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July 31, 2001

VIA HAND DELIVERY

Mr. David Waddell, Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243-0505

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 is BellSouth's Operations Support Systems Regionality Filing. This filing replaces the filing made by BellSouth on June 21, 2001. The filing is comprised of the testimony and exhibits of the following BellSouth witnesses:

Ken L. Ainsworth
David A. Coon
Alfred Heartley
Ronald M. Pate
David P. Scollard

The testimony and exhibits of Messrs. Ainsworth and Heartley are unchanged. The testimony and exhibits of Messrs. Coon, Pate and Scollard have been supplemented since the June 21 filing. The reports of PriceWaterhouseCoopers are attached to Mr. Pate's testimony.

Pursuant to Authority Rule 1220-1-1-.03(4), an original and four paper copies of the testimony and exhibits is enclosed. One electronic copy on CD ROM is also enclosed. Electronic copies are being provided to counsel of record for all known parties.

Thank you for your attention to this matter.

Very truly yours,

Guy M. Hicks

GMH/ch

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CERTIFICATE OF SERVICE

I hereby certify that on July 31, 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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BELLSOUTH TELECOMMUNICATIONS, INC.

DIRECT TESTIMONY OF KEN L. AINSWORTH

BEFORE THE TENNESSEE REGULATORY AUTHORITY

DOCKET NO. 01-00362

July 31, 2001

Q. STATE YOUR NAME, YOUR BUSINESS ADDRESS, AND YOUR POSITION WITH BELLSOUTH TELECOMMUNICATIONS, INC. ("BELLSOUTH").

A. My name is Ken L. Ainsworth. My business address is 675 West Peachtree Street, Atlanta, Georgia 30375. My title is Director – Interconnection Operations for BellSouth. I have served in my present position since December 1997.

Q. PLEASE SUMMARIZE YOUR BACKGROUND AND EXPERIENCE.

A. I have over thirty-five years experience in the telecommunications industry. My experience covers a wide range of network centers as well as outside plant construction. Specifically, I have managed and/or supported the following network centers: Switching Control Center, Special Service Center, central office operations, Access Control Advocate Center, Facility Management Administrative Center, Circuit Order Control Center, Network Operations Center, Major Account Center, 911 Center, and the Customer Wholesale Interconnection Network Service Center (CWINS). Additionally, I deployed the Work Force Administration system, which is used by these centers to status

and track special service work. I am currently a staff Director for Interconnection Services supporting maintenance and provisioning for the wholesale market.

Q. HAVE YOU TESTIFIED PREVIOUSLY BEFORE ANY STATE PUBLIC SERVICE COMMISSION?

A. No. However, I have participated in and provided technical assistance to numerous Competitive Local Exchange Carrier (CLEC) workshops in Louisiana and Georgia on issues dealing with pre-ordering, ordering and provisioning of resold services and network elements.

Q. HOW IS YOUR TESTIMONY ARRANGED?

A. My testimony is divided into the following sections:

Part A: Executive Summary: Pages 4 to 19

The Executive Summary contains an overview of the various BellSouth Centers that support CLEC pre-ordering, ordering, provisioning and maintenance requirements. Additionally, I will discuss the specific functions of each center, the training provided for center personnel, the forecasting tools utilized to anticipate CLEC demand, the regional processes used to provide CLEC support, training and assistance provided to CLECs supporting entry into the local market and the internal BellSouth groups that support each of the centers.

Part B: Comprehensive Discussion of the Processes Utilized in Providing Services to CLECs: Page 19 – 75

Directly following the Executive Summary, my testimony has been organized into the following categories:

I. Description of BellSouth Processes for the Pre-Ordering, Ordering, Provisioning, and Maintenance of Basic Resale Services, pages 20 – 33

II. Description of BellSouth Processes for the Pre-Ordering, Ordering, Provisioning, and Maintenance of Complex Resale Services (Designed), pages 33 – 41

III. Description of BellSouth Processes for the Pre-Ordering, Ordering, Provisioning, and Maintenance of Complex Resale Services (Non-Designed), pages 41 – 44

IV. Description of BellSouth Processes for the Pre-Ordering, Ordering, Provisioning, and Maintenance of Unbundled Network Elements (Designed), pages 44 – 56

V. Description of BellSouth Processes for the Pre-Ordering, Ordering, Provisioning, and Maintenance of Unbundled Network Elements (Non-designed), pages 56 – 63

VI. Description of BellSouth Processes for the Provisioning of Interim Local Number Portability (INP) and Local Number Portability (LNP), pages 63 – 66

VII. Description of BellSouth Processes for the Pre-Ordering, Ordering, Provisioning, and Maintenance of Interconnection Trunks, pages 66 – 69

VIII. Notifications To Former Local Service Provider (LSP), pages 70 – 72

IX. Description of BellSouth Processes for CLEC Account Establishment and Billing Disputes, pages 72 – 75

PART A: EXECUTIVE SUMMARY

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY TODAY?

A. The purpose of my testimony is to describe the various BellSouth centers that support CLEC pre-ordering, ordering, provisioning and maintenance activity. In my testimony I will demonstrate that our centers, the databases they access and the processes used to support CLECs are regional. Additionally, I will discuss the specific functions of each center; the training provided for center personnel, the forecasting tools utilized to anticipate CLEC demand and the regional processes used to provide CLEC support and the internal BellSouth groups that support each of the centers.

Q. WOULD YOU PLEASE PROVIDE A GENERAL DESCRIPTION OF THE CENTERS YOU WILL DISCUSS IN YOUR TESTIMONY?

A. Yes. BellSouth has six main CLEC Centers, each of which has a distinct relationship with the others. The CLEC support centers are globally referred to as Network & Carrier

Services – Customer Services. The Local Carrier Service Centers (LCSCs) handle the pre-ordering and ordering portion of a local service request which was submitted manually or via mechanized fallout, and pass this information along to either the BellSouth Customer Wholesale Interconnection Network Service Center (CWINS) or the Data Customer Support Center (DCSC). The CWINS or DCSC handles the provisioning or maintenance portion of a local service request. Some centers, such as the Complex Resale Support Group (CRSG), the Intelligent Network Services Service Center (INSSC), the Local Interconnection Service Center (LISC) and the DCSC, interface with a variety of centers to provide a particular type of service. Each of these centers utilizes the same methods and procedures, access the same databases and receive the same training in support of CLECs across all nine states.

Q. PLEASE DISCUSS THE METHOD BELLSOUTH UTILIZES TO ENSURE THE CENTERS PREVIOUSLY DESCRIBED ARE ADEQUATELY STAFFED TO MEET CURRENT AND FUTURE CLEC VOLUME.

A. In order to ensure adequate staffing of the Centers supporting CLECs, BellSouth utilizes a force model to anticipate staffing needs based on historical trends, time and motion studies, internal forecasts and targeted benchmarks. The models utilize a forward-looking view of activity by product type that allows for sufficient time to hire and train personnel in anticipation of any increase in activity. Centers which handle like activity, i.e., the LCSC for processing CLEC local service requests, are able to handle spikes in the load by shifting work between centers or utilizing overtime. BellSouth is able to shift work among like centers to handle spikes in the load because these centers receive the

same training, utilize the same processes and procedures, and access the same databases to support CLECs across all nine states.

Q. PLEASE DESCRIBE IN DETAIL EACH CLEC SUPPORT CENTER.

A. Certainly, I'll start by describing the LCSC. BellSouth's LCSC is housed in three facilities located in Atlanta, Georgia, Birmingham, Alabama, and Jacksonville, Florida. The LCSC is responsible for the pre-ordering and ordering of basic CLEC resale services and unbundled network elements (UNEs). The Atlanta and Birmingham Centers are assigned to handle the pre-ordering and ordering functions for CLECs across all nine states. CLECs are assigned to either the Atlanta or Birmingham LCSC in order to evenly distribute the total CLEC workload between these two centers. In other words, Tennessee CLECs are assigned to both the Atlanta and Birmingham LCSC.

The Jacksonville Center was added in the first quarter of 2001 in order to more efficiently meet CLEC order volume. The new Jacksonville Center will operate as a call center supporting all CLECs across nine states for calls dealing with pre-ordering and ordering issues. Working strictly as a call center will allow the Jacksonville LCSC to handle calls quicker and more effectively. This will enable the Atlanta and Birmingham centers to concentrate solely on processing orders thereby reducing order-processing time and improving accuracy. Moreover, the Jacksonville Center will also operate as an overflow center handling spikes in the load for pre-ordering and ordering functions which may occur in the other two LCSCs.

For pre-ordering and ordering of complex resale services and UNEs, the LCSCs are available to CLECs from 8 a.m. to 6 p.m. (local time of the center), Monday through

Friday. For all other services, the Atlanta and Birmingham LCSCs are available to CLEC customers from 7 a.m. to 7 p.m. and Jacksonville is available 7 a.m. to 7 p.m. (local time of the center), Monday through Saturday. The hours of operation for the LCSCs are the same or longer than the hours of operation of the various BellSouth Retail Centers which serve its customers.

Today, the LCSC has 1,033 employees. For the year 2000, the LCSC processed an average of 99,122 manual and electronic (fallout) Local Service Requests (LSRs) per month. The LCSCs' work force and productivity are continuously increasing to meet the increasing complexity of the orders handled and the evolving tighter performance standards, as well as handling forecasted demand. As CLECs move from ordering resale products to ordering UNE products and Local Number Portability (LNP), the complexity of the orders handled by the LCSC has increased significantly. As an example, the volume of LSRs that required LCSC handling (manually submitted and electronic fallout) has remained relatively flat year-over-year: 1,200,000 for 1998, 1,514,321 for 1999, and 1,189,464 for the year 2000. At the same time the LCSC operational reports show that from December 1998 through February 2001, the LCSC increased its trained service representative headcount by 130%. These head count increases, including overtime factors, allowed the LCSCs to process the more complex Local Service Requests which cannot be submitted for electronic flow through. Once LSR volume begins to approach the LCSCs' capacity, BellSouth is prepared to meet that demand by extending service representative hours and/or utilizing other work groups pre-trained in processing LSRs. Additionally, BellSouth has the ability to move the workload between the three LCSCs as an immediate response to high volumes.

All three locations of BellSouth's LCSC operate on a nine-state basis. Moreover, all three LCSCs utilize the same methods and procedures for conducting CLEC pre-ordering and ordering functions. The term "same" means the same physical facilities and the same personnel following the same procedures. The LCSC that provides manual processing for a CLEC seeking to provide service to customers in Tennessee is the very same LCSC that provides manual processing for a CLEC seeking to provide service to customers in any of the nine states within the BellSouth region. Manual processing of CLEC orders is divided between the Atlanta and Birmingham Centers by CLEC, and both centers process orders for all nine states. Once in the LCSC, LSRs are handled according to product type, but are not divided according to state. Both mechanized fallout and manually submitted LSRs are handled on a first-in/first-out non-discriminatory basis.

Mechanized LSRs that require manual handling are received by the LCSC via the single Local Exchange Ordering (LEO) system regardless whether the CLEC's service representative is in Tennessee or any of the nine states within the BellSouth region. These orders are prioritized on a first-in/first-out basis. Once processed by LEO, the LSRs are then distributed to service representatives at the location assigned to that particular CLEC and, specifically to the work group for that CLEC that handles LSRs for a particular product type. Manual LSRs are received by the LCSC assigned to handle the particular CLEC. Manual LSRs are logged and assigned to representatives by product types. A load manager by product type then monitors LSR activity via load reports to ensure LSRs are processed on the first-in/first-out basis and in accordance with evolving performance standards. The service representative would then enter the request into BellSouth's legacy (embedded) systems. I will discuss in detail the various processes used by product type, later in my testimony. The "sameness" of the LCSC's regional

operations ensures that CLECs providing local exchange service in Tennessee will receive the same nondiscriminatory access to Operation Support Systems (OSS) provided by the LCSC to CLECs operating in any of the states within the nine-state BellSouth region. Please refer to Exhibit LCSC–28, for an LCSC Organization Chart depicting the "sameness" of the organizational structure.

Q. PLEASE DESCRIBE THE CWINS CENTER.

A. BellSouth's CWINS Center is housed in three facilities located in Atlanta, Georgia; Jacksonville, Florida; and Birmingham, Alabama. The CWINS Center is responsible for the provisioning and maintenance of UNEs and all resale designed and non-designed services. The Jacksonville Center was added in the first quarter of 2001 in order to more efficiently meet CLEC order volumes. These three centers are assigned to handle the provisioning and maintenance functions for CLECs across all nine states. CLECs are assigned to each CWINS Center in order to evenly distribute the total CLEC workload between the three centers. CLEC orders are divided between the centers by CLEC account, not by state. All Resale maintenance and provisioning support for CLECs across all nine states is handled in Atlanta.

