME AND
2 MANNER AS THAT WHICH BELL SOUTH PROVIDES TO ITSELF?

3

4 A. BellSouth produces a number of measures that track how well BellSouth's
5 OSS are performing. The billing measures include comparisons of CLEC
6 billing and usage accuracy and timeliness results with the same information
7 provided to BellSouth's own customers. So, regardless of the system being
8 used (CRIS, CABS or BIBS) to provide a CLEC with a bill, these measures
9 will show how well BellSouth's CLEC billing operations are performing in
10 relation to its own retail operations. Additionally, the third party testing that
11 was ordered by the Public Service Commission in Georgia has tested all of
12 these processes. The test reports from this review provide this Authority with a
13 full appreciation for how well the systems used by BellSouth to provide
14 CLECs with billing information are performing for CLECs in Tennessee.

15

16 Q. ARE THE PROCESSES AND EQUIPMENT USED FOR BILLING IN
17 TENNESSEE THE SAME AS THE PROCESSES AND EQUIPMENT USED
18 IN GEORGIA AND THE REMAINING STATES IN BELL SOUTH'S
19 REGION?

20

21 A. Yes. For CRIS, CABS and BIBS, the same physical software that processes
22 transactions and creates invoices in Georgia also performs these same
23 functions in Tennessee and all other states in the BellSouth region. The same
24 group performs the control functions described previously for all of the states
25 in the BellSouth region, including Tennessee. A central staff supporting all

1 states develops methods and procedures required to perform all of the steps to
2 accurately produce bills for CLECs. The maintenance of the various reference
3 tables (such as product rates, etc.) used by the billing system is handled for all
4 states by one group. The systems, processes and procedures are the same for all
5 states and are created, maintained and executed by the same group of
6 employees regardless of the state being processed.¹

7
8 To effectively manage the massive amounts of data processing required to keep
9 the daily billing cycles running, customer accounts are segregated into separate
10 sets of databases depending on the state in which that account resides. Because
11 of this, multiple occurrences of CRIS, BIBS and CABS run in parallel at the
12 same time utilizing all of these databases. However, all of the software
13 versions of CRIS, CABS and BIBS are identical to each other and they are run
14 on the same type of hardware for all states. These separate processing streams
15 are running in two data centers in Birmingham, Alabama and Charlotte, North
16 Carolina. However, regardless of which processing stream is running, the

17
18
19 _____
20 ¹ During November and December, 2001, BellSouth plans to upgrade portions of the billing systems
21 used to bill CLECs for unbundled switch ports and port / loop combinations (including the UNE-P).
22 This effort has been referred to in certain venues as the "Tapestry" project. BellSouth refers to this
23 initiative as the "Integrated Billing Solution" (IBS). The changes will involve usage processing
24 functions currently being performed by BIBS, the calculation of charges for these products currently
25 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
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.

1 software, controls, procedures and processing steps required to create invoices
2 for customers (CLEC and retail) are the same.

3

4 Q. DOES THIS MEAN THAT THERE ARE NO DIFFERENCES AT ALL
5 BETWEEN INVOICES PROVIDED TO CUSTOMERS IN TENNESSEE
6 FROM INVOICES PROVIDED TO CUSTOMERS IN OTHER STATES
7 SERVED BY BELL SOUTH?

8

9 A. No. Obviously because the products and services offered by BellSouth to
10 customers in Tennessee may differ from those offered in other states, the
11 invoices themselves will not be identical. While the underlying logic for CRIS,
12 CABS and BIBS is the same throughout the nine states served by BellSouth,
13 state-specific and CLEC-specific differences within the systems are necessary
14 due to account for such things as:

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

19

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

24

25

1 Q. HAVE THE BELL SOUTH BILLING PROCESSES THAT SUPPORT
2 CLECS CHANGED OVER TIME?

3

4 A. Yes. BellSouth has continued to enhance the billing processes that it uses to
5 provide billing information to CLECs. Such enhancements are a continuous,
6 on-going effort. The reason for this can be summed up in one word - change.
7 The industry continues to meet and discuss the interactions and
8 interdependencies of each company providing telephone service to end users.
9 All of these discussions lead to new ways of providing billing information
10 between the industry participants and, therefore, the billing systems are being
11 revised to implement new guidelines as they mature. In addition, actions
12 arising from this Authority and other regulatory bodies continue to change the
13 ways that companies must interact with each other. Some of these changes will
14 necessitate revisions to the billing systems. As each of these efforts continues,
15 new guidelines, covering billing invoice formats, message exchange data
16 formats and the communication needed to accurately provide each other with
17 billing information, will be created, changed, abolished and rewritten.

18

19 Q. WHAT TYPES OF CHANGES HAVE BEEN MADE OR CONTINUE TO
20 BE ADDRESSED?

21

22 A. BellSouth has continued to make enhancements to the invoices that it provides
23 to CLECs for resale services and UNEs. In the summer of 1997, BellSouth
24 began billing CLECs for usage elements connected with unbundled switch
25 ports. The invoices for the usage charges were provided from CRIS and

1 contained supplemental reports, that included details for each type of usage. In
2 May 1998, these capabilities were enhanced to provide an option whereby a
3 CLEC could receive its invoices in formats that were developed by the industry
4 at the OBF. Since, at that time, the OBF was just beginning the work to
5 develop billing formats for UNEs, BellSouth "borrowed" the resale formats,
6 also developed at OBF, for billing UNEs until the new guidelines were
7 complete. In August 1998, BellSouth further enhanced the invoices sent to
8 CLECs by implementing a new system capability which merged the details
9 provided on the usage billing supplemental report with the invoice itself. This
10 included the rates being charged for each UNE usage element and the minutes
11 of use for each element. In the fall of 1998, the OBF completed its work on the
12 new guidelines for the bill formats to be used in billing UNEs. The guidelines
13 called for an implementation timeframe that extended into the middle of 1999.
14 BellSouth completed the massive amount of work required to provide these
15 new formats and implemented the new capability in September 1999. Exhibit
16 DPS-4 of my testimony provides a copy of one of the CABS-Formatted UNE
17 bills provided to a CLEC in Tennessee in June, 2001.

18

19 Q. WHAT IS BELL SOUTH'S CURRENT CAPABILITY TO PROVIDE
20 MECHANIZED INVOICES FOR UNE AND RESALE SERVICES
21 ORDERED BY CLECS?

22

23 A. BellSouth provides mechanized invoices for all services that are offered to
24 CLECs. For local interconnection services, BellSouth uses the processes in
25 CABS that have generally been in place to bill IXC's for access services with

1 some modifications to account for differences in ordering and rating. Exhibit
2 DPS-5 to my testimony provides a paper example of a local interconnection
3 bill for a CLEC in Tennessee. While this example is a paper document, the
4 CLEC can receive its local interconnection bill on CD-ROM, diskette or
5 transmission across a dedicated or dial-up facility. For resale services, most of
6 the CLECs in the region choose to use the bill formats available in CRIS (i.e.,
7 CLUB either in paper, diskette, CD-ROM or magnetic tape media). Electronic
8 transmission of the CLUB bill is also available for CLECs. In addition, since
9 August 1997, BellSouth has provided CLECs with the option of receiving
10 resale bills using the CABS formats designed at OBF. Currently, four CLECs
11 are receiving these CABS formatted bills in the region served by BellSouth.