The CWIN Centers normal hours of operation for provisioning of physical wirework is Monday – Friday 8:00 a.m.- 5 p.m. (location time for where the work is being performed) for all coordinated services and Monday – Saturday 8:00 a.m. – 5:00 p.m. for non-coordinated services. Maintenance coverage for both designed and non-designed services is twenty-four hours per day, seven days per week. These hours are identical to the hours for BellSouth retail products. These centers are staffed with 1,003 employees,

including electronic technicians (ETs), which are some of the highest-rated technical non-management positions in BellSouth. As with the LCSC, BellSouth utilizes a force model to anticipate staffing needs based on historical trends, time and motion studies, internal forecasts and targeted benchmarks. The CWINS Center handles spikes in the workload by utilizing overtime and/or shifting work between the three centers. Please refer to Exhibit LCSC–29 for a CWINS Organization Chart depicting the "sameness" of the organizational structure.

Q. PLEASE DESCRIBE THE DCSC.

A. The DCSC provides CLECs with an ordering, tracking, provisioning and maintenance contact for broadband services that include: NMLI (Native Mode LAN Interconnection), FDDI (Fiber Distributed Data Interface), and Video. One DCSC provides pre-ordering, ordering, provisioning, and maintenance support. This center serves CLECs in all nine states, utilizing the same methods, procedures, and process and thus a CLEC submitting inquiries for an end user in Tennessee will receive identical services for an inquiry submitted for an end user in all of the nine states within the BellSouth region.

Q. PLEASE DESCRIBE THE LISC.

A. The LISC is the pre-ordering, ordering, provisioning and maintenance contact for local interconnection trunking. The LISC processes trunking and facility requests, as well as call transport and termination services for facility-based providers across all nine states. The LISC is staffed with 113 employees. The LISC provides pre-ordering, ordering, provisioning and maintenance support to all CLECs across the nine-state region utilizing

the same processes and procedures to serve all CLECs. This center is located in Birmingham, Alabama and operates Monday through Friday from 8:00 a.m. – 4:30 p.m. (central time). One center serves CLECs in all nine states, and thus CLECs submitting inquiries for an end user in Tennessee will receive identical services for an inquiry submitted for an end user in all of the nine states within the BellSouth region.

Q. PLEASE DESCRIBE THE INSSC.

A. The INSSC serves both resale and facility-based CLECs and is responsible for issuing service orders for Advanced Intelligent Network (AIN) services. Examples of available AIN services are CNAM (Caller-ID), and GETS (Government Emergency Telecommunications Service). The INSSC deals directly with the Account Teams and is staffed with four service representatives and a Supervisor. The Center, also located in Birmingham, Alabama, operates Monday through Friday from 8:00 a.m. – 4:30 p.m. (central time). This single center serves all CLECs across the nine-state area and utilizes the same methods, procedures and processes in providing this support.

Q. PLEASE DESCRIBE THE CRSG.

A. The CRSG is responsible for processing manual service order inquiries for Complex Resale and Complex UNEs, including ADSL (Asymmetrical Digital Subscriber Line) and HDSL (High Bit Rate Digital Subscriber Line) and unbundled loops. The CRSG is staffed with 49 employees. This single center serves all CLECs across the nine-state area utilizing the same methods, procedures and processes in providing this support.

Q. PLEASE DESCRIBE THE BILLING AND COLLECTIONS GROUP

A. The Billing and Collections group in Interconnection Customer Services establishes CLEC master billing accounts and provides a single point of contact for CLECs on billing and collections issues and dispute resolution. This single group is staffed with 117 employees supporting CLECs in all nine states. The Billing and Collections group utilizes data from the same forecasting model used to project LSR activity to base future staffing requirements. This single group utilizes the same methods, procedures, and processes, accesses the same databases and receives the same training to support all CLECs across the nine state area.

Q. ARE THERE GROUPS WITHIN THE LCSC WHO COORDINATE LARGE AND/OR COMPLEX SERVICE REQUESTS FOR CLECs?

A. Yes. The LCSC Project Management organization coordinates large and/or complex provisioning and project implementation for CLECs to include UNEs and complex services. Project managers are located in Atlanta and Birmingham and are aligned to serve the same CLECs that are assigned to the Atlanta and Birmingham LCSC, respectively. Consequently, like the LCSC as a whole, Project Managers serve all assigned CLECs in the entire nine-state area and use the same processes and methods and procedures to support CLEC project management requirements. In other words, the same Project Manager will handle a CLEC's LSR for an end user in Tennessee and the same CLEC's LSR for an end user in all of the nine states within the BellSouth region. Project Management may occur with basic resale services and local number portability, depending on the quantity ordered or through special negotiation. The Project Manager

(PM) works with CLECs, Account Teams, and other BellSouth departments/centers to ensure successful overall project implementation. The Project Manager has overall responsibility for all project implementations that meet project management criteria. There are currently 17 Project Managers that support CLEC customers.

Q. ARE THEIR GROUPS WITHIN BELLSOUTH THAT ASSIST CLECs IN RESOLVING PROBLEMS WHICH MIGHT CROSS CENTER RESPONSIBILITIES?

A. Yes. Each CLEC is assigned an Interconnection Services Account Team, which acts as a single point of contact for all of that CLEC's marketing activities in all nine states. The Account Team provides day-to-day CLEC support and serves as the interface for the pre-ordering and ordering activities associated with complex services, as required. The Account Teams also assist CLECs with their interaction with the service centers mentioned earlier. The Account Teams are assigned by CLEC and not by state; thus one account team will handle inquiries regarding end users for a particular CLEC in all nine states.

Q. WHAT DOES BELLSOUTH DO TO ASSIST CLECs WITH IMPROVING FLOW THROUGH BY REDUCING ERRORS WHICH RESULT IN PROCESSING DELAYS AND DELAYED END USER SERVICE?

A. The Customer Support Management organization is responsible for reducing BellSouth's and CLECs' costs through improved CLEC service order flow-through and mechanization. Customer Support Managers (CSM) are located in Atlanta and Birmingham and are aligned with the Atlanta and Birmingham LCSC in support of

assigned CLEC requirements. The CSMs support assigned CLECs in the entire nine-state area and utilize the same methods and procedures and processes to provide CLECs with the following support: perform root-cause analysis of problems to improve the overall LCSC service order process and to resolve chronic, CLEC-specific processing problems; proactively identify opportunities to improve CLEC service order flows and develop plans to facilitate such improvements; make on-site visits with the Account Teams to address CLEC-specific operational issues; and provide assistance to resale CLECs that are utilizing Electronic Data Interchange (EDI), RoboTAG™ or Telecommunications Access Gateway (TAG) to process orders from the System Readiness Testing Phase (SRT) through successful production. CSMs are assigned on a CLEC-specific basis, not a state-specific basis. Thus, a CSM can provide a CLEC the same assistance for a LSR for an end user in Tennessee as for an end user in all of the nine states within the BellSouth region. Facility-based CLECs are assigned a CSM when requested by the Account Team. There are 18 Customer Support Managers in the Network & Carrier Services–Customer Services organization.

Q. PLEASE DESCRIBE THE METHODS BELLSOUTH UTILIZES TO SELECT PERSONNEL TO STAFF THE CENTERS YOU HAVE MENTIONED TODAY.

A. The selection of personnel serving CLECs in the above organizations is consistent with that of retail operations units in BellSouth. With one exception, the BellSouth Human Resource group uses the same job selection process for service representatives, electronic technicians and maintenance administrators for the CLEC centers as are required to staff the Network & Carrier Services – Customer Services local operation centers. The exception is that the position of LCSC service representative requires data entry skill,

which is not a BellSouth retail unit position requirement. The personnel for the Network & Carrier Services – Customer Services local operations centers were selected from existing jobholders within BellSouth work forces (employees transfer from existing positions), internal upgrade requests (existing employee bid for higher-rated position) or external sources. Assurance of quality personnel and skill level begins with the BellSouth Human Resources personnel selection process, requiring internal job applicants to qualify for job positions in the local Network & Carrier Services – Customer Services operations groups. These qualifications include existing job skill requirements or the demonstration of ability to perform the position functions, satisfactory attendance and satisfactory previous job performance. As an example, all internal applicants for an electronic technician (ET) position, without a present ET title, must successfully complete five qualification modules (General Qualifications Level 2, Basic Electricity, Basic Electronics, Digital Electronics, and Computer Fundamentals) to qualify for an ET position. External applicants must successfully complete the BellSouth interview process that evaluates problem-solving skills, decision-making skills, job history and previous experience. The BellSouth selection process is a uniformly applied set of standards to ensure that only the most qualified personnel are placed in Network & Carrier Services–Customer Services job positions.

Q. DESCRIBE THE TRAINING FOR THE PERSONNEL STAFFING THE CENTERS YOU HAVE DISCUSSED.

A. The Employee Effectiveness Organization within Network & Carrier Services-Customer Services is responsible for course development and training delivery for employees supporting CLEC services on a region-wide basis. This group was formed as part of

BellSouth's continuing effort to improve the timeliness and effectiveness of course development and training delivery. This group's work has resulted in the development of modular courses that promote the flexibility needed to customize curriculum paths. The LCSC training curriculum was derived from the existing curriculum created for the retail Customer Operating Units (COUs) and, therefore, is comparable in content and approach to the retail curriculum. The Employee Effectiveness Organization coordinates employment of outside management consultants to assist and coach newly trained employees in the CLEC ordering and repair centers. See Exhibit LCSC–1 for LCSC and CWINS Center training curriculum.

Q. HOW DO YOU ENSURE THAT THE QUALITY OF WORK PERFORMED IN THE CENTERS YOU HAVE DISCUSSED IS MAINTAINTED TO A HIGH STANDARD AND IS CONSISTENT AND THE SAME FOR HANDLING ALL CLEC ACTIVITY?

A. The foundation of the quality policy within the Network & Carrier Services–Customer Services organization is certification by the International Organization for Standardization (ISO). ISO is a global federation working to define and develop industry standards for quality. ISO 9000 is a series of international quality system standards and guidelines establishing global requirements for quality management. ISO 9002 focuses on quality systems for production, installation and servicing. ISO focuses on processes and systems, not products. ISO 9002 certification was granted to the Interexchange Carrier Service Center (ICSC), Access Customer Advocacy Center (ACAC) and Wireless Centers in February 1996 and the Atlanta and Birmingham LCSC in June 1998. The Atlanta and Birmingham CWINS Center received ISO 9002 certification in August 1999.

Plans are currently under way to certify the newly implemented Jacksonville CWINS and LCSC Centers this year. Although the new Jacksonville Centers are not ISO certified, they do however utilize the ISO model in providing CLEC support. ISO 9002 certification was also granted to the INSSC and LISC in September 2000. The Billing & Collections Group also received ISO 9002 Certifications for particular functions at the same time as their supported centers. This ISO certification demonstrates compliance with high standards of quality recognized throughout the world. It requires employees in these Centers to meet training standards, thus qualifying them to perform functions necessary for accurate processing of orders. Processes are monitored to ensure continued compliance with these standards. Monitoring includes: internal ISO reviews each six months by BellSouth quality teams, external reviews each six months by certified ISO auditors and complete re-certification every three years to ensure the ISO standards for quality are being maintained. The ISO 9002 Certification thus indicates the commitment by BellSouth Network and Carrier Services—Customer Services to provide the highest level of service to CLEC customers.

Additionally, BellSouth has internal groups dedicated to conducting quality reviews to ensure processes are consistently followed in support of CLEC activity across all nine states. These groups also identify common human errors and develop training to correct and/or to reduce errors so that BellSouth can consistently achieve prescribed service quality measures.

Q. IS BELLSOUTH'S TRAINING FOR CLEC CENTERS PERSONNEL CONSISTENT ACROSS ALL NINE STATES?

A. Yes. All LCSC service representatives receive exactly the same initial training. The service representatives are trained on a product-specific basis (i.e., resale, combinations or UNEs), not on a state-specific basis. In addition, all LCSC service representatives are subject to the same quality controls and the same incentive plans for performance.

Q. HOW DOES BELLSOUTH ASSIST CLECS IN ENTERING THE LOCAL MARKET?

A. BellSouth has created a four-phase turn-up process for providing facilities and services to CLECs. The turn-up process ensures that new CLECs are properly informed about BellSouth's full range of wholesale products, including the rules and interfaces for obtaining those products. These four phases are discussed in the following testimony.

The first phase is the Initial Contact and Negotiations. The first step of the initial contact is CLEC review of the BellSouth Guide, "Thinking of Becoming a CLEC? Before You Do Anything, Read This." This phase includes interconnection contract negotiation and approval.

The second phase is Planning. This phase includes contract review, use of Account Team Job Aid, and CLEC Activation Requirements Document.

The third phase is Technical Implementation. This phase includes CLEC initial and specialized training, billing and invoicing, and electronic interface connectivity. In the State of South Carolina, CLECs are eligible for one free seat a year in web-based training on Local Exchange Navigation System (LENS) and Trouble Analysis Facilitation

Interface (TAFI). They receive one free seat per year in TAG (an instructor lead course). As a one-time occurrence, they receive one free seat in web-based CLEC Basic Training. They may also attend six workshops per year at no charge.

The fourth phase is End-to-End Testing. This phase includes connectivity and testing with CLECs using Electronic Data Interchange (EDI) or other electronic OSS interfaces.

These processes are documented in detail in Exhibit LCSC–2, "BellSouth Start-Up Guide." This manual includes both the BellSouth processes and samples of the documentation for information furnished to the CLEC during the process.

PART B: DISCUSSION OF THE PROCESSES UTILIZED IN PROVIDING SERVICES TO CLECs

I. DESCRIPTION OF BELLSOUTH PROCESSES FOR THE PRE-ORDERING, ORDERING, PROVISIONING, AND MAINTENANCE OF BASIC RESALE SERVICES

Q. WOULD YOU PLEASE DESCRIBE THE PROCESSES BELLSOUTH UTILIZES IN PROVIDING SERVICES TO CLECs IN TENNESSEE

A. Certainly, the processes BellSouth utilizes to provide services to Tennessee CLECs are the same processes using the same methods and procedures used to serve CLECs across all nine states.

Q. PLEASE ELABORATE ON THE SPECIFIC PROCESSES MENTIONED ABOVE.

A. I will begin by describing the processes for pre-ordering, ordering, provisioning and maintenance of basic resold services.

Q. WHAT IS BASIC RESOLD SERVICE?

A. Basic resale residential and business services are those that do not require engineering design.

Q. PLEASE DESCRIBE THE PRE-ORDERING PROCESS FOR BASIC RESOLD SERVICE.

A. The pre-ordering activities associated with these types of services involve the CLEC's request for customer information, the transmittal of end user account information to the CLEC, and validation of data transmitted to the LCSC on the LSR. Ordering information for resale services is contained in the BellSouth Business Rules for Local Ordering (BBR) (LSOGv4/TCIF 9), the BellSouth Local Exchange Ordering (LEO) Implementation Guide (IG)—Volume 1 (TCIF 7), and the BellSouth Pre-Ordering and Ordering Overview Guide (LSOGv4/TCIF 9), all of which are provided by BellSouth to CLECs. The "BellSouth Business Rules for Local Ordering" is provided as Exhibit LCSC–3, the "Local Exchange Ordering Implementation Guide (LEO-IG)-Vol. 1 (TCIF7)" is provided as Exhibit LCSC–4 and the "BellSouth Pre-Ordering and Ordering Overview Guide" is provided as Exhibit LCSC–5. Volumes 1 and 4 of the LEO Guide

are available for CLECs that have chosen not to upgrade their machine-to-machine electronic interfaces to TCIF 9. The equivalent rules for TCIF 9 are contained in the BBR, as described above, and the EDI Specifications. The above referenced guides can be accessed on the web at: http://www.interconnection.bellsouth.com/guides/index.html.

End user account information is available to the CLEC from the Customer Service Record (CSR). CSR information can be obtained through two methods: manually through a faxed or mailed request or electronically through the LENS or TAG interfaces. Mailed requests are accepted, but discouraged due to additional processing time.

BellSouth provides CSR information to the requesting CLEC if the CLEC has a blanket Letter of Authorization (LOA) on file with BellSouth and the account belongs to the requesting CLEC or BellSouth. CLECs are not allowed to view or receive the CSR of an end user subscribing to another CLEC. The LOA allows the CLEC access to the end user's account information and/or authorizes the CLEC to order services on behalf of the end user. The LCSC will provide the following CSR information: telephone numbers (or other means of identification); listed name and address; directory listing information; directory delivery information; billing name and address; service address; and product and service information. For manually requested CSRs, the CLEC must provide the following information to the LCSC in order to receive a CSR: the end user's name; main account number; CLEC company; CLEC Representative name (initiator); CLEC fax number; and CLEC address. The LCSC accesses the Business Office Customer Record Inquiry System (BOCRIS) to obtain the CSR. Manually requested CSRs will be returned to the CLEC via fax within 8 business hours if the CSR is 50 pages or less. If greater than 50 pages, CSRs will be sent within 8 business hours by US mail or at the CLEC's

expense, overnight delivery. As I stated above, CLECs also have the option of reviewing their CSRs electronically through LENS or TAG. The following chart lists the information provided on a CLEC CSR.

Information on the CLEC CSR	Comments
Telephone Number or other Account Identification	
Listed Name	
Listed Address	
Directory Listing Information	
Directory Delivery Information	
Billing Name	
Billing Address	
Service Address	
Product and Service Information	USOCs (Universal Service Order Codes) and English-language
PIC	
LPIC	
BellSouth's retail rates	Only for end users in Georgia and Florida, by order of the Georgia and Florida PSCs, before the end user has been converted to the CLEC. After conversion, rates for all states are visible. Retail rates are also available to CLECs via BellSouth's tariffs.
Credit History	Only for end users in Alabama and Florida, by order of the Alabama and Florida PSCs (Public Service Commissions).
Local Service Itemization (LSI)	A summary of information found in the CSR.

If the CLEC chooses to perform pre-ordering electronically through TAG or LENS, additional inquiry or pre-ordering options are available. These include validating addresses, reserving telephone numbers, viewing features and services for specific NXXs, viewing an installation calendar in order to estimate due date interval, and

calculating an estimated due date. For a more detailed discussion, please see the Testimony of Ronald M. Pate on OSS and electronic interfaces.

Exhibit LCSC–6 summarizes the manual pre-ordering process for basic resale services.

Q. PLEASE DESCRIBE THE ORDERING PROCESSES FOR BASIC RESOLD SERVICES.

A. LSRs may be submitted manually to the LCSC or electronically via EDI, LENS or TAG. The electronic interfaces are addressed in the testimony of Ronald M. Pate, regarding OSS; therefore, I will address only the manual process in this document.

If transmitted manually, LSRs may be sent to the LCSC via facsimile. Images in the form of faxes are transmitted by customers to one of our 800 or toll free telephone lines into a modem attached to a fax server. The fax servers handle an average of 60,000 manual LSRs per month for CLEC activity across all nine states. The toll free number groups as well as the fax servers are sized to handle known and forecasted CLEC manual LSR receipt. The fax server receives the fax and records some statistics about the fax including, time of receipt, telephone number, number of pages and fax server. The fax image and data is transmitted to a database server where the image is stored for long-term archival. The database assigns a number to the fax and prints it to a dedicated print server. The LCSC, upon receipt of the LSR from the print server, types pertinent information into an application referred to as Order Tracker. Order Tracker is an application and a database that is used to keep track of basic information about, as well as the status of, manually submitted LSRs in the LCSC Center.

Information input into the Order Tracker includes, but is not limited to, Purchase Order Number (PON), Company Code (CC), date and time of LSR receipt, sales code of the Service Representative to which the LSR is assigned and the current status of LSR (such as clarification or Firm Order Confirmation (FOC)). The system is also used to transmit various notices back to the customer and to gather statistics such as volume, duration and service representative productivity. The Order Tracker is also updated with the order number, due date, date and time of FOC transmittal, and any applicable remarks.

The LSR is then given to an LCSC service representative who enters the LSR into the service order generation systems: Direct Order Entry (DOE) for orders in Florida, Georgia, North Carolina, and South Carolina; or Service Order Negotiation System (SONGS) for orders in Alabama, Kentucky, Louisiana, Mississippi, and Tennessee. The SONGS application used to process CLEC orders in Tennesee is the same SONGS application used in Alabama, Kentucky, Louisiana, and Mississippi. SONGS is used to process 4,000 to 5,000 orders per month in Tennessee and approximately 20,000 orders per month in these five states.

DOE and SONGS are input software programs that are used to provide the BellSouth Service Order Control System (SOCS) with data in order to generate service order requests. There are no material differences in functionality between the two systems. Both systems use similar processes for creating a service order. This is because SOCS requires the same LSR screening and validating procedure. BellSouth has engaged an independent third party, Price Waterhouse Coopers, to analyze the comparability between the DOE and SONGS systems and develop an appropriate testing approach to validate

BellSouth's assertion that there is no material difference in functionality between DOE and SONGS. Please refer to the affidavit of Ronald Pate filed with this docket. The output from DOE/SONGS generates the same order in SOCS used to provide service to CLECs across all nine states in the BellSouth region.

The LCSC Service Representative using DOE will request and receive due date information from the Distributed Support Application Program (DSAP). The DSAP contains the standard intervals and available installation dates. SONGS contains a software due-date module that provides information similar to that of DSAP but is solely contained within the SONGS application. Therefore, unlike DOE, which requires a query to DSAP to determine the due date, SONGS performs the calculation within SONGS. The due date determination depends upon the standard service interval and installation personnel availability. For setting due dates where a premises visit is required, both DOE and SONGS allow the choice of an AM or PM appointment. These are the same options available to BellSouth retail customers. The Work Management Center (WMC) must approve any request for an earlier due date or for a time increment other than what is routinely provided. The WMC will honor an earlier due date request, assuming work force availability when the request is received. When received, "switch as is" orders are assigned a due date by service interval only, as personnel availability is not a factor. There is no difference between the intervals used for resale and the intervals used for retail.

Q. ARE DOE AND SONGS THE SAME SYSTEMS THAT ARE USED BY BELLSOUTH RETAIL UNITS?

A. No, BellSouth Consumer, Small Business and Large Business moved to the Regional Ordering System (ROS) and Regional Negotiation System (RNS) servers because the DOE and SONGS server capacity was not sufficient to meet the requirements of their growing business needs.

Q. WHY HAS THE LCSC CONTINUED TO USE DOE AND SONGS?

A. The LCSCs have continued to use the proven DOE and SONGS systems instead of switching to ROS and RNS, because the server platforms that support ROS and RNS cannot support all of the resold products ordered through the LCSC. Since ROS and RNS functionality is limited, the LCSC service representative could use these systems for some products, yet still be required to use DOE and SONGS for the other products that ROS and RNS cannot support. UNE products, such as UNE Combinations and UNE Loops are some examples of the products that are not supported by ROS and RNS. DOE and SONGS have little or no variance in the time it takes to submit orders, and all of these systems submit orders to BellSouth's downstream order processing systems in the same manner.

Q. HOW ARE DIRECTORY LISTINGS SUBMITTED FOR CLEC REQUESTS?

A. Directory listings for Resale end users are handled by the LCSC using the following methods: (1) When a resale CLEC chooses to switch the customer "as is" that is, when the customer switches carriers but does not change listings or features the customer's listing is untouched; (2) in those instances where a basic listing change is requested, the CLEC uses two forms: the Directory Listing (DL) and the Directory Service Caption

Request (DSCR) to provide the new listing information. On these input forms, the listing is entered, as the customer desires it to appear in the directory. The LCSC will use the listing information provided on this form when inputting the service order.

Q. WHAT HAPPENS IN THE PROCESS NEXT?

A. If the order passes all edit checks and data validation, DOE or SONGS will pass the service order to the Service Order Communication System (SOCS). The Service Representative ensures that the order processes to "Assign Order" (AO) status, correcting errors detected in the mechanized processing, if necessary. The LCSC returns a FOC to the CLEC via fax through Order Tracker. Included in the FOC are the BellSouth service order numbers, due dates, and other pertinent information.

Q. HOW ARE CLEC ERRORS HANDLED BY THE LCSC?

A. If the LCSC receives an LSR with erroneous or improperly formatted data, the LCSC will return the LSR to the CLEC for clarification. Initially, when an error is detected, the service representative will attempt to identify (clarify) any other errors associated with the LSR. After this scan, the service representative will transmit the request for clarification to the CLEC via fax through Order Tracker. Once the CLEC responds with the corrected information on a supplemental LSR, the process for service order issuance resumes. Multiple clarifications on the same LSR may result from errors on supplemental LSRs submitted by the CLEC or from rejections generated by downstream systems for errors not identifiable by the service representative. If the LSR remains uncorrected by the CLEC for 10 business days, Order Tracker automatically cancels it on the 11^{th} business day after sending two follow-up notices on the 5^{th} and 10^{th} business day.

The error resolution processes described above are identical for ordering other services described later in this testimony.

Q. SINCE WE ARE DISCUSSING MANUALLY PROCESSED LSRs, PLEASE DISCUSS HOW A CLEC IS ABLE TO DETERMINE THE STATUS OF A REQUEST SUBMITTED MANUALLY TO BELLSOUTH.

A. Certainly, BellSouth utilizes a number of both on-line tools and centers to provide timely status information to CLECs.

Q. PLEASE CONTINUE TO DESCRIBE THE TOOLS AND CENTERS YOU HAVE MENTIONED.

A. CLEC Service Order Tracking System (CSOTS) became available to CLECs in December 1999. This web-based electronic interface allows CLECs to view the status and SOCS image (excluding Remarks and Assignments) of their electronically and manually submitted service orders in SOCS. This tracking system is designed to provide the CLEC community with the following capabilities: viewing service orders, determining order status, and tracking service orders.

The CLEC will be notified by the Installation and Maintenance (I&M) technician or the WMC when a missed appointment occurs on the due date. Missed appointments for BellSouth-caused reasons other than unavailable facilities are normally rescheduled for the next working day. Missed appointments for CLEC or end-user reasons are identified by the service representative through a SOCS Report and then referred to the CLEC via

fax for negotiation of a new due date. Please refer to the "CSOTS User Guide", located on the web at https://clecview.bellsouth.com/ (attached as Exhibit LCSC–8) or the OSS testimony of Ronald M. Pate for more information on jeopardy statuses.