12

13 As I described above, BellSouth provides CABS formatted bills for all UNEs
14 provided to CLECs. In each case, the CLEC will receive a bill, mechanically
15 generated, in the OBF developed CABS format. The same media choices that
16 are available to CLECs for local interconnection billing are also available for
17 the UNE bills provided by BellSouth. Exhibit DPS-4 contains a copy of a
18 CABS bills for unbundled switch ports sent to a CLEC in June, 2001.

19

20 Q. CAN BELL SOUTH BILL CLECS FOR USAGE-SENSITIVE UNES?

21

22 A. Yes. As I mentioned previously, BellSouth began to bill CLECs for usage
23 sensitive UNEs as early as August, 1997. Since that time, enhancements have
24 been made to improve the system's capabilities. The latest change has been to
25 implement the OBF UNE bill formats. A significant portion of the bill formats

1 developed deal with usage sensitive services. The usage section of the UNE
2 bill provided as Exhibit DPS-4 contains the quantities, prices and charges for
3 all usage sensitive elements such as unbundled local switching, unbundled
4 shared interoffice transport, unbundled operator services, unbundled directory
5 assistance, unbundled 800 data base queries, etc. Again, this bill was
6 mechanically generated from the billing transactions collected from
7 BellSouth's switching equipment for calls originating from or terminating to a
8 CLEC's unbundled switch ports.

9

10 Q. WOULD YOU PLEASE SUMMARIZE YOUR TESTIMONY?

11

12 A. Yes. BellSouth provides CLECs with nondiscriminatory access to bills and
13 billing data. BellSouth provides CLECs the necessary billing information via
14 the daily usage file products to enable the CLECs to bill their end users in
15 substantially the same time and manner as BellSouth bills its own retail and
16 access customers. BellSouth has taken the necessary steps to provide CABS
17 formatted bills for UNE services as well as resale services ordered by CLECs. I
18 have shown that the billing systems and processes used in Tennessee are the
19 same as those used in Georgia and all other states in the BellSouth region. The
20 third party testing performed in Georgia fully and fairly represents the
21 processes used in Tennessee. Finally, BellSouth is committed to continue to
22 update and improve its billing processes to support CLEC customers as the
23 needs of these customers change.

24

25 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

1

2 A. Yes.

3

4

5

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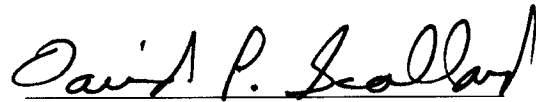
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AFFIDAVIT

STATE OF: Alabama
COUNTY OF: Jefferson

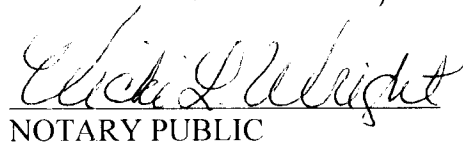
BEFORE ME, the undersigned authority, duly commissioned and qualified in and for the State and County aforesaid, personally came and appeared David P. Scollard –Manager- Wholesale Billing, BellSouth Billing Inc., who, being by me first duly sworn deposed and said that:

He is appearing as a witness before the Tennessee Regulatory Authority in Docket No. 01-00362 on behalf of BellSouth Telecommunications, Inc., and if present before the Authority and duly sworn, his testimony would be set forth in the annexed testimony consisting of 33 pages and 5 exhibit(s).



David P. Scollard

Sworn to and subscribed
before me on October 22, 2001


NOTARY PUBLIC

Notary Public, Cobb County, Georgia
My Commission Expires June 19, 2005

Bill Format Choices Provided to CLECs by BellSouth

Bill Type	Number Provided in Tennessee	Tennessee CLECs Receiving Bill Type	Number Provided Region Wide	CLECs Receiving Bill Type Region Wide
Resale CLUB Paper	117	106	1200	282
Diskette Analyzer Bill (DAB)	58	51	656	137
Resale Electronic Data Interexchange Transmitted Bill (EDI)	7	2	51	5
Resale Mag Tape Bill Format	16	12	173	24
Resale CABS Format	2	2	27	3
Unbundled Switched Port Bill ("J" Bill)	50	25	547	73
CABS Interconnection Bills	370	37	3181	114
Total	620	N/A	5835	N/A

Exhibit DPS-4

Copy of June 25, 2001 bill for UNE usage.

BILL NO
INVOICE NO
BILL DATE
OCN

615
JUN 25, 2001
PAGE 1

FOR TELCO USE:
ICSC OFC BS01

BILLING INQUIRIES CALL (800) 773-4967
WEB ADDRESS: www.interconnection.bellsouth.com

BELLSOUTH SWITCHED ACCESS SERVICE
UNBUNDLED LINE PORT

*** BALANCE DUE INFORMATION ***

ADJUSTMENTS APPLIED - SEE DETAIL
LOCAL 0.00 0.00

ZERO BALANCE DUE - SEE DETAIL 0.00

*** DETAIL OF CURRENT CHARGES ***

TOTAL - TENNESSEE - 5185

MONTHLY ACCESS CHARGES
FROM JUN 25 THRU JUL 24
LOCAL 86.85

OTHER CHARGES AND CREDITS - SEE DETAIL
LOCAL 82.37

USAGE CHARGES - SEE DETAIL
LOCAL 22.26

TOTAL CURRENT CHARGES * DUE BY JUL 16 * 191.48

TOTAL AMOUNT DUE 191.48

BILL NO
INVOICE NO
BILL DATE
OCN

615
JUN 25, 2001
PAGE 2

*** DETAIL OF BALANCE DUE ***

INVOICE NO	
PREVIOUS BALANCE	0.00
BALANCE DUE	0.00
TOTAL BALANCE DUE	0.00

BILL NO 615
INVOICE NO
BILL DATE JUN 25, 2001
OCN
PAGE 3

*** DETAIL OF OTHER CHARGES AND CREDITS ***

					AMOUNT
JUN 21 01	SO	EARNING TN423			
TELEPHONE NUMBER BTN615					
ADJUSTMENT TO COVER MINIMUM CHARGE FOR LOCAL					
SERVICE FROM JUN 7 01 THRU JUN 24 01					
(\$3.35/MO)					
LOCAL - TN - EC 5185					0.14
ADJUSTMENT TO COVER MINIMUM CHARGE FOR LOCAL					
SERVICE FROM JUN 7 01 THRU JUN 24 01					
(\$17.02/MO)					
LOCAL - TN - EC 5185					6.81
NET EFFECT OF SO					
PER MONTH					
TOTAL - TN - EC 5185					6.95
0.00					
JUN 15 01	SO	EARNING TN865			
TELEPHONE NUMBER BTN615					
CHARGE FOR NEW SERVICE FROM JUN 16 01 THRU					
JUN 24 01					
LNPCX 1 FCC LOCAL NUMBER PORTABILITY LINE CHARGE - LI					
NE					
LOCAL - TN - EC 5185					0.11
CHARGE FOR NEW SERVICE FROM JUN 16 01 THRU					
JUN 24 01					
UEPLX 1 UNBUNDLED LOOP VOICE GRADE					
LOCAL - TN - EC 5185					3.74
CHARGE FOR NEW SERVICE FROM JUN 16 01 THRU					
JUN 24 01					
UEPRC 1 UNBUNDLED EXCHANGE PORT RESIDENCE WITH CALLER					
ID					
LOCAL - TN - EC 5185					1.36
CHARGE FOR MISCELLANEOUS ACTIVITY -					
ONE-TIME CHARGE FOR					
SOMEC 1 CLEC SERVICE REQUEST PROCESSING, PER MECHANIZ					
ED LSR					
LOCAL - TN - EC 5185					3.50
NET EFFECT OF SO					
PER MONTH					
TOTAL - TN - EC 5185					8.71
0.00					
JUN 06 01	SO	EARNING TN423			
TELEPHONE NUMBER BTN615					