CLECs also have another source available to them to check on orders placed in PF (Pending Facilities) Status. The PF Report is compiled daily from a SOCS database 'snapshot' taken at approximately 2 a.m. The information listed on this report includes the PON, Order Number, Telephone Number, Listed Name, and the type of facility needed on the order. The report will also provide the Estimated Service Date (ESD), Expected Completion Date (ECD), facility and current answer when available from engineering. See Exhibit LCSC–9 for a PF Report example. PFs will also be discussed in the ordering sections later in my testimony.

The PON Status Report is updated five times a day, roughly every three hours during business hours Monday through Saturday. This Report is provided to CLECs and displays manually submitted PONs. The Report provides current information such as the date that the PON was received and the PON status. Clarified or rejected PONs show the date of clarification or rejection as well as the reason. For those with a FOC status, the report provides the order number, telephone number and any due date information provided to the CLEC. This report is updated five times a day, roughly every three hours during business hours Monday through Saturday. See Exhibit LCSC–10 for a PON Status Report example. Both the PF Report and the PON Report can be viewed at https://clec.bellsouth.com/. This is a secure site, and a CLEC can only view their customer's information. Passwords can be obtained from the CLEC's Account Team. Exhibit LCSC–11 summarizes the basic resale service ordering process.

Q. PLEASE DISCUSS THE PROVISIONING PROCESSES FOR BASIC RESOLD SERVICES.

A. As previously discussed, basic resale services do not require engineering design work for each order. Therefore, after LCSC order issuance, provisioning is handled by the BellSouth Network Operations organization. This process is identical to that for similar services provisioned in the retail business units. For a complete summary of basic resold services, please refer to the "BellSouth Products and Services Interval Guide", Exhibit LCSC–7. Exhibit LCSC–12 summarizes the basic resale services provisioning process.

The service order issuance initiates the work activity in the Central Office (CO), Recent Change Memory Administration Group (RCMAG), or the I&M group, required to complete the service order. This activity depends on the type of order activity requested. The outside dispatch work group completes service order activity requiring a customer premises or facility dispatch on the due date. The dispatched service technician provides notification of service order completion. The BellSouth technician will attempt to contact the CLEC. If the CLEC cannot be reached, the technician will complete the service order and note the contact attempt in the remarks section of the service order.

If the dispatched BellSouth technician cannot gain access to the customer premises, the CLEC is advised and a No Access Card (RF2999) in the name of the reseller is left at the customer premise. The CLEC is responsible for rescheduling access for the installation.

A non-dispatched service order is automatically processed on the due date. The installation should be completed by 5:00 p.m. on the service order due date. If the CLEC determines that service has not been provided by 5:00 p.m., the CLEC should place a call to the BellSouth Resale Maintenance Center, for assistance.

Q. DOES BELLSOUTH PROVIDE CLECs WITH THE ABILITY TO ENTER TROUBLE REPORTS FOR BASIC RESOLD SERVICES?

A. Yes, the CLEC may submit trouble reports for basic resale services either electronically or manually. The electronic interfaces for CLECs, Trouble Analysis Facilitation Interface (TAFI) and the Electronic Communications Trouble Administration (ECTA) Gateway are discussed in the Operations Support Systems testimony of Ronald M. Pate. Therefore, I will address only the manual process. Exhibit LCSC–13 summarizes the basic resale services maintenance and repair flow.

Q. PLEASE CONTINUE DESCRIBING THE MAINTENANCE PROCESS.

A. To begin the manual maintenance and repair process, the CLEC refers the end user trouble to the CWINS Center via telephone after having completed an initial analysis of the end-user's trouble to ensure that the trouble is in BellSouth facilities. The Maintenance Administrator (MA) in the CWINS Center receives the trouble report from the CLEC and, with the CLEC on line, enters the reported telephone number into TAFI. TAFI is the same maintenance presentation interface utilized by the BellSouth retail units, and the CWINS Center MA has access to all the same functionalities of TAFI as his or her retail counterparts. TAFI tests the telephone number software or equipment

and provides a "next-step" recommendation. TAFI may indicate that: the trouble has been repaired; a dispatch by a BellSouth repair group is required; No Trouble was Found (NTF); or the trouble is likely in the Customer Premise Equipment (CPE).

If TAFI reports “No Trouble Found” or if the trouble appears to be in the CPE, the CLEC is asked to accept the disposition, and the report is closed. Should the CLEC demand a dispatch, the MA advises the CLEC that a charge may be incurred if the trouble is not found in the BellSouth facility or equipment.

Q. WHAT IF THE TROUBLE CANNOT BE CLEARED BY THE CWINS CENTER?

A. When the suspected trouble cannot be repaired in the CWINS Center, the MA advises the CLEC of the TAFI-generated repair commitment and transmits the report via TAFI, through Loop Maintenance Operations System (LMOS) to the responsible BellSouth work group for dispatch. When the trouble report is dispatched to the responsible BellSouth work group, the technician in the work group that ultimately resolves the trouble is responsible for contacting the designated CLEC representative and closing the report. As with trouble reports from BellSouth retail customers, the dispatched technician makes one attempt to close the report with the CLEC. If the technician is unable to reach the CLEC, the report is closed in LMOS, and the CLEC must contact the CWINS Center to determine the status of the report.

Q. YOU HAVE DESCRIBED THE PROCESSES USED FOR BASIC RESOLD SERVICES. ARE COMPLEX DESIGNED SERVICES HANDLED DIFFERENTLY?

A. Yes.

II. DESCRIPTION OF BELLSOUTH PROCESSES FOR THE PRE-ORDERING, ORDERING, PROVISIONING, AND MAINTENANCE OF COMPLEX RESALE SERVICES (DESIGNED)

Q. PLEASE DESCRIBE WHAT A COMPLEX RESOLD SERVICE IS.

A. Designed Complex Resale services are non-basic services which require an engineering design to assure service parameters are met. Typical examples of designed complex services are Primary Rate ISDN, SynchroNet® service, PBX (Private Branch Exchange) trunks, and DID (Direct Inward Dial). For a complete listing of Complex Resold Services, please refer to the "BellSouth Products and Services Interval Guide", Exhibit LCSC-7.

Non-designed Complex Resale products will be discussed later in my testimony.

Q. CAN A CLEC OBTAIN PREORDERING INFORMATION FOR COMPLEX DESIGNED SERVICES?

A. Yes, as previously described in connection with basic resale services, a CLEC may obtain end-user account information by submitting an LOA to the LCSC for designed services. When a CLEC manually interfaces with BellSouth, the Account Team performs all pre-ordering activities during the data validation step of the ordering process.

Q. PLEASE DESCRIBE THE ORDERING PROCESS FOR COMPLEX DESIGNED RESOLD SERVICES.

A. BellSouth's complex ordering process for CLECs is the same as that for BellSouth retail customers. The BellSouth Work Aid for Ordering Complex Services is also a helpful resource available to CLECs and can be found at www.interconnection.bellsouth.com/guides/index.html. This website offers order documents and order document instructions. For additional information about the complex ordering process, please refer to the testimony of Ronald M. Pate on OSS.

CLECs order most complex services, except those ordered as "Switch As Is" and "Switch with PIC (Presubscribed Interexchange Carrier) or LPIC (Local Presubscribed Interexchange Carrier) Changes or Freezes," through the Account Team. Complex orders for "Switch As Is" and "Switch with PIC or LPIC Changes or Freezes" and some complex services are processed in the same manner as basic resale services addressed in previous paragraphs. I will now describe the manual complex ordering process in which the Account Team is the CLEC's interface with BellSouth.

When initial installation of a complex service is desired, the CLEC submits an LSR, including the product-specific complex work instruction, to the Account Team. The Account Team reviews the LSR for accuracy and completeness, validates the pre-ordering data, completes associated documentation, and if required, routes a service inquiry to the appropriate BellSouth work group(s) for additional information.

Complex services frequently require the processing of a service inquiry before a firm order confirmation is made to the CLEC. The Account Team may initiate service inquiries at the request of the CLEC or when the CLEC submits an LSR as described above. Service inquiries may be initiated for a variety of reasons, but they primarily are initiated to validate the availability of BellSouth equipment and/or facilities and to determine the date by which the service may be provided.

The Account Team/CRSG collects the responses to the service inquiries. Service inquiry response intervals depend upon the product and the nature and details of each individual inquiry. Inquiries typically are handled within two to five workdays, depending on the product. Service inquiries for BellSouth retail and CLEC services are handled without any preference, on a first-come, first-served basis. The Account Team/CRSG begins the ordering process upon receipt of the LSR and all inquiry responses. The Account Team/CRSG processes the service inquiry and prepares a hand-off package that includes all the documents necessary to do the service inquiry for the specific product ordered. Examples of these documents include the service inquiry and the service inquiry response, the LSR and any CLEC ordering documents required for that specific product. The team then forwards the package to the service center for service order issuance.

The LCSC receives the hand-off package, completes associated worksheets, and types the order into DOE or SONGS. During order entry, DOE or SONGS performs data and formatting edits. If the order passes all edits, then DOE or SONGS transmits the order to SOCS, which distributes it to other BellSouth provisioning systems.

If the order involves the DCSC, then they receive the hand-off package and associated worksheets, and type the order in the Broadband Administrative Support System (BASS). During order entry, BASS performs data and formatting edits. If the order passes all edits, then BASS transmits the order to SOCS. If the complex service does not require an account team interface, the order is submitted directly to the LCSC and is processed as described for basic resold service.

Q. HOW ARE DUE DATES ESTABLISHED AND COMMUNICATED TO THE CLEC?

A. The LCSC or DCSC determines the due date interval from the information provided by the Account Team in conjunction with the BellSouth Products and Services Interval Guide, and if appropriate, the service inquiry response information. Due dates are determined through the service order inquiry process on an Individual Case Basis (ICB) for complex resale services. The LCSC or DCSC provides a FOC to the CLEC, Account Team, and the Project Manager, when applicable. The Project Manager coordinates projects with other BellSouth departments and tracks the service orders to ensure their timely completion.

Q. HOW ARE CLEC ERRORS HANDLED?

A. If the service center receives an LSR with erroneous or improperly formatted data, the service representative attempts to identify all errors associated with the LSR. The clarification is transmitted to the BellSouth Account Team for correction or referred by the Account Team to the CLEC for correction. Once the CLEC responds with the corrected information on a supplemental LSR, the process for service order issuance resumes. Complex order rejections are directly related to the accuracy and completeness

of information provided by the CLEC. A group of highly skilled BellSouth employees is trained specifically in the area of complex service ordering, qualifying them to handle CLEC requests effectively and efficiently. For efficient ordering, the CLEC must assume responsibility for obtaining comparable expertise in the area of complex services. Lack of accurate CLEC input initiates the clarification process and prolongs the ordering process.

Q. HOW ARE DIRECTORY LISTINGS PROCESSED?

A. Directory listings for complex resale services are handled by the LCSC in the same manner as described in this testimony for basic resale services.

Q. HOW IS THE CLEC NOTIFIED OF STATUS CHANGES AND/OR DUE DATE CHANGES CAUSED BY BELLSOUTH?

A. The CLEC has access to the same web based reports discussed for basic resold services. Additionally, if a missed appointment occurs on the due date the CWINS Center notifies the CLEC. Missed appointments attributable to BellSouth are normally rescheduled for the next working day. This process is comparable to the retail process. Missed appointments attributable to the CLEC are identified to the LCSC Service Representative and referred to the CLEC or where applicable, the account team for a new due date. The CLEC will be faxed a notification to supplement the order with a new LSR. The CLEC will then forward the Supplement to the service representative for service order updating. Exhibit LCSC–14 charts the complex resale designed/non-designed ordering process.

Q. PLEASE DESCRIBE THE PROVISIONING PROCESS FOR COMPLEX DESIGNED SERVICES.

A. Certainly, the issuance of a SOCS order and generation of an engineering design for a complex designed resale service causes the Work Force Administration (WFA) system to generate a work activity schedule. The Overall Control Office (OCO) utilizes WFA to track critical date activities through completion of the service order. The WFA system also loads work steps to the appropriate central office and field operations for work activities related to the service order.

Complex services are assigned a Project Manager, if required, who verifies the service order accuracy, and tracks and monitors the order to completion where appropriate.

The ET in the CWINS Center reviews the WFA work lists for assigned critical date activities. Critical dates normally are Screen Date (SCR), Frame Continuity Date (FCD), and Due Date (DD). The ET reviews the order on the assigned critical dates, verifies a correct engineering document, initiates any action that may be necessary for problem resolution, and advises the CLEC of any jeopardy condition that could affect the Due Date. As appropriate, the ET also performs operational tests with the work groups in Network Operations to verify that the service meets designed requirements.

The CWINS Center technician or Project Manager notifies the CLEC upon service order completion and offers cooperative testing at the time of notification. Once the CLEC accepts the service, the CWINS Center technician enters the completion of the order in

the appropriate system. Exhibit LCSC–15 charts the complex resale designed provisioning process.