BILL NO 615
INVOICE NO
BILL DATE JUN 25, 2001
OCN PAGE 4

*** DETAIL OF OTHER CHARGES AND CREDITS ***
BIP AMOUNT

TELEPHONE NUMBER BTN615 EARNING TN423 (CONT'D)
CHARGE FOR NEW SERVICE FROM JUN 7 01 THRU
JUN 24 01
LNPCX 1 FCC LOCAL NUMBER PORTABILITY LINE CHARGE - LI 0.21
NE LOCAL - TN - EC 5185
CHARGE FOR NEW SERVICE FROM JUN 7 01 THRU
JUN 24 01
UEPLX 1 UNBUNDLED LOOP VOICE GRADE 7.49
LOCAL - TN - EC 5185
CHARGE FOR NEW SERVICE FROM JUN 7 01 THRU
JUN 24 01
UEPRC 1 UNBUNDLED EXCHANGE PORT RESIDENCE WITH CALLER 2.72
ID LOCAL - TN - EC 5185
CHARGE FOR MISCELLANEOUS ACTIVITY -
ONE-TIME CHARGE FOR
SOMEC 1 CLEC SERVICE REQUEST PROCESSING, PER MECHANIZ 3.50
ED LSR LOCAL - TN - EC 5185
1 NET EFFECT OF SO FRACTIONAL PON ONE-TIME BILLED AMOUNT
PER MONTH TOTAL - TN - EC 5185 10.42 3.50 13.92
0.00
JUN 11 01 SO EARNING TN423
TELEPHONE NUMBER BTN615
CHARGE FOR NEW SERVICE FROM JUN 12 01 THRU
JUN 24 01
LNPCX 1 FCC LOCAL NUMBER PORTABILITY LINE CHARGE - LI 0.15
NE LOCAL - TN - EC 5185
CHARGE FOR NEW SERVICE FROM JUN 12 01 THRU
JUN 24 01
UEPLX 1 UNBUNDLED LOOP VOICE GRADE 5.41
LOCAL - TN - EC 5185
CHARGE FOR NEW SERVICE FROM JUN 12 01 THRU
JUN 24 01
UEPRC 1 UNBUNDLED EXCHANGE PORT RESIDENCE WITH CALLER 1.97
ID LOCAL - TN - EC 5185
CHARGE FOR MISCELLANEOUS ACTIVITY -
ONE-TIME CHARGE FOR

BILL NO 615
INVOICE NO
BILL DATE JUN 25, 2001
OCN PAGE 5

*** DETAIL OF OTHER CHARGES AND CREDITS ***
BIP AMOUNT

TELEPHONE NUMBER BTN615 EARNING TN615 (CONT'D)
SOMEC 1 CLEC SERVICE REQUEST PROCESSING, PER MECHANIZ
ED LSR

1 NET EFFECT OF SO LOCAL - TN - EC 5185 3.50
PER MONTH FRACTIONAL PON ONE-TIME BILLED AMOUNT
TOTAL - TN - EC 5185 7.53 3.50 11.03

JUN 06 01 SO PON
TELEPHONE NUMBER BTN615 EARNING TN901
CHARGE FOR NEW SERVICE FROM JUN 7 01 THRU
JUN 24 01

LNPCX 1 FCC LOCAL NUMBER PORTABILITY LINE CHARGE - LI
NE

LOCAL - TN - EC 5185 0.21
CHARGE FOR NEW SERVICE FROM JUN 7 01 THRU
JUN 24 01

UEPLX 1 UNBUNDLED LOOP VOICE GRADE
LOCAL - TN - EC 5185 7.49
CHARGE FOR NEW SERVICE FROM JUN 7 01 THRU
JUN 24 01

UEPRC 1 UNBUNDLED EXCHANGE PORT RESIDENCE WITH CALLER
ID

LOCAL - TN - EC 5185 2.72
CHARGE FOR MISCELLANEOUS ACTIVITY -
ONE-TIME CHARGE FOR
SOMEC 1 CLEC SERVICE REQUEST PROCESSING, PER MECHANIZ
ED LSR

1 NET EFFECT OF SO LOCAL - TN - EC 5185 3.50
PER MONTH FRACTIONAL PON ONE-TIME BILLED AMOUNT
TOTAL - TN - EC 5185 10.42 3.50 13.92

JUN 06 01 SO PON
TELEPHONE NUMBER BTN615 EARNING TN615
CHARGE FOR NEW SERVICE FROM JUN 7 01 THRU
JUN 24 01

LNPCX 1 FCC LOCAL NUMBER PORTABILITY LINE CHARGE - LI
NE

LOCAL - TN - EC 5185 0.21

BILL NO
INVOICE NO
BILL DATE
OCN

615

JUN 25, 2001
PAGE 7

*** DETAIL OF OTHER CHARGES AND CREDITS ***
BIP

TOTAL OTHER CHARGES AND CREDITS
TOTAL - TN - EC 5185 82.37

BILL NO 615
INVOICE NO
BILL DATE JUN 25, 2001
OCN
PAGE 8

***** LOCAL USAGE FOR OFFICE CHTGTRBDS0 *****
MAY 25 01 THRU JUN 24 01

RATE CATEGORY	QUANTITY	RATE	AMOUNT
UNBUNDLED TRANSPORT SHARED TRANSPORT - TN - EC 5185			
LOCAL			
UNDETERMINED ROUTING			
ORIGINATING			
CHTGTNNSDS1 - 006 MILES	3	.000040000	.01
CHTGTNBRDS0 - 009 MILES	13	.000040000	.01
CHTGTNMVDS0 - 009 MILES	36	.000040000	.01
ACCESS			
TANDEM			
ORIGINATING			
CHTGTNNS84T - 006 MILES	81	.000040000	.02
TERMINATING			
CHTGTNNS84T - 006 MILES	1	.000040000	.01
TOTAL UT SHRD TRANS	134		.06
UNBUNDLED TRANSPORT FACILITIES TERMINATION EO TO EO - TN - EC 5185			
LOCAL			
UNDETERMINED ROUTING			
ORIGINATING	52	.000360000	.02
TOTAL UT F TERM EO-EO	52		.02
UNBUNDLED TRANSPORT FACILITIES TERMINATION EO TO TANDEM - TN - EC 5185			
ACCESS			
TANDEM			
ORIGINATING	81	.000360000	.03
TERMINATING	1	.000360000	.01
TOTAL UT F TERM EO-TAN	82		.04
UNBUNDLED TRANSPORT TANDEM SWITCHING - TN - EC 5185			
LOCAL			
UNDETERMINED ROUTING			
ORIGINATING	52	.000676000	.04
ACCESS			
TANDEM			
ORIGINATING	81	.000676000	.05
TERMINATING	1	.000676000	.01

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***** LOCAL USAGE FOR OFFICE CHGTNRBDS0 *****			
MAY 25 01 THRU JUN 24 01			
RATE CATEGORY	QUANTITY	RATE	AMOUNT
TOTAL UT TANDEM SW	134		.10
TOTAL UNBUNDLED TRANSPORT CHARGE - TN - EC 5185			.22
UNBUNDLED END OFFICE - TN - EC 5185			
UNBUNDLED LOCAL SWITCHING - SWITCHING FUNCTIONALITY			
LOCAL			
ORIGINATING			
EO			
SINGLE NETWORK			
INTRASWITCH			
INITIAL	12	.001900000	.02
ADDITIONAL	96	.001900000	.18
INTER SWITCH			
INITIAL	9	.001900000	.02
ADDITIONAL	43	.001900000	.08
TEO			
SINGLE NETWORK			
INTER SWITCH			
INITIAL	9	.001900000	.02
ADDITIONAL	43	.001900000	.08
ACCESS			
ORIGINATING			
EO			
MULTIPLE NETWORK			
INTER SWITCH			
INITIAL	38	.001900000	.07
ADDITIONAL	153	.001900000	.29
TERMINATING			
TEO			
MULTIPLE NETWORK			
INTER SWITCH			
INITIAL	23	.001900000	.04
ADDITIONAL	114	.001900000	.22
TOTAL ULS - SWITCH FUNC	540		1.02
TOTAL UNBUNDLED END OFFICE CHARGES - TN - EC 5185			1.02
UNBUNDLED MISCELLANEOUS - TN - EC 5185			
800 ACCESS 10 DIGIT SCREENING			
800 DELIVERY	57	.004000000	.23
TOTAL UNBUNDLED MISCELLANEOUS CHARGES - TN - EC 5185			.23
TOTAL LOCAL USAGE CHARGES FOR OFFICE CHGTNRBDS0			1.47

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***** LOCAL USAGE FOR OFFICE CHTGTNRBDS0 *****
MAY 25 01 THRU JUN 24 01

RATE CATEGORY	QUANTITY	RATE	AMOUNT
TOTAL USAGE CHARGES FOR OFFICE CHTGTNRBDS0			1.47

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***** LOCAL USAGE FOR OFFICE CLVLTNADS0 *****
MAY 25 01 THRU JUN 24 01

RATE CATEGORY	QUANTITY	RATE	AMOUNT
UNBUNDLED TRANSPORT SHARED TRANSPORT - TN - EC 5185			
LOCAL			
UNDETERMINED ROUTING			
ORIGINATING			
OKGVKYESD0 - 010 MILES	8	.000040000	.01
TANDEM			
ORIGINATING			
NSVLTNMH92T - 038 MILES	1	.000040000	.01
ACCESS			
TANDEM			
ORIGINATING			
NSVLTNMH92T - 038 MILES	10	.000040000	.01
TERMINATING			
NSVLTNMT84T - 041 MILES	1	.000040000	.01
NSVLTNMH92T - 038 MILES	2	.000040000	.01

TOTAL UT SHRD TRANS	22		.05
UNBUNDLED TRANSPORT FACILITIES TERMINATION EO TO EO - TN - EC 5185			
LOCAL			
UNDETERMINED ROUTING			
ORIGINATING			
TANDEM	8	.000360000	.01
ORIGINATING	1	.000360000	.01

TOTAL UT F TERM EO-EO	9		.02
UNBUNDLED TRANSPORT FACILITIES TERMINATION EO TO TANDEM - TN - EC 5185			
ACCESS			
TANDEM			
ORIGINATING	10	.000360000	.01
TERMINATING	3	.000360000	.01

TOTAL UT F TERM EO-TAN	13		.02
UNBUNDLED TRANSPORT TANDEM SWITCHING - TN - EC 5185			
LOCAL			
UNDETERMINED ROUTING			
ORIGINATING	8	.000676000	.01
TANDEM	1	.000676000	.01
ORIGINATING			

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***** LOCAL USAGE FOR OFFICE CLVLTWADS0 *****
MAY 25 01 THRU JUN 24 01

RATE CATEGORY	QUANTITY	RATE	AMOUNT
ACCESS			
TANDEM			
ORIGINATING	10	.000676000	.01
TERMINATING	3	.000676000	.01

TOTAL UT TANDEM SW 22
TOTAL UNBUNDLED TRANSPORT CHARGE - TN - EC 5185 .04

UNBUNDLED END OFFICE - TN - EC 5185 .13
UNBUNDLED LOCAL SWITCHING - SWITCHING FUNCTIONALITY

LOCAL			
ORIGINATING			
EO			
SINGLE NETWORK			
INTRASWITCH			
INITIAL	73	.001900000	.14
ADDITIONAL	2,786	.001900000	5.29
INTERSWITCH			
INITIAL	3	.001900000	.01
ADDITIONAL	6	.001900000	.01

TEO			
SINGLE NETWORK			
INTERSWITCH			
INITIAL	3	.001900000	.01
ADDITIONAL	6	.001900000	.01

ACCESS			
ORIGINATING			
EO			
MULTIPLE NETWORK			
INTERSWITCH			
INITIAL	22	.001900000	.04
ADDITIONAL	83	.001900000	.16

TERMINATING			
TEO			
MULTIPLE NETWORK			
INTERSWITCH			
INITIAL	32	.001900000	.06
ADDITIONAL	122	.001900000	.23

TOTAL ULS - SWITCH FUNC 3,136
TOTAL UNBUNDLED END OFFICE CHARGES - TN - EC 5185 5.96

UNBUNDLED MISCELLANEOUS - TN - EC 5185 5.96

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***** LOCAL USAGE FOR OFFICE CLVLTNADS0 *****
MAY 25 01 THRU JUN 24 01

RATE CATEGORY	QUANTITY	RATE	AMOUNT
800 ACCESS 10 DIGIT SCREENING	24	.004000000	.10
800 DELIVERY			
OPERATOR CALL HANDLED	1	.300000000	.30
TOTAL UNBUNDLED MISCELLANEOUS CHARGES - TN - EC 518540
TOTAL LOCAL USAGE CHARGES FOR OFFICE CLVLTNADS0 . . .			6.49

TOTAL USAGE CHARGES FOR OFFICE CLVLTNADS0			

6.49			

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***** LOCAL USAGE FOR OFFICE KVVLTNMDSD1 *****
MAY 25 01 THRU JUN 24 01

RATE CATEGORY	QUANTITY	RATE	AMOUNT
UNBUNDLED TRANSPORT SHARED TRANSPORT - TN - EC 5185			
LOCAL			
UNDETERMINED ROUTING			
ORIGINATING			
KNVLTNBEDS0 - 004 MILES	2	.000040000	.01
KNVLTNBHDS0 - 001 MILES	4	.000040000	.01
KNVLTNFCDS0 - 005 MILES	3	.000040000	.01
KNVLTNMDSD0 - 008 MILES	4	.000040000	.01
KNVLTNTHCDS0 - 003 MILES	5	.000040000	.01
KNVLTN02DS0 - 001 MILES	4	.000040000	.01
KNVLTNVODS0 - 005 MILES	1	.000040000	.01
KNVLTN51CH0 - 005 MILES	56	.000040000	.01
HSCITNMTDS0 - 013 MILES	1	.000040000	.01
SVLNTNMTDS0 - 022 MILES	47	.000040000	.04
TANDEM			
ORIGINATING			
KNVLTNBEDS0 - 004 MILES	2	.000040000	.01
KNVLTNTHCDS0 - 003 MILES	11	.000040000	.01
KNVLTNTHCDS0 - 005 MILES	1	.000040000	.01
KNVLTN51CH0 - 005 MILES	3	.000040000	.01