Q. PLEASE DESCRIBE THE PROCESS USED BY CLECs TO REPORT MAINTENANCE PROBLEMS WITH COMPLEX RESOLD SERVICES AND HOW BELLSOUTH ISOLATES AND PERFORMS ANY NECESSARY REPAIRS.

A. The CLEC may submit trouble reports on designed complex services either electronically or manually to the CWINS Center. I will discuss the manual process. Please refer to the testimony of Ronald M. Pate for information regarding the mechanized interfaces provided to CLECs for trouble entry, testing and statusing.

Q. PLEASE CONTINUE WITH DESCRIBING THE MANUAL PROCESS.

A. The CLEC completes an analysis of the end-user's trouble to determine that the problem is in the BellSouth network or facilities and initiates a maintenance ticket to the CWINS Center. The MA or ET in the CWINS Center gathers all the pertinent information from the CLEC (including the circuit identification), enters the ticket into the WFA system, and provides the trouble report number and commitment information to the CLEC. All the designed services trouble tickets are generated in the human-to-machine WFA – Control ("WFA/C") interface, which sends the tickets to either the WFA – Dispatch In or WFA – Dispatch Out modules to be worked by either a central office work group or an outside installation and maintenance work group, respectively, except where conditions are resolved up front with the technician.

The trouble report is assigned to an ET who tests, analyzes, and determines the appropriate action for repair. If no trouble is found on the initial analysis and tests, then the CWINS Center technician contacts the CLEC to close the trouble report.

If a trouble condition is found, the CWINS Center technician coordinates the repair by dispatching the trouble through the WFA system to the appropriate maintenance group. The CWINS Center technician tracks the repair progress, tests with repair forces, and provides status reports to the CLEC, as required.

The dispatch technician contacts the CWINS Center when repair is complete. The CWINS Center technician verifies that the service problem has been resolved and contacts the CLEC. Upon concurrence of the CLEC, the CWINS Center technician closes the trouble report in the WFA system. If the CLEC does not concur, then both parties will attempt to resolve any issues and concerns.

Q. DOES BELLSOUTH RESOLVE MAINTENANCE ISSUES IN THE SAME TIME FRAME FOR A CLEC AS IT DOES FOR A BELLSOUTH END USER?

A. Yes, repairs of complex resale services are performed in the same timely manner as those for retail services. Exhibit LCSC–16, “Complex Resale (Designed) Maintenance”, illustrates this process.

III. DESCRIPTION OF BELLSOUTH PROCESSES FOR THE PRE-ORDERING, ORDERING, PROVISIONING, AND MAINTENANCE OF COMPLEX RESALE SERVICES (NON-DESIGNED)

Q. WHAT ARE COMPLEX RESALE NON-DESIGNED SERVICES?

A. Complex resale non-designed services are non-basic services that do not require an engineering design to meet service specifications. Non-designed complex services are MultiServ® service, ESSX® service and Centrex.

Q. PLEASE DESCRIBE THE PRE-ORDERING, ORDERING, PROVISIONING AND MAINTENANCE PROCESSES FOR PROVIDING THESE SERVICES TO CLECs.

A. I will start with pre-ordering. Pre-ordering activities between the CLEC and BellSouth begin with the CLEC interacting with the Account Team, if required. Account Team pre-order activity for complex services may vary considerably depending on the service requested. For example, pre-ordering for MultiServ® service typically would include Account Team negotiation and a service inquiry. Pre-ordering for certain SynchroNet® service products, by contrast, generally would only involve the Account Team in negotiation and not the service inquiry. The service order inquiry for complex service orders is discussed in the complex resale ordering section of this document. Most complex services, except those ordered as "Switch As Is" and "Switch with PIC or LPIC Changes or Freeze," must be ordered through the Account Team. Complex orders for "Switch As Is" and "Switch with PIC/LPIC Changes/Freeze" are processed in the same manner as basic resale services addressed in previous paragraphs.

Q. PLEASE DESCRIBE THE ORDERING PROCESS FOR COMPLEX NON-DESIGNED SERVICES.

A. Certainly, I will describe the manual ordering process for non-designed complex services in which the Account Team is the CLEC interface. Exhibit LCSC–14, "Complex Resale Services (Designed/Non-Designed) – Ordering", summarizes this process. When initial installation of a non-designed complex service is desired, the CLEC submits a product-specific CLEC ordering document to the Account Team. This submission serves as an LSR. The Account Team reviews the LSR for accuracy and completeness, validates the pre-ordering data, and completes associated documentation. The Account Team then prepares a hand-off package consisting of all the documents necessary to perform the service inquiry for the specific product ordered. Examples of these documents include the service inquiry and the service inquiry response, the LSR and any CLEC ordering documents required for that specific product. The team then forwards the package to the Service Center complex ordering group.

The LCSC receives the hand-off package and associated worksheets and types the order into DOE or SONGS. During order entry, DOE or SONGS performs data and formatting edits. If the order passes all edits, then DOE or SONGS will transmit the order to SOCS, which distributes it to other BellSouth provisioning systems.

The appropriate service center determines the due date by using information from the Account Team or the "BellSouth Products and Services Interval Guide", Exhibit LCSC-7. Any request for an earlier due date must be approved by the WMC, which uses

the same processes and guidelines for resale due dates as are used when the WMC processes analogous retail due date requests.

The LCSC provides a FOC to the CLEC, the Account Team and the Project Manager if required. If required, the Project Manager coordinates projects with other BellSouth departments and tracks the service orders to ensure their timely completion.

Q. HOW ARE CLEC ERRORS HANDLED?

A. As with basic resold service, complex order rejections are directly related to the accuracy and completeness of information provided by the CLEC. Rejects and/or clarifications are handled the same as with basic resold service.

Q. HOW DOES THE CLEC RECEIVE STATUS UPDATES?

A. The CLEC receives status updates utilizing the same web based tools previously discussed for basic resold services.

Q. PLEASE DISCUSS THE PROVISIONING PROCESS FOR THESE SERVICES.

A. After the service center issues the non-designed service order, the LCSC Project Manager assumes responsibility for project control. The Project Manager's responsibilities include order tracking, problem resolution, CLEC status and cutover coordination. Work groups in Network Operations complete other provisioning activities in the same manner as for similar retail non-designed complex services. The type of non-designed service

requested determines which Network Operations work groups are involved and with whom the Project Manager interfaces.

Upon completion of the service order activities, the Project Manager notifies the CLEC, and the service orders are completed in the appropriate system. Exhibit LCSC–17 further illustrates "Complex Resale Services (Non-Designed) Provisioning".

Q. PLEASE DESCRIBE THE MAINTENANCE PROCESS USED BY CLEC TO TEST, REPORT AND STATUS THESE SERVICES AS WELL AS THE PROCESS USED BY BELLSOUTH TO RESOLVE PROBLEMS IF ANY, IN THE BELLSOUTH NETWORK.

A. The maintenance process for non-designed complex resale services is identical to that for basic resale. It is summarized in Exhibit LCSC–13 of this document.

IV. DESCRIPTION OF BELLSOUTH PROCESSES FOR THE PRE-ORDERING, ORDERING, PROVISIONING, AND MAINTENANCE OF UNBUNDLED NETWORK ELEMENTS (DESIGNED)

Q. WOULD YOU PLEASE DISCUSS THE PROCESSES USED TO PROVIDE CLECs WITH UNBUNDLED NETWORK ELEMENTS (UNEs)?

A. UNEs are network elements, such as unbundled loops and ports, offered to facility-based CLECs. UNEs may be designed or non-designed. I will first discuss the designed UNEs. Designed UNEs incorporate provisioning coordination, remote test capability if available

and engineering circuit design. BellSouth's technical reference, TR73600 which is available at http://www.interconnection.bellsouth.com/products/tech_ref/TR-73600.pdf, describes the various loop offerings and identifies the loop as designed or non-designed. Ordering information for UNE services is contained in the BellSouth Business Rules for Local Ordering, the BellSouth Local Exchange Ordering (LEO)-Implementation Guide (IG)—Volume 1 (TCIF7) and the BellSouth Pre-Ordering and Ordering Overview Guide, all of which BellSouth provides to the CLECs. The "BellSouth Business Rules for Local Ordering" is provided as Exhibit LCSC–3, the "Local Exchange Ordering (LEO)-Implementation Guide (IG), Vol.1 (TCIF7)"is provided as Exhibit LCSC–4 and the "BellSouth Pre-Ordering and Ordering Overview Guide" is provided as Exhibit LCSC–5.

Q. DOES BELLSOUTH OFFER THE ENHANCED EXTENDED LINK (EEL)?

A. Yes, the FCC's 319 Remand Order requires BellSouth to offer EELs to CLECs under certain circumstances.

Q. WHAT IS AN EEL?

A. An EEL consists of a combination of an unbundled local loop and transport terminated in a CLEC collocation site. EELs allow a CLEC to serve end users without having to collocate in the end users' serving wire center. A CLEC utilizing an EEL would realize reduced collocation costs by having to collocate in as few as one incumbent LEC central office in a Metropolitan Statistical Area (MSA). In general, EELs can be described as an extension of the loop.

Q. PLEASE DESCRIBE ANY PRE-ORDERING PROCESS USED FOR DESIGNED UNE'S.

A. Unless specifically mentioned below, the pre-ordering process for designed UNEs is the same as for resale services. See Exhibit LCSC–6, Pre-Ordering flowcharts.

Q. SO CERTAIN DESIGNED UNES HAVE DIFFERENT PRE-ORDERING PROCEDURES?

A. Yes, for example, the Pre-Ordering procedures for the ISDN-BRI UNE Combination do not include a service inquiry. Account Team involvement may occur dependent on the request the customer is making. ISDN-BRI UNE orders requiring Account Team involvement include but are not limited to: New Connects (ACT=N), Switch with changes (ACT=V), and when termination liability is applicable. When no contract termination charges apply, the request will go directly to the LCSC.

When a CLEC wishes to order a UNE ISDN-PRI, also known as a Rebundled Switched UNE Combination, it submits its request to the CRSG. This request includes the LSR and END USER forms and the CLEC Ordering Document for ISDN-PRI Rebundled Switched UNE Combination. The CRSG will verify that there is a signed contract for this product and perform a service inquiry, if required. Orders that are "Conversion Only" require no service inquiry. They do, however, require a Service Request (SR) since the downstream Network systems are updated from the service order and a change is required to convert the service from flat to measured rated in keeping with the UNE Combo requirements. The SR is originated by the CRSG using the appropriate USOCs

as shown in the CLEC's contract and then forwarded to the LCSC via e-mail at the same time that the hand-off package is faxed to the LCSC. The dedicated LCSC service representative will complete the appropriate section of the SR and forward as required via e-mail to the appropriate Network departments. Orders that are new or that are adding to a pre-existing ISDN-PRI require a service inquiry. Once the CRSG has finished its pre-ordering responsibilities, it will then send the hand-off package to the LCSC.

Q. WHAT ABOUT PRE-ORDERING FOR DESIGNED PORT/LOOP COMBINATIONS?

A. Pre-Ordering of designed Port/Loop Combinations is similar to that of resale products. Some designed Port/Loop Combinations include PBX, Centrex trunks, MultiServ® service, and DIDs.

Q. PLEASE DESCRIBE THE PROCESSES USED BY CLECs AND BELLSOUTH TO ORDER DESIGNED UNES.

A. LSRs may be submitted to the LCSC either electronically or manually. I will address the manual ordering processes. Please refer to the testimony of Ronald M. Pate which explains how some designed UNEs are submitted electronically and flow-through directly to SOCS. The manual ordering process is summarized in Exhibit LCSC–18.

Q. PLEASE START BY DESCRIBING THE ORDERING PROCESS FOR DESIGNED VOICE GRADE LOOPS.

A. The CLEC transmits an LSR to the LCSC via facsimile. Pertinent information is typed into the Order Tracker**,** which assigns a BellSouth tracking number Local Order Number

(LON). Information entered into the Order Tracker includes PON, CC, date and time of LSR receipt and sales code of the service representative to whom the LSR is assigned.

All new "change orders" (ILEC to CLEC) for facility-based CLECs require disconnection from BellSouth and then reconnection to the CLEC. The disconnect and reconnect orders are related so they can be handled together to assure a seamless transaction.

The LSR for stand-alone UNE Loops is distributed to the service representative to begin service order processing. The service representative verifies the LSR for accuracy and completeness and types the information directly into the Exchange Access Control and Tracking (EXACT) system. The service order is processed through the Translation of USOCs and Field Identifiers (FIDs) system (TUF) and is transmitted to SOCS.

LSRs for UNE Loops associated with Local Number Portability (LNP) and those processes are described later.

The LCSC representative determines the CLEC UNE due date interval from the BellSouth Products and Services Interval Guide. The LCSC then applies the appropriate due date associated with the UNE service.

The service representative monitors the LSR through assigned order status, assisting in correcting any errors that are detected in mechanical processing. A FOC is returned to the CLEC via an electronically generated facsimile, and the Order Tracker is updated with order numbers, due dates, date and time of FOC transmittal, and any applicable remarks.