TOTAL UT SHRD TRANS 144 .17

UNBUNDLED TRANSPORT FACILITIES TERMINATION EO TO EO - TN - EC 5185

LOCAL			
UNDETERMINED ROUTING			
ORIGINATING	127	.000360000	.05
TANDEM			
ORIGINATING	15	.000360000	.01

TOTAL UT F TERM EO-EO 142 .06

UNBUNDLED TRANSPORT FACILITIES TERMINATION EO TO TANDEM - TN - EC 5185

ACCESS			
TANDEM			
ORIGINATING	3	.000360000	.01

TOTAL UT F TERM EO-TAN 3 .01

UNBUNDLED TRANSPORT TANDEM SWITCHING - TN - EC 5185

LOCAL			
UNDETERMINED ROUTING			
ORIGINATING	123	.000676000	.08

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***** LOCAL USAGE FOR OFFICE KNVLTHMADSI *****
MAY 25 01 THRU JUN 24 01

RATE CATEGORY	QUANTITY	RATE	AMOUNT
TANDEM ORIGINATING	15	.000676000	.01
ACCESS TANDEM ORIGINATING	3	.000676000	.01

TOTAL UT TANDEM SM 141
TOTAL UNBUNDLED TRANSPORT CHARGE - TN - EC 5185 .10
UNBUNDLED END OFFICE - TN - EC 5185 .34

UNBUNDLED LOCAL SWITCHING - SWITCHING FUNCTIONALITY

LOCAL ORIGINATING EO			
SINGLE NETWORK			
INTRASWITCH			
INITIAL	32	.001900000	.06
ADDITIONAL	150	.001900000	.29
INTERSWITCH			
INITIAL	43	.001900000	.08
ADDITIONAL	76	.001900000	.14
MULTIPLE NETWORK			
INTERSWITCH			
INITIAL	21	.001900000	.04
ADDITIONAL	4	.001900000	.01
TEO			
SINGLE NETWORK			
INTERSWITCH			
INITIAL	43	.001900000	.08
ADDITIONAL	76	.001900000	.14
MULTIPLE NETWORK			
INTERSWITCH			
INITIAL	7	.001900000	.01
ADDITIONAL	3	.001900000	.01
ACCESS ORIGINATING EO			
MULTIPLE NETWORK			
INTERSWITCH			
INITIAL	25	.001900000	.05
ADDITIONAL	20	.001900000	.04
TERMINATING TEO			
MULTIPLE NETWORK			
INTERSWITCH			
INITIAL	13	.001900000	.02
ADDITIONAL	39	.001900000	.07

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***** LOCAL USAGE FOR OFFICE KNVLTNHDSD1 *****
MAY 25 01 THRU JUN 24 01

RATE CATEGORY	QUANTITY	RATE	AMOUNT
TOTAL ULS - SWITCH FUNC	552		1.04
TOTAL UNBUNDLED END OFFICE CHARGES - TN - EC 5185			1.04
UNBUNDLED MISCELLANEOUS - TN - EC 5185			
800 ACCESS 10 DIGIT SCREENING			
800 DELIVERY	53	.004000000	.21
TOTAL UNBUNDLED MISCELLANEOUS CHARGES - TN - EC 5185			.21
TOTAL LOCAL USAGE CHARGES FOR OFFICE KNVLTNHDSD1			1.59

TOTAL USAGE CHARGES FOR OFFICE KNVLTNHDSD1			

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***** LOCAL USAGE FOR OFFICE MHPHTNADS1 *****
MAY 25 01 THRU JUN 24 01

RATE CATEGORY	QUANTITY	RATE	AMOUNT
UNBUNDLED TRANSPORT SHARED TRANSPORT - TN - EC 5185			
LOCAL			
UNDETERMINED ROUTING			
ORIGINATING			
MHPHTNBADS0 - 011 MILES	162	.000040000	.07
MHPHTNCKDS0 - 007 MILES	2	.000040000	.01
MHPHTNCTDS0 - 006 MILES	17	.000040000	.01
MHPHTNDVCM0 - 012 MILES	51	.000040000	.02
MHPHTNELD0 - 010 MILES	3	.000040000	.01
MHPHTNFRDS0 - 006 MILES	253	.000040000	.06
MHPHTNGTDS0 - 015 MILES	1	.000040000	.01
MHPHTNHTDS0 - 003 MILES	11	.000040000	.01
MHPHTNOADS1 - 011 MILES	3	.000040000	.01
MHPHTNSLDS0 - 009 MILES	3	.000040000	.01
MHPHTNSTDS0 - 003 MILES	18	.000040000	.01
MHPHTNWC0 - 010 MILES	99	.000040000	.04
MHPJTNAAGDS0 - 010 MILES	6	.000040000	.01
MHPJTNAJDS0 - 014 MILES	214	.000040000	.12
MHPJTNAJDS0 - 038 MILES	1	.000040000	.01
TANDEM			
ORIGINATING			
MHPHTNBH01 - 001 MILES	32	.000040000	.01
MHPHTNCTDS0 - 006 MILES	1	.000040000	.01
MHPHTNDVCM0 - 012 MILES	1	.000040000	.01
MHPHTNELD0 - 010 MILES	3	.000040000	.01
MHPHTNHACH0 - 001 MILES	18	.000040000	.01
MHPHTNHAXVX - 001 MILES	2	.000040000	.01
MHPJTNEWCMI - 036 MILES	5	.000040000	.01
MHPJTNSGCM0 - 007 MILES	1	.000040000	.01

TOTAL UT SHRD TRANS 907 .49

UNBUNDLED TRANSPORT FACILITIES TERMINATION EO TO EO - TN - EC 5185

LOCAL			
UNDETERMINED ROUTING			
ORIGINATING			
TANDEM			
ORIGINATING			
MHPHTNBADS0 - 011 MILES	882	.000360000	.32
MHPHTNCKDS0 - 007 MILES	59	.000360000	.02

TOTAL UT F TERM EO-EO 941 .34

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***** LOCAL USAGE FOR OFFICE MHPHNMADS1 *****
 MAY 25 01 THRU JUN 24 01

RATE CATEGORY	QUANTITY	RATE	AMOUNT
UNBUNDLED TRANSPORT FACILITIES TERMINATION EO TO TANDEM - TN - EC 5185			
ACCESS			
TANDEM			
ORIGINATING	1	.000360000	.01
TERMINATING	1	.000360000	.01

TOTAL UT F TERM EO-TAN	2		.02
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UNBUNDLED TRANSPORT TANDEM SWITCHING - TN - EC 5185			
LOCAL			
UNDETERMINED ROUTING			
ORIGINATING	836	.000676000	.57
TANDEM			
ORIGINATING	59	.000676000	.04
ACCESS			
TANDEM			
ORIGINATING	1	.000676000	.01
TERMINATING	1	.000676000	.01