Q. HOW ARE CLEC ERRORS PROCESSED?

A. If the LCSC receives an LSR with erroneous or improperly formatted data or the order fails system edit verifications, the LSR is returned to the CLEC for correction as described previously for resold services.

Q. HOW DOES BELLSOUTH PROVIDE STATUS AND DUE DATE INFORMATION FOR THE MENTIONED SERVICES?

A. If a facility jeopardy condition exists, e.g., if facilities are unavailable, the CLEC is notified of the PF condition by accessing the PF Report which is accessible via the Internet. The information provided by the PF report is the same as described for basic resale services. Once facilities are available, the LCSC provides a new FOC to advise the CLEC of the new due date. The CLEC is advised by the service center representative of any other known jeopardy conditions prior to the due date. The CWINS technician, I&M technician or CWINS advises the CLEC when a missed appointment occurs on the due date. Misses attributable to BellSouth are normally rescheduled for the next working day. Misses attributable to the CLEC are subsequently identified by the service representative and referred to the CLEC for a new due date. The CLEC is advised via facsimile that a supplemental LSR is required. Additional reports are available via the internet as previously mentioned for basic resold services.

Q. HOW DOES THE CLEC PROCESS DIRECTORY LISTINGS FOR UNE SERVICES?

A. Directory listings for UNE services are handled by the LCSC in the same manner as described for basic resold services.

Q. PLEASE DESCRIBE THE ORDERING PROCESS FOR THE EEL.

A. The process for ordering of an EEL is the same as for any designed service using the manual ordering process. An individual LSR may be used for ordering new EELs in those situations mandated by the Federal Communications Commission (FCC) or a State Commission. Conversion of services already combined in the network to EELs can be ordered using an individual LSR or by using a spreadsheet to facilitate conversion of multiple circuits.

Q. PLEASE DISCUSS ORDERING OF ISDN-BRI AND ISDN-PRI COMBINATIONS.

A. The process for ordering an ISDN-BRI UNE is the same as for any designed service using the manual LCSC ordering process. When there is account team involvement, the Account Team will provide the LCSC with a hand-off package. The package includes all the documents necessary to perform a service inquiry for the specific product ordered. Examples of these documents include the service inquiry, the service inquiry response, the LSR and any CLEC ordering documents required. The LCSC will then type the order into DOE or SONGS. After all edits are complete, DOE or SONGS will transmit the order and distribute it to the other BellSouth provisioning systems.

The process for ordering a UNE ISDN-PRI will be the same as for any designed service using the manual ordering process. This service can only be ordered manually. Once the

CRSG provides the LCSC with the hand-off package, the LCSC will complete the ordering document, forward it to the appropriate Network departments and type the order into DOE or SONGS. After all edits are complete, DOE or SONGS will transmit the order and distribute it to the other BellSouth provisioning systems.

Q. CAN A CLEC ORDER A NON-DESIGNED OR A DESIGNED XDSL LOOP?

A. Yes, please refer to the testimony of Wiley (Jerry) G. Latham for more information on xDSL products.

Q. HOW ARE DESIGNED PORT/LOOP COMBINATIONS ORDERED?

A. The ordering process for designed Port/Loop Combinations is similar to that of designed resale products.

Q. PLEASE DESCRIBE THE PROCESSES USED TO PROVISION DESIGNED UNE LOOPS?

A. Depending on the quantity and complexity of the service order activity, either a BellSouth CWINS technician or Project Manager will assume responsibility for coordination control. For example, an LSR requesting conversion of fourteen or fewer lines is handled by the CWINS Center exclusively. Orders requesting conversion of fifteen or more BellSouth lines to a CLEC require coordination between the CWINS Center and service center Project Manager. These conversions include coordination of the physical loop order, any associated number portability, and the local disconnect order.

The conversion time for these orders is coordinated by the CWINS Center technician according to the contractual agreement between the CLEC and BellSouth. The Project Manager Implementation Guidelines posted on the guides website provides product-specific information.

The issuance of the SOCS order and generation of the designed engineering document causes the WFA system to generate a work activity schedule. The CWINS Center uses this schedule to coordinate the installation, testing, and turn-up of the designed UNE. WFA is the system utilized by the Overall Control Office (OCO) to track critical date activities through completion of the order. The WFA system loads work steps to the appropriate central office and field operations for activities required to complete service order activity.

The CWINS Center provisioning technician or MA accesses the WFA work list and reviews all associated orders and builds a manual conversion sheet. This allows the CWINS Center technician to efficiently review pertinent information on associated orders. This also creates a reference work sheet for the cutover process, if required.

Within 24-48 hours before the Due Date, the CWINS Center technician verifies that CO wiring has been completed and tested within the CO. Additionally, the CWINS Center tests for CLEC dial tone. If CLEC dial tone is not verified, the CLEC is notified to allow the CLEC to correct the problem prior to the conversion date. In addition, the CWINS Center technician verifies information with the CLEC to ensure the service order information is correct and that the CLEC is ready to convert the service as ordered.

On the Due Date, the CWINS Center technician verifies that the required BellSouth personnel are scheduled for the conversion time. The CWINS Center technician sets up communications with BellSouth conversion personnel to begin service cutover to the CLEC. Upon completion of the cutover activity, the CLEC is notified. Log notes are entered into WFA as part of the conversion process. These log notes are time stamped in the WFA system. With CLEC concurrence, the service order is completed. If the CLEC does not concur, then both parties will attempt to rectify any issues and concerns. If contract language calls for it, after conversion, the CWINS Center technician will provide cooperative testing to ensure the loop being provisioned meets the technical criteria outlined in TR73600. TR73600 is a BellSouth Technical Reference that defines the technical parameters for each loop offered by BellSouth. Additional acceptance testing, testing requested which is over and above what is required for the loop being provisioned by CWINS Center personnel, can be requested by the CLEC at an additional cost.

Q. DOES BELLSOUTH PROVIDE PROVISIONING OUTSIDE NORMAL WORKING HOURS TO CLECs?

A. Yes, BellSouth will perform UNE provisioning activities outside of normal operating hours upon scheduled request. CLECs make their after-hours requests on LSRs submitted to the LCSC. After-hours charges apply, as they do for BellSouth retail.

Q. WHAT HAPPENS IF THE CONVERSION CANNOT BE PERFORMED BY BELLSOUTH?

A. The CWINS Center technician notifies the CLEC if, at any time during the provisioning process, a problem is identified that would jeopardize the conversion due date. The CWINS Center technician also escalates problems internally to resolve any BellSouth issues that place the due date in jeopardy.

Q. WHAT PROCESS IS USED BY BELLSOUTH TO PROVISION NEW LOOPS NOT REQUIRING A CONVERSION OF EXISTING SERVICE?

A. Non-conversion UNE orders follow the same tracking process by the CWINS Center technician but without a specific appointment time on the due date. The process for provisioning of EELs, UNE ISDN-BRI, and UNE ISDN-PRI is the same as for any other designed service. The process for provisioning of designed Port/Loop Combinations is similar to that of designed resale and retail products.

Q. DOES BELLSOUTH PROVIDE A CONTACT POINT TO CLECs TO ESCALATE PROVISIONING PROBLEMS FOR RESOLUTION?

A. Yes, if the CLEC is displeased with the provisioning progress on a designed UNE order or with a due date jeopardy or miss; it may escalate its concern to the CWINS Center. The CWINS Center, which provides duty-manager coverage 24 hours per day, 7 days a week, will, in turn, escalate up the line of management in the appropriate BellSouth organizations until the jeopardy or problem is resolved. This escalation process is fundamentally the same throughout BellSouth's retail and wholesale operation. Exhibit LCSC–19 summarizes the UNE designed provisioning process.

Q. HOW ARE CLEC MAINTENANCE REQUESTS PROCESSED TO RESOLUTION BY BELLSOUTH?

A. CLEC maintenance and repair reports for designed unbundled network elements are directed to the BellSouth CWINS Center. The CLEC initiates a maintenance call to the CWINS Center after completing an initial analysis of the end user's trouble to determine whether the problem is in the BellSouth network. The CLEC is also expected to correctly identify the circuit for the affected service. The ET in the CWINS Center gathers all of the pertinent information from the CLEC, and enters the ticket into the WFA system.

A CWINS Center ET is assigned the trouble report, performs analyses, makes appropriate circuit tests and determines action necessary for repair. If the initial analyses and tests reveal no trouble, the CWINS Center ET contacts the CLEC to advise of the results and attempts to close the trouble report. Should the CLEC demand a dispatch on a NTF condition, the CLEC will be advised that a charge may be incurred if trouble is not found in the BellSouth network.

If the analysis identifies a trouble condition, the CWINS Center ET coordinates the repair by handing off the trouble through the WFA system to the appropriate maintenance and repair group. The CWINS Center ET tracks the repair progress tests with repair forces and, upon request or when otherwise appropriate, provides status reports to the CLEC.

The BellSouth work group contacts the CWINS Center when repair is complete. The CWINS Center ET verifies that the service problem is resolved and contacts the CLEC. The CLEC's concurrence in the repair allows the CWINS Center ET to close the

maintenance report. If the CLEC does not concur, then both parties will attempt to rectify any issues and concerns.

The procedures governing maintenance of EELs, UNE ISDN-BRI and UNE ISDN-PRI are the same as for any other designed service. The process governing maintenance for designed Port/Loop Combinations is similar to that of designed resale and retail products.

Q. HOW ARE CLEC ESCALATIONS HANDLED?

A. If the CLEC is concerned with the progress on a trouble report, the CLEC may escalate to the CWINS Center by telephone. The CWINS Center ET escalates, when required, to internal BellSouth work groups to resolve delays in the restoration process. The process is diagrammed in Exhibit LCSC–20 "UNE Designed Maintenance/Repair".

V. DESCRIPTION OF BELLSOUTH PROCESSES FOR THE PRE-ORDERING, ORDERING, PROVISIONING, AND MAINTENANCE OF UNBUNDLED NETWORK ELEMENTS (NON-DESIGNED)

Q. PLEASE DISCUSS THE PROCESSES FOR PRE-ORDERING, ORDERING, PROVISIONING AND MAINTENANCE OF NON-DESIGNED SERVICES.

A. The process for pre-ordering non-designed services, such as SL1 Loops, SL1 Loops with LNP and non-designed Port/Loop Combinations is the same as described for basic resale services in this testimony. BellSouth's technical reference, TR73600 which is available at http://www.interconnection.bellsouth.com/products/tech_ref/TR-73600.pdf, describes the various loop offerings and identifies the loop as designed or non-designed.

Q. PLEASE DESCRIBE THE ORDERING FUNCTIONS FOR NON-DESIGNED UNES.

A. For manual ordering of non-designed UNEs, the CLEC transmits an LSR to the LCSC via facsimile. A service representative at the LCSC enters the pertinent information into the Order Tracker, which assigns a BellSouth LON. Information entered into the Order Tracker includes: PON, Operating Company Name (OCN), date and time of LSR receipt, and sales code of the Service Representative to which the LSR is assigned. Some non-designed UNEs can be ordered electronically.

The LSR for a stand-alone loop is distributed to the service representative to begin service order processing. The service representative verifies the LSR for accuracy and completeness and types information from the document into DOE or SONGS. The service order is processed through DOE or SONGS into SOCS. The service representative ensures that the order processes to AO or Pending (PD) status, correcting errors detected in mechanized processing, if necessary. A FOC is transmitted to the CLEC via an electronically generated facsimile. CSOTS is updated with order numbers, due dates, the date and time the FOC was transmitted to CLEC, and any remarks. LSRs for UNE Loops associated with LNP will be discussed later in my testimony. If the LSR is inaccurate and/or incomplete, notification is transmitted to CLEC via an electronically generated facsimile advising the CLEC that the LSR is in clarification status and the reason. Information related to the LSR's placement in clarification status, e.g., date, time, reason, is typed into CSOTS. The errors are resolved through the submission of an supplemental LSR by the CLEC. The entire ordering process for "Unbundled Network Elements (Non-Designed)" is illustrated in Exhibit LCSC–21. The Ordering process of non-designed Port/Loop Combinations is the same as for any other non-designed service.

For a Line Sharing UNE, when it returns the FOC to the CLEC, the LCSC will also attach a splitter assignment data form and a target interval. The LCSC will then prepare the service order for billing. For more information regarding line sharing, please refer to the testimony of Tommy Williams.

Q. HOW ARE DIRECTORY LISTINGS FOR NON-DESIGNED SERVICES HANDLED?

A. Directory listings for UNE services are handled by the LCSC in the same manner as described previously in my testimony for basic resold services.