TOTAL UT TANDEM SW	897		.63
TOTAL UNBUNDLED TRANSPORT CHARGE - TN - EC 5185			1.48

UNBUNDLED END OFFICE - TN - EC 5185
 UNBUNDLED LOCAL SWITCHING - SWITCHING FUNCTIONALITY

LOCAL			
ORIGINATING			
EO			
SINGLE NETWORK			
INTRASWITCH			
INITIAL	8	.001900000	.02
ADDITIONAL	38	.001900000	.07
INTERSWITCH			
INITIAL	114	.001900000	.22
ADDITIONAL	550	.001900000	1.05
MULTIPLE NETWORK			
INTERSWITCH			
INITIAL	34	.001900000	.06
ADDITIONAL	244	.001900000	.46
TEO			
SINGLE NETWORK			
INTERSWITCH			
INITIAL	114	.001900000	.22
ADDITIONAL	550	.001900000	1.05

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***** LOCAL USAGE FOR OFFICE MHPHTNADS1 *****
MAY 25 01 THRU JUN 24 01

RATE CATEGORY	QUANTITY	RATE	AMOUNT
MULTIPLE NETWORK INTERSWITCH INITIAL	10	.001900000	.02
ADDITIONAL	210	.001900000	.40
ACCESS ORIGINATING			
ED			
MULTIPLE NETWORK INTERSWITCH INITIAL	51	.001900000	.10
ADDITIONAL	31	.001900000	.06
TERMINATING			
TEO			
MULTIPLE NETWORK INTERSWITCH INITIAL	93	.001900000	.18
ADDITIONAL	168	.001900000	.32
TOTAL ULS - SWITCH FUNC	2,215		4.23
TOTAL UNBUNDLED END OFFICE CHARGES - TN - EC 5185			4.23
UNBUNDLED MISCELLANEOUS - TN - EC 5185			
800 ACCESS 10 DIGIT SCREENING	188	.004000000	.75
800 DELIVERY			
TOTAL UNBUNDLED MISCELLANEOUS CHARGES - TN - EC 5185			.75
TOTAL LOCAL USAGE CHARGES FOR OFFICE MHPHTNADS1			6.46

TOTAL USAGE CHARGES FOR OFFICE MHPHTNADS1			

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***** LOCAL USAGE FOR OFFICE NSVLTNMG0 *****
MAY 25 01 THRU JUN 24 01

RATE CATEGORY	QUANTITY	RATE	AMOUNT
UNBUNDLED TRANSPORT SHARED TRANSPORT - TN - EC 5185			
LOCAL			
UNDETERMINED ROUTING			
ORIGINATING	1	.000040000	.01
NSVLTNMGDS0 - 005 MILES	3	.000040000	.01
NSVLTNMTDS1 - 003 MILES	121	.000040000	.01
NSVLTNMTDS3 - 003 MILES	6	.000040000	.01
NSVLTNMTDS0 - 006 MILES	29	.000040000	.01
NSVLTNMGDS0 - 005 MILES	4	.000040000	.01
NSVLTN90DS1 - 058 MILES	1	.000040000	.01
NSVLTNCFH01 - 004 MILES	2	.000040000	.01
NSVLTNCFDS0 - 004 MILES	2	.000040000	.01
NSVLTNKHCH0 - 009 MILES	143	.000040000	.03
NSVLTNKHCH0 - 005 MILES	70	.000040000	.03
NSVLTNKHCH0 - 011 MILES	5	.000040000	.01
NSVLTNAPDS0 - 007 MILES	11	.000040000	.01
NSVLTNCHDS0 - 008 MILES			
TANDEM			
ORIGINATING	1	.000040000	.01
NSVLTN29CH2 - 003 MILES	2	.000040000	.01
NSVLTN32CH1 - 003 MILES	2	.000040000	.01
NSVLTNKHCH0 - 009 MILES	2	.000040000	.01
NSVLTNKHCH0 - 005 MILES			
ACCESS			
TANDEM			
ORIGINATING	31	.000040000	.01
NSVLTNMT84T - 003 MILES	47	.000040000	.01
TERMINATING			
NSVLTNMT84T - 003 MILES			
TOTAL UT SHRD TRANS	483		.23
UNBUNDLED TRANSPORT FACILITIES TERMINATION EO TO EO - TN - EC 5185			
LOCAL			
UNDETERMINED ROUTING			
ORIGINATING	390	.000360000	.14
TANDEM	5	.000360000	.01
ORIGINATING			
TOTAL UT F TERM EO-EO	395		.15

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***** LOCAL USAGE FOR OFFICE NSVLTNMG0 *****
MAY 25 01 THRU JUN 24 01

RATE CATEGORY	QUANTITY	RATE	AMOUNT
UNBUNDLED TRANSPORT FACILITIES TERMINATION EO TO TANDEM - TN - EC 5185			
LOCAL TANDEM			
ACCESS ORIGINATING	1	.000360000	.01
TANDEM ORIGINATING	31	.000360000	.01
TERMINATING	47	.000360000	.02

TOTAL UT F TERM EO-TAN ----- 79 .04

UNBUNDLED TRANSPORT TANDEM SWITCHING - TN - EC 5185			
LOCAL			
UNDETERMINED ROUTING			
ORIGINATING	391	.000676000	.26
TANDEM			
ACCESS ORIGINATING	5	.000676000	.01
TANDEM			
ORIGINATING	31	.000676000	.02
TERMINATING	47	.000676000	.03

TOTAL UT TANDEM SW ----- 474 .32
TOTAL UNBUNDLED TRANSPORT CHARGE - TN - EC 5185 .74

UNBUNDLED END OFFICE - TN - EC 5185

UNBUNDLED LOCAL SWITCHING - SWITCHING FUNCTIONALITY			
LOCAL			
ORIGINATING			
EO			
SINGLE NETWORK			
INTRASWITCH			
INITIAL	35	.001900000	.07
ADDITIONAL	168	.001900000	.32
INTERSWITCH			
INITIAL	58	.001900000	.11
ADDITIONAL	328	.001900000	.62
MULTIPLE NETWORK			
INTERSWITCH			
INITIAL	10	.001900000	.02
ADDITIONAL	1	.001900000	.01
TEO			
SINGLE NETWORK			
INTERSWITCH			
INITIAL	58	.001900000	.11

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***** LOCAL USAGE FOR OFFICE NSVLTNINC60 *****
MAY 25 01 THRU JUN 24 01

RATE CATEGORY	QUANTITY	RATE	AMOUNT
ADDITIONAL MULTIPLE NETWORK INTER SWITCH INITIAL	328	.001900000	.62
ADDITIONAL	5	.001900000	.01
ACCESS ORIGINATING EO	1	.001900000	.01
MULTIPLE NETWORK INTER SWITCH INITIAL	20	.001900000	.04
ADDITIONAL	13	.001900000	.02
TERMINATING TEO			
MULTIPLE NETWORK INTER SWITCH INITIAL	94	.001900000	.18
ADDITIONAL	295	.001900000	.56

TOTAL ULS - SWITCH FUNC 1,414
TOTAL UNBUNDLED END OFFICE CHARGES - TN - EC 5185 2.70

UNBUNDLED MISCELLANEOUS - TN - EC 5185
800 ACCESS 10 DIGIT SCREENING 2.70
800 DELIVERY .38

TOTAL UNBUNDLED MISCELLANEOUS CHARGES - TN - EC 5185 .38
TOTAL LOCAL USAGE CHARGES FOR OFFICE NSVLTNINC60 3.82

TOTAL USAGE CHARGES FOR OFFICE NSVLTNINC60 3.82

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***** LOCAL USAGE FOR OFFICE NSVLTNMTDS3 *****
MAY 25 01 THRU JUN 24 01