Q. PLEASE CONTINUE BY DISCUSSING THE PROVISIONING PROCESSES FOR NON-DESIGNED UNES.

A. I'll first describe a UNE conversion where the CLEC does not request a coordinated conversion. UNE services that are non-designed do not require special engineering design and therefore do not come with an engineering layout record. After LCSC order issuance, non-designed and non-coordinated services will be provisioned by the BellSouth Network Operations work groups rather than the provisioning control centers. The service order issuance initiates the work activity in the CO and the I&M group required to complete the service order. The conversion is completed during normal working hours. These groups ensure that end user service outage during the conversion is minimal by performing pre-conversion testing and monitoring of the end user's line prior to transferring the loop from BellSouth to the CLEC. This activity depends on the type of order activity requested. The CO and I&M groups through a mechanized interface

will provide notification of service order completion to the CLEC for number porting notification.

Q. PLEASE DISCUSS A COORDINATED NON-DESIGNED UNE CONVERSION.

A. The process described below is the standard flow for Non-Designed, Coordinated Loops. Exhibit LCSC–22 "UNE Non-Designed Provisioning", diagrams this process. Specific contractual requirements may require slight variations from the standard procedures.

The CWINS Center oversees provisioning of non-designed UNEs for which coordination is requested. The CWINS Center does not perform service order coordination if the CLEC does not select this option.

The issuance of the SOCS order causes the WFA system to generate a work activity schedule. The CWINS Center uses this schedule to coordinate the installation and turn-up of the non-designed, coordinated UNE. The Project Manager is notified by the LCSC of the service order's issuance to establish tracking of those service order requests meeting the criteria for project management.

Where fifteen and more loops are to be provisioned, a CWINS Center technician and Project Manager are assigned to the order and the order is identified in the WFA system for Due Date tracking. The CWINS Center technician or Project Manager reviews the order for accuracy and queries associated systems for order status. The CWINS Center technician or Project Manager contacts the CLEC prior to the due date to confirm or

negotiate the actual due date conversion time. The CWINS Center technician or Project Manager then contacts any associated work group to schedule the conversion.

On the Due Date, the CWINS technician verifies that the required personnel are scheduled for the conversion time. The CWINS Center technician sets up communications with required conversion personnel to begin service cutover to the CLEC. Upon completion of the cutover activity, the CLEC is notified. With CLEC concurrence, the service order is completed.

The CWINS Center technician completes the service after concurrence of the CLEC. Any trouble conditions related to the conversion are resolved with the CLEC.

Q. WILL BELLSOUTH PERFORM AFTER HOUR CONVERSIONS?

A. Yes, BellSouth will perform UNE provisioning activities outside normal operating hours upon request. The CLEC makes its after-hours request on the LSR submitted to the LCSC. After-hours provisioning activity is subject to cost-based overtime charges.

Q. HOW ARE PORT/LOOP COMBINATIONS PROVISIONED?

A. Provisioning for non-designed Port/Loop Combination UNEs are handled in the same manner as a non-designed resold services.

Q. HOW ARE LINE SHARED NON-DESIGNED LOOPS PROVISIONED?

A. Provisioning for Line Sharing UNEs requires the CO wiring through the splitter. Thomas G. Williams discusses this process in more detail in his Line Sharing testimony.

Q. PLEASE DESCRIBE THE MAINTENANCE PROCESSES FOR NON-DESIGNED UNES.

A. If a CLEC selects a manual trouble-reporting mode, the CLEC will refer the end-user trouble to the CWINS Center via telephone. The CLEC is expected to complete an initial analysis of the end-user's trouble to ensure that the trouble is in BellSouth's network before contacting the CWINS Center. The CWINS Center personnel receives the trouble report from the CLEC, and with the CLEC on the line, enters the reported circuit ID into the BellSouth LMOS system.

After an initial review of the report, the CWINS Center personnel will advise the CLEC of the repair commitment information. The trouble report will be sent via LMOS to the appropriate network organizations for trouble resolution. When the trouble report is sent to a BellSouth network service organization, the technician in the work group that ultimately resolves the problem will contact the designated CLEC representative and close the report. As is the policy for trouble reports from BellSouth retail customers, the downstream field or center technician makes one contact attempt to close the report. If the technician does not get an answer from the CLEC or is in queue for a prolonged period of time, the report is closed in LMOS and the CLEC may contact the CWINS Center to determine the status of the report. Exhibit LCSC–23 "UNE Non-Designed Maintenance" illustrates this process. BellSouth field service technicians are instructed

to stay on-line while waiting for CLECs for the same length of time as they would for BellSouth retail customers.

If the analysis indicates that there is no trouble in BellSouth's network, the CWINS Center personnel will contact the CLEC and advise it of the NTF determination. If the CLEC accepts the BellSouth determination, the trouble ticket is closed. Should the CLEC demand a dispatch on a NTF condition, the CLEC will be advised that a charge may be incurred if trouble is not found in the BellSouth network.

Q. HOW IS MAINTENANCE FOR A PORT/LOOP COMBINATION HANDLED?

A. Maintenance for non-designed Port/Loop Combinations is handled in the same manner as for any other non-designed service.

Q. PLEASE DESCRIBE THE MAINTENANCE PROCESSES FOR LINE SHARED UNES.

A. To obtain maintenance for Line Sharing UNEs, the CLEC calls the CWINS Center and report its trouble using the POTS telephone number. The CWINS Center will take the report and submit an LMOS ticket to the CO. This ticket for the CO is to verify that the splitter has been wired properly and is working. The CO technician would also check to see if data was flowing from the CLEC equipment. If all of this is working and wired properly, then the CO will attempt to close out the ticket with the CLEC. If the CLEC requests a dispatch, that same LMOS trouble ticket is used to assign and dispatch a technician to the end user's premises. The outside service technician will check the

length of the circuit and will test for pair degradation. If no trouble is found or a trouble is found in the CPE, the service technician will close the ticket and bill the CLEC. Otherwise, the technician will repair the trouble.

VI. DESCRIPTION OF BELLSOUTH PROCESSES FOR THE PROVISIONING OF LOCAL NUMBER PORTABILITY AND INTERIM LOCAL NUMBER PORTABILITY

Q. WOULD YOU PLEASE DESCRIBE THE PROCESSES BELLSOUTH USES TO PROVIDE NUMBER PORTABILITY?

A. Yes. I will first describe permanent number portability (LNP) without a loop, and then with a loop. For LNP without loops, the following cutover process is observed. This process is for those numbers that reside in an LNP-capable office. The CLEC sends the LSR to the LCSC for processing. The LCSC verifies all customer information received from the CLEC against the existing customer service record, thus ensuring the accuracy of the request. The LCSC issues a trigger order due that day. The purpose of the trigger order is to start the AIN look-up process in the donor switch. This feature allows intra-office calls to route correctly in the interim between activation of the port and disconnection of the telephone number. In some cases, a trigger order cannot be issued because certain classes of service cannot physically accommodate the trigger attribute. Some examples of these services include DID, Primary Rate ISDN, Remote Call Forwarding (RCF) and RingMaster* service. Despite trigger limitations, the CLEC is in control of the activation of the port. Based on the type of service porting and the customer's needs, the CLEC determines the optimum time to activate the port. The

LCSC sends the FOC Accept to the CLEC, if all the information is correct. The CLEC sends a Create Message to the Number Portability Administration Center (NPAC). The NPAC sends the Create Message to BellSouth, which then sends a concurrence message back to NPAC. On port day, the CLEC sends an activate message to NPAC. At this point, the number is ported. The NPAC sends a broadcast message to all service providers announcing that the number is ported. The LCSC receives the broadcast message via a mechanized gateway from NPAC and immediately issues a disconnect order. The disconnect order stops billing and updates E911 records upon completion.

For LNP with Loop, the same steps are followed as described in the process above for porting a number without a loop. All service orders are issued before the actual porting date to allow BellSouth sufficient time to coordinate porting with loops. As mentioned earlier in my testimony, twenty-four to forty-eight hours prior to the due date, the CWINS Center tests for CLEC dial tone in the BellSouth switch. The CWINS Center also coordinates a conversion start time with the CLEC. On the cut date, the CWINS Center technician sets up communications with required conversion personnel to begin service cutover to the CLEC. All wiring work in the CO and field, if required, is begun. Once the BellSouth conversion is complete, the CLEC is notified. After accepting the loop(s), the CLEC will then send a broadcast message to the NPAC to activate the porting of the number. At this point, the number is ported and is now in the control of the CLEC. The CWINS Center technician will perform the work activity in the MARCH (Mechanized Automated Recent Change) translations system to complete the switch disconnect. All orders are then completed in the order systems to discontinue billing and complete the work order to update E911 records. The cut is now considered complete.

For more information on ordering Local Number Portability products, please refer to the "Local Number Portability (LNP) Reference Guide" attached as Exhibit LCSC–24 or the guides website at http://www.interconnection.bellsouth.com/guides/index.html.

Q. WHAT IS THE PROCESS FOR INTERIM LOCAL NUMBER PORTABILITY (INP)?

A. For Interim Local Number Portability (INP) orders where there is no loop cutover, the following process is followed. The CLEC coordinates the conversion date with the CWINS Center two days in advance of the conversion to schedule a conversion time. The CWINS Center will schedule appointments on a first come, first served basis. Appointments will not be taken and scheduled less than 24 hours in advance. Requests for after-hours conversions will be billed an additional labor charge. Prior to the scheduled conversion, the CWINS Center verifies that all BellSouth internal systems are assigned correctly. On conversion day, the CLEC calls the CWINS Center to start the conversion. The CWINS Center technician performs the work activity in the MARCH translations system, and then places a test call to verify service completion. The CWINS Center then informs the CLEC that the conversion is complete and is available for post-conversion testing, if desired by the CLEC. The CLEC should then test the order, and accept the conversion after successful testing. The CWINS Center now considers the conversion complete and records the CLEC contact name and number accepting the conversion. Upon acceptance, the CWINS Center technician completes various order functions to complete the process in the BellSouth order system.

VII. DESCRIPTION OF BELLSOUTH PROCESSES FOR THE PRE-ORDERING, ORDERING, PROVISIONING AND MAINTENANCE OF LOCAL INTERCONNECTION TRUNKS

Q. PLEASE DISCUSS THE PROCESSES BELLSOUTH UTILIZES FOR PRE-ORDERING, ORDERING AND PROVISIONING AND MAINTENANCE OF LOCAL INTERCONNECTION TRUNKS.

A. As before, I will discuss the processes in the same order as presented in the question. The pre-ordering process for interconnection trunks occurs through pre-planning between BellSouth and the CLEC and intra- and inter-departmental coordination within BellSouth.

Q. PLEASE CONTINUE BY DISCUSSING HOW LOCAL INTERCONNECTION TRUNKS ARE ORDERED.

A. The CLEC may request interconnection trunking either electronically or manually. Using the manual process, the CLEC transmits an Access Service Request (ASR) to the LISC via facsimile. After the ASR is typed into the EXACT system, the information is verified for accuracy and completeness. If error-free, the ASR is sent through the EXACT system to either the appropriate network group (CAC) or to a Project Manager (PJS). The network organization handles trunk group changes of 96 or fewer trunks, as well as disconnects; the Project Manager handles all new trunk groups, project orders, and trunk group changes of 97 trunks or more. EXACT generates the applicable due dates if the due date is greater than ten days from receipt of an accurate ASR. The Project Manager

negotiates the Due Date interval with the CLEC and other BellSouth groups on an individual case basis (ICB), depending on the size and complexity of the ASR. Project Management also negotiates new due dates when the requested due date on the ASR is ten days or less from the date an accurate ASR is received. The CAC or PJS passes the ASR through the provisioning process and back to the LISC for confirmation and completion.

Upon receipt of the CAC/PJS response, the LISC returns the FOC associated with the manual ASR via facsimile. The ASR is then processed through EXACT into TUFs and SOCS. The service representative ensures that the service order processes to AO or PD status, by correcting errors detected in mechanized processing, if necessary.

If the ASR received by the LISC is inaccurate or incomplete, the service representative places the ASR in clarification status. The CLEC is notified via telephone that ASR corrections are needed. The CLEC then transmits a supplemental ASR with corrections. If error-free, the supplemental ASR is processed in the normal manner. This process is diagrammed in Exhibit LCSC–25 “Interconnection Trunks Pre-Ordering & Ordering”.

Q. PLEASE DISCUSS THE PROVISIONING PROCESS.

A. The issuance of the SOCS order and generation of the designed engineering document causes the WFA system to generate a work activity schedule. The WFA system also issues work steps to the appropriate central office and field operations personnel for activities required to complete service order. The LISC Maintenance and Provisioning Center is the designated control office for interconnection trunks and coordinates the

installation, testing, and turn-up of these trunks. The Project Manager (PM) associated with the service order confirms receipt with the LISC technician and ensures that the service order receives the attention and priority required to complete the order on the due date. The PM will review the service order, track the progress of the order through the critical dates, become involved with CLEC notification if the due date is in jeopardy, and work with other departments, as required, to ensure that the due date is met.

The LISC Maintenance and Provisioning Center technician reviews the orders on the assigned critical dates, reviews progress, initiates action to resolve any problem areas identified, and provides status to CLECs for any issue that could jeopardize the service due date. The critical dates are Frame Continuity Date and Due Date. On each of these critical dates, the LISC coordinates the work operations to be completed by various BellSouth work groups. Timely completion of tasks associated with each critical date ensures that the service is tested and completed on the scheduled due date. The LISC Maintenance and Provisioning Center notifies the CLEC upon completion of the order. Exhibit LCSC–26 "Interconnection Trunk Provisioning" illustrates this process.

Q. HOW IS MAINTENANCE HANDLED?

A. Maintenance and Repair for Local Interconnection trunks is controlled by the LISC Maintenance and Provisioning Center. The CLEC may notify the CWINS Center if they have a translation or routing trouble or the LISC Maintenance and Provisioning Center when troubles are opened on local interconnection trunks or facilities. The CWINS Center will notify the LISC Maintenance and Provisioning Center of any trouble report received from a CLEC.

It is important that the CWINS Center or LISC Maintenance and Provisioning Center speak directly with the CLEC representative reporting the trouble to ensure that BellSouth receives all pertinent information. For this reason, reports are not accepted via facsimile or other non-interactive methods.

CLEC trouble reports are received and entered into WFA-C by the CWINS Center or LISC Maintenance and Provisioning Center personnel. The ET in the LISC determines what corrective action is needed and coordinates repair activities. He or she may contact appropriate centers or field work groups for trouble resolution or establish a conference bridge to facilitate cooperative actions among multiple field and center personnel, if necessary. Upon resolution of the problem, the ET closes the trouble report with the CLEC and then in WFA-C. The LISC Maintenance and Provisioning Center, functioning as the control office for interconnection trunks, uses WFA-C records and status information in all interactions with the CLEC.

The control office technician provides status and completion information to the CLEC-designated contact via telephone. Exhibit LCSC–27 "Interconnection Trunks Maintenance/Repair" illustrates the maintenance and repair process for interconnection trunks.

VIII. NOTIFICATIONS TO FORMER CLEC

Q. HOW DOES BELLSOUTH NOTIFY A CLEC THAT AN END USER HAS CHANGED LOCAL SERVICE PROVIDERS?

A. When an end user decides to switch from one CLEC to another, the incumbent service provider is notified that the switch is completed in accordance with the process described below. The CLEC is notified when the service orders necessary to switch an end user have been completed in SOCS. If the LSR submitted by the new CLEC is incomplete or inaccurate, issuance of service orders is delayed, thus delaying notification to the old CLEC.

An end user served using BellSouth facilities or services may switch CLECs by contacting a different carrier and requesting service from that carrier. The new CLEC prepares and submits an LSR to the LCSC to switch the end user. The incumbent service provider is not contacted for authorization. Rather, the BellSouth LCSC, if it has received a Blanket LOA Agreement from the CLEC, assumes that the initiating CLEC has an end user authorization on file. A Blanket LOA Agreement states that the CLEC will not submit any requests or inquiries to BellSouth for which that CLEC does not have proper authorization from the end user upon whose behalf the service is offered. The Blanket LOA is required before any LSR for switching service is processed for the CLEC.

When the LCSC receives a LSR to switch an end user, the service representative issues a disconnect ("D") order on the existing service, inserting the applicable Disconnect Reason Code (DCR). The service representative issues a connect ("N") order to establish the end user as a customer of the newly selected carrier and provides a confirmation to the new carrier. BellSouth systems have been programmed to recognize a change in local provider by keying on the DCR data found on the "D" service order. Alternately, a single

change ("C") order may be issued to switch an end user to a different LSP, rather than "D" and "N" orders. Single "C" orders are used for "Conversion As Is" or "Conversion As Specified" orders when a BellSouth customer goes to a CLEC or an end user goes from one CLEC to another CLEC. Single "C" is not used on moves or change of location.

Once the service order is completed, a file is generated by SOCS and sent to a 3rd party that sends the letter to the disconnected CLEC. This letter is generated and is mailed within 48 hours after posting of the complete service order. The disconnected CLEC is provided the Account/Telephone number after the order ports as complete to another CLEC or BellSouth, as indicated by the DCR. The letter is mailed to the billing name and address as indicated on the "D" or single "C" order. The codes provided on BellSouth's disconnect notification reports are as follows:

DISCONNECT REASON CODES	
CODE	DEFINITION
RB	Reseller to BellSouth
RT	Reseller to Reseller
SE	End User switched in error
AS	Abandon Station
CB	Facility-Based CLEC to BellSouth (Non-Designed Only)
CC	Facility-Based CLEC to Facility Based CLEC (Non-Designed Only)

There is also a website that lists a Loss Notification Report. This website provides the same information as the letters mailed to the CLECs. Information provided via the Loss Notification Report is timelier and provides for same-day notice of orders processed transferring end users between local service providers. This information can be viewed at https://clec.bellsouth.com/. The website is secure and each CLEC's information is accessible by only authorized representatives with passwords. Passwords can be obtained

from the CLEC's Account Team. BellSouth has plans to discontinue the use of the mail out notice to CLECs by the third quarter of this year. At that time, notice will be available in a timelier manner via the web report as has been previously described.

Additionally, an electronic disconnect notification report is available to CLECs, and is described in the testimony of Ronald M. Pate.

IX. DESCRIPTION OF BELLSOUTH PROCESSES FOR CLEC ACCOUNT ESTABLISHMENT AND BILLING DISPUTES

Q. PLEASE DISCUSS HOW BELLSOUTH HANDLES BILLING AND COLLECTIONS ISSUES AND DISPUTES WITH CLECs.

A. Specialized groups within Network and Carrier Services-Customer Services handle billing and collections for CLEC accounts. The Billing and Collections group is responsible for billing and collections for local interconnection and for UNEs billed through the Carrier Access Billing System (CABS). Additionally, the Billing and Collections group is responsible for billing and collections for resale and for UNEs billed through the Customer Record Information System (CRIS). The Billing and Collections service representative is responsible for: billing investigations; interdepartmental coordination of billing issues; treatment and collection; dispute resolution; and records corrections, if necessary. The Billing and Collections Group supports all IXCs and CLECs across all nine states utilizing the same processes and procedures.

Q. HOW DOES A CLEC SUBMIT A DISPUTE?

A. A CLEC submits a billing dispute to the Billing and Collections group. The preferred method for submitting a dispute is via a CLEC Billing Adjustment form. The service representative in the billing group investigates and analyzes the dispute and notifies the CLEC of the resolution via a CLEC Billing Adjustment Response form.

Q. WHEN DOES BELLSOUTH BEGIN COLLECTION ACTIVITIES?

A. Collections activities begin when there is a balance due from a prior month's bill. Activities may be initiated by the CLEC, or by the service representative in the Billing and Collections group. If the CLEC does not pay the past due balance, make acceptable payment arrangements, or honor previously arranged schedules, the matter is escalated within BellSouth. Escalations are handled in the following order: Billing Operations Manager; Billing Operations Director; Operations Assistant Vice President - Billing and Collections; and Operations Vice President – Network & Carrier Services-Customer Services.

If payment is not received as a result of the escalation process, the issuance of service orders for the CLEC is discontinued. The Billing Operations Manager notifies the following organizations of this action: the Account Team; Provisioning, Electronic Interface System Group and other impacted BellSouth organizations. Once payment is received or satisfactory payment arrangements are made, the Billing Operations Manager sends an urgent notification to all the previously notified parties, usually via telephone, advising them that service order processing for the CLEC should be resumed. An electronic message is sent as a follow-up to the telephone call.

Q. WHAT HAPPENS IF ALL EFFORTS TO COLLECT PAYMENT HAVE BEEN EXHAUSTED?

A. After all collection efforts have been exhausted, the Discontinuance Executive Approval and Notification process is invoked. The following offices are contacted for approval and notification to discontinue all services to the CLEC: Operations Vice President—Network & Carrier Services—Customer Services; Vice President—Network & Carrier Services—Customer Services; State President (impacted states); President—Network & Carrier Services; State General Counsel; Attorney responsible for Interconnection; and appropriate Regulatory and External Affairs representatives.

Once approval for discontinuation of service to the CLEC is obtained, a certified letter is sent to the CLEC, advising of the action to be taken. The letter includes such information as the disconnect date for CLEC customers, the outstanding balance due and a summary of CLEC responsibility to their end user.

When payment is received or when acceptable payment arrangements are made with the CLEC, the Billing Operations Manager sends an urgent message to the Provisioning Manager in the LCSC via telephone, advising him or her to restore CLEC services and to resume processing service orders for the CLEC. An electronic message is sent as a follow-up to the telephone call. The Provisioning Manager coordinates the restoration efforts and resumes processing the CLEC's manual or electronic orders.

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes.

Glossary of Terms

ACAC - Access Customer Advocacy Center

AE - Account Executive

AN - Account Number

ASR - Access Service Request

ATM - Asynchronous Transfer Mode

ATN - Account Telephone Number

BAPCO - BellSouth Publishing and Advertising Company

BBS - BellSouth Business Systems

BOCRIS - Business Office Customer Record Information System

BRC - Business Repair Center

CABS - Carrier Access Billing System

CLLI - Common Language Location Identifier

CO - Central Office

CRIS - Customer Record Information System

CRSG - Complex Resale Support Group

CSM - Customer Support Manager

CSR - Customer Service Record

CWINS-Customer Wholesale Interconnection Network Service Center

DCSC - Data Customer Support Center

DD - Due Date

DOE - Direct Order Entry

DSAP - Distributed Support Application Program

EAN - Existing Account Number

EASC - Equal Access Service Center

EATN - Existing Account Telephone Number

ECD - Estimated Completion Date

EDI - Electronic Data Interchange

EDI/SSL3 - Electronic Data Interchange over Secure Sockets Layer 3

ESD - Estimate Service Date

ET - Electronic Technician

EXACT - Exchange Access Control and Tracking System

FACS - Facility Assignment and Control System

FCD - Frame Continuity Date

FDDI- Fiber Distributed Data Interface

FID - Field Identifier

FOC - Firm Order Confirmation

GSST - General Subscriber Services Tariff

GUI - Graphical User Interface

HTML - Hyper Text Markup Language

I&M - Installation & Maintenance Work Group

ICB - Individual Case Basis

ICSC - Interexchange Carrier Service Center

INP - Interim Number Portability

INSSC - Intelligent Network Services Service Center

LAN - Local Area Network

LCSC - Local Carrier Service Center

LENS - Local Exchange Navigation System

LEO - Local Exchange Ordering System

LESOG - Local Exchange Service Order Generator

LISC - Local Interconnection Service Center

LMOS - Loop Maintenance Operations System

LNP - Local Number Portability

LOA - Letter Of Authorization

LON - Local Order Number

LAUTO-LNP Automation

LPIC - Local Presubscribed Interexchange Carrier

LSR - Local Service Request

MA - Maintenance Administrator

MARCH-Mechanized Automated Recent Change

MLT - Mechanized Loop Testing

N&CS - Network & Carrier Services

N&CS-CS - Network & Carrier Services - Customer Services

Navis Core - UNIX-based GUI used to configure and monitor a Cascade Network

NMLI-Native Mode LAN Interconnection

OBF - Ordering and Billing Forum

OCN - Operating Company Name

OCO - Overall Control Office

ODUF - Optional Daily Usage File

OSPE - Outside Plant Engineering

PDF - Portable Document Format

PF - Pending Facilities

PIC - Presubscribed Interexchange Carrier

PJS - Project Specialist

PLT - Private Line Services Tariff

PON - Purchase Order Number

POTS - Plain Old Telephone Number

PSPRC - Payphone Service Provider Repair Center

PSPSC - Payphone Service Provider Service Center

P/SIMS - Product/Services Inventory Management System

PTD - Plant Test Date

RAO - Revenue Accounting Office

RB - Traffic or orders traveling from a Reseller to BellSouth

RCMAG - Recent Change Memory Administration Group

RG - Routing Guide

RNS - Regional Negotiation System

ROS - Regional Ordering System

RSAG - Regional Street Address Guide

RT - Traffic or orders traveling from a Reseller to another Reseller

SAC - Service Advocate Center

SCR - Screen

SD - System Designer

SE - Switched in Error (error code)

SOCS - Service Order Communication System

SOER - Service Order Edit Routine

SONET - Synchronous Optical Network Ring

SONGS - Service Order Negotiation System

SPOC - Single Point of Contact

SQM - Service Quality Management

SSI&M- Special Service Installation & Maintenance Technician

TAFI - Trouble Analysis Facilitation Interface

TAG - Telecommunications Access Gateway

TIRKS - Trunk Inventory Record Keeping System

TT - Testing Technician

TUF - Translation of USOCs and FIDs

UNE - Unbundled Network Element

USOC - Universal Service Order Code

VAN - Value Added Network connections

WCO - Routing Control Office

WFA - Work Force Administration

WFA-C - Work Force Administration-Control

WMC - Work Management Center

AFFIDAVIT

STATE OF: Georgia
COUNTY OF: Fulton

BEFORE ME, the undersigned authority, duly commissioned and qualified in and for the State and County aforesaid, personally came and appeared Ken L. Ainsworth –Director – Interconnection Operations, BellSouth Telecommunications 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 80 pages and 29 exhibit(s).

Ken L. Ainsworth

Sworn to and subscribed
before me on July 31, 2001

NOTARY PUBLIC

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