RATE CATEGORY	QUANTITY	RATE	AMOUNT
UNBUNDLED TRANSPORT SHARED TRANSPORT - TN - EC 5185			
LOCAL			
UNDETERMINED ROUTING			
ORIGINATING	9	.000040000	.01
NSVLTNINC0 - 003 MILES	113	.000040000	.02
NSVLTNSTDS0 - 004 MILES	14	.000040000	.01
NSVLTNUNDS0 - 002 MILES	12	.000040000	.01
BRMDINDDS0 - 009 MILES	106	.000040000	.03
NSVLTNCHDS0 - 006 MILES			
TANDEM			
ORIGINATING	1	.000040000	.01
NSVLTN29CH2 - 004 MILES	2	.000040000	.01
NSVLTNKHCH0 - 008 MILES			
TOTAL UT SHRD TRANS	257		.10
UNBUNDLED TRANSPORT FACILITIES TERMINATION EO TO EO - TN - EC 5185			
LOCAL			
UNDETERMINED ROUTING			
ORIGINATING	252	.000360000	.09
TANDEM	4	.000360000	.01
ORIGINATING			
TOTAL UT F TERM EO-EO	256		.10
UNBUNDLED TRANSPORT FACILITIES TERMINATION EO TO TANDEM - TN - EC 5185			
ACCESS			
TANDEM	48	.000360000	.02
TERMINATING			
TOTAL UT F TERM EO-TAN	48		.02
UNBUNDLED TRANSPORT TANDEM SWITCHING - TN - EC 5185			
LOCAL			
UNDETERMINED ROUTING			
ORIGINATING	252	.000676000	.17
TANDEM	4	.000676000	.01
ORIGINATING			
ACCESS			
TANDEM	48	.000676000	.03
TERMINATING			

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***** LOCAL USAGE FOR OFFICE NSVLTNMTDS3 *****
MAY 25 01 THRU JUN 24 01

RATE CATEGORY	QUANTITY	RATE	AMOUNT
TOTAL UT TANDEM SW	304		.21
TOTAL UNBUNDLED TRANSPORT CHARGE - TN - EC 5185			.43
UNBUNDLED END OFFICE - TN - EC 5185			
UNBUNDLED LOCAL SWITCHING - SWITCHING FUNCTIONALITY			
LOCAL			
ORIGINATING			
EO			
SINGLE NETWORK			
INTRASWITCH			
INITIAL	53	.001900000	.10
ADDITIONAL	229	.001900000	.44
INTERSWITCH			
INITIAL	24	.001900000	.05
ADDITIONAL	217	.001900000	.41
MULTIPLE NETWORK			
INTERSWITCH			
INITIAL	8	.001900000	.02
ADDITIONAL	9	.001900000	.02
TEO			
SINGLE NETWORK			
INTERSWITCH			
INITIAL	24	.001900000	.05
ADDITIONAL	217	.001900000	.41
MULTIPLE NETWORK			
INTERSWITCH			
INITIAL	5	.001900000	.01
ADDITIONAL	8	.001900000	.02
ACCESS			
ORIGINATING			
EO			
MULTIPLE NETWORK			
INTERSWITCH			
INITIAL	25	.001900000	.05
ADDITIONAL	4	.001900000	.01
TERMINATING			
TEO			
MULTIPLE NETWORK			
INTERSWITCH			
INITIAL	22	.001900000	.04
ADDITIONAL	46	.001900000	.09

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***** LOCAL USAGE FOR OFFICE NSVLTNMTDS3 *****
MAY 25 01 THRU JUN 24 01

RATE CATEGORY	QUANTITY	RATE	AMOUNT
TOTAL ULS - SWITCH FUNC	891		1.72
TOTAL UNBUNDLED END OFFICE CHARGES - TN - EC 5185			1.72
UNBUNDLED MISCELLANEOUS - TN - EC 5185			
800 ACCESS 10 DIGIT SCREENING	70	.004000000	.28
800 DELIVERY			
TOTAL UNBUNDLED MISCELLANEOUS CHARGES - TN - EC 5185			.28
TOTAL LOCAL USAGE CHARGES FOR OFFICE NSVLTNMTDS3			2.43
***** CHARGES FOR OFFICE NSVLTNMTDS3 *****			2.43

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***** SUMMARY OF UNBUNDLED USAGE CHARGES *****
TENNESSEE - 5185

LOCAL
TOTAL UNBUNDLED TRANSPORT CHARGES
TOTAL END OFFICE CHARGES
TOTAL MISCELLANEOUS CHARGES
TOTAL USAGE CHARGES

3.34
16.67
2.25

22.26

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***** SUMMARY OF UNBUNDLED USAGE CHARGES *****
TOTAL - ALL STATES/ECS

TOTAL UNBUNDLED TRANSPORT CHARGES
TOTAL END OFFICE CHARGES
TOTAL MISCELLANEOUS CHARGES
TOTAL USAGE CHARGES

3.34
16.67
2.25

22.26

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PAGE	REFERENCE NO	PAGE	REFERENCE NO	PAGE	REFERENCE NO
1	BILL FACE PAGE				
3	OC-AND-C PAGE				
8	CHTGTNRBDS0				
11	CLVLTNTHADS0				
14	KNVLTNTHADS1				
17	MPHTNTHADS1				
20	NSVLINING0				
23	NSVLTNMTDS3				

Sample DUF Records Provided to a CLEC in Tennessee

202401010628661904794170001739000
000000000061300000000000000070000000000000000000000000000000

1001310106131042362205960001042336425990000000000000000151318000226702001860000410000700010000570000000004004
00004236220596CHATTNOOGATNCHAT TNOOGATN91 00000000010000000000000000

1001310106131042362205960001042362482560000000000000000131901000049802001860000410000700010000570000000004004
00004236220596CHATTNOOGATNCHATTNOOGATN91 00000000010000000000000000

1001310106131042362205960001042385500710000000000000000150806000049802001860000410000700010000580000000004004
00004236220596CHATTNOOGATNCHATTNOOGATN91 00000000010000000000000000000017B019242364800011999A

1001310106131042362205960001042385500710000000000000000150928000057802001860000410000700010000580000000004004
00004236220596CHATTNOOGATNCHATTNOOGATN91 00000000010000000000000000000017B019242364800011999A

1001310106131042362205960001042385500710000000000000000160034000049902001860000410000700010000580000000004004
00004236220596CHATTNOOGATNCHATTNOOGATN91 00000000010000000000000000000017B019242364800011999A

100131010613104236220596000104238550071000000000000000160156000609402001860000410000700010000580000000004004
00004236220596CHATTNOOGATNCHATTNOOGATN91 0000000001000000000000000000017B019242364800011999A

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100131010613104236220596000104238941649000000000000000090732000306202001860000410000700010000570000000004004
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100131010613104236220596000104238941649000000000000000091422000050102001860000410000700010000570000000004004
00004236220596CHATTNOOGATNCHATTNOOGATN91 00000000010000000000000000

100131010613104236220596000104238941649000000000000000091538000335202001860000410000700010000570000000004004
00004236220596CHATTNOOGATNCHATTNOOGATN91 000000000100000000000000000000

Sample DUF Records Provided to a CLEC in Tennessee

1001310106131042362205960001070637581670000000000000000100641001615702001860000410000700010000570000000004004
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00004236220596CHATTNOOGATNRINGGOLD GA91 00000000010000000000000000

1001310106131042362205960001070696577740000000000000000130654000230502001860000410000700010000570000000004004
00004236220596CHATTNOOGATNRINGGOLD GA91 00000000010000000000000000

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00004236222132CHATTNOOGATNCHATTNOOGATN91 00000000010000000000000000

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00004236222132CHATTNOOGATNCHATTNOOGATN91 00000000010000000000000000

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00004236222132CHATTNOOGATNRINGGOLD GA91 00000000010000000000000000

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Sample DUF Records Provided to a CLEC in Tennessee

10013101061310423622214200010423265709000000000000000091118000047302001860000410000700010000580000000004004
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1001310106131042362221420001042344724590000000000000000132148000053102001860000410000700010000570000000004004
00004236222142CHATTNOOGATNPIKEVILLE TN91 000000000100000000000000000000

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00004236222142CHATTNOOGATNCHATTNOOGATN91 00000000010000000000000000000017B019242366499991999A

Sample DUF Records Provided to a CLEC in Tennessee

1001310106131042362221420001042388662320000000000000000132731000042402001860000410000700010000570000000004004
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1001310106131042362221420001042389480610000000000000000102223000119402001860000410000700010000580000000004004
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1001310106131042362221420001042389480610000000000000000120627000027002001860000410000700010000580000000004004
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1001310106131042362221420001042394221080000000000000000105436000038302001860000410000700010000570000000004004
00004236222142CHATTNOOGATNJASPER TN91 000000000100000000000000000000

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Sample DUF Records Provided to a CLEC in Tennessee

1001310106131042362221420001070663839080000000000000000102939000058802001860000410000700010000570000000004004
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100131010613104236226063000104237566070000000000000000092211000203902001860000410000700010000570000000004004
00004236226063CHATTNOOGATNCHATTNOOGATN91 00000000010000000000000000

1001310106131042362260630001042383754170000000000000000115802000145302001860000410000700010000570000000004004
00004236226063CHATTNOOGATNSO PITTSBGTN91 00000000010000000000000000

1001310106131042362260630001042383782120000000000000000153711000031902001860000410000700010000570000000004004
00004236226063CHATTNOOGATNSO PITTSBGTN91 00000000010000000000000000

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00004236226063CHATTNOOGATNCHATTNOOGATN91 00000000010000000000000000

Usage Records Available to CLECs on the Optional Daily Usage File and the Access Daily Usage File

Type of Facility	Direction	Carrier	Type of Call	Record Provided?
Unbundled Local Switching	Originating	BellSouth	Local	Yes. (ODUF)
Unbundled Local Switching	Originating	BellSouth	Intra-State Toll (Intra-LATA)	Yes. (ODUF)
Unbundled Local Switching	Originating	InterExchange Carrier (not BellSouth)	Intra-State Toll (Both Inter-LATA and Intra-LATA)	Yes. (ADUF)
Unbundled Local Switching	Originating	InterExchange Carrier (not BellSouth)	Inter-State Toll (inter-LATA)	Yes. (ADUF)
Unbundled Local Switching	Terminating	Facility Based CLEC	Local	Yes. (ADUF)
Unbundled Local Switching	Terminating	BellSouth	Intra-State Toll (Intra-LATA)	Yes. (ADUF)
Unbundled Local Switching	Terminating	InterExchange Carrier (not BellSouth)	Intra-State Toll (Both Inter-LATA and Intra-LATA)	Yes. (ADUF)
Unbundled Local Switching	Terminating	InterExchange Carrier (not BellSouth)	Inter-State Toll (inter-LATA)	Yes. (ADUF)
Resold Line	Originating	BellSouth	Local	Yes. (ODUF) If resold line is flat rate then records are available with EODUF option.
Resold Line	Originating	BellSouth	Intra-State Toll	Yes. (ODUF)

Exhibit DPS-5

Copies of pages 25 and 26 from a July 10, 2001 bill for local usage.

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LOCAL USAGE FOR OFFICE BRPTALMARS0 CIC *****
JUN 10 01 THRU JUL 09 01

RATE CATEGORY	QUANTITY	RATE	BIP	AMOUNT
LOCAL TRANSPORT SWITCHED COMMON TRANSPORT HOST TO REMOTE - AL - EC 5181				
TANDEM				
TERMINATING				
STSNALMADS0 - 10 MILES	11	0.000010000		0.01
TOTAL LT SW COM TRANS	11			0.01

LOCAL TRANSPORT SWITCHED COMMON TRANSPORT HOST TO SMC - AL - EC 5181				
TANDEM				
TERMINATING				
LTL CHTGTNNSDS0				
STSNALMADS0 - 33 MILES	11	0.000010000		0.01
TOTAL LT SW COM TRANS	11			0.01

LOCAL TRANSPORT FACILITIES TERMINATION HOST TO REMOTE - AL - EC 5181				
TANDEM				
TERMINATING				
STSNALMADS0				
	11	0.000450000		0.01
TOTAL LT CT FAC TERM	11			0.01

LOCAL TRANSPORT FACILITIES TERMINATION HOST TO SMC - AL - EC 5181				
TANDEM				
TERMINATING				
LTL CHTGTNNSDS0				
CHTGTNNSDS0	11	0.000450000	50	0.01
TOTAL LT CT FAC TERM	11			0.01
TOTAL LOCAL TRANSPORT CHARGES - AL - EC 5181				0.04

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***** LOCAL USAGE FOR OFFICE BRPTALMARS0 CIC *****
JUN 10 01 THRU JUL 09 01

RATE CATEGORY	QUANTITY	RATE	BIP	AMOUNT
---------------	----------	------	-----	--------

LOCAL TRANSPORT FACILITIES TERMINATION HOST TO SMC - TN - EC 5185

TANDEM
TERMINATING
LTL CHGTGNNSDS0
CHGTGNNSDS0

11	0.000387100	50		0.01

TOTAL LT CT FAC TERM	11			0.01

LOCAL TRANSPORT TANDEM SWITCHING - TN - EC 5185

TANDEM
TERMINATING

11	0.000977800			0.01

TOTAL LT AC TANDEM SW	11			0.01
TOTAL LOCAL TRANSPORT CHARGES - TN - EC 5185				0.02
TOTAL LOCAL TRANSPORT CHARGES				0.06

END OFFICE - AL - EC 5181

LOCAL SWITCHING
TERMINATING
PREMIUM

11	0.001800000			0.02

TOTAL LOCAL SWITCHING	11			0.02
TOTAL END OFFICE CHARGES - AL - EC 5181				0.02

CARRIER COMMON LINE ACCESS - AL - EC 5181

TERMINATING

11	0.000000000			0.00

TOTAL CARR COMM LINE	11			0.00
TOTAL CARRIER COMMON LINE ACCESS - AL - EC 5181				0.00
TOTAL LOCAL USG CHGS FOR OFFICE BRPTALMARS0 CIC				0.08

TOTAL USAGE CHARGES FOR OFFICE BRPTALMARS0 CIC

0.48
